



BOH PICTURE

VOL. 47, NUMBER 1 / Spring-Summer 2019
A Publication of Boh Bros. Construction Co., LLC



Driving for Safety

CMAR process speeds improvements to the Causeway Bridge

1
CMAR Solution

6
US 190 Pump Station

8
A Link to Operations

10
AGC JLT Build America
Award

13
Boh Employee
Spotlight

President
Robert S. Boh

On the cover:
Boh's marine piling
crews progress on the
southbound Causeway
Safety Shoulders.

The BOH Picture is
published for employees
and friends of Boh Bros.
Construction Co., LLC

Address all correspondence to:
BohPictureEditor@bohbro.com



www.bohbros.com

A safety culture in a company starts with caring. We care for ourselves, for each other, and we apply this caring to achieve the daily goal that no one gets hurt; everyone goes home safe. In order to reach this goal every day, we begin with a plan to do the work safely, we use the right tools, we evaluate the hazards and come up with the steps needed to do the work incident free. When something changes, and the original plan will no longer work, we stop and adjust the plan. If we have the self-discipline to do these things, the results will be what we want. These “basics” are so familiar to many of us that they are easy to take for granted or overlook.

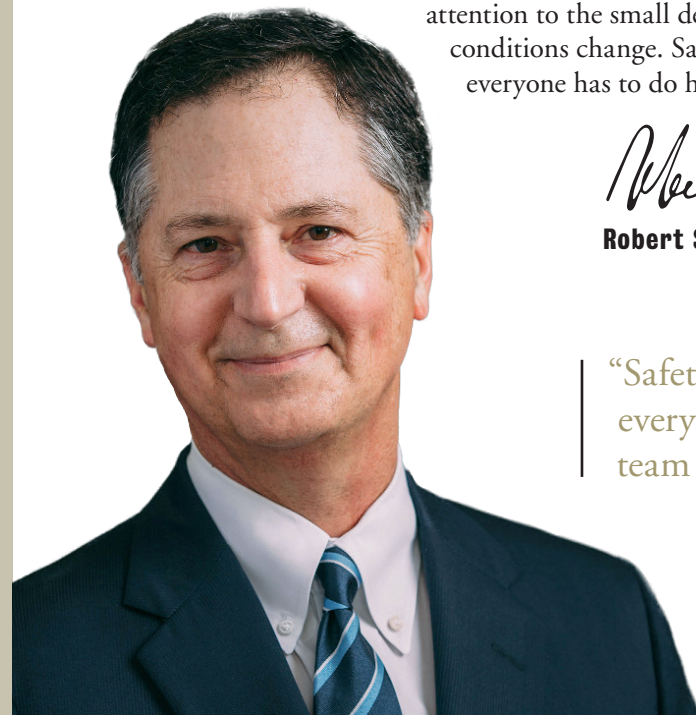
I was interested, then, when I heard some comments from Saints quarterback and icon Drew Brees following a big win last season. See if you can connect our approach to safety with Drew's recipe for winning football.

Speaking about the success of the offense in this game, a 48-7 victory over Philadelphia, Drew said, “There's still a process. Each and every week, the game plan that the coaches work so hard to put together, the time that we need in practice to make sure that we are executing that plan to perfection.” He continued, “There's just so much that goes into that. We don't take that for granted. You don't just snap your fingers and come out and play like that. A lot of time on task, and great effort, and great focus and attention to detail. We do come out with a lot of confidence because we know the amount of preparation that has gone into that. Each and every time we touch the ball, we feel like we're going to make plays, that we have in the game plan. If all of a sudden adjustments need to be made, we know how to make those. I think there's just a lot of confidence that goes into each and every time we touch the ball what do we need to do to put points on the board this drive.”

