



POLICY PROHIBITING HARASSMENT, DISCRIMINATION AND RETALIATION

Solomon Page Group LLC (the “Company”) strictly prohibits and does not tolerate discrimination against employees, applicants, interns, or any other covered persons because of race, color, religion, creed, national origin or ancestry, ethnicity, sex, gender (including gender nonconformity and status as a transgender or transsexual individual), age, physical or mental disability, citizenship, military status (including past, current, or prospective service in the uniformed services), genetic information, predisposing genetic characteristics, marital status, partnership status, sexual orientation, caregiver status and any other characteristic protected by applicable federal, New York State or New York City law.

SEXUAL HARASSMENT AND PROTECTED CLASS HARASSMENT

The Company is committed to maintaining an environment that is built on mutual respect and is free from discrimination and harassment. In keeping with this goal, the Company will not tolerate sexual harassment or harassment of any kind of its employees by anyone, including, but not limited to any supervisor, co-worker, volunteer, vendor, visitor, client or customer. Likewise, the Company strictly prohibits any employee from engaging in sexual harassment or harassment of any kind against an applicant for employment, intern (whether paid or unpaid), independent contractor, subcontractor, vendor, consultant, or any other individual conducting business with the Company (collectively referred to as “third parties”). This policy applies regardless of an individual’s immigration status. Additionally, this policy applies not only while an individual is on Company premises, but also in any setting related to the individual’s employment and/or engagement with the Company (including events and/or travel outside the office).

To achieve our goal of providing a workplace free from sexual and protected class harassment, we have included in this policy definitions and examples of conduct that will not be tolerated and have provided a procedure by which employees who believe they have encountered harassment can formally complain.

SEXUAL HARASSMENT

The Company specifically prohibits workplace sexual harassment, which it considers a form of employee misconduct. Workplace or work-related sexual harassment constitutes discrimination and is illegal under federal, state and local laws and will not be tolerated by the Company. The prohibition against sexual harassment applies equally to male and female employees, and includes harassment where the harasser and the victim are the same sex or the opposite sex such as men toward men, women toward women, men toward women, and women toward men. It also includes harassment on the basis of sexual orientation, self-identified or perceived sex, gender expression, gender identity and transgender status.

For the purposes of this policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment or a third party’s engagement;
2. Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual’s employment (such as favorable reviews, salary increases, promotions, increased benefits or continued employment); or
3. Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive environment, even if the complaining individual is not the intended target of the sexual harassment.



Although it is not possible to list all examples of conduct that constitute sexual harassment, the following are some examples of conduct that, if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances, including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances—whether they involve physical touching or not
- Requests for sexual favors in exchange for actual or promised job benefits, such as a favorable review, salary increase, promotion, etc.
- Touching in a way that may make an employee feel uncomfortable, such as kissing, hugging, patting, pinching or intentional brushing against another's body
- Making obscene gestures
- Displaying sexually suggestive objects, pictures, posters, cartoons, screensavers, calendars, etc.
- Sending email or voicemail messages containing sexual content or references
- Use of sexual epithets, jokes, vulgar or offensive conversations, teasing, or gossip regarding one's sex life, deficiencies, or prowess, or that of another
- Commenting about a person's physical appearance in a suggestive manner
- Inquiries into one's sexual experiences or discussion of one's sexual activities
- Sex stereotyping, i.e., actions indicating that a person's conduct or personality traits are inappropriate because they may not conform to others' ideas or perceptions about how individuals of a particular sex should act or look
- Other conduct directed toward a person because of his or her gender or sexualorientation
- Other verbal or physical conduct of a sexual nature

PROTECTED CLASS HARASSMENT

Harassment on the basis of any protected characteristic is also strictly prohibited. Under this policy, harassment is unwelcome verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, creed, national origin, alienage, ancestry, ethnicity, sex, gender (including gender nonconformity and status as a transgender or transsexual individual), age, physical or mental disability, citizenship, military status (including past, current, or prospective service in the uniformed services), genetic information, predisposing genetic characteristics, marital status, partnership status, sexual orientation, caregiver status or any other characteristic protected by applicable federal, New York State or New York City law, and that:

1. Has the purpose or effect of creating an intimidating, hostile or offensive environment;
2. Has the purpose or effect of unreasonably interfering with an individual's performance; or
3. Otherwise adversely affects an individual's employment or other economic opportunities.

