



Equal Opportunity Policy

1.0 PURPOSE

1.1 ZS Associates is committed to providing equal employment opportunity without regard to race, color, religion, gender, gender identity, gender expression, pregnancy, sexual orientation, national or ethnic origin, ancestry, citizenship, age, disability, marital or family status, sexual and reproductive health decisions, veteran status, genetic information, domestic violence victim or order of protection status, record or offenses, or other personal characteristic protected by applicable law. ZS Associates will respond promptly to reports of violations of this policy. When ZS Associates determines that this policy has been violated, it will act promptly to take appropriate corrective measures as it deems appropriate, including, in the case of employees, disciplinary action up to and including termination under our disciplinary procedure in compliance with local law. Retaliation against an individual who has reported a violation of this policy or who has cooperated with an investigation of a reported violation is also prohibited and will not be tolerated.

2.0 POLICY STATEMENT

2.1 Employees are expected to treat all individuals, including fellow employees, applicants for employment, contractors, and any other person you may interact with in the course of performing your job duties, without discrimination in all aspects of the working relationship, including:

- 2.1.1 Performance of job duties;
- 2.2.2 Recruitment, hiring, placement, and job assignments;
- 2.1.3 Promotion, demotion, and transfer;
- 2.1.4 Performance management, corrective action, and termination;
- 2.1.5 Training, educational, and developmental programs;
- 2.1.6 Compensation and benefits; and
- 2.1.7 Privileges of employment (e.g., memberships, sponsorships).

2.2. Employees are prohibited from:

- 2.2.1 Engaging in, condoning, or encouraging discrimination; and/or
- 2.2.2 Engaging in retaliation.

2.3 All solicitations or advertisements for job openings placed by or on behalf of ZS Associates must state that all qualified applicants will receive consideration for employment without regard to race, color, religion, gender, gender identity, gender expression, pregnancy, sexual orientation, national or ethnic origin, ancestry, citizenship, age, disability, marital or family status, sexual and reproductive health decisions, veteran status, genetic information, domestic violence victim or order of protection status, record or offenses, or other personal characteristic protected by applicable law. Use of the term "Equal Opportunity Employer" or "EOE" will meet with this requirement.

3.0 WHO IS COVERED BY THE POLICY

3.1 This applies to all persons involved in ZS Associates' operations, such as ZS Associates' employees and anyone else on ZS Associates occupied or controlled property. Any employee who is found by ZS Associates to have violated this policy will be subject to disciplinary action as ZS Associates determines to be appropriate.

4.0 REPORTS OF PROHIBITED CONDUCT

4.1. Any individual subjected to conduct prohibited by this policy by any person in any ZS Associates workplace must immediately report the inappropriate conduct to ZS Associates.

4.2 Reports of prohibited conduct may be made verbally or in writing to anyone in a supervisory role, the local Office Managing Principal, a Human Resources team member, or the Manager of Human Resources. Under no circumstances is anyone required to report prohibited conduct to a person he or she believes may be responsible for that conduct.

4.3 Principals, Managers, and anyone in a supervisory role who become aware of or observe any conduct that could be considered a violation of this policy must promptly report such conduct or incident(s) to a Human Resources team member or the local Office Managing Principal.

5.0 INVESTIGATIONS AND CORRECTIVE MEASURES

5.1 ZS Associates will investigate all reports of conduct prohibited by this policy as promptly as possible. ZS Associates expects employees who are contacted in the course of an investigation to cooperate fully, and to answer questions honestly and completely. The individual who made the report will be generally advised of the results of the investigation.

5.2 Any employee who is found by ZS Associates to have engaged in conduct prohibited by this policy will be subject to disciplinary action as ZS Associates determines to be appropriate, up to and including termination of employment. ZS Associates may discipline employees for any prohibited

conduct regardless of whether the conduct violates local law. In addition, appropriate corrective measures may be taken when non-employees, including customers, are found to have engaged in conduct prohibited by this policy.

5.3 An employee who has reported a violation of this policy or who has been disciplined for violating this policy may appeal the result of the investigation or the discipline imposed to the Manager of Human Resources. The appeal will be heard by the Manager of Human Resources or a designated other Principal of the firm. An employee must request an appeal within seven calendar days of being informed of the result or the disciplinary action or else the decision will be final.

6.0 PROTECTION AGAINST RETALIATION

6.1 Retaliation in any form against an individual who reports a violation of this policy, or who provides information in the course of an investigation of a reported violation, is strictly prohibited and will not be tolerated. Any employee who is found by ZS Associates to have engaged in retaliatory conduct will be subject to disciplinary action as ZS Associates determines to be appropriate. ZS Associates may discipline employees for any retaliatory conduct regardless of whether the conduct violates local law. In addition, appropriate corrective measures may be taken when non-employees, including customers, are found to have engaged in retaliatory conduct. Anyone experiencing or witnessing a violation of this prohibition against retaliation must report the violation as described in paragraph 4 of this policy.

7.0 CONFIDENTIALITY

7.1 ZS Associates will investigate and resolve reports of violations of this policy in as confidential a manner as permitted by the circumstances. Any individual who reports violations or who is contacted in the course of an investigation is expected to treat reports of violations or information regarding reports as strictly confidential.

8.0 DEFINITIONS

8.1 References in this policy to "ZS Associates," "ZS," "we," "us," and "our" are references to ZS Associates, Inc. and its direct or indirect affiliates.

8.2 The term "discrimination" means any decision relating to the terms or conditions of an individual's employment with, or performance of work for, ZS Associates which is based upon, or influenced by, such individual's race, color, religion, gender, gender identity, gender expression, pregnancy, sexual orientation, national or ethnic origin, ancestry, citizenship, age, disability, marital or family status, sexual and reproductive health decisions, veteran status, genetic information, domestic violence victim or order of protection status, record or offenses, or other personal characteristic protected by applicable law.

8.3 The term "retaliation" means any action taken or attempted with the purpose or effect of limiting or depriving any individual of employment opportunities, or otherwise adversely affecting his or her status or conditions of employment as an ZS Associates employee, because he or she has, in good faith, exercised rights or fulfilled obligations under this equal employment opportunity policy, such as by reporting or opposing any conduct prohibited by this policy, making a charge, or testifying, assisting, or participating in any manner in an investigation, proceeding, or hearing related to such charge.

The office in which you are based may have its own version of this policy. Please refer to your local handbook (if applicable) or contact your Office Managing Principal for more information/guidance. Because ZS does business globally, our employees are subject to the laws and regulations of different countries. Your office-specific policy, and/or local laws and regulations, shall control in the case of a conflict with the policy set forth above.

Reference to "employee(s)" in this policy does not confer employment status with ZS Associates to contractors. This policy does not create any substantive or procedural rights. ZS Associates reserves the right to change or delete any policy at any time without notice.