Speaking to the objective of coming back week after week ready to win, he said, “Honestly, there's always another challenge. Every time we step on the field, we understand that we are going to have to earn it. We have to go out and earn the victory. We have to go out there and earn that amount of points within the framework of understanding what's winning football. When you take care of the football, when you convert third downs, when maximize your opportunities in the red zone, that is winning football. Control the ball, control time of possession. If we just continue to create the sense of urgency, each and every week on making sure we accomplish those things then good things will happen. We focus on the little things that I've been talking about. Our execution, the tempo at which we play, getting in and out of the huddle, up and down, playing fast, making good decisions. If you have positive plays, good things happen.”

On the surface, you might think that there is not much in common between winning football in the NFL and safe production on a construction jobsite. However, if you look a little deeper, you might find some striking similarities in what it takes to achieve both:

a good plan, discipline to execute all of the steps of the plan, attention to the small details, and making adjustments as conditions change. Safety and football are team sports; everyone has to do his job for the team to win.



Robert S. Boh, President

“Safety and football are team sports; everyone has to do his job for the team to win.”



CMAR Solution

Project Team Tackles Causeway Shoulders with Collaboration, Creativity

For any project on the heavily traveled Lake Pontchartrain Causeway, there are two equally formidable challenges—weather and traffic. And when the longest bridge in the U.S. needed its most significant upgrade in half a century, the Causeway Commission turned to Construction Management at Risk (CMAR) to get the job done. *(continued next page)*



The end goal is to build twelve, 1,008-foot-long shoulders, six on the northbound bridge and six on the southbound bridge

of the design. As such, the commission first submitted Requests for Qualifications for the design, then selected Volkert Inc. of Mobile, Ala., from a short list of qualified applicants. In April 2018, the commission selected Boh Bros. as its pre-construction contractor. Huval & Associates of Lafayette, the project manager for the Commission, and CEC Inc. of Lafayette, the independent cost estimator, round out the team.

G. J. Schexnayder, Group Manager—Heavy Construction, says Boh’s Statement of Qualifications was graded and scored to narrow the list down to three contractors. The SOQ decision was “100 percent qualifications based,” according to a contractor’s key personnel resumes, past project experience and understanding of the project. Following an interview, the Causeway Commission awarded the \$200,000 pre-construction services contract to Boh.

In the months that followed, Boh collaborated with Volkert and the Commission on constructability, schedule and budget to help guide the design. Throughout the CMAR process, intensive owner involvement was crucial. The Causeway team held weekly meetings with all the stakeholders, with the owner present and participating in most decisions. As a result, there wasn’t a lot of waiting, thinking and analyzing. “We would call in the expertise we needed depending upon the topic of the meeting,” Schexnayder says. “If we were talking about pile driving we would bring in a lot of pile driving guys, for example. Or if it was related to the super structure, we would bring in the guys that did the super structure work.”

Through it all, transparency is paramount when addressing and resolving risk. One concern on any project is pile length variability and whether the piles can be driven to grade. “In a low bid world, the contractor assumes the risk of pile cutoff, should the pile meet refusal before reaching designed tip elevation. In that case, if a contractor thinks they’re going to have 100 piles hit refusal and need to be cut (in a low bid environment), they’re going to put the cost of cutting those 100 piles in their job, and the owner is going to pay that whether they cut 25, 75 or even 150 piles.

“But if we break that out as a risk item in CMAR, and don’t include the pile cutoff cost in our bid, then we’ll get reimbursed for only those pile cutoffs that occur. If we cut 25 piles, the owner pays for 25, not 100.”

A police presence at the site, a requirement on any

The end goal is to build twelve, 1,008-foot-long shoulders, six on the northbound bridge and six on the southbound bridge, to provide much-needed relief to stranded motorists. Until now, a series of seven crossovers linking the two spans have provided the only way for travelers to get out of the main lanes of traffic during an emergency.

The shoulders are long overdue. The first bridge was completed in 1956 when the annual traffic count was only about 200,000 cars. Today, it’s 12 million. “The Causeway is at capacity every morning and evening,” says Causeway

General Manager Carlton Dufrechou. “There are about 3,500 plus vehicles per lane during rush hour. And every day, we have eight to ten breakdowns.”

