

### ***EQUAL EMPLOYMENT OPPORTUNITY***

Management Consulting Group (MCG) is committed to providing equal opportunity in all areas of recruitment, employment, assignment, transfer, promotion, compensation, benefits, and training as well as any Company sponsored education, social, or recreational program. It is MCG's policy that employees and applicants will not be discriminated against because of race, color, national origin, creed, religion, religious affiliation, age, sex, marital status, disability, veteran status, or any other protected status. Unlawful discrimination, including harassment, will not be tolerated.

Harassment of individuals based on race, color, national origin, creed, religion, religious affiliation, age, sex, marital status, disability, veteran status, or any other protected status is prohibited. Unlawful harassment can take many forms. It may be, but is not limited to, words, signs, offensive jokes, cartoons, pictures, posters, e-mail jokes or statements, pranks, intimidation, physical assaults or contact, or violence. Prohibited harassment may also take the form of other verbal or non-verbal conduct, including derogatory statements not directed to the targeted individuals, but taking place within their hearing or sight.

All employees, supervisors, managers, and officers shall comply with the Company's Equal Employment Opportunity policies and procedures and the laws prohibiting discrimination. Any person who violates such policies, procedures, or laws shall be subject to appropriate disciplinary action, up to and including discharge.

All complaints shall be investigated promptly, thoroughly, and impartially. Employees and others may, at any time, raise concerns or complaints without fear of retaliation about matters they perceive to be unlawful. Any person who believes he or she has been discriminated against should promptly report the matter using the following procedure:

- 1) You may report the matter to your manager. All managers who receive such reports shall immediately notify Todd Ghanizadeh in the MCG office. MCG will conduct an investigation and respond.
- 2) You may report the matter directly to Todd Ghanizadeh in the MCG office. MCG will investigate the matter and respond.

When an issue involves your manager, you should report the matter directly to Todd Ghanizadeh. You may, at any time, directly contact Todd at MCG with any concerns.

MCG will protect the confidentiality of persons using this procedure to the extent possible.

### ***SEXUAL HARASSMENT***

MCG has established a strict policy prohibiting unlawful harassment of employees, including implied or expressed forms of sexual harassment. Title VII of the Civil Rights Act of 1964 provides that it shall be an unlawful discriminatory practice for any employer, because of the sex of any person, to discharge, refuse to hire, or otherwise discriminate against that person with respect to any matter directly or indirectly related to employment.

Harassment of an employee on the basis of sex violates this federal law.

To help define unlawful sexual harassment, the Equal Employment Opportunity Commission issued guidelines stating that unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature will constitute unlawful sexual harassment when:

- 1) Submission to sexual conduct is an explicit or implied term or condition of an individual's employment;
- 2) The submission to or rejection of sexual conduct by an individual is the basis for any employment decision affecting that individual; or
- 3) Sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature have the purpose or effect of unreasonably interfering with an individual's work performance or create an intimidating, hostile or offensive working environment.

Examples of hostile, intimidating, and offensive environment include, but are not limited to the following: pictures, cartoons, symbols, or apparatus found to be offensive and which exist in the workspace of an employee, or inappropriate pictures or materials from computer systems. It is against MCG's policy to download any inappropriate pictures or materials from computer systems.

Sexual harassment can take many forms. It may be, but is not limited to: words, signs, offensive jokes, cartoons, pictures, posters, e-mail jokes or statements, pranks, intimidation, physical assaults or contact, or violence. Additionally, gender-based harassment may not necessarily be sexual in nature. It may take the form of other verbal or non-verbal conduct, including derogatory statements not directed to the targeted individuals, but taking place within their hearing or sight.

MCG will not tolerate any form of sexual harassment in the workplace, including acts of non-employees. Employees and others may, at any time, raise concerns or complaints without fear of retaliation about matters they perceive to be unlawful.

