

NON-RETALIATION POLICY

Purpose

This Non-Retaliation Policy (the “**Policy**”) outlines how and when you should speak up and report conduct you believe violates a law, regulation or a policy of The Cannon Corporation and its subsidiaries and affiliates (collectively, the “**Firm**”). It also outlines the rights and protections for those who come forward to report such concerns and/or participate in the investigations of reportable conduct.

The Code of Conduct and other policies of the Firm require all directors, officers, and employees to conduct Firm business with integrity, honesty and respect and to comply with all applicable laws. In order to maintain this workplace environment and to preserve the reputation and continued success of the Firm, the Firm must be informed about and be able to address any breach or potential breach of the Firm’s policies or applicable laws. To this end, all employees must speak up promptly if they have reason to suspect that such misconduct has occurred.

This Policy is also designed to foster a safe and confidential environment for employees to make such reports. The Firm takes seriously, and will investigate, all complaints of retaliation of any kind against an employee who reports or discloses possible improper or illegal activities. This also applies to complaints of interference with an employee’s attempt or right to make a report or disclosure. The Firm will not tolerate retaliation against an employee for making a report or participating in an investigation of reportable conduct, nor will the Firm tolerate an employee using his or her authority or influence to prevent another employee from making such a report or disclosure or impeding such an investigation.

1. Scope

This Policy applies to all employees of the Firm. Employees are required to report concerns and assist in investigations that relate to issues of ethical standards, compliance, or any other conduct in violation of Firm policies or applicable laws, rules or regulations. The Firm prohibits any acts of retaliation against such an employee who has reported a concern or assisted with an investigation.

Examples of protected activities include:

- Lodging an internal complaint (written or oral) with Human Resources or management, specifically opposing unlawful discrimination or harassment, or complaining about violations of wage and hour law (for example, if an employee believes he has been sexually harassed or not paid overtime he is owed).
- Filing a complaint of unlawful discrimination or harassment with the US Equal Employment Opportunity Commission (EEOC), or the applicable equivalent in the jurisdictions in which the Firm operates, or in court.
- Participating in the Firm’s internal investigation into allegations of sexual harassment.
- Supporting another employee’s internal or administrative complaint of unlawful discrimination (for example, by testifying or providing an affidavit in support of a co-worker who has filed a discrimination complaint with the EEOC).
- Requesting an accommodation under the Americans with Disabilities Act or the applicable equivalent in the jurisdictions in which the Firm operates.



- Requesting or taking leave under the Family and Medical Leave Act or the applicable equivalent in the jurisdictions in which the Firm operates.
- Filing a worker's compensation claim.

The examples above are illustrative only, and not exhaustive. No form of unlawful retaliation for any protected activity will be tolerated. Employees should never hesitate to come forward with a report about a concern. The employee does not have to be right in their perception, but the employee should be providing truthful and accurate information and have a reasonable basis to believe that wrongdoing has occurred or is about to occur. When in doubt about whether or not there has been a violation, it is always better to report your concern.

2. Non-Retaliation

The Firm prohibits and will immediately respond to any retaliatory behavior against an employee who has reported a concern or assisted in an investigation or proceeding regarding a violation of Firm policies or applicable laws, rules or regulations. Examples of retaliatory conduct may include discrimination, harassment or other adverse employment consequences, such as denial of a promotion, refusal to hire, reduction in pay or hours, blacklisting, or assignment of undesirable job duties. Retaliatory behavior includes interfering with an employee's attempts to make a report. If you suspect retaliation against yourself or any employee for speaking up, you should report your concern.

3. Where to Report Concerns or Retaliatory Conduct

The Firm offers several channels for reporting concerns or retaliatory conduct. Use the channel with which you are most comfortable, starting with your direct manager or supervisor. Other reporting channels include:

- The Employee Development Manager;
- The Director of Human Resources;
- The Director of Compliance;
- The General Counsel;
- The Audit Committee; or Integrity Champions;
- The Board of Directors.
- Another manager or supervisor or member of Human Resources;

Individuals who receive such reports must promptly inform the Director of Compliance, Director of Human Resources, or Employee Development Manager,

Employees are also encouraged to make use of the Firm's Compliance and Ethics Hotline, a confidential telephone line that employees can use 24/7 to report concerns relating to possible violations of this policy.

You can reach the confidential Compliance and Ethics Hotline at:

- From the U.S. and Canada call 1.855.502.1878
- From India call 1.855.502.1880, Access Code 000-117
- From Abu Dhabi call 8000 444 1055

Or report online: www.reportlineweb.com/cannondesign



You may report suspected violations anonymously; however, providing your name may expedite the time it takes the Firm to respond to your concern and allows the Firm to contact you directly during any investigation for further information. Either way, you should treat the information that you provide as confidential. If the reported behavior or retaliatory conduct continues after you have reported it, please report your concern or the retaliatory conduct directly to the Firm's Director of Compliance.

4. Firm's Response to Concerns or Retaliatory Conduct

All internal complaints will be handled promptly, discreetly and professionally. While the Firm may be required to disclose information or identities of individuals in certain circumstances, the Firm will only share information you provide with those who need to know or as required to fulfill its legal obligations. Where appropriate, the Firm may provide feedback to the employee raising the concern. Investigations will be conducted by, or under the supervision of, the Director of Compliance. It is important that employees reporting concerns do not conduct their own investigations.

At the end of an investigation, the Firm will take whatever corrective and disciplinary actions it deems necessary. Anyone who has retaliated against an employee for speaking up may face discipline up to and including termination. The Firm may also report any actual or suspected breaches of law to the relevant law enforcement agencies, where appropriate.

5. Administration and Modification

Administration of this Policy must conform to all applicable laws governing protection of employees from retaliation. In the event that any law is in conflict with this Policy, the applicable law will prevail. This Policy is subject to modification or termination by the Firm, in part or in its entirety. The Firm retains the exclusive right to interpret the Policy in its sole discretion, and any determination by the Firm will be final.

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