

**EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION PROGRAM
STATEMENT OF POLICY**

Berdon LLP is committed to a program of equal employment opportunity without regard to race, color, ethnicity, national origin, ancestry, citizenship, sex, pregnancy, sexual orientation, gender identity, age, religion/creed, handicap/disability, genetic information/history, military/veteran status, or any other characteristic or condition protected by law. It is the policy of Berdon not merely to refrain from employment discrimination as required by the various federal, state, and local enactments, but to take positive affirmative action to employ and advance in employment minorities, women, individuals with disabilities and protected veterans, and to treat qualified individuals without discrimination on the basis of their protected class, physical or mental disability or veteran status.

In furtherance of this policy, Berdon will:

1. Recruit, hire, train and promote persons of all job classifications, without regard to race, color, ethnicity, national origin, ancestry, citizenship, sex, pregnancy, sexual orientation, gender identity, age, religion/creed, handicap/disability, genetic information/history, military/veteran status, or any other characteristic or condition protected by law.
2. Ensure that promotion decisions are in accord with principles of equal employment opportunity by imposing only job-related requirements for promotion opportunities.
3. Ensure that all personnel actions, such as compensation, benefits, transfers, layoffs, return from layoff, leaves, and Berdon-sponsored training, education, social and recreation programs will be administered without regard to race, ethnicity, color, national origin, gender, religion, age, sexual orientation, veteran status, disability or other protected status.
4. Take affirmative action on behalf of women, people of color, individuals with disabilities and veterans to actively recruit and place qualified members of these groups for employment with Berdon;
5. Provide for the prompt, thorough, and impartial consideration of all complaints.
6. Identify and analyze problem areas in employment of women and people of color, and establish procedures for the elimination of such deficiencies; provide a program of action toward these ends and timetables for the achievement of equal employment opportunity in accordance with the spirit of the law.
7. Take affirmative action to eliminate problem areas and to achieve certain goals, and continually measure, records, and report on progress toward their realization.
8. Make a good faith effort to reasonably accommodate the physical and mental limitation of any employee or applicant for employment or for religious purposes unless such accommodation imposes an undue hardship on the conduct of our business.

The HR Supervisor has been appointed the role of the Equal Opportunity/Affirmative Action Officer and is responsible, among other duties, for designing and implementing an internal audit and report system that will:

- i. Indicate the need for remedial action, if any;
- ii. Measure the effectiveness of Berdon's program; and
- iii. Determine the degree to which Berdon's goal and objectives have been achieved.

Employees who need assistance in the clarification or resolution of EEO matters should contact their manager or the Human Resources office. If the circumstances make reporting an issue to

either of these individuals difficult, feel free to contact any member of management. Retaliation against any employee for making an EEO claim or participating in the investigation of a complaint is strictly prohibited and will not be tolerated.

On a strictly voluntary basis, Berdon invites all individuals with a disability and protected veterans who are either employees or applicants for employment, and who wish to participate under Berdon's Affirmative Action Program to identify themselves to their manager or the Human Resources department. Any individual who identifies himself/herself will not be subjected to any form of harassment or retaliation based on his/her status or self-identification. Further, this self-identification will be kept confidential. If you are interested in viewing the AAP for Employees with Disabilities and/or Protected Veterans, please contact the HR Supervisor during regular working hours.

The Chief Executive Officer fully supports the Affirmative Action Program and directs the responsibility of all those with employment responsibility to seek to achieve the stated aims of this program. Moreover, it is the responsibility of each and every member of the staff of Berdon to assist in achieving the aims of this policy and to make equal opportunity an actual, functioning condition of work life at Berdon.