The potential for danger is high, as the existing crossovers were never intended to be emergency stopping areas. They don’t have on- or off-ramps and require that traffic come to a near full stop in order to make a 90-degree turn.

For the Causeway Commission, it quickly became obvious that a CMAR approach to the project would best address their concerns, and provide the most collaborative, comprehensive approach to constructing the shoulders. An integrated team approach to planning, design and

construction, CMAR serves the multi-pronged purpose of addressing risk, controlling schedule and budget, and ensuring quality for the owner.

Dufrechou says the use of CMAR expedited the design and planning phases, and allowed the project team to troubleshoot some key challenges much earlier than the traditional design-bid-build approach. “We cannot close this bridge down. Our mission is to get our commuters back and forth safely and timely. That was the driver behind this.”

CMAR statutes dictate that the owner hire a design engineer and contractor through independent contracts, who in turn work together to maximize the efficiency





Causeway job, was another risk item addressed by CMAR. Causeway specifications requires one to three police officers on the bridge, solely dedicated to the project. “They elected to take that as a risk item as well, so they only pay for it when we use it.” Schexnayder points out that the risk items aren’t just a blank check, as all are coordinated and cleared daily with the owner’s representative.

A Minimally Invasive Approach

Boh was a crucial part of the pre-construction process, as the contractor’s engineering background enabled the team to make changes more easily. “We have a built-in appreciation for how changes impact design,” Schexnayder says. “That better enables us to suggest solutions that work for both the contractor and designer.”

The CMAR process also allowed for a more expedited design and planning phase, and facilitated a construction schedule that minimally impacted traffic. As a result, the project moved quickly from pre-construction to construction in less than nine months, a process that would have undoubtedly taken longer by other means.

Along the way, the team looked for ways to shorten the schedule through Advance Work Packages, such as casting three 120-foot-long test piles in Summer 2018 to facilitate pile driving immediately after the notice to proceed, and purchasing 80 percent of the remaining pile lengths prior to an executed GMP (Guaranteed Maximum Price). “I’d say a good 120 days of time were saved due to early procurement,” says Boh project manager Thad Guidry. All of the spun cast piles are being supplied by Gulf Coast Pre-Stress in Pass Christian, Miss.

In fact, the pre-work packages were structured so that the Causeway Commission had full ownership of purchased materials. “If Boh would have failed to negotiate an agreeable GMP construction contract, the owner would have those pieces already cast and available to use,” Schexnayder says. “They would still recognize the schedule benefit even if it hadn’t worked out with Boh Bros.”

Ultimately, Boh Bros. was awarded the Causeway GMP construction contract, although that was never

guaranteed—CMAR guidelines require a commitment by the construction manager to deliver the project for the GMP, regardless of their involvement during pre-construction. If the preconstruction contractor’s price is significantly higher than the estimate provided by the independent cost estimator, and the owner determines it to be too expensive, the owner can put the project out for bid. In that case, the preconstruction contractor is not allowed to bid on the project.

The team’s most impactful pre-construction decision was to fabricate the bridge sections off-site, in modular fashion, and barge them to the site from Boh’s Almonaster Yard. The ABC (Accelerated Bridge Construction) approach will enable pile driving and pile cap construction to be performed exclusively from the water, thereby circumventing lane closures or shifts. In all, the project scope requires 180 bridge spans (72 in the northbound lanes and 108 in the southbound lanes) from 56 to 84 feet long, supported by 192, 54-inch-diameter cylinder piles ranging from 54 to 112 linear feet.

With the piles and caps in place, the crew will simply float the completed deck pieces to the site. To the average motorist, the shoulders will seemingly materialize overnight. “Tackling one span a night, we’re going to saw cut and remove the existing barrier rail, put the new span in, and in the morning it’s there and it’s safe.” This method allowed the project to meet one of the owner’s main goals, to minimize the impact to daily traffic.

