



MEMO

TO: WSP USA and its Suppliers
FROM: Laura Unger, Title VI Liaison/Small Business Liaison Officer
SUBJECT: Title VI Compliant Procedures
DATE: April 1, 2021

Introduction

These procedures apply to complaints of discrimination made under Title VI of the Civil Rights Act of 1964, concerning WSP USA's suppliers, vendors, consultants, and/or contractors (hereinafter "Suppliers"). Intimidation or retaliation of any kind is prohibited by law.

These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant. These procedures do not prevent the complainant from filing formal complaints with other State or Federal agencies or seeking private counsel for complaints alleging discrimination.

Every effort will be made to obtain early resolution of complaints at the lowest possible level. The option of informal mediation meeting(s) between the affected parties and the investigator may be utilized for resolution at any stage of the process. WSP USA will make every effort to pursue a resolution of the complaint. Initial interviews with the complainant and the respondent will include requests for information regarding specific relief and settlement options.

Filing

Any person who believes that a Supplier has been subjected to discrimination or retaliation prohibited by Civil Rights authorities, based upon race, color, or national origin may file a written complaint to WSP USA's Title VI Liaison. Complaints may also be filed with applicable State, local, or municipal



transportation agency; Federal Highway Administration (FHWA) Division Offices; the FHWA Headquarters Office of Civil Rights; Federal Transit Authority (FTA) Civil Rights Office; the United States Department of Transportation (USDOT) Departmental Office of Civil Rights, or the U.S. Department of Justice.

Per Title VI, a formal complaint must be filed no later than 180 calendar days after the alleged occurrence or when the alleged discrimination became known to the complainant. The complaint must meet the following requirements:

- Complaints must be in writing and signed by the complainant(s). Complainant(s) with Limited English Proficiency or other limitations preventing them from filing a written complaint may contact the Title VI Liaison via telephone to arrange for their complainant(s) to be transcribed for their signature.
- Complaints must include the date of the alleged act(s) of discrimination (date when the complainant(s) became aware of the alleged discrimination or the date on which the conduct was discontinued or the latest instance of the conduct).
- Complainant must present a detailed description of the issues, including, to the best of their knowledge, names, job titles, and addresses of those individuals perceived as parties in the action complained against.
- Complaint must include a way to contact the complainant(s).

Receipt and Acceptance

Upon receipt of the complaint, the Title VI Liaison will log the complaint, determine its jurisdiction and the need for additional information. The Title VI Liaison will notify the complainant, in writing, within five (5) calendar days of receipt of the complaint.

In order to be accepted, a complaint must meet the following criteria:

- The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
- The allegation(s) must involve a covered basis such as race, color, or national origin.



- The allegation(s) must involve a program or activity that receives federal financial assistance.

Title VI Liaison will assume responsibility for investigating complaints alleging discrimination against any WSP USA Suppliers or potential Suppliers. Complaints in which Title VI Liaison is named as the Respondent shall be forwarded to the appropriate federal, state or local agency for proper disposition, in accordance with their procedures.

Dismissal

A complaint may be recommended for dismissal for the following reasons:

- The complainant requests withdrawal of the complaint.
- The complainant fails to respond to reasonable requests for additional information needed to process the complaint.
- The complainant cannot be located after reasonable attempts to contact the complainant.

A complaint that is dismissed may be forwarded to an alternative investigation team with appropriate jurisdiction, including but not limited to WSP USA's EEO Officer or Ethics & Compliance Department.

Investigation of Complaints

In cases where WSP USA's Title VI Liaison assumes responsibility for investigation, they will provide the respondent with the opportunity to respond to the allegations in writing. WSP USA's Title VI Liaison will designate an investigative team responsible for evaluating the complaint, developing an investigative plan, conducting interviews, collecting and analyzing evidence, and preparing an investigative report.

WSP USA's Title VI Liaison final investigative report will be submitted to the FHWA, FTA, or appropriate federal agency, within 90 days of receipt of the complaint. The federal agency will issue a final agency decision (FAD) and provide written notification of the decision to the complainant, respondent, and Title VI Liaison.



Appeals

If the federal agency concludes that the respondent is in compliance with laws/regulations, and the complainant disagrees, the complainant may, if dissatisfied, file an action in the appropriate U.S. District Court.

Confidentiality

Investigation files are confidential and will be maintained by WSP USA. The contents of such files will only be disclosed to appropriate WSP USA personnel and federal authorities in accordance with Federal and State laws. WSP USA will retain files in accordance with records retention schedules and all Federal guidelines.