

SASAKI POLICIES AND PRACTICES

Nondiscrimination and Anti-Harassment Policy

The firm is committed to creating and maintaining a work environment in which employees are treated fairly and with dignity, decency, respect, and in accordance with all applicable law. Through enforcement of this policy and by education of employees, the firm strives to prevent inappropriate conduct that could be considered unlawful harassment. In addition, the firm is committed to correcting any inappropriate conduct and to disciplining those who violate this policy.

All employees of Sasaki, regardless of position, are covered by, and are expected to comply with, this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Sasaki's policy against harassment also covers other individuals who have a relationship with the firm that enables the firm to exercise some control over the individual's conduct in places and activities that relate to the firm's work, which may include directors, officers, independent contractors, vendors, and clients.

While this policy sets forth Sasaki's goals of promoting a workplace that is free of unlawful harassment, the policy is not designed or intended to limit the firm's authority to discipline or take remedial action for workplace conduct which it deems unacceptable, regardless of whether that conduct satisfies the definition of unlawful harassment.

Sasaki does not permit behavior, whether physical, visual, electronic, verbal, or nonverbal in nature, that may constitute harassment of any kind based on race, color, religious creed, sex, national origin, ancestry, sexual orientation, pregnancy, veteran's status, age, marital status, gender identity or expression, genetic information, disability/handicap, military service, or on any other basis protected by law. Harassment is a form of employee misconduct that is demeaning to another person and undermines the integrity of the employment relationship.

This policy applies to all work-related settings and activities, both inside and outside the workplace, and includes business trips and business-related social events. It also extends to the company's property, including but not limited to its telephones, copy machines, facsimile machines, and computers and computer applications, such as email and internet access, which may not be used to engage in conduct that violates this policy.

Even where the unwelcome conduct is not sufficiently severe or pervasive to constitute actionable harassment under the law, Sasaki forbids unwelcome conduct in the workplace and in any setting related to the firm's business activities.

Unlawful Harassment Definition and Examples

It is against the firm's policy to engage in conduct that denigrates or shows hostility or aversion toward an employee because of an employee's race, color, religious creed, sex, national origin,

ancestry, sexual orientation, pregnancy, veteran's status, age, marital status, gender identity or expression, genetic information, disability/handicap, military service, or on any other basis protected by law.

Examples of unwelcome conduct prohibited by this policy include, but are not limited to the following:

- Conduct that unreasonably interferes with an individual's work performance, that creates an intimidating or offensive work environment, that otherwise adversely affects an individual's employment opportunities, and that implicates an employee's race, color, religious creed, sex, national origin, ancestry, sexual orientation, pregnancy, veteran's status, age, marital status, gender identity or expression, genetic information, disability/handicap, military service, or any other basis protected by law.
- Hostile physical contact, intimidating acts, threats of such actions or violence, or any other actions that may be considered threatening or hostile in nature and that implicate an employee's race, color, religious creed, sex, national origin, ancestry, sexual orientation, pregnancy, veteran's status, age, marital status, gender identity or expression, genetic information, disability/handicap, military service, or any other basis protected by law.
- Derogatory remarks, epithets, slurs, negative stereotyping, offensive jokes, teasing, the display or circulation of offensive printed, visual, or electronic materials or similar misconduct that implicates an employee's race, color, religious creed, sex, national origin, ancestry, sexual orientation, pregnancy, veteran's status, age, marital status, gender identity or expression, genetic information, disability/handicap, military service, or any other basis protected by law. Unlawful harassment can be physical, visual, verbal, or nonverbal conduct, and it can extend to smart phones and social media, for example, to include texting, sending MMS photos, tweeting, etc.

Sexual Harassment

Sexual harassment is a problem that deserves special mention. Sexual harassment is a form of employee misconduct that is demeaning to another person and undermines the integrity of the employment relationship. Through enforcement of this policy and by education of employees, Sasaki strives to prevent inappropriate conduct that could be considered sexual harassment. In addition, the firm is committed to correcting any inappropriate conduct and to disciplining those who violate this policy.

It is against the firm's policy to engage in harassment based on gender, including offensive conduct that is sexual in nature. Any hostile conduct based on gender is also forbidden by this policy regardless of whether the individual engaged in sexual harassment and the individual being harassed are of the same or different genders.

