

Policy:	Equal Employment Opportunity	Policy Reference and Revision Number:	HR 002 Rev 000
Department:	Human Resources	Effective Date:	08/01/2021
Authorized By:	SVP Human Resources	Page:	Page 1 of 2

Purpose

To provide an environment of mutual respect where equal employment opportunities are available for all employees and applicants without regard to race, color, religion, sex, sexual orientation, gender identity, marital status, national origin, citizenship, age, disability, veteran status, genetics, or any other basis that is protected under applicable federal, state, or local laws.

Policy

BWC Terminals (the “**Company**”) prohibits discrimination of any type at all our locations and affords equal employment opportunities to employees and applicants, without regard to race, color, religion, sex, sexual orientation, gender identity, marital status, national origin, citizenship, age, disability, veteran status, genetics, or any other basis that is protected under applicable federal, state, or local laws.

The policy of equal employment opportunity and anti-discrimination applies to all aspects of the relationship between the Company and its employees, including but not limited to:

- Recruitment
- Employment
- Promotion
- Working Conditions
- Training and Educational opportunities
- Wages and Salary administration
- Benefits and the application of policies
- Discipline
- Terminations
- Layoffs
- Transfers

The Company prohibits any form of retaliation against any employee for filing a complaint in good faith under this policy or for assisting in a complaint investigation. Supervisors or managers who retaliate against an employee may be subject to corrective action up to and including termination.

Procedure

Any employee who feels they have been harassed, discriminated against or subject to retaliation by a co-worker, supervisor, agent, client, vendor, or customer of the Company, in violation of this policy, or who is aware of such harassment, discrimination or retaliation against others, should immediately report the circumstances verbally or in writing to their immediate supervisor or Human Resources.

Alternatively, any employee who feels they have been subject to an employment practice, policy, or procedure that violates this Policy or learns of or witnesses such an employment practice, policy, or procedure may call the Company’s Alertline at 1-800-721-7234 or make a report on the internet at <https://www.bwcterminals.com/employee-resources/>

Employees may make an anonymous report, and when doing so, should provide as much detail as possible concerning the incident(s) in question, including but not limited to time, place, and the identity of persons

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involved or with knowledge, so the Company may be able to investigate the anonymous report. If a report lacks sufficient detail, it may prevent the Company from taking appropriate action.

After a report is received, a thorough and objective investigation by management will be undertaken. The investigation will be completed, and a determination made and communicated to the employee as soon as practical. The Company expects all employees to fully cooperate with any investigation conducted by the Company into a complaint of harassment, discrimination, or retaliation, or regarding the alleged violation of any Company policies, and during the investigation, to keep matters related to the investigation confidential. If the Company determines that this policy has been violated, remedial action will be taken, commensurate with the severity of the offense. Appropriate action will also be taken to deter any future harassment or discrimination prohibited by this policy. If a complaint of prohibited harassment, discrimination or retaliation is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken.