



EEO, Non-Discrimination and Anti-Harassment Policy

Version: 4.0 Applies To: Company

**Company Policy
Human Resources**

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Author	Davide Tuninetti, CHRO		
Approvals	Brett Cope, President, CEO & Chairman		

I. Policy Statement and Purpose

Powell Industries Inc. is an Equal Opportunity Employer and maintains a work environment in which all employees are treated with respect and dignity. The Company has implemented this Equal Opportunity, Non-Discrimination in Employment and Policy Against Harassment, Discrimination and Retaliation (the "Equal Opportunity Policy") as part of its longstanding commitment to compliance with all applicable equal opportunity and affirmative action requirements. The purpose of these policies is to communicate the Company's requirement for all employees to interact in a professional manner and contribute to a work environment that reflects the spirit of equal employment opportunity free from prohibited harassment, discrimination and/or retaliation. These policies also establish our reporting procedures and processes for responding to claims of inappropriate behavior and perceived harassment, discrimination, and retaliation so that issues can be identified and remedied internally, promptly, thoroughly and effectively.

II. Application

This Equal Opportunity Policy applies to all U.S. based employees of Powell Industries Inc. and its subsidiaries. Additionally, this policy applies whenever and wherever a covered Company employee is performing a function of his or her job, including all Company locations, customer worksites, and Company-sponsored or customer-sponsored business and social functions.

The employment aspects of this Equal Opportunity Policy require that all employment decisions regarding applicants and employees be non-discriminatory, based only on valid job requirements, and extend to all terms, conditions, and privileges of employment including, but not limited to, recruitment, selection, compensation, benefits, training, promotion, and disciplinary actions. Any employee who is found to have violated the anti-discrimination or anti-retaliation provisions of this Equal Opportunity Policy with respect to another individual will be subject to corrective action, up to and including termination.

III. Equal Opportunity

The Company is committed to maintaining a work environment free from all forms of unlawful discrimination and harassment. It is the Company's policy to prohibit discrimination and harassment against any applicant or employee on the basis of race, color, religion (including religious dress and

EEO, Non-Discrimination and Anti-Harassment Policy

Version: 4.0 Applies To: Company

**Company Policy
Human Resources**

grooming), sex or gender, national origin, ancestry, age, mental or physical disability, medical condition, pregnancy, military or veteran status, genetic information, citizenship status, marital status, sexual orientation, gender identity and/or gender expression, or any other reason prohibited by law. It is also the Company's policy to provide reasonable accommodation for qualified individuals with disabilities and to the sincerely held religious beliefs, practices or observance of applicants or employees so long as such accommodation does not pose an undue hardship. The Company also prohibits retaliation against any individual who in good faith complains of perceived harassment or discriminatory conduct, participates in a Company or agency investigation into such complaints, requests a reasonable accommodation, or engages in other protected activity.

IV. Non-Discrimination in Employment

Powell Industries Inc. and one or more of its subsidiaries are federal contractors or subcontractors subject to Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("Section 4212") and Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"). As such, it is the Company's policy to take positive, proactive steps to employ, advance in employment, and otherwise treat qualified protected veterans, and individuals with disabilities without regard to their veteran status, or physical or mental disability. The Company will provide reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities unless the accommodation imposes undue hardship on the operation of the Company's business.

The Company's Non-Discrimination in Employment policy prohibits employees and applicants from being subjected to retaliation because they have engaged in or may engage in: (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503, Section 4212, or any other Federal, state or local law requiring equal opportunity for disabled persons or protected veterans; (3) opposing any act or practice made unlawful by Section 503 or Section 4212 and their implementing regulations, or any other Federal, State or local law requiring equal opportunity for disabled persons or protected veterans; or (4) exercising any other right protected by Section 503 or Section 4212 or their implementing regulations. Prohibited retaliation includes, but is not limited to harassment, intimidation, threats, coercion, or other adverse actions that might dissuade someone from asserting their rights.

V. Prohibition Against Discrimination and Harassment

A key component of the Company's commitment to equal opportunity is zero tolerance for workplace discrimination and harassment based on, or because of, an individual's race, color, religion (including religious dress and grooming), sex, gender identity and/or expression, national origin, ancestry, age, mental or physical disability, medical condition, pregnancy, childbirth or related condition, military or veteran status, genetic information, citizenship status, marital status, sexual orientation, or any other reason prohibited by law. Such harassment, whether committed by Company personnel (including supervisors and managers) or by clients, customers, vendors, or other individuals doing business with the Company, is unlawful and will not be tolerated.

EEO, Non-Discrimination and Anti-Harassment Policy

Version: 4.0 Applies To: Company

**Company Policy
Human Resources**

Harassment can be any single incident or pattern of behavior where the effect, intentional or unintentional, creates a hostile, offensive, or intimidating work environment based upon any of the above classifications. Harassing behaviors can include (but are not limited to) unwelcome comments that are gender-based, sexual, or ethnic in nature; religious slurs; racial insults; unwanted touching or sexual advances or requests; age-based remarks; jokes, epithets, inappropriate or derogatory comments, emails, voice mails, or written or pictorial material that makes fun of or insults an individual or a group based upon a protected classification; or similar inappropriate remarks or behavior. Harassment may also include inappropriate comments or conduct between or among individuals in the same protected classification.