Sexual Harassment Definition and Examples

Harassment on the basis of sex constitutes unlawful sex discrimination. Unwelcome sexual advances, requests for sexual favors, and other conduct of a sexual nature constitute sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual
- 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

Examples of sexual harassment prohibited by this policy include, but are not limited to, the following:

- Unwelcome advances, demands, pressures, or requests for sexual acts or favors
- Offering employment benefits, such as favorable performance reviews, salary increases, promotions, increased benefits, or continued employment, in exchange for sexual favors
- Making or threatening reprisals after a negative response to sexual advances
- Repeated unwanted sexual flirtations, advances, or propositions
- Offensive physical contact such as unwanted patting, grabbing, pinching, brushing against another's body, or impeding or blocking movement
- Offensive visual conduct, including leering, making sexual gestures, or displaying offensive sexually suggestive objects or pictures, cartoons, or posters
- Offensively suggestive or obscene letters, notes, or invitations
- Offensive sexually oriented verbal comments, whistling, epithets, slurs, teasing, or jokes
- Continued or repeated verbal abuse of a sexual nature
- Graphic, degrading, or other sexual comments about an individual's appearance or sexual activity

Sexual harassment can be physical, visual, electronic, verbal, or nonverbal conduct, and it can extend to smart phones and social media, for example, to include texting, sending MMS photos, tweeting, etc.

Employee Responsibility

All employees are responsible for ensuring that the workplace is free from unwelcome conduct that is prohibited by this unlawful harassment policy. Employees are expected to avoid any behavior or conduct that could reasonably be interpreted or perceived as prohibited under this policy. No employees or officers are exempt from the requirements of this policy.

Reporting Procedures

Employees who believe they have experienced unlawful harassment have a responsibility to act. This responsibility applies whether the harassment is by any employee of the firm or other individual who has a relationship with the firm that enables the firm to exercise some control over the individual's conduct in places and activities that relate to the firm's work. Employees subjected to harassment are encouraged to directly inform the offending person(s) that such conduct is offensive and must stop. If, however, the employee does not wish to communicate directly with the alleged harasser(s), or if direct communication has been ineffective, then that employee should immediately notify HR. Although reports may be made verbally, employees are strongly encouraged to make any reports of harassment in writing, as doing so will assist in the investigation process.

In addition to the above, Massachusetts employees may file a formal complaint with either or both of the government agencies set forth below. Using the firm's complaint process does not prohibit employees from filing a complaint with these agencies. Each of the agencies has a 300-day time period for filing a claim.

The United States Equal Employment Opportunity Commission (EEOC)

John F. Kennedy Federal Building
475 Government Center
Boston, MA 02203-0506
+1 617 565 3200
+1 800 669 4000

The Massachusetts Commission Against Discrimination (MCAD)

One Ashburton Place, Room 601
Boston, MA 02108
+1 617 994 6000

Management Responsibility

Any manager or supervisor who has witnessed, heard, heard of, or otherwise been made aware of conduct that is or may be inconsistent with this policy or who receives a report of conduct, from any source whatsoever, that is inconsistent with this policy must report the matter immediately to HR.

Investigation and Corrective/Remedial Action

All reports of harassment that the firm receives pursuant to this policy will be promptly investigated in as confidential, timely, and thorough a manner as possible and in accordance with the requirements of applicable law. The firm recognizes that allegations of harassment and retaliation can be extremely sensitive. However, certain circumstances may require the firm to disclose such information in order to conduct a full and fair investigation or for other legitimate legal or business reasons. The firm official or any other person conducting the investigation will only involve those individuals necessary to complete the investigation. The steps to be taken during the investigation cannot be fixed in advance, but will vary depending upon the nature of the allegations. The investigation will generally begin with a private interview with the person filing the complaint, alleged victim (if not the person who filed the complaint), and the person alleged to have committed the misconduct. It may extend to witnesses of the alleged harassment. It is the responsibility of every employee to cooperate fully with an investigation.

When the investigation is completed, the investigator will, to the extent appropriate, inform the complaining party and the person alleged to have committed the misconduct of the results of the investigation. Any report or other writings that are generated in the course of the investigation are the firm's property and will not be shared with those who have been interviewed in connection with the investigation.

Based upon the findings of the investigation, prompt and appropriate action will be taken to address any violations of this policy. This may include disciplinary action, up to and including termination of employment, regardless of the job positions of the parties involved and whether the conduct amounts to a violation of this policy. Such action may include formal counseling, disciplinary suspension, or probation. If the person who engaged in inappropriate conduct is not a Sasaki employee, then the firm will take whatever corrective action is reasonable and appropriate under the circumstances.

The firm might conclude, depending on the investigation and findings, that no violation of the policy occurred, or that a conclusion cannot be reached as to whether a violation has occurred. In any event, the firm ordinarily will take steps to ensure that the individuals involved are reminded of this policy and the firm's commitment to a harassment-free work environment. Those involved in an investigation will also be cautioned about retaliation.

Retaliation

No hardship, loss of benefit, or adverse employment action may be imposed on an employee for complaining about or filing a good-faith complaint of harassment or discrimination. Further, employees may not be harmed in any way for cooperating with or otherwise participating in the investigation of a complaint. Retaliation is a serious violation of this policy.

If an employee believes that retaliation has occurred against any individual, the employee should immediately report it through the means described under "Reporting Procedures." Anyone who is found to have retaliated against an employee for complaining about or reporting a harassment or discrimination complaint, or for cooperating or otherwise participating in an investigation, will be subject to discipline, up to and including termination.