



Sexual Harassment and Other Illegal Discrimination Policies

It is the Firm's policy to maintain a professional working environment for all employees, free of any form of unlawful discrimination or sexual harassment. Harassment or discrimination based on an individual's race, color, religion, sex, national origin, age, disability, marital status, sexual preference or veteran status is illegal and will not be tolerated.

This policy applies to all employees, vendors, service representatives and others doing business with the Firm.

We are all responsible for maintaining a work environment free of sexual harassment and other forms of impermissible discrimination. Your cooperation in preventing this type of conduct is essential.

Unacceptable Conduct

Awareness of and attention to the sensitivities of others are essential in maintaining a professional environment. Everyone must use mature judgment and maintain the highest standards of performance and personal conduct at all times. The unacceptable conduct outlined below is prohibited.

No supervisor shall threaten or insinuate, either explicitly or implicitly, that an employee's refusal to submit to sexual advances will adversely affect the employee's employment, evaluation, wages, advancement, assigned duties, shifts, or any other condition of employment or career development.

Verbal abuse and sexual, ethnic or racial slurs will not be tolerated. Any verbal, visual or physical conduct that belittles or demeans any individual on the basis of race, color, religion, sex, national origin, age, disability, marital status, sexual preference or veteran status is unacceptable conduct.

Other unacceptable conduct, whether committed by supervisory or non-supervisory personnel, includes any action which creates an offensive or hostile work environment, such as:

- Unwelcome sexual remarks, advances, propositions;

- Unwelcome touching or other physical contact;
- Unwelcome or repeated requests for dates or other social engagements;
- Graphic verbal comments about an individual's body;
- Sexually degrading words used to describe an individual;
- The display of sexually suggestive objects or pictures in the workplace;
- Threatening or profane language towards others;
- Jokes or pranks or other conduct considered by the Firm to be offensive or unprofessional.

Reporting Allegations of Harassment or other Impermissible Discrimination

Any employee who believes that the actions or words of a supervisor, manager, fellow employee, client, vendor or other visitor constitute harassment or discrimination must bring the problem to the Firm's attention immediately. If you believe you have been sexually harassed or discriminated against, you should immediately report such complaints to your immediate supervisor or manager. If the complaint involves someone in your direct line of supervision, you should inform another supervisor or the Director of Human Resources of the complaint.

You should also promptly advise your supervisor or manager or the Director of Human Resources, if you are harassed or discriminated against at work by a vendor, service representative or others doing business with the Firm, so that appropriate action may be taken.

Managers or supervisors receiving complaints of sexual harassment or other impermissible discrimination should immediately inform the Director of Human Resources.

Retaliation

No employee will suffer an adverse employment action as a result of reporting a claim of alleged sexual harassment or other form of illegal discrimination, even if the investigation produces insufficient evidence to support the complaint or if the charges cannot be proven. There will be no retaliation against any other individual who participates in the investigation of a complaint.

Retaliation is a serious violation of this policy and should be reported immediately. If you believe you have been retaliated against, please report this to the Director of Human Resources immediately. Any person found to have retaliated against another individual for reporting harassment or providing information concerning an act

of harassment will be subject to the same disciplinary action provided for harassment offenders.

Management Responsibilities

Each complaint of sexual harassment or illegal discrimination will be investigated promptly, thoroughly, impartially and in the most discreet manner possible.

Managers and/or supervisors who allow sexual harassment or unlawful discrimination to continue or fail to take appropriate corrective action upon becoming aware of such conduct may be considered a party to the offense, even though they may not have engaged in such behavior.

Managers and/or supervisors who fail to respond appropriately to allegations of sexual harassment or illegal discrimination will be subject to corrective action and/or disciplinary action, including termination.

Penalties

Any employee who engages in conduct determined to be sexual harassment or any other form of illegal discrimination, or who encourages such conduct by others, shall be subject to corrective action and/or disciplinary action, which may include termination.