

EQUAL EMPLOYMENT OPPURTUNITY POLICIES AND PROCEDURES

SLO is an equal opportunity employer. It is SLO's goal to provide equal employment opportunities for all employees, to prevent any unlawful discrimination or harassment of any individual working at or with SLO and to provide a mechanism by which individuals can bring any concerns about discrimination or harassment to the attention of management at SLO.

Application and Hiring Procedures

All applications regarding employment with SLO shall be completed and submitted through www.shulicklaw.com. All applicants are required to read and acknowledge the "Equal Employment Opportunity Policy." The acknowledgement of the "Equal Employment Opportunity Policy" is condition precedent to an application being considered by SLO.

Qualifications

All applicants are expected and required to be of the highest moral character. SLO and all Two Logan Square affiliates operate in industries wherein honesty, integrity, ethics, trust, accountability, responsibility and respect are of the utmost importance and are paramount to the successful and efficient representation of our clients and in all related SLO and affiliate endeavors.

Accordingly, all candidates will be evaluated based on the totality of their application including, but not limited to, the following considerations and/or factors: professional qualifications and work history; professional and character references; educational history and, if required, related work product; and criminal background checks to the extent permitted and required by laws governing the Commonwealth.

In evaluating all candidates, if said candidate has any form of a criminal background and/or criminal record, that information will be considered and taken into account as one consideration and/or factor and will not alone form the basis for the disqualification and/or rejection of that particular candidate. If a criminal background and/or record is deemed to be a consideration and/or factor in a hiring decision related to an application, the following sub-factors shall be considered: the nature and gravity of the offense, the time passed since the conviction/completion of obligation pursuant to the conviction/arrest; and the nature of the professional position sought with SLO or its affiliates.

Current and Future SLO Employees

The aforementioned "Qualifications" section shall apply equally to all current and future SLO employees during the entire course of their employment with SLO and/or any of its affiliates. The terms "applicant" and "employee" shall be used interchangeable for the purpose of DVHS's Equal Employment Policy.

Non-Discrimination and Anti-Harassment Policy

SLO expects all individuals to treat each other with dignity and respect. We are committed to maintaining an environment in which employees and visitors are not subjected to different treatment because of legally-protected characteristics. Therefore, SLO will not accept or tolerate any discrimination, or different treatment, of or among employees, customers, suppliers or visitors based on the following characteristics:

Race
Color
Religious Creed
National Origin
Sex (including pregnancy)
Age
Ancestry
Disability

This policy applies to all aspects of hiring and employment in our company, including, but not limited to, recruiting, hiring, training, promotions, transfers, benefits, compensation, disciplinary action, position elimination, termination and social or recreational programs.

Harassment includes verbal or physical conduct which may or does offend, denigrate or belittle any individual because of, or due to, any of the characteristics described above. Such conduct includes pictures, jokes, comments, innuendoes or any other behavior that creates an environment which is offensive to anyone.

State and Federal Remedies

If you believe you have been subjected to any form of discrimination or harassment in the preceding or following sections, you may file a formal complaint with either or both of the government agencies set forth below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim (EEOC = 180 days; PHRC = 3 months).

- The United States Equal Employment Opportunity Commission (“EEOC”) – whose current address can be located by dialing 411 or by visiting their website at www.eeoc.gov
- The Pennsylvania Human Relations Commission (“PHRC”) – whose current address can be located by dialing 411 or by visiting their website at www.phrc.state.pa.us

Staff Issue Reporting and Escalation Protocol

This Section applies to all sections of the Equal Employment Policy and Procedure and requires the following:

IT IS THE EMPLOYEE'S RESPONSIBILITY TO REPORT ANY INCIDENT IN WRITING TO THE OFFICE MANAGER OR THE PRESIDENT THAT REQUIRE FOLLOW UP, ADMINISTRATIVE ACTION, DISCIPLINE OR REVIEW OF ANOTHER WORKER, CO-WORKER OR EMPLOYEE, SO THAT PROPER FOLLOW UP CAN BE ACCOMPLISHED.

IF THE INCIDENT RELATES TO AN EMPLOYEE'S SUPERVISOR, A LETTER OUTLINING THE INCIDENT, TIME, DATE, PLACE AND OTHER RELEVANT MATTERS SHOULD BE FORWARDED DIRECTLY TO THE PRESIDENT FOR REVIEW AND FOLLOW UP.