Pile driving at the \$45.8 million site kicked off in February, with a notice to proceed in December. Guidry expects pile driving to continue through the summer. “The project is being tackled first in the southbound lanes to stay ahead of a guardrail replacement project being performed by another contractor,” he adds. Project completion is expected by April 2020.

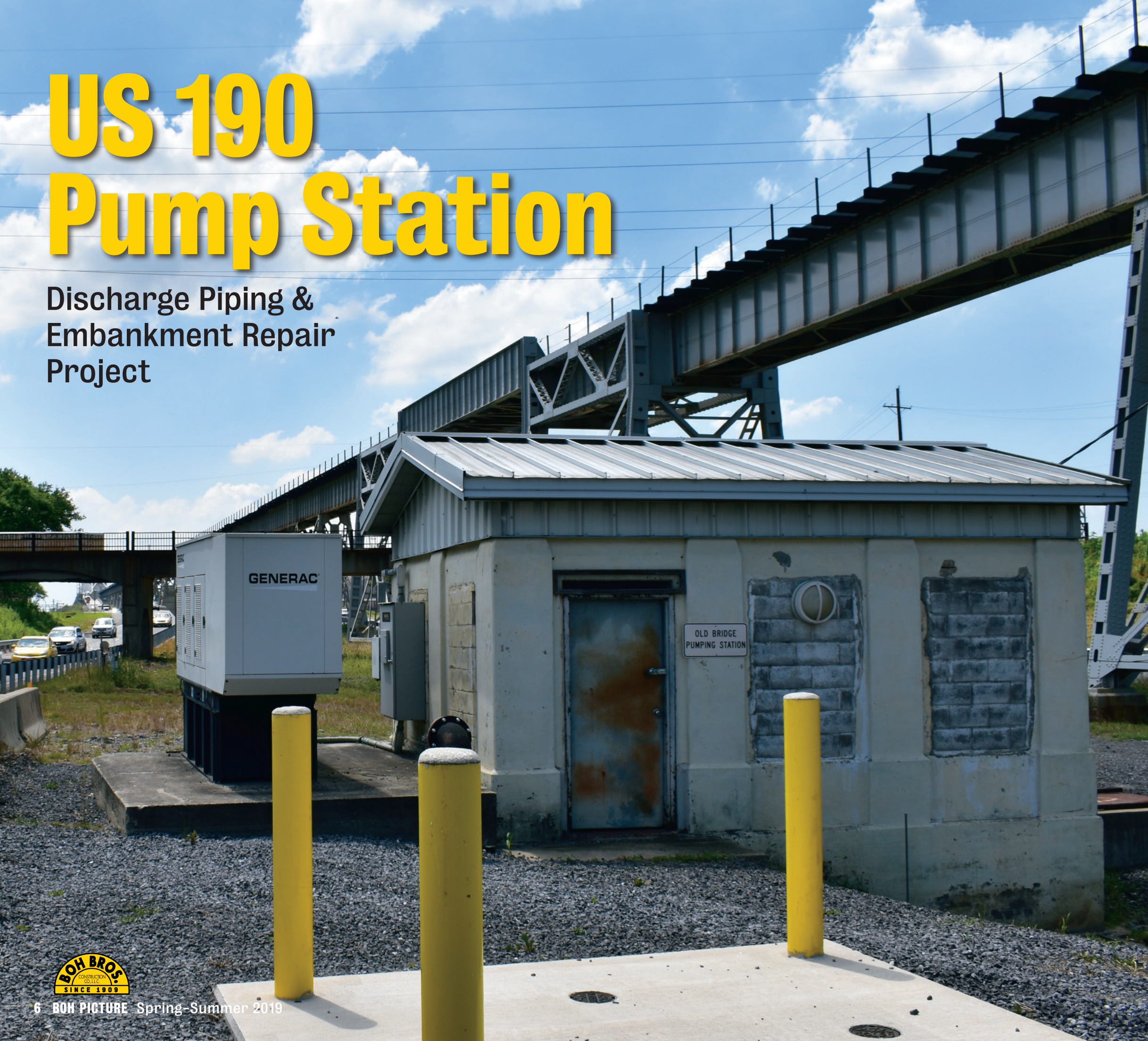
The Causeway Commission’s Dufrechou has been enormously pleased with CMAR. “When I first considered it, I didn’t think it was applicable at all, but I’ve become an advocate,” he says. “It’s certainly working for us. I think we’re going to finish well below the original estimate. It was truly a creative process, and it was interesting to sit in on those sessions and hear the ideas flying back and forth.” 🌞