Complaints shall be investigated promptly, thoroughly, and impartially. Any person who believes he or she has been harassed or retaliated against should promptly report the matter using the following procedures:

- 1) You may report the matter to your manager. All managers who receive such reports shall immediately notify Todd Ghanizadeh in the MCG office. MCG will conduct an investigation and respond.
- 2) You may report the matter directly to Todd Ghanizadeh in the MCG office. MCG will investigate the matter and respond.

When an issue involves your manager, you should report the matter directly to Todd Ghanizadeh. You may, at any time, directly contact Todd at MCG with any concerns. MCG will protect the confidentiality of persons using this procedure to the extent possible.

If it is determined that sexual harassment has occurred, appropriate disciplinary action, up to and including discharge, will be taken. The severity of the discipline will be determined by the severity and frequency of the offense or other conditions surrounding the incident.

## ***AMERICANS WITH DISABILITIES ACT***

### ***Summary of Commitment & Policy***

MCG is committed to extending equal employment opportunities to qualified individuals with disabilities in

compliance with all applicable provisions of the Americans With Disabilities Act (ADA) and all similar applicable federal, state and local laws. Thus, it is the Company's policy not to discriminate against qualified individuals with disabilities and to provide reasonable accommodations as required by law to qualified applicants and employees with disabilities in all employment practices, including recruitment, hiring, training, promotion, transfer, job assignments, compensation, benefits, discipline and discharge.

No program or activity administered by the Company shall unlawfully exclude from participation, deny benefits to or discriminate against any individual by reason of his or her disability. The Company will provide reasonable accommodation to the known physical or mental limitations of a qualified disabled applicant or employee in accordance with all applicable laws.

### ***Summary of Procedures for Requesting Accommodations***

Applicants or employees should request a reasonable accommodation by making such needs known to the Company. Applicants who, because of a disability, need an accommodation in order to complete the Company's application process or perform the essential functions and/or physical demands of the job they are seeking, should contact MCG.

Qualified individuals employed by the Company who, because of a protected disability, need an accommodation to perform the essential functions and/or physical demands of their assigned job or a job to which they wish to transfer, should contact MCG. An individual seeking an accommodation should specify what accommodation he or she needs. Any accommodation requests and related information, including any medical documentation, will be treated as confidential and kept apart from the employee's personnel record.

The Company will engage in an interactive dialogue with the individual requesting accommodation to identify the barriers that make it difficult for the individual to have an equal opportunity to perform his or her essential job functions. The Company will identify possible accommodations that might enable the individual to perform his or her essential job functions. Possible accommodations will include those job modifications or adjustments or changes to the work environment, which are reasonable and would not pose an undue hardship for the Company and its operations. The ADA does not require an employer to make any modification, adjustment, or change in a job that would fundamentally alter the essential functions of the job in question.

### ***Prohibited Conduct***

The Company prohibits and will not condone discrimination against or harassment of an applicant or employee because of a physical or mental disability or medical condition. The Company also

prohibits any retaliation against an individual for having complained of conduct alleged or perceived to be in violation of an individual's right to equal employment opportunities. This prohibition applies to retaliation against an individual for having complained within the Company or having filed a complaint or lawsuit against the Company with an administrative agency or a court.

All complaints shall be investigated promptly, thorough, and impartially. Any person who believes he or she has been discriminated or retaliated against should promptly report the matter using the following procedure:

- 1) You may report the matter to your manager. All managers who receive such reports shall immediately notify MCG. MCG will conduct an investigation and respond.
- 2) You may report the matter directly to Todd Ghanizadeh in the MCG office. MCG will investigate the matter and respond.

***ACKNOWLEDGMENT OF RECEIVING REVISED EQUAL EMPLOYMENT OPPORTUNITY POLICIES***

I acknowledge receiving copies of and reading the MCG policies entitled Equal Employment Opportunity, Sexual Harassment, and Americans with Disabilities, as revised. I understand that these policies supercede and replace all prior policies pertaining to these subjects, including any policies that I may have previously received or signed.

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Employee Signature

Date

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Printed Employee Name

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Employee Assignment Location (Company)