

Equal Employment Opportunity

1.0 Scope

This Equal Opportunity Policy ("**Policy**") applies to all U.S. employees of Curia Global, Inc. and its U.S. subsidiaries (hereinafter referred to as the "**Company**" or "**Curia**") and applicants for U.S. employee positions with a Company.

2.0 Policy

2.1 Curia is an equal opportunity employer. It is the Company's policy to ensure that all available employment opportunities are provided to qualified individuals without regard to race, color, religion, sex, age, national origin, marital status, disability status, genetics, gender identity or expression, veteran status, sexual orientation, or any other basis prohibited by law.

2.2 The Company has established employment policies and procedures based on valid job-related and business necessity standards of conduct and performance. Applicants for employment will be recruited, selected and placed on the basis of merit and qualifications with respect to the positions being filled. The Company's employment policies, procedures and practices with respect to hiring, training, performance evaluation, promotion, transfer, compensation, benefits, demotion, layoff, discipline or termination will be administered on the basis of performance and ability and not without regards to the race, color, religion, sex, age, national origin, marital status, disability status, genetics, gender identity or expression, veteran status, sexual orientation or any other legally protected characteristic an individual.

2.3 It is also the Company's policy to provide an accommodation to qualified individuals with disabilities and sincerely held religious beliefs, practices or observances so long as such an accommodation does not pose an undue hardship to the Company. Please see the Company's Reasonable Accommodation Policy for further information on this topic.

2.4 The Company prohibits retaliation against any individual who in good faith complains of perceived harassing or discriminatory conduct, who participates in a Company or government agency investigation into such complaints, who requests a accommodation for a disability or sincerely held religious belief, practice or observance, or who engages in any other legally protected activity.

2.5 Federal, state and local government nondiscrimination posters will be displayed at all times in conspicuous locations at all facilities. Notices, advertisements, forms, job descriptions and other specifications relating to employment shall not indicate any preference, limitation, or discrimination based on race, color, religion, sex, age, national origin, marital status, disability status, genetics, gender identity or expression, veteran status, sexual orientation, or any other basis prohibited by law. Further, all employment advertisements placed by the Company or its contract recruiters must include the phrase that indicates that the Company is An Equal Opportunity Employer.

2.6 The Company may be required to implement affirmative action planning. The Company will comply with these requirements through positive programs of specific and results-oriented procedures and will apply every good-faith effort. The objective of these procedures and good-faith efforts is equal opportunity, and nothing contained in these programs shall be interpreted as a requirement to grant

preferential discriminatory treatment. These business-oriented action programs will be designed to further assure each qualified individual with equal access to opportunities for entry and growth.

2.7 In order to measure the effectiveness of the Company's efforts, the Human Resources Department will conduct periodic audits.

2.8 The Human Resources Department is responsible for overseeing compliance with this Policy including providing training for all supervisors and employees, responding promptly to any employee inquiries or complaints, and ensuring that the Company meets all EEO-related requirements under applicable federal and state law.

2.9 All members of the Company's management team are expected to assure that this Policy is appropriately communicated, implemented and uniformly applied in those areas of the operation for which they have responsibility. If a member of management observes, suspects or receives a complaint of unlawful discrimination, harassment or retaliation involving an employee, applicant or other person, the member of management must immediately notify the Chief Human Resources Officer ("CHRO") and General Counsel ("GC") of the concern.

2.10 All employees are expected to adhere to this Policy and to conduct themselves in such a manner so as to assure a working environment free of unlawful discrimination, harassment or retaliation.

2.11 Employees and applicants who believe they have been subject to unlawful discrimination, harassment or retaliation in violation of this Policy should report the matter to their supervisor or another member of management or a Human Resources Representative. The Company also offers employees the option of reporting concerns, including on an anonymous basis, by telephone, e-mail or online to a third party administrator of the Company's compliance reporting system. Please see **the Harassment Prevention Policy or the NYS Sexual Harassment Prevention Policy** for further information. Upon receipt of a complaint, the CHRO and GC will assign a member of the Human Resource Department or Legal Department, or an outside representative, to promptly and thoroughly investigate all complaints. All complaints will be treated with proper care and discretion, and information provided will be revealed on a strictly need-to-know basis.. The Company will take corrective action if an investigation determinates that this Policy has been violated.

2.12 The Company does not discourage or obstruct employees and applicants from filing a complaint with the U.S. Equal Employment Opportunity Commission or any other federal, state or local government agency. No adverse actions will be taken against employees or applicants in retaliation for filing a complaint in good faith with a government agency.

2.13 Any questions from an applicant or an employee, a government concerning this Policy should be referred to a member of the Human Resources Department. Any questions from a government agency or attorney concerning this Policy should be referred to a member of the Curia Legal Department.

Approved by: SVP, Chief Human Resources Officer

Questions or concerns? Please contact the Human Resources Team: HR@curiaglobal.com
www.curiaglobal.com