

Policy Against Harassment in the Workplace

Purpose of this Policy

Professional behavior is expected and required of all ABM employees. The Company's intent is to provide all employees with a workplace environment consistent with ABM's core values of Respect, Integrity, Collaboration, Innovation and Excellence. Employees who are respected and valued and who are not distracted by discrimination, harassment, retaliation or other forms of unprofessional or unacceptable conduct can fully contribute their skills and talents to enhance ABM's performance. Accordingly, ABM does not tolerate workplace discrimination or harassment based on age, ancestry, color, religious creed, request for / use of family and medical care leave, disability (mental or physical) including HIV and AIDS, marital status, medical, genetic information, military and veteran status, national origin, race, sex, gender, gender identity, gender expression, sexual orientation, or any other status protected by law.

This policy is designed to promote a culture that supports our core values. To achieve this goal, this policy prohibits both illegal conduct and unprofessional, offensive conduct that is disruptive to teamwork and productivity. This policy applies to all ABM employees as well as third parties such as customers, vendors and tenants who interact with ABM employees.

Prohibited Conduct

Prohibited conduct includes offensive or derogatory verbal comments or jokes based on any of the protected categories listed above. Obscene gestures, display of offensive or sexual visual material, unwanted sexual advances and physical touching or blocking of movement are also prohibited. Submission to sexual advances in order to get, keep or advance in a job is a serious form of sexual harassment. If you are not sure if your conduct is appropriate for the workplace ask: "Would I want to see my behavior portrayed on the front page or the evening news?" If the answer is "no," then stop what you are doing. If you are unsure about the answer, you should contact Human Resources.

ABM is committed to providing a work environment that is free of unlawful sexual harassment. ABM strictly prohibits sexual harassment by or against any individuals involved in our operations, including employees (regardless of position), applicants, interns, vendors, contractors, sub-contractors, consultants or any other third party involved in ABM operations. If such harassment is committed in the workplace by someone not employed by ABM, the reporting and complaint procedure in this policy should still be followed. The workplace includes: actual worksites, your office, any setting in which work-related business is being conducted (either during or after normal business hours), online and electronic interactions with ABM employees and third parties involved in ABM operations, ABM-sponsored events, and ABM owned / controlled property.

Sexual Harassment

Sexual harassment is defined as unwelcome verbal or physical behavior based upon a person's gender or sex and includes unwanted verbal or physical sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or

- Submission to, or rejection of, such conduct, is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment, even if the individual making the report is not the intended target of such conduct.

Sexual harassment includes (but is not limited to) the following types of conduct:

- Unwanted sexual advances or propositions (including repeated and unwelcome requests for dates);
- Offers of employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct: leering, making sexual gestures, displaying pornographic or sexually suggestive images, objects, pictures, cartoons, graffiti, posters or websites on computers, emails, cell phones, bulletin boards, etc.;
- Verbal conduct: making or using sexist remarks or derogatory comments based on gender, innuendos, epithets, slurs, sexually explicit jokes, whistling, suggestive or insulting sounds or lewd or sexual comments about an individual's appearance, body, dress, sexuality or sexual experience;
- Verbal and / or written abuse of a sexual nature, graphic verbal and / or written sexually degrading commentary about an individual's body or dress, sexually suggestive or obscene letters, notes, invitations, emails, text messages, tweets or other social media postings;
- Physical conduct: unwelcome or inappropriate touching of employees or third parties, physical violence, intimidation, assault or impending or blocking normal movements;
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity or the status of being transgender, such as:
 - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to do his / her job;
 - Sabotaging an individual's work; and
 - Bullying, yelling and name calling

Sexual harassment can occur regardless of the gender of the person committing it or the person exposed to it. Harassment on the basis of an individual's sexual orientation, self-identified gender, perceived gender, or transgender status are all forms of prohibited sexual harassment.

Retaliation against anyone who reports harassment or discrimination or who participates in an investigation into allegations of a policy violation is absolutely prohibited. Retaliation is defined as any conduct or harm that would have the effect of discouraging an employee from making a complaint. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit. Retaliation is unlawful and a form of misconduct that will result in disciplinary action, up to and including termination of employment.

Anyone who believes they (or any other ABM employee) has been subjected to retaliation should report this concern using the "Reporting and Complaint Procedure" set forth below.