Although it is not possible to list all examples of conduct that constitute protected class harassment, the following are some examples of conduct which, if unwelcome, may constitute harassment depending upon the totality of the circumstances, including the severity of the conduct and its pervasiveness:

- Use of derogatory words, phrases, epithets, jokes, slurs or negative stereotyping
- Committing threatening, intimidating or hostile acts towards an individual or group based on a protected class trait
- Sending e-mail or voicemail messages containing derogatory statements regarding a particular ethnic group, race, religion or other legally protected status
- Demonstrations of a racial or ethnic nature such as use of gestures, pictures or drawings which would offend a particular protected individual or group
- Comments about an individual's skin color or other racial/ethnic characteristics
- Making disparaging remarks about an individual's gender that are not sexual in nature
- Negative comments about an individual's religious beliefs (or lack of religious beliefs)
- Expressing negative stereotypes regarding an individual's birthplace or ancestry
- Negative comments regarding an individual's age
- Derogatory or intimidating references to an individual's mental or physical impairment



Please note that while this policy sets forth our goals of promoting a workplace that is free of unlawful harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of unlawful harassment.

RETALIATION IS PROHIBITED

Unlawful retaliation can be any action that could discourage an employee from coming forward to make or support a harassment or discrimination claim and is prohibited by federal, state, and local law. New York State law protects any individual who has engaged in "protected activity." Protected activity occurs when a person has: made a complaint of harassment, either internally or with any anti-discrimination agency; participated in an investigation of a harassment complaint; testified or assisted in a proceeding involving harassment under applicable law; opposed unlawful harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment; reported that another employee has been harassed; or encouraged a fellow employee to report harassment. Even if the alleged harassment does not turn out to rise to the level of a violation of law, the individual is protected from retaliation if the person had a good faith belief that the practices were unlawful. However, this retaliation provision is not intended to protect persons making intentionally false charges of harassment.

Retaliation against any employee for reporting discrimination or harassment or for participating in an investigation of a claim of discrimination or harassment is a serious violation of this policy and will result in the violator being subject to disciplinary action, up to and including termination of employment. Further, retaliating against third parties who have complained about sexual harassment or cooperated in an investigation of a sexual harassment complaint is strictly prohibited under this policy.

COMPLAINT PROCEDURE

The Company requires the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals (including any interns or third parties) who believe that they have experienced or witnessed conduct that they believe is contrary to the Company's policy must report such issues to Kathy Brown, Vice President of Human Resources. Complaints may be made using the Complaint Form enclosed with this policy. Complaints may also be made verbally or in writing (including via email). The Company will protect the confidentiality of discrimination, harassment, and/or retaliation complaints to the extent possible.

Employees must be aware that gossip, hearsay, rumors and similar sources are difficult, if not impossible, to investigate. The more specific and detailed a complaint is, the better able the Company is to investigate it and take corrective action.

Employees who have experienced conduct that they believe is contrary to this policy have an obligation to use this complaint procedure.

Early reporting and intervention have proven to be the most effective methods of resolving actual or perceived incidents of harassment. The Company requires the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. The Company will make every effort to stop alleged harassment before it becomes severe or pervasive, but can only do so with the cooperation of its personnel.

If a manager or supervisor observes, becomes aware of, or receives information about conduct that might violate this policy, he or she must contact the Human Resource Department.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it stop. The Company encourages but does not require individuals who believe they are being harassed to promptly notify the offender that his or her behavior is unwelcome.



INVESTIGATION

Any reported allegations of discrimination, harassment or retaliation will be investigated promptly, thoroughly, and impartially. The investigation may involve a review of the allegations, as well as the collection of relevant records and the implementation of interim measures, as necessary. It may also include interviews with the parties involved in the complaint, coworkers, former employees and other witnesses who may have knowledge of the situation.

All employees of the Company are required to cooperate in any investigation conducted by the Company concerning complaints or allegations related to this policy. Refusal to cooperate may result in disciplinary action.

Confidentiality will be maintained throughout the investigatory process to the extent possible and consistent with an adequate investigation and appropriate corrective action.

