

## Equal Employment Opportunity Policy

---

The Firm is committed to the principles of equal employment opportunity, and to compliance with all federal, state and local laws concerning discrimination in employment. To this end, the Firm ensures equal opportunity to all Employees and applicants regardless of race, color, sex, sexual orientation, marital status, religion, creed, ancestry, disability, age, weight, height, national origin, veteran status, citizenship status, or any other protected class under relevant state and federal laws.

This policy of equal opportunity will be observed with respect to all employment practices including, but not limited to, recruitment, hiring, job assignment, rank, transfer, Firm sponsored training and apprenticeship, re-employment, compensation, benefits, promotions, upgrading, demotion, downgrading, lay-off, terminations, social and recreational programs and all other terms and conditions of employment.

The Firm believes that equal opportunity is not only consistent with good business practices but, more importantly, it is a moral concern and obligation for each Person.

### Discrimination and Harassment Policy

The Firm reiterates its commitment to a work environment which promotes equal opportunity and in which all individuals are treated with respect and dignity. The Firm does not tolerate discrimination against or harassment of any of its Personnel, applicants or clients whether in the workplace or in outside work sponsored settings. Any form of discrimination and/or harassment related to an individual's race, color, sex, sexual orientation, marital status, religion, creed, ancestry, disability, age, weight, height, national origin, veteran status, citizenship status, or any other protected class under relevant state and federal laws is a violation of this Policy and will not be tolerated. Discrimination and harassment are specifically prohibited by law and this Policy will be enforced vigorously and speedily.

Discrimination includes a wide range of behaviors, which may include, but are not limited to: failure to hire, promote or otherwise advance an individual because of his or her race, color, sex, sexual orientation, age, disability, marital status, religion, creed, ancestry, national origin, weight, height or veteran status.

Harassment includes a wide range of overt and subtle behaviors, which may include, but are not necessarily limited to: slurs, jokes, other verbal, graphic, or physical conduct relating to an individual's race, color, sex, sexual orientation, age, disability, marital status, religion, creed, ancestry, national origin, weight, height or veteran status.

Voice mail and E-mail are quick and easy methods of transmitting messages. Therefore, think before you speak or write. Slurs and certain jokes or attempts at humor are inappropriate and might be actionable.

Discrimination and/or harassment, whether committed by a Partner or any Employee, is specifically prohibited as against Firm Policy. If any Person believes he or she has been the victim of discrimination and/or harassment in any form or have witnessed an act (or acts) of discrimination and/or harassment, regardless of who the offender may be, such Person is urged, encouraged and expected to discuss the incident promptly with a Partner, Supervisor, Manager, the HR Manager, the COO or a member of the Firm's Discrimination/Harassment Committee. Ultimately, the Firm's Discrimination/Harassment Committee must be made aware of the incident(s). The names of the members of the Discrimination/Harassment Committee are listed at the end of this Policy. All

---

complaints received by any Partner, Manager, Supervisor or any other Employee must be reported to a member of the Discrimination/Harassment Committee as soon as such complaint is received; failure to report such complaint may result in disciplinary action. All reports of discrimination and/or harassment will be acted upon speedily, and will be investigated discreetly and with sensitivity by the Discrimination/Harassment Committee.

Such investigation may include interviews with the accused, as well as interviews with witnesses to the alleged discrimination or harassment, if any.

If a member of the Discrimination/Harassment Committee is accused of discrimination and/or harassment, the investigation will be conducted by the other members of the Committee.

While the Firm's ability to deal with discrimination or harassment by an "outsider" (e.g., a client, vendor, outside counsel, etc.) is limited, nonetheless a complainant should report all incidents to a member of the Discrimination/Harassment Committee. A member of the Discrimination/Harassment Committee will, at a minimum, discuss the matter with the accused, if so requested by the complainant.

The Firm will maintain a written record of all discrimination and/or harassment complaints, the investigation and all findings. The Discrimination/Harassment Committee may require complaints to be reduced to writing.

While confidentiality will be maintained throughout the entire investigatory process to the extent practicable and appropriate under the circumstances to protect the privacy of the persons involved, each complaint will be investigated.

If the Discrimination/Harassment Committee finds that discrimination and/or harassment has occurred, its findings, as well as recommendations, may be presented to the Executive Committee for responsive action.

Misconduct constituting discrimination and/or harassment will be dealt with promptly and appropriately. Responsive action may include training, referral to counseling, and disciplinary action such as warnings, reprimands, withholding of a promotion, probation, reassignment, suspension without pay, compensation adjustments or discharge.

Retaliation against an individual who makes a report of alleged discrimination and/or harassment or assists in providing information in connection with a report of discrimination and/or harassment, would be a serious violation of this Policy. Acts of retaliation should be reported to the Discrimination/Harassment Committee promptly and will be handled with appropriate responsive action.

The Firm recognizes that the question of whether a particular course of conduct constitutes discrimination and/or harassment requires a factual determination. The Firm also recognizes that false accusations can have serious effects on innocent Persons. Therefore, if an investigation results in a finding that a Person who has accused another of discrimination and/or harassment has maliciously or recklessly made false accusations, the accuser will be subject to appropriate disciplinary action as described above, including suspension without pay or discharge.

Anyone directly involved in a discrimination and/or harassment investigation wishing the matter to be reconsidered, may submit a written request in a timely manner to the Discrimination/Harassment Committee with a copy to the Executive Committee.