

3. EMPLOYMENT POLICIES

3.1. Employment at Will

Bora is an at will employer. This means that employment can be terminated, with or without cause, and with or without notice, at any time, at the option of the firm or at the option of the employee.

The policies contained herein are not to be construed as a contract of employment. Bora expressly reserves the right to change, add to, or delete policies at any time. Changes will be effective on dates determined by the company. Only Bora's management committee has authority to alter the policies, and all such changes will be issued to employees in either written or electronic format.

3.2. Diversity

Bora is committed to fostering, cultivating and preserving a culture of diversity and inclusion.

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well.

We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

Bora's diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Work/life balance through flexible work schedules to accommodate employees' varying needs.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.

All employees of Bora have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All employees are also required to attend and complete annual diversity awareness training to enhance their knowledge to fulfill this responsibility.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the company's diversity policy and initiatives should seek assistance from a Principal or HR.

3.3. Discrimination, Harassment and Retaliation

3.3.1. Nondiscrimination

Bora is an equal employment opportunity employer. All employees have the right to work in a discrimination-free environment. The Firm will not permit or condone any arbitrary discrimination in the workplace. It is our policy that employment decisions will be made without regard to race, color, sex, creed, sexual orientation, religion, age, national origin, disability or any other basis prohibited by state, local or federal laws. Anyone with a protected disability will be reasonably accommodated as appropriate.

3.3.2. Sexual Harassment

Bora prohibits sexual harassment of its employees by other employees or outside parties. Sexual harassment can negatively affect morale, motivation and job performance. It is inappropriate and will not be tolerated.

Sexual Harassment under this policy means unwelcome sexual advances, requests for favors and other offensive verbal or physical conduct of a sexual nature when: (a) submission to such conduct is made either explicitly, or implicitly, a term of condition of an individual's employment; (b) submission to, or rejection of, such conduct by an individual is used as the basis for employment decisions affecting such individual; or (c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

The intent of this policy is to address and prevent offensive conduct well before it rises to the level of unlawful sexual harassment. To this end, we view conduct covered by the policy to possibly include unwelcome verbal behavior such as comments, suggestions, jokes or derogatory remarks based on sex; physical behavior such as pats, squeezes, repeatedly brushing against someone's body or impeding or blocking normal work or movements; and visual harassment such as posting sexually suggestive or derogatory pictures, cartoons or drawings, even at one's workstation. It also may include unwanted sexual advances, pressure for sexual favors and/or basing employment decisions (such as an employee's performance evaluations, work assignments or advancement) upon the employee's acquiescence to conduct prohibited by this policy while in the workplace.

3.3.3. Workplace Harassment

Workplace harassment based on an employee's race, religion, age, disability, marital status, sexual orientation or other protected status can be a form of discriminatory behavior. It can negatively affect morale, motivation and job performance and may result in increased absenteeism, turnover, inefficiency and loss of productivity. It will not be permitted at the Firm.

The intent of this policy is to address and prevent offensive conduct well before it rises to the level of unlawful harassment. To this end, we view conduct covered by this policy to possibly include unwelcome slurs, comments, jokes, innuendos, compliments, pictures, cartoons, pranks and/or other verbal or physical conduct which creates an intimidating, hostile or offensive working environment or interferes with an individual's work performance or employment opportunities.

3.3.4. Individuals and Conduct Covered

These policies apply to all applicants and employees and prohibit inappropriate conduct, as defined above, and retaliation whether engaged in by fellow employees, by a supervisor or manager or by someone not directly connected to the Firm, such as vendors, guests or clients.

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

3.3.5. Retaliation is Prohibited

Bora prohibits retaliation against any individual who reports discrimination or harassment under our policies or participates in an investigation of such reports. Retaliation against an individual for reporting harassment or discrimination under our policies or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, and if established, will result in disciplinary action toward the offender.

3.3.6. Complaint Procedure

If you at any time feel that you are being harassed, or discriminated or retaliated against, as defined in these policies, please confront the person engaged in the conduct and ask that it stop. If you are uncomfortable doing this, or the conduct does not stop, be sure to bring this to the attention of your supervisor or someone on the Human Resources committee (currently defined as Pat Harrington and Dawn Ridenour) immediately. If you ever feel you have witnessed harassment of, or discrimination or retaliation against others, as defined in these policies, bring it to the attention of management or Human Resources.

Important Notice to All Employees: Employees who have experienced conduct they believe is contrary to this policy have an obligation to take advantage of this complaint procedure. An employee's failure to fulfill this obligation could affect his or her rights in pursuing legal action.

Bora will investigate the matter, as appropriately and as discreetly as possible. We will advise you generally of the results of the investigation. If the investigation shows that the accused employee violated this policy, the Firm will take appropriate disciplinary action, up to and including discharge. There will be no reprisal or retaliation for raising harassment or discrimination concerns. Discrimination, retaliation and sexual or workplace harassment are considered improper conduct and will not be tolerated by Bora.

3.3.7. Immigration Compliance

Bora is committed to employing only United States citizens and immigrants who are authorized to work in the U.S. We do not unlawfully discriminate on the basis of citizenship or national origin.

In compliance with the Immigration Reform and Control Act of 1986, each new employee must complete the Employment Eligibility Verification Form I-9 and present documentation establishing employment eligibility and identity. Former employees who are rehired must also complete the form regardless of the length of time between termination and rehire. Employees with questions or those seeking more information on immigration law issues are encouraged to contact anyone on the Human Resources committee.

3.3.8. Drug-Free Workplace

The goal of this policy is to maintain a drug-free workplace and to otherwise comply with the "Drug-Free Workplace Act of 1988." This means we provide a site for the performance of work done in connection with Federal contracts at which employees are prohibited from engaging in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance, as outlined in Section 202 of the controlled Substances Act (21 U.S.C. § 812), and as further defined in regulation at 21 CFR 1308.11-1308.15.

The unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is specifically prohibited in our workplace. Engaging in any of these prohibited activities will result in appropriate disciplinary action, up to and including termination. In addition, employees must notify Bora of any criminal drug statute conviction no later than five days after such conviction.

3.3.9. Personnel Records

Each employee completes various forms related to payroll and benefit information, as well as other internal personnel-related matters. This information, along with wage history and performance review records, is kept in the employee's personnel file and is available to the employee upon request. Please contact Human Resources for further information.

3.3.10. Employee Friendly

Bora will not resist or take action against employees for being involved in any attempt by employees to informally self-organize. Bora recognizes the right of employees to form a committee or council to discuss and resolve issues of important to employees.