When the Company has completed its investigation, to the extent appropriate, it will inform the person(s) filing the complaint and the person(s) alleged to have committed the conduct of the results of the investigation.

CORRECTIVE ACTION

Any conduct that violates this policy – including engaging in harassment and, with respect to managers and supervisors, failing to report and/or allowing any such conduct to continue – will subject the individual engaging in such misconduct to corrective action. Corrective action may include, for example, mandatory training, referral to counseling, monitoring of the offender and/or disciplinary action such as a warning, reprimand, withholding of a promotion or pay increase, reduction of wages, demotion, reassignment, temporary suspension without pay, or termination of employment, as the Company believes appropriate under the circumstances. Please be aware that sexual and/or other unlawful harassment is considered a form of employee misconduct and sanctions will be enforced against individuals engaging in sexual and/or other unlawful harassment and any supervisory and managerial personnel who allow such behavior to continue.

LEGAL PROTECTIONS

Sexual harassment and other unlawful harassment is not only prohibited by the Company but is also prohibited by federal, state and, where applicable, local law.

Aside from the internal process at the Company (as set forth above), employees may also choose to pursue legal remedies under the following laws, with the governmental entities described below.

New York State Human Rights Law (the “NYSHRL”): The NYSHRL applies to all employers in New York State with regard to sexual and other unlawful harassment and protects employees, paid or unpaid interns and third parties, regardless of immigration status. A complaint alleging violation of the NYSHRL may be filed either with the Division of Human Rights (the “DHR”) or in New York State Supreme Court. Complaints with the DHR may be filed any time within one year of the harassment. If an individual did not file at the DHR, they can sue directly in state court under the NYSHRL within three years of the alleged harassment.

The DHR will investigate your complaint. If it is ultimately found that harassment has occurred, remedies may include monetary damages, attorneys’ fees, civil fines or ordering the employer to take action to stop the harassment.

The DHR’s main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458, (718) 741-8400. For more information, visit www.dhr.ny.gov.

Civil Rights Act of 1964: The Equal Employment Opportunity Commission (the “EEOC”) enforces federal anti-discrimination laws, including Title VII of the Civil Rights Act of 1964. An individual can file a complaint with the EEOC anytime within 300 days from the harassment. A complaint must be filed with the EEOC before you can file in federal court. Federal courts may award remedies if discrimination is found to have occurred.



Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at www.eeoc.gov or via email at info@eeoc.gov. If an individual has filed a complaint with the DHR, the DHR will cross-file the complaint with the EEOC to preserve the right to proceed in federal court.

New York City Human Rights Law: Employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450; or visit www.nyc.gov/html/cchr/html/home/home.shtml.

Local Law Enforcement: If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

COMPLAINT FORM

If you believe that you have been subjected to sexual harassment or other unlawful harassment, you are encouraged to complete this form and submit it to Kathy Brown, Vice President of Human Resources at KBrown@SolomonPage.com.

Once you submit this form, Solomon Page will investigate any claims pursuant to its Policy Prohibiting Harassment, Discrimination and Retaliation. If you are more comfortable reporting verbally or in another manner, Solomon Page will also investigate any claims pursuant to the policy above. You will not be retaliated against for filing a complaint.

For additional resources, visit: ny.gov/programs/combating-sexual-harassment-workplace

COMPLAINANT / YOUR INFORMATION

Name:

Work Address:

Work Phone:

Job Title:

Email:

Select Preferred Communication Method: ☐Email ☐Phone ☐In Person

SUPERVISOR INFORMATION

Immediate Supervisor's Name:

Title:

Work Address:

Work Phone:

COMPLAINT INFORMATION AND DETAILS

1. Your complaint of sexual and/or other harassment is made against:

Name:

Title:

Work Address:

Work Phone:

Relationship to you: ☐Supervisor ☐Subordinate ☐Co-Worker ☐Other



2. Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

Date(s) sexual harassment and/or other unlawful harassment occurred:

Is the sexual harassment and/or other unlawful harassment continuing? ☐Yes ☐No

3. Please list the name and contact information of any witnesses or individuals that may have information related to your complaint:

The last question is optional, but may help our investigation.

4. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

If you have retained legal counsel and would like us to work with them, please provide their contact information.

Signature:

Date: