

EQUAL EMPLOYMENT

2.1 Equal Employment Opportunity

The Company is committed to the principles of equal employment opportunity. The Company's practices and employment decisions, including those regarding recruitment, hiring, assignment, promotion, compensation, benefits, training, discipline, and termination shall not be based on any person's actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, related medical conditions and lactation), gender identity or gender expression (including transgender status), sexual orientation, marital status, military service and veteran status, disability, protected medical condition as defined by applicable state or local law, genetic information or other characteristic protected by applicable federal, state or local laws and ordinances. Furthermore, the Company is committed to providing a workplace free from harassment based on any of the foregoing protected categories.

Employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of Human Resources. Reports of discrimination should be made in accordance with the Reporting Procedures set forth in the Discrimination, Harassment & Retaliation Prevention policy below as well as any procedures set forth in any applicable state supplement. We will not allow any form of retaliation against employees who raise issues of equal employment opportunities in the workplace.

[For more information on this policy, employees should access Veolia's intranet at One to One; Policies, Forms & Procurement; Policies; HR POLICIES; HR103](#)

2.2 Reasonable Accommodations and Interactive Dialogue

The Company is committed to complying with applicable federal, state and local laws governing reasonable accommodations of individuals, including but not limited to the Americans with Disabilities Act ("ADA"). To that end, we will endeavor to make a reasonable accommodation to applicants and employees who have requested an accommodation or for who the Company has notice may require such an accommodation, without regard to any protected classifications, related to an individual's:

- i) Disability, meaning any physical, medical, mental, or psychological impairment, or a history or record of such impairment.
- ii) Sincerely held religious beliefs and practices.
- iii) Needs related to pregnancy, childbirth or related medical conditions
- iv) Any other reason required by applicable law, unless the accommodation would impose an undue hardship on the operation of our business.

Any individual who would like to request an accommodation based on any of the reasons set forth above should contact Human Resources.

After receiving a request for an accommodation or learning indirectly that an individual may require such an accommodation, the Company will engage in an interactive dialogue with the individual. Even if an individual has not

formally requested an accommodation, the Company may initiate an interactive dialogue under certain circumstances, such as when the Company has knowledge that an individual's performance at work has been negatively affected and a reasonable basis to believe that the issue is related to any of the protected classifications set forth above, in compliance with applicable law. In the event the Company initiates an interactive dialogue with an individual, it should not be construed as the Company's belief an individual requires an accommodation, but will serve as an invitation for the individual to share with the Company any information the individual desires to share, or to request an accommodation.

The interactive dialogue may take place in person, by telephone, or by electronic means. As part of the interactive dialogue, the Company will communicate openly and in good faith with the individual in a timely manner in order to determine whether and how the Company may be able to provide a reasonable accommodation. To the extent necessary and appropriate based on the request, the Company will attempt to explore the existence and feasibility of alternative accommodations as well as alternative positions for the individual. The Company is not required to provide the specific accommodation sought by an individual, provided the alternatives are reasonable and either meet the specific needs of the individual or specifically address the individual's limitations. As part of the interactive dialogue, the Company reserves the right to request supporting documentation, to the maximum extent permitted by applicable law.

The Company will endeavor to keep confidential all communications regarding requests for reasonable accommodations and all circumstances surrounding an individual's underlying reason for needing an accommodation.

The Company will not allow any form of retaliation against individuals who have requested an accommodation, for whom the Company has notice may require such an accommodation, or who otherwise engage in the interactive dialogue process.

Individuals with questions regarding this policy should contact Human Resources.

2.3 Lactation Accommodation

The Company will provide a reasonable amount of break time to accommodate an employee desiring to express breast milk for the employee's child, to the extent required by and in accordance with applicable law. If possible and permitted by applicable law, the break time must run concurrently with rest and meal periods already provided to the employee. Break time that cannot run concurrently with rest and meal periods already provided to the employee will be unpaid, to the extent permitted by applicable law.

The Company will make reasonable efforts to provide an employee with use of a room or location in close proximity to the employee's work area, other than a bathroom, for the employee to express milk in private. This room or location may be the employee's private office, if applicable.

Employees will not be discriminated against or retaliated against for exercising their rights under this policy. Employees can contact Human Resources with questions regarding this policy.

2.4 Pay Transparency Nondiscrimination Provision

The Company will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation



information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the Company, or (c) consistent with the Company's legal duty to furnish information. 41 CFR 60-1.35(c).

2.5 Discrimination, Harassment and Retaliation Prevention

The Company does not tolerate and prohibits discrimination or harassment of or against our job applicants, contractors, interns, volunteers, or employees by another employee, supervisor, vendor, customer, or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, related medical conditions and lactation), gender identity or gender expression (including transgender status), sexual orientation, marital status, military service and veteran status, disability, protected medical condition as defined by applicable state or local law, genetic information, or any other characteristic protected by applicable federal, state, or local laws and ordinances (referred to as "protected characteristics").

The Company also prohibits retaliation as defined below.

The Company is committed to a workplace free of discrimination, harassment, and retaliation. These behaviors are unacceptable in the workplace and in any work-related settings such as remote work settings, business trips and Company sponsored social functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor or other third party. In addition to being a violation of this policy, discrimination, harassment or retaliation based on any protected characteristic as defined by applicable federal, state, or local laws and ordinances also is unlawful. For example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of sexual harassment as defined by applicable federal, state, or local laws and ordinances are unlawful.

