



SCHWARTZ SEMERDJIAN HAILE BALLARD & CAULEY LLP

Attorneys at Law

EQUAL EMPLOYMENT OPPORTUNITY POLICY

EQUAL EMPLOYMENT OPPORTUNITY

All persons are entitled to equal employment opportunity and Schwartz Semerdjian Haile Ballard & Cauley (hereinafter referred to as "Firm") does not unlawfully discriminate against its employees or applicants because of race, color, religion, sex, pregnancy, national origin, ancestry, age, marital status, sexual orientation, physical or mental disability or medical condition. Equal employment opportunity will be extended to all persons in all aspects of the employer-employee relationship, including recruitment, hiring, upgrading, training, promotion, transfer, discipline, layoff, recall and termination.

NONDISCRIMINATION POLICY

The Firm is committed to the right of all individuals to be treated fairly. It does not permit discrimination or harassment based on race, religion, gender, sexual orientation, age, national origin, marital status, political belief, or other illegal considerations. This includes all forms of discrimination or harassment, however subtle, including, for example, (i) racist, sexist, or other demeaning jokes, (ii) developing sexual relationships from which one could infer that favorable treatment by the Firm is conditioned upon the granting of sexual favors, and (iii) criticism of others that reference that person's race, sex or national origin.

If any employee believes that he or she is being discriminated against or harassed, he or she should immediately report the conduct to the Administrator or if the employee believes the Administrator is discriminating, he or she should immediately report the conduct to the Managing Partner. Likewise, if an employee observes conduct that he or she believes is discriminatory or harassing, that conduct should be reported immediately to the Administrator or the Managing Partner. All complaints will be promptly investigated.

No one will be penalized for asserting the right to work in an environment free from discriminatory harassment or insult, and no one will be penalized for reporting such discrimination.

SEXUAL HARASSMENT POLICY

1. The Firm prohibits sexual harassment of its employees in the workplace by any person and in any form.
2. Employees are not required to endure insulting, degrading, or exploitative sexual treatment or endure a hostile work environment because of sexual harassment.
3. No Firm employee may:
 - a. Threaten or insinuate, either explicitly or implicitly, that another employee's refusal to submit to sexual advances will adversely affect the employee's employment, evaluation, wages, advancement, assigned duties, or any other condition of employment or career development.
 - b. Make any employment decision affecting an individual based on the individual's submission to or rejection of unwelcome sexual advances, requests for sexual favors or other verbal conduct of a sexual nature.
 - c. Make unwelcome sexual flirtations, advances, requests, suggestive comments, or propositions;
 - d. Engage in verbal abuse of a sexual nature;
 - e. Make graphic verbal comments about an individual's body;
 - f. Use sexually degrading words to describe an individual;
 - g. Leer, display sexually suggestive objects or pictures, or make sexual gestures;
 - h. Engage in unwelcome touching such as hugging, pinching, kissing, patting or brushing against another employee;
 - i. Engage in any other sexual activity that creates a hostile, intimidating, or offensive work environment.
4. Any employee who believes that he or she has been the subject of sexual harassment should report the alleged act immediately to the Administrator or the Managing Partner. Every effort will be made to ensure that complaints of sexual harassment are investigated and resolved promptly, confidentially and effectively. The Firm will undertake an appropriate follow-up investigation and take appropriate measures to assure the harassment has stopped and does not recur. Violation of the sexual harassment policy will result in discipline up to and including discharge.
5. No employee or supervisor shall in any way retaliate against another employee for making a complaint of sexual harassment or for participating in a Firm investigation regarding sexual harassment. However, the Firm does take claims of

sexual harassment very seriously and such claims can have significant effects on the employment and reputation of the accused harasser. Therefore, it is a violation of this policy to make false accusations of harassment or to fail to honestly answer questions during an investigation, or to fail to cooperate in an investigation, or to fail to maintain the confidentiality of an investigation. Any employee engaging in that conduct will be subject to discipline up to and including termination.

6. Because the Firm believes very strongly in a workplace free of sexual harassment, the Firm discourages dating and sexual relationships of any kind between its Employees.

DISSEMINATION OF POLICY

To ensure that all employees, applicants for employment, and the public are aware of the Firm's policy on Equal Employment Opportunity (EEO) and its commitment to nondiscrimination and all applicable Federal and State civil rights laws, the following has been developed:

INTERNAL DISSEMINATION

1. The Firm's EEO Policy and the Federal and State Notice of Equal Employment Opportunity are to be posted in locations accessible to all employees.
2. The Firm's EEO Policy shall be included in the employee handbook. New employees will be given a copy of the Firm's EEO Policy and sign an acknowledgment of receipt of the policy.
3. At a minimum of once a year, during employee meetings, the Firm's EEO Policy will be discussed and reviewed.
4. During orientation for all new employees, the Firm's EEO Policy will be discussed and reviewed.
5. At a minimum of once a year, the Firm's EEO Policy will be reviewed with those in supervisory positions.
6. As part of the Firm's annual performance evaluation process, those in supervisory positions will also be reviewed for their adherence and performance under the Firm's EEO Policy.

EXTERNAL DISSEMINATION

1. The Firm will discuss its EEO Policy with vendors with whom it anticipates doing business, as well as include the appropriate EEO clause in all purchase orders, leases and contracts (either by reference or in its entirety).
2. The Firm will notify unions and/or community organizations with which we have an agreement or other contract or understanding of our EEO commitment.
3. The Firm will post on its public website (www.sshbclaw.com) a PDF file of the EEO Policy that any user may access and download.

DISSEMINATION IN RECRUITMENT

1. All recruiting services will be provided written notification of employment opportunities, and be informed of the Firm's EEO Policy.
2. The phrase "AN EQUAL OPPORTUNITY EMPLOYER" will be used in all recruitment advertisements.
3. The Firm will maintain a current record of each walk-in applicant and referrals from unions, recruitment sources, or community organizations.
4. The Firm will encourage all current employees to recruit candidates for employment opportunities within the firm.
5. The Firm will provide on-the-job training opportunities and/or training programs for all of its employees, including apprenticeship, trainee and promotional programs relevant to the Firm's employment needs.

RESPONSIBILITY FOR THE EQUAL EMPLOYMENT OPPORTUNITY PLAN

The Administrator and the Firm's Partners provide the policy direction and set the tone which ultimately determines the success of the plan.

The Administrator has the principal responsibility for developing and maintaining the personnel system including recruitment/selection, classification, payroll and equal employment opportunity.

The Firm's attorneys are required to carry out their duties in directing work product without regard to non-job related factors.

DATA COLLECTION, EVALUATION AND ANALYSIS

An information system will be maintained to provide the data and information necessary for analysis and for the evaluation of progress in equal employment opportunity. The data will be generated on a regular basis and will include, but not be limited to the following: current workforce composition by race, sex, age, job classification and department; and turnover data by race, sex, age, job classification and department

The Administrator is responsible for data collection and analysis, the monitoring and evaluating of all employment processes including recruitment, hiring, training and promotion for compliance with EEO principles.

The Administrator shall render an annual written report to the Firm's Managing Partner regarding program progress.

CONCLUSION

It is this Firm's policy not to discriminate against minorities or women with respect to recruitment, hiring, training, promotion and other terms and conditions of employment, provided the individual is qualified to perform the work available.

The Firm's working environment is non-segregated. The Firm's office is located in a building which provides separate restrooms for women and men to assure privacy between the sexes.

If you have any questions regarding this policy, please see the Administrator or the Managing Partner.