



STATEMENT OF POLICY AND PROCEDURE

**Equal Employment Opportunity**

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It is the policy of PMA Consultants, LLC (PMA) to prohibit discrimination against any employee or job applicant in recruitment, hiring, placement, compensation, benefits, transfer, promotion, layoff, recall from layoff, company-sponsored training, tuition reimbursement, social programs, termination, and any other term or condition of employment or recruitment/hiring with respect to race, religion, creed, color, age, sex, height, weight, national origin, handicap, disability, marital status, sexual orientation, citizenship status, or any other characteristic protected by federal, state, or local law or regulation.

This prohibition against discrimination also extends to otherwise qualifying handicapped or disabled individuals, disabled veterans, and veterans of the Vietnam era. Under the legal authority of: Executive Order 478; the Equal Pay Act of 1963; Title VI and Title VII of the Civil Rights Act of 1964; the Age Discrimination in Employment Act of 1967; the Equal Employment Opportunity Act of 1972; the Civil Rights Act of 1992; Section 504 of the Rehabilitation Act of 1973; the Americans With Disabilities Act of 1990; and the Family and Medical Leave Act of 1993, PMA commits itself and its employees, within the context of these laws, to ensure equitable participation of minorities, women, Vietnam era veterans, and persons with disabilities in Company operations.

The Company's Equal Employment Opportunity/Affirmative Action (EEO/AA) Policy applies to human resource/employment practices by PMA, including recruitment, hiring, placement, compensation, transfer, benefits, promotion, layoff, recall from layoff, termination, and any other term or condition of employment. The Company further will review, investigate, and where necessary, initiate changes in policies and procedures relative to facilities and programs accessible to the public, including the consideration of reasonable accommodation for persons with disabilities, as set forth in Company policy.

This EEO/AA Policy expresses PMA's commitment as to the following:

- 1) Recruitment and hiring of job applicants without regard to race, religion, creed, color, age, sex, height, weight, national origin, handicap, disability, marital status, sexual orientation, citizenship status, or any other characteristic protected by federal, state, or local law or regulation.
- 2) Basing employment decisions without regard to race, religion, creed, color, age, sex, height, weight, national origin, handicap, disability, marital status, sexual orientation, citizenship status, or any other characteristic protected by federal, state, or local law or regulation.
- 3) Administration of placements, compensation, benefits, transfers, promotions, layoffs, recalls from layoff, company-sponsored training, tuition reimbursements, social programs, terminations, and all other human resource/employment actions without regard to race, religion, creed, color, age, sex, height, weight, national origin, handicap, disability, marital status, sexual orientation, citizenship status, or any other characteristic protected by federal, state, or local law or regulation.
- 4) Dissemination of this EEO/AA Policy as a standard protocol, and where requested, to employees, new hires, subconsultants, joint venture partners, and clients.

PMA takes failure to observe this EEO/AA Policy seriously. The Director, Human Resources, is charged with implementing all elements of this EEO/AA policy. Leaders are **required** to report to the Director, Human Resources, or the Chief Strategy Officer, or both, and to their immediate supervising Leader, any failure to observe this EEO/AA Policy that they become aware of. Leaders are responsible for keeping any workplace the Company arguably controls free from even the appearance of violation of this EEO/AA Policy, and should be on the alert for any behavior that could be considered a violation, even if a Leader thinks someone is being unreasonably sensitive. Leaders shall be evaluated on the success of this EEO/AA Policy the same way as their performance is evaluated relative to other goals.

Any employee who has a good faith belief that he/she has been subjected to a violation(s) of this EEO/AA Policy has the right to report the incident(s) to or file a complaint with the employee's Leader and the Director, Human Resources, or the Chief Strategy Officer, or both. When such a report or complaint is received, Human Resources, in consultation with the Chief Strategy Officer, will promptly investigate the matter. The investigation will be thorough and neutral, tailored to the particular allegations made, and conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances.

The investigation will generally include a private interview with the person filing the report or complaint and with witnesses. The Company will also interview the person alleged to have committed the equal employment violation(s). Neither the claimant nor the alleged offender will be entitled to participate in the determination of whether a violation has occurred, other than as witnesses. When the investigation has been completed, the Company will, to the extent appropriate, inform the person filing the report or complaint and the person alleged to have committed the policy violation of the results of the investigation.

If PMA determines that a violation of the EEO/AA Policy did occur, the Company will act promptly to eliminate the offending conduct. Where it is appropriate, in the case of employees over whom it has control, the Company will impose disciplinary action, up to and including termination, as PMA deems reasonable under the circumstances, and in accordance with applicable law.

In addition to the above, any PMA employee who has a good faith belief that he or she has been subjected to an equal employment violation(s) has the right to file a formal complaint with a federal or state agency or the courts. The federal agency is the Equal Employment Opportunity Commission. While the purpose of this EEO/AAO policy is to establish prompt, thorough, and effective procedures for responding to every complaint and incident of an EEO/AA violation so that the problem can be identified and remedied internally, using PMA's internal process does not prohibit an employee from filing a complaint with the appropriate state or federal agency or the courts.

I, Gui Ponce de Leon, PhD, PE, PMP, LEED AP, Chief Executive Officer, recognize that when the effects of human resources/ employment practices, regardless of their intent, discriminate and create adverse impact against any group of people, action must be taken to ensure that the Company values employee diversity, and affords equal opportunity through affirmative action.



Signature

October 1, 2014