DISCRIMINATION DEFINED

Discrimination under this policy generally means treating differently or denying or granting a benefit to an individual because of the individual's actual or perceived protected characteristic.

HARASSMENT DEFINED

Harassment generally is defined in this policy as unwelcome verbal, visual, or physical conduct that denigrates or shows hostility or aversion towards an individual based on or because of any actual or perceived protected characteristic or has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures, or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts, or e-mails) or physical conduct (including physical touch, physically threatening another, blocking someone's way, etc.). Such conduct violates this policy, even if it does not rise to the level of a violation of applicable federal, state, or local laws and ordinances. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

SEXUAL HARASSMENT DEFINED

Sexual harassment includes harassment on the basis of sex or gender (including pregnancy, childbirth, related medical conditions and lactation), gender identity or gender expression (including transgender status), and/or sexual orientation. Sexual harassment includes unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, and other verbal, visual, or physical conduct of a sexual nature or which is directed at an individual because of that individual's sex or gender (including pregnancy, childbirth, related medical conditions and lactation), gender identity or gender expression (including transgender status), and/or sexual orientation when:

- Submission to that conduct or those advances or requests is made either explicitly or implicitly a term or condition of an individual's employment.
- Submission to or rejection of the conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual.
- The conduct or advances or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

EXAMPLES OF CONDUCT THAT VIOLATES

THIS POLICY INCLUDE:

- Unwelcome flirtations, leering, whistling, touching, pinching, assault, brushing up against someone's body, blocking normal movement.
- Requests for sexual favors or demands for sexual favors in exchange for favorable treatment.
- Obscene or vulgar gestures, posters, or comments.
- Sexual jokes or comments about a person's body, sexual prowess, or sexual deficiencies.
- Propositions, or suggestive or insulting comments of a sexual nature.
- Derogatory cartoons, posters, and drawings.
- Sexually-explicit e-mails, texts, other electronic messages, or voicemails.
- Viewing or sharing pornography.
- Uninvited touching of a sexual nature.
- Unwelcome sexually-related comments.
- Comments, inquiries, or gossip about one's own or someone else's sex life or sexual activities.
- Conduct or comments consistently targeted at only one gender, even if the content is not sexual.
- Teasing or other conduct directed toward a person because of the person's gender.

RETALIATION DEFINED.

Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below.

"Adverse conduct" includes but is not limited to: any action that would discourage or keep an individual from reporting discrimination, harassment, or retaliation; shunning and avoiding an individual who reports discrimination, harassment, or retaliation; express or implied threats or intimidation intended to prevent an individual from reporting discrimination, harassment, or retaliation; and denying employment benefits because an applicant or employee reported discrimination, harassment, or retaliation or participated in the reporting and investigation of discrimination, harassment, or retaliation.

REPORTING PROCEDURES.

The following steps have been put into place to ensure the work environment at the Company is respectful, professional, and free of discrimination, harassment, and retaliation. If an employee believes someone has violated this policy, the employee should promptly bring the matter to the immediate attention of one or more of the following: their immediate supervisor, the Human Resources Department, the Chief Human Resources Officer (CHRO), or the Veolia North America - Ethics & Compliance Helpline at **(844) 286-0002**. If any of these individuals is the person toward whom the complaint is directed, or if the employee is uncomfortable bringing the concern to their immediate supervisor, employees should contact any higher level manager in their reporting chain (or any of the individuals referenced above).

Every supervisor or manager who learns of any employee's concern about conduct in violation of this policy, whether in a formal complaint or informally, or who otherwise is aware of conduct in violation of this policy must immediately report the issues raised or conduct to Human Resources or senior management at the business unit level.

INVESTIGATION PROCEDURES.

Upon receiving a complaint, the Company will promptly conduct a fair and thorough investigation into the facts and circumstances of any claim of a violation of this policy that is fair for all parties. To the extent possible, the Company will endeavor to keep the reporting employee's concerns confidential. However, complete confidentiality may not be possible in all circumstances. Employees are required to cooperate in all investigations conducted pursuant to this policy.

During the investigation, the Company generally will interview the complainant and the accused, conduct further interviews as necessary and review any relevant documents or other information. Those receiving claims and leading investigations will handle complaints and questions with sensitivity toward those participating.

Upon completion of the investigation, the Company will determine whether this policy has been violated based upon its reasonable evaluation of the information gathered during the investigation. The Company will follow-up with the complainant and the accused at the conclusion of the investigation.

In the event the Company determines that a violation of this policy has occurred, the Company will take steps to ensure a safe work environment for the individuals who experienced the complained-of conduct. The Company will take corrective measures against any person who it finds to have engaged in conduct in violation of this policy, if the Company determines such measures are necessary. These measures may include, but are not limited to, counseling, suspension, or immediate termination.

Anyone, regardless of position or title, whom the Company determines has engaged in conduct that violates this policy will be subject to discipline, up to and including termination. This includes individuals engaging in discrimination, harassment or retaliation, as well as supervisors or managers who fail to report violations of this policy, or knowingly allow prohibited conduct to continue. Individuals who engage in conduct that rises to the level of a violation of law can be held personally liable for such conduct.

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Remember, the Company cannot remedy claimed discrimination, harassment, or retaliation unless an employee brings these claims to the attention of management. Employees should report any conduct that they believe violates this policy.