The team's most impactful pre-construction decision was to fabricate the bridge sections off-site, in modular fashion.



US 190 Pump Station

Discharge Piping &
Embankment Repair
Project



Since 1940, the Huey P. Long Bridge over the Mississippi River in Baton Rouge has served commuters on US Hwy 190 and the KCS Railroad. The Baton Rouge structure is often referred to as the Old Bridge, or the Airline Bridge, and is similarly constructed to the other, more famous Huey P. Long Bridge in New Orleans. The bridge serves approximately 17,300 commuters and up to five (5) train crossings per day, servicing the northern part of East Baton Rouge Parish. The bridge is also an important alternate route to the I-10 Mississippi River Bridge, affectionally known in Baton Rouge as the “new” bridge.

Maintaining such an important piece of infrastructure has been a high priority for the Louisiana Department of Transportation and Development (DOTD) for many years. Several upgrades to the structure have occurred, including structural maintenance, travel lane widening in both directions, and several re-paintings. Furthermore, since installing a new Intelligent Traffic System at Interstate 10 and LA Hwy 1, more commuters are recognizing the benefit of the “old” bridge.

As with any major piece of infrastructure, the surrounding environment must also be well maintained. Boh Bros. plays a key part in this maintenance, and has assisted the DOTD with the eastern side drainage pump station for many years. To have appropriate clearance under two rail bridges, the eastbound US 190 lanes are installed below the typical road grade, creating a low point that requires draining by the pump station. Typically, the system drains via box culvert to the nearby



“Our experienced field crews have been able to assist the DOTD with emergency repairs to the system over the years and are able to make suggestions that add value.”

Larry Lamonte, *Project Manager*

Mississippi River. However, when the river rises to a certain elevation, the area is drained via electric pumps and bypass valves. The pump station is also used during significant rain events, keeping the major roadway open and dry. In 2005, Boh Bros. executed a project to replace the 10” vertical pumps and associated electric motors, valves, controls, along with several upgrades to the physical pump station building.

Building on that experience, Boh Bros. most recently completed a project to add flexibility to the pump station. According to Chad Roubique, DOTD District 61 Project Engineer, the latest upgrades intended to “future proof” the station. After deciding to repair the main tail drain line, the DOTD team realized that further investments in the surrounding infrastructure would add reliability to the system.

“Boh Bros. is such a great partner when dealing with this pump station,” says Roubique. “Their past experience with the station gives us knowledge and insight on how to solve any issues that arise.” Larry Lamonte, Boh Project Manager adds, “Our experienced field crews have been able to assist the DOTD with





The latest project adds new life to an old system, further maintaining a critical piece of infrastructure for the DOTD.

emergency repairs to the system over the years and are able to make suggestions that add value.”

Roubique says, “The Boh team is always responsive, offering great suggestions, and are problem solvers on our work.” In that spirit, the most recent project was value engineered with the entire project team. After reviewing the initial design of the tail line replacement, the project team was able to add a secondary outfall to the system, adding reliability and options should future issues arise. Fifty (50) LF sections of carbon steel pipe casing were installed under US 190 by the jack and bore method to accommodate new, 12” PVC piping. Tie-ins were made to the existing system, and new manual valves were installed to provide redundancy to the discharge system. Along

with a repair to the existing clay embankment in the area, the latest project adds new life to an old system, further maintaining a critical piece of infrastructure for the DOTD.

