

## **STATEMENT OF POLICY**

Transdev Services, Inc. (Transdev) is a continuing Equal Opportunity Employer, committed to EEO for all persons and to support the creation and maintenance of a qualified and diverse workforce. Transdev is committed to developing a written nondiscrimination program that sets forth the policies, practices, and procedures, with goals and timetables, to which the agency is committed and make the EEO Program available for inspection by any employee or applicant for employment upon request. Transdev will afford equal employment opportunities to employees and applicants, and will not tolerate discrimination based on gender, race, sex (including gender identity) religion, color, creed, age, national origin, ancestry, marital status, citizenship status, veteran status, disability, sexual orientation, pregnancy, genetic identity or any other factor prohibited by applicable federal, state or local law.

This policy applies to all terms, conditions, employment practices and privileges of employment including recruitment, selection, on-boarding, initial periods of employment, job assignments, training and development, working conditions, promotion, transfer, compensation, benefits, educational assistance, layoff and recall, social and recreation programs, termination and separation and other terms and conditions of employment. Transdev is committed to providing reasonable accommodations to applicants and employees who need them because of a disability or to practice or observe their religion, absent undue hardship.

The responsibility for the implementation and monitoring of the EEO Program is assigned to Human Resources, specifically Phyllis Witherspoon, the Human Resources Manager. An EEO/AAP has also been developed and is available for review in Human Resources. The goals of this program are:

- To recruit, hire and promote qualified employees without regard to race, sex (including gender identity), religion, color, creed, age, national origin, ancestry, marital status, citizenship status, veteran status, disability, sexual orientation, genetic identity, pregnancy, genetic information or any other factor prohibited by applicable federal, state or local law.
- To base employment decisions on the principles of Equal Employment and Affirmative Action.
- To fill employment and promotional opportunities utilizing only job-related criteria.

- To administer personnel actions, such as compensation, benefits, transfers, layoffs, Company sponsored training programs and social and recreational programs on a non-discriminatory basis.

Implicit in our policy is the commitment of the Company to maintain a work environment that is safe, productive and free from harassment of any kind, including sexual harassment. The Company identifies itself as an Equal Opportunity Employer in advertising for employees, recruiting brochures, employee manuals, bulletin board postings of EEO and Unlawful Harassment policies and all day-to-day practices.

Moreover, we individually and collectively share the responsibility for understanding the great importance of pleasant working associations, and assuring that every employee is welcomed, accepted and rewarded according to his or her contribution toward the attainment of our goals and objectives.

Principal and direct responsibility for successful implementation of this policy in a uniform manner has been assigned to the Human Resources Department. Within their respective areas of responsibility, all managerial and supervisory personnel are accountable to ensure compliance with this policy. Questions, comments, concerns or to voice complaints regarding this Equal Employment Opportunity and Affirmative Action Policy should be directed to the Human Resources Representative.

The purpose of Transdev's EEO/AA Plan is to formalize its commitment to diversity and equal employment opportunity. It demonstrates Transdev's efforts to monitor the composition of its EEO occupational categories and its overall workforce by racial, ethnic, and gender classifications. In addition, the plan demonstrates Transdev's efforts to identify and correct areas of underutilization. Transdev takes specific steps to eliminate unlawful discrimination, as well as the effects and appearance of unlawful discrimination. The affirmative action steps taken by Transdev ensures policies, practices, and programs facilitate non-discriminatory efforts to establish and maintain a workforce that reflects the availability of minority and female individuals ready, willing and able to work.

In developing and implementing the EEO/AAP, Transdev has been guided by its established policy of providing equal opportunity. Any placement goals that Transdev has established herein are not intended as rigid, inflexible quotas that must be met, but rather as targets reasonably attainable by applying every good faith effort in implementing this EEO/AAP. Nothing herein is intended to sanction the discriminatory treatment of any person. Indeed, all employment decisions at Transdev are made based on job-



related criteria. Thus, this EEO/AAP has been developed in strict reliance upon the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission.

This EEO/AAP does not constitute an expressed or implied contract between Transdev and its employees, job applicants, or other persons. Nothing in this EEO/AAP provides any individual or group with a private right of action against Transdev.

Transdev prohibits retaliation against any individual who in good faith files a charge of discrimination, reports harassment or who assists, testifies, or participates in any equal employment proceeding. Any applicant or employee has a right to file a discrimination complaint. Retaliation against an individual who files a charge or complaint of discrimination, participates in an employment discrimination proceeding (such as an investigation or lawsuit), or otherwise engages in protected activity is strictly prohibited and will not be tolerated. In the event the complaint is related to the Human Resource function, applicants or employees may file their complaint with the Compliance Manager or Regional Director of Human Resources (Kesi Dorner 404-392-5014) contact Transdev through the Transdev Ethics & Compliance Hotline at 1-866-850-3033 which is managed through Transdev's Legal department or contact Transdev online from our website at [www.transdevna.com](http://www.transdevna.com).

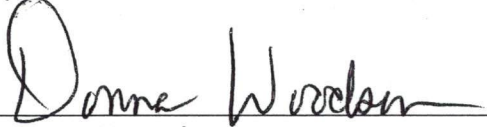
Transdev partnered with NAVEX Global to handle employee concerns through the Ethics & Compliance Hotline. The Ethics & Compliance Hotline is a tool to report possible unethical and unsafe behavior regarding harassment and retaliation, safety, fraud, or whistleblower issues. Transdev firmly believes that this method of reporting allows employees to express their concerns in a safe, non-retaliatory, and confidential manner in the effort of protecting their interest and the organization. The Ethics & Compliance Hotline is managed by our legal department, and as such, employees have the ability to ensure that their concerns are managed by either the Regional Director of Human Resources or a representative from the Legal Department to alleviate any conflict of interest.

- Employees may contact a toll-free number staffed by live operators 24-hours per day, 7 days per week, 365 days per year.
- There is a web reporting portal available 24-hours per day, 7 days per week, 365 days per year.
- The service has case management capabilities.
- It also has web-based reporting in 150 languages.

- In addition, there is a call-based ability to report in different languages.
- Posters are hung at the Winston-Salem, NC facility (and all locations throughout Transdev) notifying employees of the program.
- Additionally, wallet cards are distributed to all employees notifying them of the program.
- Each event is categorized, and investigations are begun.
- Finally, employees receive a timely update regarding the results of the investigation.

Employees and applicants are required to report any apparent discrimination or unlawful harassment and/or violations of the ADA. Transdev forbids any form of unlawful harassment for any circumstances as well as any harassment covered under the ADA affecting employees, passengers or others. Complaints are investigated in a prompt and thorough manner and handled as confidentially as possible.

Transdev is dedicated to this commitment, and we will maintain an environment free of unfair or illegal discrimination for all employees and applicants.

  
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Donna Woodson  
Transdev General Manager

  
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Date