FAILURE TO FOLLOW THESE PROCEDURES MAY RESULT IN YOUR ISSUE OR COMPLAINT NOT BEING ADEQUATELY ADDRESSED, WHICH WILL BE THE FAULT OF THE COMPLAINING EMPLOYEE, AND EMPLOYER/SLO SHALL BE ABSOLVED OF ALL RESPONSIBILITY REGARDING THE ALLEGED INCIDENT.

Sexual Harassment Policy

Introduction

It is the goal of SLO to promote a workplace that is free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by SLO. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is similarly unlawful and will not be tolerated. To achieve our goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees.

Because SLO takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual 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 sexual harassment.

Definition of Sexual Harassment

The generically accepted legal definition for sexual harassment is this: “sexual harassment” means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- (a) Submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or
- (b) Such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual’s work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a work place environment that is hostile, offensive, intimidating or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which, 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
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one’s sex life, comment on an individual’s body, comment about an individual’s sexual activity, deficiencies or prowess
- Displaying sexually suggestive objects, pictures, cartoons, etc.
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments
- Inquiries into one’s sexual experiences
- Discussion of one’s sexual activities

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of sexual harassment complaint is unlawful and will not be tolerated by SLO.

Complaints of Sexual Harassment

If any of our employees believes that he or she has been subjected to sexual harassment, the employee has the right to file a complaint with our organization. IT IS THE EMPLOYEE'S RESPONSIBILITY TO REPORT ANY INCIDENT IN WRITING TO THE OFFICE MANAGER OR THE PRESIDENT THAT REQUIRES FOLLOW UP, ADMINISTRATIVE ACTION, DISCIPLINE OR REVIEW OF ANOTHER WORKER, CO-WORKER OR EMPLOYEE, SO THAT PROPER FOLLOW UP CAN BE ACCOMPLISHED. IF THE INCIDENT RELATES TO AN EMPLOYEE'S SUPERVISOR, A LETTER OUTLINING THE INCIDENT, TIME, DATE, PLACE AND OTHER RELEVANT MATTERS SHOULD BE FORWARDED DIRECTLY TO THE PRESIDENT FOR REVIEW AND FOLLOW UP. FAILURE TO FOLLOW THESE PROCEDURES MAY RESULT IN YOUR ISSUE OR COMPLAINT NOT BEING ADEQUATELY ADDRESSED, WHICH WILL BE THE FAULT OF THE COMPLAINING EMPLOYEE AND EMPLOYER/SLO SHALL BE ABSOLVED OF ALL RESPONSIBILITY REGARDING THE ALLEGED INCIDENT.

Sexual Harassment Investigation

When we receive the complaint we will promptly investigate the allegation in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation will include a private interview with the person filing the complaint and with witnesses, if available. We will also interview the person alleged to have committed sexual harassment. When we have completed our investigation, we will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation. If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate, we will also impose disciplinary action.

Disciplinary Action

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may range from counseling, up to and including termination from employment, and may include such other forms of disciplinary action as we deem appropriate under the circumstances.

Americans with Disabilities Act (ADA) Policy

While not legally required to do so, SLO will attempt to comply with all applicable provisions of the Americans with Disabilities Act ("ADA"). It is SLO's policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability or perceived disability so long as the employee can perform the essential functions of the job. Consistent with this policy of nondiscrimination, SLO will provide reasonable accommodations to a qualified individual with a disability, as defined by the ADA, who has made SLO aware of his or her disability, provided that such accommodation does not constitute an undue hardship on the company.

Employees with a disability who believe they need a reasonable accommodation to perform the essential functions of their job should contact the President in strict accord with the procedures outlined in capitals below. SLO encourages individuals with disabilities to come forward and request reasonable accommodations.

**A LETTER OUTLINING THE REQUEST, BASIS FOR REQUEST, PROPOSED ACCOMMODATION AND ALL OTHER RELEVANT MATTERS SHOULD BE FORWARDED DIRECTLY TO THE OFFICE MANAGER ON BEHALF OF THE PRESIDENT FOR REVIEW AND FOLLOW UP. FAILURE TO FOLLOW THESE PROCEDURES MAY RESULT IN YOUR ISSUE OR COMPLAINT NOT BEING ADEQUATELY ADDRESSED, WHICH WILL BE THE FAULT OF THE COMPLAINING EMPLOYEE AND EMPLOYER/SLO SHALL BE ABSOLVED OF ALL RESPONSIBILITY REGARDING THE REQUEST.