

## STRATEGIC LEGAL SOLUTIONS

### FULL AND PART-TIME EMPLOYEE ANTI-DISCRIMINATION/HARASSMENT POLICIES

#### **Anti-Discrimination/Harassment Policy**

It is the policy of the Company to maintain a work environment in which all individuals are treated with respect and dignity. The Company does not tolerate discrimination against, or harassment of, any of its employees, applicants, or contract personnel whether in the workplace, client offices or in work-sponsored outside settings. Any form of discrimination and/or harassment based on an individual's race, creed, color, gender, sexual orientation, gender identity, marital status, age, religion, veteran status, alienage or citizenship status, national origin or ancestry, handicap or disability, medical condition, pregnancy, childbirth and related medical conditions, genetic information, or any other classification protected by federal, state, or local law is a violation of this Policy and will not be tolerated. Any form of discrimination based on these protected categories will not be tolerated and includes, but is not limited to, discrimination in hiring, promotion, demotion, benefits, and termination of employment. Furthermore, those employees, applicants or contract personnel who need an accommodation because of a disability or because of his or her religious beliefs should inform the Company.

#### **Sexual Harassment Policy**

The Company is committed to creating and maintaining a work environment which promotes equal opportunity so all individuals are treated with respect and dignity and where illegal discrimination, including sexual harassment, does not occur. Sexual harassment, whether verbal, physical or environmental, and whether in the workplace itself or in outside work-sponsored settings, is not acceptable and will not be tolerated. Sexual harassment is specifically prohibited by law and this Policy will be enforced diligently.

As defined by the courts and by the Equal Employment Opportunity Commission, sexual harassment includes any unwelcome or unwanted gender-based conduct: (1) when an employee's submission to or rejection of this conduct affects decisions regarding hiring, evaluation, promotion or any other aspect of employment; or (2) when such conduct substantially interferes with an individual's employment or creates an intimidating, hostile or offensive work environment.

It is not easy to define exactly what actions or course of conduct will constitute sexual harassment in any particular case because it will depend on the specific facts and circumstances, including how pervasive, abusive or serious the behavior is. Examples of inappropriate behavior which may constitute sexual harassment include, but are not limited to:

- coerced sexual acts;
- express or implied demands for sexual favors in exchange for favorable reviews, assignments, promotions, continued employment or promises of continued employment;
- unwelcome sexual advances;
- touching or assaulting an individual's body, or staring in a sexual manner;
- graphic, verbal commentary about an individual's body or sexuality;

- o repeated sexual jokes, sexual language, sexual epithets, sexual gossip, sexual comments or sexual inquiries;
- o repeated and unwelcome flirtations, advances, or propositions;
- o repeatedly asking a person working for the Company for a date after the worker has indicated that he or she is not interested;
- o sexually suggestive or obscene comments or gestures;
- o the display in the workplace of graphic and sexually implicit or suggestive objects, pictures or graffiti; including those posted from the internet onto a PC monitor;
- o negative statements or disparaging remarks consistently targeted at any gender, even if the content of the verbal abuse is not sexual in nature; or
- o retaliation against a person working for the Company, for complaining about any of the types of behavior described above.

The types of behavior described above are only examples of prohibited harassment behaviors and are unacceptable not only in the workplace, but also in other work-related settings such as client offices, business trips or business-related social events.

### **Individuals Covered by this Policy**

All Company employees are subject to this policy including Company officers. Contract personnel working for the Company are also subject to and protected by this Policy. Any type of harassment, whether engaged in by fellow employees, supervisors, officers, or by contract personnel working for the Company, is contrary to this policy and will not be tolerated. The Company encourages the reporting of all incidents of harassment, regardless of who the offender may be.

### **Reporting a Complaint**

The Company encourages applicants, employees, or contract personnel who believe they are being improperly harassed or discriminated against to firmly and promptly notify the alleged offender that his or her behavior is unwelcome. However, we also recognize that perceived power and status disparities between an alleged offender and a victim may make such a confrontation difficult. Therefore, whether or not the offensive behavior is discussed with the alleged offender, individuals who believe they have been subjected to improper harassment or discrimination should report the incident to the Manager of Human Resources and/or any member of Senior Management. The current Manager of Human Resources, Nicole Brello, may be reached at 212-944-9112 ext. 201 or nbrello@strategiclegal.com. The Company will accept any and all complaints from applicants, employees, or contract personnel who wish to file internal complaints with the Company, whether formally or informally.

The filing of anonymous harassment or discrimination complaints is also permitted through the use of a physical or electronic "drop-box." The physical mailbox is entitled "Anonymous" and is located in the front reception area at the Company's 110 East 42nd Street office. Any submission made to this physical mail box are received by the Manager of Human Resources, Nicole Brello. Additionally, the Company has a URL, <http://www.suggestionox.com/response/HCxNjr>, in which anonymous suggestions and complaints can be made. The Manager of Human Resources, Nicole Brello, will receive these written suggestions and complaints.

Furthermore, the Company has a designated email address, hrmanager@strategiclegal.com, where employees can email any concerns, suggestions, or complaints. While this email address does not provide anonymity, as the sender's email address is left on the server, any concerns, suggestions, or complaints made through this email address go directly to the Manager of Human Resources, Nicole Brello.

Under no circumstance is any employee or contract personnel required to report the alleged discrimination or harassment to the alleged offender.

The prompt reporting of complaints will, in turn, enable the Company to take prompt remedial action where appropriate. However, due to the sensitivity of these problems, we will not impose a time limitation for reporting discrimination and harassment complaints. Late reporting of complaints will not, in and of itself, prevent the Company from responding to the complaint.

The Company encourages applicants, employees, and contract personnel to report acts of harassment or discrimination by non-employees, such as customers, vendors, contract personnel, other service providers and any other non-employees. Applicants, employees, and contract personnel also have the right to file a Charge of Discrimination with the Equal Employment Opportunity Commission (EEOC) or another appropriate government agency and to participate in the investigation of any Charge without fear of retaliation.

All allegations of harassment or discrimination will be promptly investigated to the extent necessary to reach a reasonable conclusion concerning the allegations. The Director of Human Resources will be responsible for ensuring that a proper investigation of all complaints is conducted and for the protection of employees and contract personnel from retaliation.

The Company will promptly provide the complainant a summary of the conclusions reached through the investigation and a description of any action to be taken in response.

If the Company finds that harassment or discrimination occurred, it will take prompt and appropriate corrective action and the offender will be subject to appropriate disciplinary action up to and including termination of employment or other working relationship.

If the complainant or the alleged offender is dissatisfied with the outcome of the investigation, either individual has the right to seek reconsideration of the decision. The dissatisfied party should submit his or her written comments in a timely manner to the Director of Human Resources and/or any member of Senior Management.

### **No Retaliation**

The Company will not in any way retaliate against an applicant, employee, or contract personnel who makes a report of perceived harassment or discrimination, who opposes practices he or she considers to be discriminatory, who participates in protected activity under the law, or who provides information related to complaints of discrimination. Retaliation is a serious violation of the Company's harassment and discrimination policies and anyone who feels they have been subjected to any acts of retaliation should immediately report such conduct by following the complaint procedure set forth in this Policy. Any person who retaliates against another individual for reporting any perceived acts of harassment or discrimination will be subject to disciplinary action up to and including termination of employment or other working relationship.

The Company has developed and shall implement this Policy to ensure that all its employees and contract personnel can work in an environment free from discrimination and harassment.