

UNIVERSAL INSTITUTE

NON-DISCRIMINATION / ANTI-HARASSMENT POLICY

To ensure the safe and fair working environment for all Universal Institute staff and clients we are committed to ensuring a workplace free of any type of harassment and therefore have implemented a zero tolerance policy. For a complete account of the Company's policies regarding harassment of any type, as well as definitions of harassment and discrimination, refer to the Employee Handbook.

All staff will be made aware of this policy through the Employee Handbook and the Code of Conduct. Means of filing a complaint for alleged violations are set forth in the Employee Handbook and Code of Conduct. Universal Institute will maintain a record of all complaints received of harassment or discrimination of any type. All incidents and complaints are considered serious in nature and will be investigated. Staff found to be at fault will be subject to disciplinary action up to and possibly including termination. If possible, staff will be transferred to another work area pending the results of the investigation.

EQUAL EMPLOYMENT OPPORTUNITY

Universal supports, and is committed to, equal employment opportunity for all personnel. This means that the Company will make all employment decisions, including the decisions to hire, recruit, train, or promote, based on its determination of whether an individual has the required skill, ability, experience, or other qualifications to perform the essential job functions.

Universal does not discriminate against applicants or employees because of race, color, religion, creed, national origin, ancestry, gender, marital status, age, disability, sexual orientation, atypical hereditary cellular or blood trait, obligation for U.S. military service or any other category protected by applicable law. This policy applies to all terms and conditions of employment, including, but not limited to, recruiting, hiring, training, promoting, termination, leave of absence, compensation and benefits and all other personnel actions and conditions.

AMERICANS WITH DISABILITIES ACT

It is Universal's policy that we will not discriminate against qualified individuals with disabilities with regard to any aspect of their employment. Universal is committed to complying with the American with Disabilities Act of 1990 and its related Section 504 of the Rehabilitation Act of 1973. Universal recognizes that some individuals with disabilities may require accommodations at work. If you are currently disabled or become disabled during your employment, you should contact the Director of HR, and/or the person designated in your Universal location to handle human resources-related issues to discuss reasonable accommodations that may enable you to perform the essential functions of your job.