Employee Responsibilities

Speak Up: If you are offended by conduct in the workplace, we encourage you to respond immediately by objecting directly to the offender, which is often very effective. If you are

uncomfortable objecting to the offender, or if the conduct continues, report the conduct using the Company's reporting procedures described below.

Report It: If you believe you have been subjected to discrimination, harassment, or retaliation, you are required to immediately report it using the reporting procedures below so that ABM can investigate and take corrective action if warranted. Keep in mind that if you fail to respond to harassment by reporting it, ABM cannot help resolve the situation or address any misconduct. If you witness offensive conduct, report it using the reporting procedures below. Preferences based on familial or romantic relationships are not appropriate in ABM's workplace. If you see favoritism occurring, report it using the procedures below.

ABM takes seriously all concerns about employee treatment and maintaining a professional workplace environment and prohibits retaliation against individuals who report violations of this policy in good faith. If you observe or experience retaliation, please report it using the reporting procedures below. Retaliation is defined as any conduct or harm that would have the effect of discouraging an employee to make a complaint.

Please note that the initiation of a good faith complaint of sexual harassment or retaliation will not be grounds for disciplinary or other retaliatory action, even if the allegations cannot be substantiated or the employee was mistaken about certain aspects of his / her complaint. Any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline, up to and including termination of employment.

Listen and Respond: If you are told you have engaged in offensive conduct in the workplace, listen and respond by changing your behavior. Even if you didn't intend to offend or bother anyone, your conduct can still be construed as offensive. Consider that even if your co-workers didn't object at the time, this does not mean they condone behavior that is unprofessional, derogatory or sexual in nature. If you have questions about whether your behavior is acceptable, talk with your manager or Human Resources representative.

Don't Touch: Touching in the workplace (beyond the professional handshake) is high risk behavior and should be avoided.

Leader Responsibilities

In addition to the responsibilities described above, supervisors and managers are also expected to do the following:

Get Help: If you witness or otherwise learn that discrimination, harassment, retaliation, or prohibited behavior is being exhibited by or toward an ABM employee, you must promptly report it to Human Resources. Failure to do so could result in discipline. You must report it even if the employee asks you not to or tells you that the situation has been resolved. Do not attempt to investigate the complaint yourself. Supervisors and Managers are not permitted to conduct investigations into these types of complaints. These investigations must be conducted by a designated Human Resources professional.

Eliminate Favoritism: Preferences based on familial or romantic relationships are not appropriate in ABM's workplace. Relationships of these types or any sexual relations between a supervisor and his/her subordinate are not acceptable. Sexual relations of any type at any company or client worksite are not acceptable. Some relationships must be disclosed and may also be prohibited by ABM's Code of Business Conduct, Nepotism and Personal Relationships and Consensual Relationships policies.

More information on these policies can be found in the Employee Policy Handbook or on the ABM Policy Portal on ABM Connect^x.

Reporting and Complaint Procedure

ABM cannot carry out its goal of providing a work environment free of harassment, discrimination and retaliation unless employees report incidents of such conduct as soon as they occur to:

- (1) The ABM Compliance Hotline at 1-877-ALERT 04 (1-877-253-7804). The Hotline is staffed 24 hours per day, 7 days per week and specialists are available to take calls in any language. Reports can be made anonymously and are also accepted online at abmhotline.ethicspoint.com. Reports are taken by an unbiased vendor and are forwarded in a secure and confidential manner to an appropriate Human Resources professional for prompt investigation; or
- (2) Your local Human Resources representative or regional HR Director;
- (3) ABM Employee Relations at (415) 351-4367;
- (4) In writing using the attached Complaint Form, which can be completed and returned to either your local Human Resources representative or your Regional HR Director.

For issues other than those covered by this policy, please first discuss the situation with your immediate supervisor as part of the Company's "Open Door" policy. An explanation of this policy can be found in the Employee Policy Handbook.

Company Response to Reports

Reports will be assessed and assigned to a designated Human Resources professional for a prompt, objective, and thorough investigation. Information will be treated as confidentially as practicable given the need to conduct a thorough and fair investigation. The investigation process will reach reasonable conclusions based on the evidence collected. If the Company determines that conduct violating this policy has occurred, it will take prompt and appropriate remedial action. This can include discipline or termination of the individual who engaged in inappropriate conduct and/or other measures designed to prevent future harassment. Investigations will be closed in a timely manner.

