

## **EQUAL OPPORTUNITY, AFFIRMATIVE ACTION, AND PAY EQUITY POLICY**

has implemented the following policies and procedures as part of our ongoing commitment to equal employment opportunity, affirmative action, and pay equity. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, leaves of absence, compensation, and training.

### Equal Opportunity Policy

is committed to maintaining a work environment that is free from any and all forms of unlawful discrimination and harassment. It is therefore the firm's policy to prohibit discrimination and harassment against any applicant,

employee, vendor, contractor, or client on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, pregnancy, veteran status, genetic information, citizenship status, or any other basis prohibited by law. It is also policy to prohibit any and all forms of retaliation against any individual who has complained of harassing or discriminatory conduct, or participated in a firm or agency investigation into such complaints.

### Affirmative Action Policy

is a federal contractor subject to Executive Order 11246, Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("Section 4212") and Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"). Accordingly, it is policy to take affirmative action to employ, advance in employment, and otherwise treat qualified minorities, women, protected veterans, and individuals with disabilities without regard to their race/ethnicity, sex/sexual orientation/gender identity, veteran status, or physical or mental disability. Under this policy, will also provide reasonable accommodation to the known physical or mental limitations of an otherwise qualified employee or applicant for employment, unless the accommodation would impose undue hardship on the operation of the firm's business.

affirmative action policy also prohibits employees and applicants from being subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in 1) filing a complaint, 2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503, Section 4212, or any other Federal, state, or local law requiring equal opportunity for disabled persons or covered veterans, 3) opposing any act or practice made unlawful by Section 503 or Section 4212 and their implementing regulations, or any other Federal, state, or local law requiring equal opportunity for disabled persons or covered veterans, or 4) exercising any other right protected by Section 503 or Section 4212 or their implementing regulations.

The non-confidential portions of the affirmative action program for individuals with disabilities and protected veterans shall be available for inspection upon request by any employee or applicant for employment by contacting Human Resources during normal business hours.

will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by , or (c) consistent with the firm's legal duty to furnish information.

With regard to the above paragraph, the term "pay" means any payments made to, or on behalf of, an employee or offered to an applicant as remuneration for employment, including but not limited to salary, wages, overtime pay, shift differentials, bonuses, commissions, vacation and holiday pay, allowances, insurance and other benefits, stock options and awards, profit sharing, and retirement. The term "compensation information" means the amount and type of compensation provided to employees or offered to applicants, including, but not limited to, the desire of the firm to attract and retain a particular employee for the value the employee is perceived to add to the contractor's profit or productivity; the availability of employees with like skills in the marketplace; market research about the worth of similar jobs in the relevant marketplace; job analysis, descriptions, and evaluations; salary and pay structures; salary surveys; labor union agreements; and contractor decisions, statements and policies related to setting or altering employee compensation. A job function may be considered "essential" if: (i) The access to compensation information is necessary in order to perform that function or another routinely assigned business task; or (ii) The function or duties of the position include protecting and maintaining the privacy of employee personnel records, including compensation information.

These policies reflect s belief that providing equal opportunity for all employees is an essential component of living our Vision, as well as good business practice. Equal opportunity requires the best effort from all of us.

## <sup>2</sup> Pay Equity

is committed to pay equity. Compensation at our firm is never based upon gender, sexual orientation, race, ethnic status, or other such factors. We consider a number of factors when evaluating compensation equity. In addition to multiple-leader involvement in compensation matters, HR conducts reviews of compensation to examine pay equity (typically several times each year). We incorporate guidance from employment law and equal employment opportunity/affirmative action specialists into our pay equity practices.

also supports and assists with efforts to expose diverse students to careers in our industry so that young males and females of all backgrounds will enter professions offering access to rewarding opportunities and pay. We encourage employees to help further this effort by talking with students about your career, education, and how your career choice has enabled you to personally make a difference.