In a time of tight budgets at the DOTD for maintenance projects, along with the seasonably high river and significant rain events, this innovation and “team first” attitude was key in providing value to the taxpayers of Louisiana. “We are very confident when Boh Bros. wins a project for our group,” adds Roubique.

Finally, Lamonte says, “We were able to work with the DOTD project team to maximize the funds they had for the project. We assisted with traffic control planning, piping system suggestions, and constructability reviews to meet the project’s goals of future proofing the system while enabling minimal disruption to the traveling public and surrounding business facilities.”

A Link to Operations

Boh Names Quebedeaux to Newly Created Safety Position



The effectiveness of a corporate safety program is fundamentally tied to its execution at the operations level. In that regard, Boh Bros. Construction’s newly appointed Senior Vice President of Safety Jeff Quebedeaux brings a lot to the table.

Quebedeaux can lean upon his 33 years of operations experience, most recently as Boh’s vice president of utilities and paving, to provide support and assistance to Corporate Safety Director Heather Grytza, her staff of safety professionals, and Boh’s Operations Group.

The creation of the position in January reinforces the contractor’s “never be satisfied” safety mantra. “Our company needs to improve its safety performance,” says President Robert S. Boh. “This is crucial for our employees and their families, as well as to our business as we meet our clients’ increasing expectations for being a ‘safe’ contractor.”

By Quebedeaux assuming more of the administrative safety functions, Grytza can do what she does best—mentoring the Boh team of safety professionals, educating front-line supervisors on safety guidelines, and spending time on projects identifying and mitigating hazards.

Quebedeaux serves as an owner liaison, participating in safety-related seminars to comply with owner requirements. “I am an added resource to the safety team to provide assistance with customer mandated safety deliverables, perform analytics on our safety performance, and identify and lead initiatives for improvement,” Quebedeaux says.

Perfectly Suited

Quebedeaux’s “boots on the ground” background is no accident, as Boh Bros. views safety as an operational responsibility. A home-grown graduate of West Jefferson High School and Nicholls State University, with a bachelor’s degree in civil engineering technology, Quebedeaux landed his first job at Boh as a layout helper some 33 years ago during construction of the Westbank Approaches to the Greater New Orleans Bridge No. 2, (later renamed Crescent City Connection).

Not long after, he performed the field layout on the Singing River Causeway, a 3.1-mile-long bridge in Pascagoula, MS. Looking back, he says he learned some valuable safety lessons there, since many of the employees

were local to Pascagoula and therefore not familiar with Boh’s safety culture. These lessons, along with others learned along the way, have formed Quebedeaux’s views about safety.

“On any job, it’s paramount to educate at the craft level,” Quebedeaux says. “You have to make them feel they’re part of the process. You have to engage them and empower them.” Also, site leadership needs to “walk the walk” for a safety program to be effective. “We set an example every day, and only we control if it’s a good or bad example.”

Quebedeaux was mentored in the world of estimating and project management by Boh stalwart Wayne Wooley, working on projects in a variety of markets, from Florida to Texas, including but not limited to the industrial/ petro-chemical and municipal infrastructure markets. In 2008, Quebedeaux became the assistant manager of heavy construction under Ed Scheuermann, and was named vice president of Utilities and Paving in 2012.

Safety at Every Level

In his new role, Quebedeaux plans to launch some long-term initiatives that will encourage increased safety engagement at the craft level. He also plans to better integrate technology into the safety process, primarily by streamlining safety planning and record keeping with other business functions, which will enable safety planning to begin during the proposal preparation and carry through to project execution. “In this way, everyone is involved in the plan—starting with the estimators, flowing to the project managers—and communicated to the field supervision and craft for input and buy-in,” Quebedeaux says. After all, at the end of the day he believes that effective safety is a product of planning, communication, and execution. “We view the safety department as a resource to help operations perform the work safely.”