Sexual harassment is a form of workplace harassment that is also prohibited by the Company's policy. Both quid pro quo ("this for that") and hostile work environment harassment are prohibited under the Company's Equal Opportunity Policy.

- Quid pro quo harassment may occur when someone in a position of authority or influence asks for or requests some romantic or sexual conduct from someone else, and in exchange, offers, some benefit to the other person's employment if the request is accepted or threatens some detriment to the other person's employment if the request is rejected.
- Hostile work environment harassment may occur when an individual engages in unwelcome visual, verbal, or physical conduct based on or because of sex (or any other characteristic covered by the Company's policy), and where this conduct is either so severe or pervasive that it unreasonably interferes with an employee's work performance or creates a hostile, intimidating, or offensive work environment.

Any employee who is found to have violated this Equal Opportunity Policy will be subject to appropriate corrective action, up to and including termination of employment.

VI. Complaint and Investigation Procedure and Obligations of Company Personnel

This Equal Opportunity Policy shall be posted in all Company facilities. All managers of the Company are responsible for abiding by the terms set forth in this Policy, establishing equal opportunity and non-discrimination as an integral part of their personnel decisions, encouraging employees to bring their concerns forward and preventing harassment, discrimination, and/or retaliation in the workplace. All managers and supervisors who receive a complaint of or otherwise observe or become aware of any potential discrimination, harassment, or retaliation, or who receive a request or are aware of an individual's potential need for an accommodation regarding their employment, must promptly report that issue to Human Resources for appropriate investigation and handling. Failure by a manager or supervisor to properly report concerns or misconduct of which the manager or supervisor is aware could lead to disciplinary action, up to and including termination of employment. Since all of Powell Industries Inc. personnel have an obligation to contribute to a discrimination and harassment-free workplace, all employees are strongly encouraged to report any violation of the Company's Equal Opportunity Policy through one of the Company reporting avenues identified below.

EEO, Non-Discrimination and Anti-Harassment Policy

Version: 4.0 Applies To: Company

**Company Policy
Human Resources**

If you believe that you have been subjected to discrimination, harassment or retaliation, or other behavior that violates the Company's Equal Opportunity Policy, you should tell the offender that his or her behavior is offensive and should be stopped. You should also promptly report your concerns to any of the following:

- Your manager or next-level manager, or
- Your Human Resources Representative, or
- Chief Human Resources Officer, or
- The Powell Ethics Line at www.powellind.ethicspoint.com or 1-877-217-4661

After the Company receives a complaint alleging a violation of the Company's Equal Opportunity Policy, the Company will conduct a prompt, thorough, and impartial investigation and take corrective action as appropriate based upon information obtained during its investigation. Employee complaints and investigations will be kept confidential to the extent possible. However, complete confidentiality is not guaranteed. No one, regardless of position or length of service, is exempt from this Policy.

VII. Prohibition Against Retaliation

Every employee is encouraged to come forward without fear of reprisal, as the Company's Equal Opportunity Policy prohibits any and all forms of retaliation against anyone who makes a good faith complaint pursuant to this Policy, or who otherwise participates in a Company or agency investigation into such complaints, even if sufficient evidence is not found to substantiate the complaint. If you believe that you have been or may be subjected to retaliation for making or cooperating in the investigation of a complaint under this Equal Opportunity Policy, please promptly notify the Company through one of the reporting avenues set forth in this Policy. Concerns of retaliation will be investigated and addressed in the same manner as allegations of discrimination and harassment.

VIII. Questions

If you have any questions regarding this Equal Opportunity Policy, wish to report a complaint or concern of harassment, discrimination, retaliation, or other perceived misconduct, or need to discuss a request for a reasonable accommodation, please contact your direct manager, next-level manager, or a member of the Human Resources Department.

IX. Responsibility for Implementation - Statement from Brett Cope, President, CEO & Chairman

As President, CEO & Chairman of Powell Industries Inc., I am committed to the principles of Equal Employment Opportunity and Non-Discrimination in Employment set forth in this Policy. To ensure dissemination and implementation of equal employment opportunity and non-discrimination throughout all levels of the company, I have designated Davide Tuninetti as the Chief Human Resources Officer for Powell Industries Inc. He oversees the Human Resources function which includes human resources

EEO, Non-Discrimination and Anti-Harassment Policy

Version: 4.0 Applies To: Company

***Company Policy
Human Resources***

personnel dedicated to ensuring adherence to all applicable policies, laws, and regulations in the areas of equal employment opportunity and non-discrimination. Further, the Human Resources function is responsible for establishing and maintaining an internal audit and reporting system to allow for effective measurement of, and compliance with, the company's non-discrimination in employment programs.



Brett A. Cope
President, CEO & Chairman