

Non-Discrimination (also Gender Diversity, Ethnic Diversity)

It is the Company's policy to maintain a working environment where no employee is harassed on the basis of an individual's race, religion, color, sex, national or ethnic origin, citizenship status, age, marital status, military or veteran status, family status, physical or mental disability, sexual orientation or gender identity, or other such characteristics (together referred to as "personal characteristics") of the employee or his or her relatives, friends or associates.

Harassment is a verbal or physical conduct that demeans or shows hostility or aversion toward an individual because of his or her personal characteristics and that may be offensive to others, create an offensive, intimidating or hostile working environment, or interfere with another employee's work performance. Examples of such behavior are:

- Epithets, slurs, insults or negative stereotyping.
- Acts or jokes that are hostile or demeaning with regard to personal characteristics.
- Threatening, intimidating or hostile acts that relate to personal characteristics.
- Written or graphic material that demeans, ridicules or shows hostility toward an individual or group because of personal characteristics.

The Company will not tolerate any form of harassment of employees on the job by supervisors, other employees or by non-employees such as customer's clients, vendors or contractors.

An employee, who believes that he or she has been the object of harassment based on personal characteristics, or who observes an incident of such harassment, should report the matter immediately to his or her supervisor. A supervisor who observes an incident that may constitute harassment or who otherwise becomes aware of such an incident should immediately notify one of the Principals, who will arrange for an appropriate investigation. Upon completion of the investigation, the employees directly involved will be advised of the results.

An employee not satisfied with his or her supervisor's response to a complaint of harassment based on personal characteristics, or who for any reason feels uncomfortable discussing the matter with his or her supervisor (for example, if the complaint concerns the supervisor's conduct), may bring the complaint directly to the attention of one of the Principals. The complaint will be investigated, and the complaining employee will be advised of the conclusions.

To the fullest extent possible, all internal investigations of harassment complaints will be conducted confidentially.

Any supervisor or other employee who is found to have engaged in harassment of another employee based on his or her race, color, religion, gender, national origin, age or disability will be disciplined in accordance with the Company's discipline policy. Please note that a complaint regarding harassment based on personal characteristics may be filed with either of the agencies referred to at the end of the firm's Sexual Harassment Policy, above.

All questions regarding this policy should be directed to a Principal.