Retaliation against an employee for making a good-faith report of harassment or for participating in an investigation into violations of this policy is strictly prohibited by the Company and the law and will result in appropriate disciplinary action, up to and including termination of employment.

Other Information

Sexual harassment is illegal under the New York State Human Rights Law, Title VII of the Federal Civil Rights Act of 1964, and certain local laws including (for employees who work in New York City), the New York City Human Rights Law. Employees may file a complaint with the federal Equal Opportunity Commission, the New York State Division of Human Rights, (if you are an employee who works in New York City), the New York City Commission on Human Rights, another enforcement agency (if applicable) or in certain courts of law. Agencies accept and investigate charges of sexual harassment. The Equal Employment Opportunity Commission has district, area and regional offices and may be contacted by visiting www.eeoc.gov, emailing info@eeoc.gov or by telephone at 1-800-669-4000 (TTY 1-800-669-6820). The New York State Division of Human

Rights can be contacted by visiting <http://www.nyc.gov/html/cchr/html/home/home.shtml> or by telephone at (212) 306-7450.

Along with this Sexual Harassment Policy, all ABM employees who work in New York City are being provided with a “Stop Sexual Harassment Act Fact Sheet,” which is also posted at their place(s) of business.

Employees subject to unlawful harassment may be entitled to certain remedies, including monetary damages, civil penalties, and injunctive relief (such as an order that certain actions be taken or certain behaviors stopped).

Thank you for doing your part to help us create a positive work environment. We all share in the responsibility.

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ABM Sample Complaint Form for Reporting Sexual Harassment in the Workplace

New York State Labor Law requires all employers, including ABM, to adopt a Sexual Harassment prevention policy that includes a complaint form to report alleged incidents of sexual harassment. If you believe you have been subjected to sexual harassment, you are encouraged to complete this form and submit it to either your local Human Resources representative or your Regional Human Resources Director. You are also welcome to make a report of sexual harassment to your local Human Resources Representative or your Regional Human Resources Director verbally or in any other fashion you choose. ***You will not be retaliated against – at any time - for filing a complaint.***

For additional resources, visit ny.gov/programs/combating-sexual-harassment-workplace

COMPLAINT INFORMATION

1. Your complaint of sexual harassment is made about:

Name:

Title (if known):

Work Address:

Work Phone (if known):

Relationship to you: Supervisor ____ Subordinate ____ Co-Worker ____ Other ____

2. Please describe what happened and how it is affecting you and your work at ABM. Please use additional sheets of paper if necessary and attach any relevant documents (photographs, text messages, etc.) as evidence.

3. Date(s) sexual harassment occurred:

4. Is the sexual harassment continuing? Yes ____ No ____

5. Please list the name and contact information of any witnesses or individuals who may have information relating to your complaint.

6. **OPTIONAL**: Have you previously complained or provided information (verbal or written) about related incidents? If so, when and to whom did you complain or provide information?

If you have retained legal counsel or an attorney and would like ABM to work with them, please provide their contact information in the space below.

Printed Name: _____

Signature: _____

Date: _____

Telephone Number: _____

This policy and complaint form is available in the following languages at:

<https://www.abm.com/employees/employee-policy-handbook/>

Albanian

Polish

Serbian

Spanish

Tagalog

This policy and complaint form is available in Albanian at:

Kjo politikë dhe ky formular ankese është i disponueshëm në gjuhën shqipe në adresën:

<https://www.abm.com/employees/employee-policy-handbook/>

This policy and complaint form is available in Polish at:

Niniejsza polityka oraz Formularz skargi jest dost pny w polskiej wersji j zykowej na stronie:

<https://www.abm.com/employees/employee-policy-handbook/>

This policy and complaint form is available in Serbian at:

Ova politika i obrazac žalbe dostupni su na srpskom jeziku putem linka:

<https://www.abm.com/employees/employee-policy-handbook/>

This policy and complaint form is available in Spanish at:

Esta política y formulario de denuncia está disponible en español en:

<https://www.abm.com/employees/employee-policy-handbook/>

This policy and complaint form is available in Tagalog at:

Ang patakaran at complaint form (porma ng pagsasampa ng reklamo) na ito ay makukuha sa Tagalog sa:

<https://www.abm.com/employees/employee-policy-handbook/>