“Our goal is no one gets hurt. It’s as simple as that.”





AGC JLT Build America Award

Regional Transit Authority Cemeteries Transit Center

BOH WINS PRESTIGIOUS BUILD AMERICA AWARD Each year the Associated General Contractors of America accepts award submissions from contractors across the country and selects the top construction projects from each category. This year, Boh Bros. was selected as the winner of the JLT Build America Award for our work on the Regional Transit Authority Cemeteries Transit Center, in the Highway and Transportation Under \$10 Million Renovation category. The selection for the winning project was based on several factors including: excellence in project management, innovative construction practices, improvements to safety and quality, excellence in client service, sensitivity to the environment and surroundings, and contributions to the community. Boh is proud to have been a part of this project and is honored to receive this award.



ABOUT THE PROJECT

The New Orleans Regional Transit Authority, in cooperation with the Federal Transit Administration, commissioned the development of the new Cemeteries Transit Center. This project created safer conditions for pedestrians and drivers, while improving connectivity between transfers for transit riders. The new Cemeteries Transit Center, originally planned to take place over 18 months, was constructed from start to finish in just four months.

The project was constructed directly adjacent to historic cemeteries and structures and is located on

top of a mass burial site. On several occasions, phases of the project had to come to a standstill, as remains were encountered during excavation, which required assessment and, at times, relocation. Still, throughout all these constraints, the project was completed within the tight four-month window.

The overhaul of the City Park Avenue intersection incorporated 1,585 linear feet of track and concrete track slab, new traffic signals on three vital thoroughfares (Canal Street, City Park Avenue, and Canal Boulevard), improved the roadway, added new pedestrian signals, added new bus and streetcar shelters, and added a covered walkway between transfer points.

BOH EMPLOYEE SPOTLIGHT



Curtis Prudhomme, Operator

Curtis Prudhomme has been a part of Boh Bros. for more than forty years. Currently, Curtis works as an operator, but started his career with Boh as a laborer. During Curtis' time, he has seen and experienced

the ordinary and sometimes out of the ordinary. "On one project, we had to create a makeshift dam to reroute water so we could excavate and lay pipe," he said. "On another, we had to worry about snakes in the trees." Wherever the projects take him, Curtis enjoys working with his crews and feels like everyone is part of a big family.



Kathleen "Elaine" Wilson, Laborer

A one-year veteran of Boh Bros., Elaine is a laborer in the Baton Rouge division. Although she has only worked on a few projects in her time with Boh, her favorite so far has been Yuhuang Chemical Inc. in

St. James Parish. Her reasons for enjoying this project were simple saying, "I liked that it was a wide open area and that it was completely new. Also, the project was in my backyard; I live about five minutes from the project site, so commuting was easy." When Elaine is not on a jobsite, she can be found volunteering at her local church.



Johnell Labrie, Carpenter

Stepping up to a challenge is exactly what Johnell Labrie, a carpenter and Boh employee of twenty years, likes to do. No matter if the project calls for square, triangular, or round forms, Johnell will make sure it

gets done, and done safely. "Put it in front of me and I will build it," he said. Johnell also enjoys working on projects that require him to travel. Some of his favorites have taken place in Lake Charles, Louisiana, and Pascagoula, Mississippi saying, "I appreciate the opportunity to meet new people and work in different environments."



Clifton Griffith, Carpenter Lead Man

Clifton joined Boh Bros. in early 2002 after previously working on the residential side of construction. Now, Clifton works on projects as a carpenter lead man and assists crews that build forms for bridge decks,

industrial plants, pump stations, and a variety of other projects. "It doesn't matter with Boh Bros., we do it," he said. "We make it happen." When the time came to make a move from New Orleans and closer to Baton Rouge, Clifton asked for a transfer saying, "I didn't want to leave the company because I love my job. It's fascinating work."



