

WITT O'BRIEN'S EQUAL EMPLOYMENT OPPORTUNITY POLICY

Witt O'Brien's maintains a continuing policy of non-discrimination in employment. It is Witt O'Brien's policy to provide equal opportunity and access for all persons, without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, or status as a disabled veteran or other protected veteran, in all phases of the employment process and in compliance with applicable federal, state, and local laws and regulations. This policy of nondiscrimination shall include, but not be limited to, the following employment decisions and practices: hiring; promotions; demotions or transfers; layoffs; recalls; terminations; rates of pay or other forms of compensation; selection for training, including apprenticeship; and recruitment or recruitment advertising.

Witt O'Brien's will not discharge or, in any other manner, discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by Witt O'Brien's, or (c) consistent with Witt O'Brien's legal duty to furnish information.

Employees and applicants of Witt O'Brien's will not be subjected to any form of harassment or discrimination for exercising rights protected by, or because of their participation in an investigation or compliance review related to, the Americans With Disabilities Act, Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, the Veterans Employment Opportunities Act of 1998, or any other federal or state non-discrimination law, rule, or regulation. Such rights include protection against discrimination on the basis of a person's relationship or association with a protected veteran.

If you believe that you have been discriminated against in any manner as described above, you should notify William C. (Bill) Long, Executive Vice President & Chief Legal Officer. Witt O'Brien's will continue to direct management personnel to take such action as may be required to prevent behavior prohibited by this policy. All matters will be investigated and appropriate disciplinary action will be taken, up to and including termination of employment, if necessary. Retaliation against anyone who complains of or witnesses behavior contrary to this policy is also prohibited.

Witt O'Brien's also maintains affirmative action programs to implement our equal employment opportunity policy for individuals with disabilities and protected veterans. Employees or applicants who wish to review the full narrative portion of Witt O'Brien's affirmative action program for individuals with disabilities or protected veterans may schedule an appointment to do so by contacting Compliance Officer, William C. (Bill) Long, Executive Vice President & Chief Legal Officer, during normal business hours, by calling 1-202-585-0780.

This policy has the full support of the CEO of Witt O'Brien's.