

**NORMAN BOBROW & CO., INC.  
and FIRST NEW YORK REALTY BROKERS LLC**

**ANTI-DISCRIMINATION, ANTI-HARASSMENT POLICY  
AND GRIEVANCE PROCEDURES**

**CONDUCT AND BEHAVIOR STANDARDS**

Norman Bobrow & Co., Inc. and First New York Realty Brokers LLC (hereinafter collectively referred to as “Company”) respects and highly values its diverse population. Accordingly, the Company has an unwavering ethical commitment toward promoting a workplace that is respectful of personal differences and free of discrimination and harassment. This principle applies in our hiring and interviewing process as well as all aspects of our work environment. By providing a respectful, creative, and positive atmosphere where individuals can be successful and achieve, the Company is capable of attracting, motivating, and retaining the best people available.

The Company is committed to providing a work environment free of discrimination and harassment based on age, ancestry, color, marital status, medical condition, mental disability, physical disability, national origin, race, religion, sex, sexual orientation or veteran status.

It is the Company's intention to provide an atmosphere free of harassment that creates tension and/or an intimidating, offensive, or hostile work environment. Conduct that causes such conditions violates the Company’s code of business conduct.

**DEFINITIONS AND GRIEVANCE PROCEDURE**

1) Applicability: The Standards and Procedures in this document apply equally to any person working in Company facilities, whether as employee, independent contractor, temporary worker, intern, or in any other capacity, and whether or not said person is receiving or is eligible to receive financial compensation from the Company. All such persons shall hereinafter be collectively referred to as “Associates.”

2) Sexual harassment is defined as any unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature, when:

- Submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of an individual's employment or educational advancement, or evaluation, or
- Submission to or rejection of such conduct is used as the basis for employment or educational advancement, or evaluation, or

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- Such conduct, of a severe and pervasive manner, has the purpose or effect of interfering with an individual's work performance or educational experience; creates an intimidating, hostile, or offensive work/educational environment.
  - Unwelcome behavior is if the individual did not solicit or invite conduct, and particularly if s/he indicates that s/he finds the conduct undesirable or offensive. Acquiescence or failure to complain does not mean that the conduct is welcome. However, if an individual actively participates in sexual banter or discussions without giving an indication that s/he does not like it, it will more than likely not meet the definition of "unwelcome."

3) Harassment - a person engages in harassment when, with the intent to harass, annoy, or alarm another person, he/she:

- Engages in inappropriate physical behavior including but not limited to striking, shoving, and kicking or otherwise subjects others to physical contact, or threatens to do the same; or
- Follows a person in or about a public place or places; or
- Engages in a course of conduct or repeatedly commits acts which alarm or seriously annoy such other person, and which serve no legitimate purpose. Depending on its severity, a single act may constitute harassment.

3) Racial Harassment - Verbal or physical conduct that is directed at an individual because of his/her race, color, national origin or ethnicity, and that is sufficiently severe or pervasive so as to have the effect of creating an intimidating, hostile, or offensive work or educational environment, which unreasonably interferes with work or educational performance, or negatively affects an individual's employment or educational opportunities.

4) Disability Harassment - Verbal or physical conduct that is directed at an individual because of his/her disabling mental or physical condition, and that is sufficiently severe or pervasive so as to have the effect of creating an intimidating, hostile, or offensive work or educational environment which unreasonably interferes with work or educational performance, or negatively affects an individual's employment or educational opportunities.

5) Religious Harassment - Verbal or physical conduct that is directed at an individual because of his/her religion and/or religious beliefs and that is sufficiently severe or pervasive as to have the effect of creating an intimidating, hostile, or offensive work or educational environment, which unreasonably interferes with work or educational performance, or negatively affects an individual's employment or educational opportunities.

6) Discrimination - Actions based on race, color, religion, age, national origin, ancestry, sex, sexual orientation, disability or veteran status or those that are prohibited by New York State law, that are sufficiently severe or pervasive enough to have the effect of substantially interfering with one's

employment or educational performance or creating an intimidating, hostile or offensive employment or educational environment."

**Any Associate experiencing such harassment or discriminatory behavior is encouraged to report the incident directly to the President of the Company without fear of reprisal. All incidents will be immediately investigated, and the appropriate action taken.**

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## CONDUCT AND BEHAVIOR STANDARDS

All Associates are expected to contribute to the success of the Company by performing their jobs as required and conducting themselves in a professional manner consistent with the company's business philosophy, values and standards of business conduct. Associate honesty and integrity are essential to ethical business practices. Associates are required to prepare all reports, accurately and truthfully. Additionally, it is essential to avoid making misrepresentations or dishonest statements to anyone inside or outside the company.

The following list includes, but is not limited to, unacceptable conduct that is considered detrimental to the company's best interests and may result in immediate disciplinary action, up to and including termination of association and/or employment:

- Falsification of facts or company records
- Unethical, immoral, indecent or illegal conduct
- Harassment (which includes, but is not limited to, sexual harassment, physical fighting, or other abusive conduct creating an intimidating, hostile or offensive work environment, as described above)
- Discrimination against any Associate or applicant due to age, ancestry, color, marital status, medical condition, mental disability, physical disability, national origin, race, religion, sex, sexual orientation, or veteran status.
- Deliberate destruction of Company or another Individual's property
- Deliberate work stoppage or slowdown
- Theft, misappropriation, or unauthorized personal use of company property or property of others
- Insubordination/refusal to follow legitimate direction from a manager or deliberately undermining a manager's authority
- Bringing weapons, illegal substances or other contraband onto Company property or being in possession, or in the case of illegal substances, under the influence, of same
- Any action which seriously impacts Company business or image in a negative or destructive way
- Any conduct that poses a serious threat to the health or safety of Associates or Company operations
- Unsatisfactory attendance or abuse of sick leave
- Gambling during work hours or on company property
- Being or appearing to be under the influence of alcoholic beverages or non-prescription drugs during working hours or paid break periods.

Misuse of Company property, including Company's equipment, supplies, e-mail, intranet, and computer and voicemail systems can constitute unethical conduct. These tools and resources are intended to assist Associates in conducting legitimate Company business, and any other use of such property is discouraged.

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By signing below, you indicate that you have read and understood the NORMAN BOBROW & CO., INC. and FIRST NEW YORK REALTY BROKERS LLC., ANTI-DISCRIMINATION, ANTI-HARRASSMENT POLICY AND GRIEVANCE PROCEDURES — CONDUCT AND BEHAVIOR STANDARDS and will abide by same.

Please retain a copy of this document for your records and return signed original to the Office Manager.

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Signature

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Printed name

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Date