Terry Remonet, Carpenter Foreman

Working as a carpenter foreman, Terry ensures that his crew has everything necessary to get a job done safely and as planned. He coordinates daily with multiple crafts and notes that it takes a team effort to

make sure a project goes smoothly. Over Terry's thirty-five year career with Boh, two projects stand out the most: the GNO Bridge and Twin Spans (emergency repairs after Katrina). "The view from 185 feet above the river is something I won't forget," he said in regards to the GNO Bridge. As part of the night crew on the Twin Spans repair job Terry commented, "It was an interesting job because we weren't building it; we were putting the pieces back together."



Joel Duronslet, Jr., Laborer Foreman

Over the past twenty-five years, Joel has worked as a laborer, operator and now as a laborer foreman for Boh. "I have a passion for learning," Joel said. "On every project I learn something new, which makes

me better at my job." Joel credits Boh for helping him find his path in life and giving him the ability to acquire a craft. When asked about his time with Boh Joel said, "I wouldn't work anywhere else. This is my second family. When the owner shakes your hand and knows your name, that means something. You don't get that at every company."





P.O. Drawer 53226
New Orleans, LA 70153

Prsrt Std
U.S. Postage
PAID
New Orleans, LA
Permit No. 1273

www.bohbros.com



Spring-Summer Anniversaries

45 YEARS

Robert L. Doss
Royce J. Plaisance

40 YEARS

Billy W. Hubbard, Jr.
Gary M. Lipani

30 YEARS

Cynthia W. Borne
William H. Brundige, Jr.
Dwayne A. Declouette
Michael L. Kennedy
David S. Littlejohn, Jr.
Michael E. Sylvester

25 YEARS

Michael Alsobrooks III
Roger McCall

20 YEARS

Margaret I. Baggett
Ernest Chisholm
Anthony L. Fernandez
Ricky J. Hernandez
Michael E. Hornsby
Brian C. Lacoste
Dennis C. Leblanc
Joshua G. McIntyre
J. D. Miller
Brad J. Reidenauer
Glenn J. Schexnayder
Gail G. Untereiner

15 YEARS

Edgar L. Barabino IV
John P. Kellum
Keith D. Pace
Thomas J. Robeaux

10 YEARS

Alvin C. Abbott
Jason C. Aubin
Brock B. Audibert
Paul E. Brasel
Brandon A. Brooks
Nicholas A. Carollo
Merlin Clark
Kevin D. Gordon
Heath M. Guidry
Thad J. Guidry
Kevin M. Hannah
David J. Leblanc
Henry P. Mackey
Bong V. Nguyen
Loi Nguyen
David J. Poole
Mark J. Stevens, Jr.
Darryl L. Stevenson
Vinh Q. Tran
Matthew J. Vessier
Travis S. Wilhike
Matthew Williams
Bryant E. Woodson
Richard K. Ziegler

5 YEARS

Brian G. Bazajou
Henry E. Bustamante
Anne Gwin Duval
Ryan M. Gaubert
Ryan M. Hofmann
Ryan A. Lee
Christopher A. Sterling
Brittney A. Talbot
Brian O. Weber
Ronaldo R. Williams

Equal Employment Opportunity/Affirmative Action Policy

Boh Bros. is an equal employment opportunity/affirmative action employer. The objective of this Company is to recruit, hire, train and promote into all job levels the most qualified applicants without regard to race, color, religion, sex, national origin, age, disability or protected veterans status. All such decisions are made by utilizing objective standards based on the individual's qualifications as they relate to the particular job vacancy and to the furtherance of equal employment opportunity. All other personnel decisions such as compensation, benefits, transfers, layoffs, return from layoff, company sponsored training, education, tuition assistance, social and recreational programs will be administered without regard to race, religion, color, sex, national origin, age, disability or protected veterans status. Boh Bros. employees should refer to www.hrconnection.com for further information on this and other employment-related policies including Anti-Harassment, Discrimination and Retaliation Policy and Reporting Procedure.