The Sundt Companies, Inc. & Subsidiaries policy to provide a working atmosphere free from discriminatory insult, intimidation and other forms of harassment. Furthermore, all employees share the responsibility for fostering a pleasant working atmosphere, which allows individuals to achieve high performance in their duties. State and federal anti-discrimination laws also prohibit harassment.

Harassment based on race, religion, sex, sexual orientation, gender identity, color, age, disability, national origin, covered veteran status, genetic information; or any other federal, state, or local discriminatory regulation is a violation of The Sundt Companies, Inc. & Subsidiaries policy against hostile workplace/sexual harassment. Harassment may be overt or subtle, but whatever form it takes, verbal, non-verbal or physical, harassment is insulting and demeaning to the recipient and cannot be tolerated in the workplace. Examples of harassment are verbal abuse; racial, ethnic and religious epithets; slurs or jokes; graffiti (remarks written or drawn on walls or other structures); obscene gestures and hazing. Even derogatory remarks between friends may lead to overt acts of discrimination.

The Sundt Companies, Inc. & Subsidiaries strongly disapproves of and does not tolerate sexual harassment of any kind. All employees must avoid offensive or inappropriate sexual behavior at work and are responsible for ensuring that the workplace is free from sexual harassment at all times.

The Sundt Companies, Inc. & Subsidiaries policy prohibits unwelcome sexual advances; requests for sexual acts or favors, with or without accompanying promises, threats, or reciprocal favors or actions; or other verbal or physical conduct of a sexual nature which has the purpose or effect of adversely affecting an employee's performance or which creates a hostile or offensive working environment. Examples of prohibited conduct include, but are not limited to, lewd or sexually suggestive comments; off-color language or jokes of a sexual nature; slurs and other verbal, graphic or physical conduct relating to an individual's sex; or any display of sexually explicit pictures, greeting cards, calendars, articles, books, magazines, photos or cartoons.

Complaints of sexual harassment will be promptly and carefully investigated, and all employees are assured that they will be free from any and all reprisal or retaliation from filing such complaints. Any employee who has a complaint of sexual harassment at work by anyone, including supervisors, co-workers, visitors, clients, or customers, should immediately bring the problem to the attention of The Sundt Companies, Inc. & Subsidiaries officials. Employees may bring the complaint to the attention of their Supervisor/Project/Area AA/EEO Coordinator, or if the complaint involves supervisory personnel in the employee's line of command, to another supervisor, or the Corporate.
AA/EEO Officer, Mrs. Marian Enriquez.

Mrs. Enriquez can be reached at 1-800-280-3000 ext. 3108 or 480-293-3108, 2620 South 55th Street, Tempe, Arizona 85282.

The Employee Owner Experience/Diversity Department investigations will include interviews with all relevant persons including the complainant, the accused, and other potential witnesses. Disclosure of facts to parties and witnesses will be held on “a need to know” basis and limited to what is reasonably necessary to conduct a fair and thorough investigation.

The Sundt Companies, Inc. & Subsidiaries will review its findings with the complainant at the conclusion of its investigation. If the investigation reveals that the complaint appears to be valid, immediate and appropriate corrective action, up to and including discharge, will be taken to stop the harassment and prevent its recurrence. If the validity of the complaint cannot be determined, immediate and appropriate action will be taken to assure that all parties are reacquainted with The Sundt Companies, Inc. & Subsidiaries Hostile Workplace/Sexual Harassment Policy and to avoid sexual harassment in the future.

The Sundt Companies, Inc. and Subsidiaries require EEO/Sexual Harassment/Hostile workplace training for all employees. Administrative employees, including foremen and above for field personnel, must complete and pass the training within the first six months of employment and attend a refresher course every two years. Additionally, Sundt provides all employees, a copy of Sundt’s EEO/Sexual Harassment/Hostile policies, which are also part of our company’s onboarding process.

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<th>History of Policy</th>
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<td><strong>Revised:</strong> May 07, 2007; February 07, 2008; June 26, 2009; April 26, 2011; March 01, 2013; May 15, 2015</td>
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<td><strong>Reviewed:</strong> July 27, 2007; April 26, 2011; June 07, 2012</td>
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End of Policy