

## **Equal Employment Opportunity and Affirmative Action Statement of Policy**

It is the policy of Kilpatrick Townsend & Stockton, LLP not to discriminate or allow the harassment of employees or applicants on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law with regard to any employment practices, including recruitment, advertising, job application procedures, hiring, upgrading, training, promotion, transfer, compensation, job assignments, benefits and/or other terms, conditions, or privileges of employment, provided the individual is qualified, with or without reasonable accommodations, to perform the essential functions of the job. This policy applies to all jobs at the Company. The Company will continue to take affirmative action to ensure that individuals are employed, and that employees are treated during employment, without regard to their sex, gender identity, sexual orientation, race, physical or mental disability, protected veteran status, gender identity, sexual orientation, or any other characteristic protected by law in all employment practices as follows:

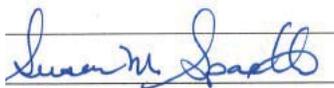
Employment decisions at the Company are based on legitimate job related criteria. All personnel actions or programs that affect qualified individuals, such as employment, upgrading, demotion, transfer, recruitment, advertising, termination, rate of pay or other forms of compensation, and selection for training, are made without discrimination based upon the individual's sex, gender identity, sexual orientation, race, religious creed, national origin, physical or mental disability, protected veteran status, color, or any other characteristic protected by law. Employees may choose to voluntarily disclose their sex, race, national origin, disability and protected veteran status at any time by contacting Human Resources. Such information will be maintained in a confidential manner and will not be used against an individual when making any employment decisions. Employees and applicants with disabilities and disabled veterans are encouraged to inform Human Resources if they need a reasonable accommodation to perform a job for which they are otherwise qualified. The Company makes, and will continue to make, reasonable accommodations to the known physical or mental limitations of an otherwise qualified applicant or employee to promote the employment of qualified individuals with disabilities and disabled veterans, unless such accommodations would impose an undue hardship on the operations of the Company's business.

Kilpatrick Townsend & Stockton, LLP, and our Chairman, are fully committed to principals of equal employment opportunity and affirmative action. As Managing Partner, I support the successful implementation of the Company's Affirmative Action Programs. I have appointed Ramona Moody, Affirmative Action Officer for the Company, with responsibility for implementation of the Company's affirmative action activities. The Affirmative Action Officer has the full support of top management and the staff necessary to fully implement this Program. All managers and supervisors will take an active part in the Company's AAP to ensure all qualified employees and prospective employees are treated in a non-discriminatory manner with respect to all employment decisions. Furthermore, Kilpatrick Townsend & Stockton, LLP will solicit the cooperation and support of all employees for the Company's Equal Employment Opportunity and Affirmative Action Policy.

Our Affirmative Action Programs include an audit and reporting system, which, among other things, uses metrics and other information to measure the effectiveness of our Program. The Affirmative Action Officer has been assigned responsibility for periodically reviewing progress in the compliance and implementation of our policy of affirmative action. In accordance with public law, the Company's program of affirmative action for qualified individuals with disabilities and the program of affirmative action for protected veterans are available for inspection in the Human Resources Department, Monday through Friday, from 9:00 a.m. to 5:00 p.m. upon request.

In addition, employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in, or may have engaged in, filing a complaint, assisting or participating in an investigation, compliance review hearing, or other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, Executive Order 11246, and/or any other federal, state or local law or

regulation regarding Equal Employment Opportunity, opposing any act or practice made unlawful, or exercising any other right protected by such laws or regulations or exercising any other right protected by such laws or regulations.

A handwritten signature in blue ink, appearing to read "Susan M. Spaeth", is written over a horizontal line.

Susan Spaeth  
Managing Partner