



STANFLES

REALTY™

POLICY AGAINST SEXUAL HARASSMENT OF CLIENTS AND EMPLOYEES

STANFLES REALTY intends to provide their employees and independent contractors/agents with a positive working environment based on trust and mutual respect.

As part of its commitment to eliminating unprofessional and illegal conduct, STANFLES REALTY prohibits sexual harassment of its employees, clients or any other person with whom a representative of the Company, whether or not an employee of the Company, interacts in his or her professional capacity. The Company prohibits any form of sexual harassment of its employees and clients whether or not such harassment occurs on Company premises or elsewhere. This policy applies to independent contractors, vendors and suppliers who do business with the Company.

Sexual harassment of any kind is illegal, will not be tolerated, and may be grounds for immediate and permanent termination of the independent contractor or vendor's business relationship with the Company. Further, sexual harassment of clients or employees by independent contractors or vendors may result in personal liability of the harasser to the victim. The Company will not defend or indemnify independent contractors, vendors or suppliers who are sued for sexual harassment. Should the Company be subjected to litigation as a result of sexual harassment by an independent contractor, vendor or supplier, the Company reserves the right to seek full indemnity for any fees or expenses associated with the litigation.

Sexual harassment is defined as unwelcome sexual advances, or visual, verbal, or physical conduct of a sexual nature. This definition includes many forms of offensive behavior and includes gender based harassment either of a person of the opposite sex as the harasser or of the same sex. Examples of sexual harassment are:

1. Unwanted sexual advances.
2. Offering any service, advantage or other benefit to an employee or client in exchange for sexual favors.
3. Making or threatening reprisals after a negative response to sexual advances.
4. Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons or posters.
5. Verbal conduct: making or using derogatory comments, epithets, slurs, and jokes. Inappropriate discussion of personal sexual matters or intimate relationships. Intrusive inquiries of offensive comments regarding the sexual practices or experience of any person.
6. Verbal sexual advances or propositions. Asking for "dates" or otherwise social contact if the individual has made clear, or if circumstances suggest, that such requests will not be welcomed.
7. Verbal abuse of sexual nature, verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene letters, notes or invitations.
8. Physical conduct: touching, assault, impeding or blocking movements.

Due to the risk of sexual harassment liability, the Company strongly discourages any social or sexual relationship between its independent contractors and clients.

Any complaint of sexual harassment by an employee or client, whether phrased as such or otherwise that is brought to the attention of an independent contractor or vendor of the Company, must be reported to the Company immediately. Failure to report any complaint will be considered a breach of Company policy and may be grounds for immediate and permanent termination of the Company's relationship with the independent contractor or vendor. This duty to report complaints applies in all situations, including those in which the complaint is thought to be insignificant, petty, unreasonable or groundless. Reports of sexual harassment complaints will be treated confidentially to the greatest extent possible consistent with the Company's need to investigate such complaints. The independent contractor, vendor or supplier accused of harassment will be interviewed and apprised of the outcome of the investigation.

This policy applies to independent contractors despite the fact that they are not employees of the Company. Recent legislation in California has increased the potential for sexual harassment litigation against certain individuals who work in professional business relationships with their clients. California law now prohibits sexual harassment occurring in any "professional relationship," specifically including the relationship between real estate agent and client, or real estate loan officer and client. You should be aware that any person with whom you deal in your professional capacity may now be a potential claimant in an action for sexual harassment against you and the Company. The Company will not do business with any independent contractor or agent who does not agree to observe the provision of the above policy.

I acknowledge that I have received a copy of the STANFLES REALTY Policy against Harassment of Clients and Employees, that I have carefully read the policy, and that I will abide by its provisions.

SIGNATURE

ASSOCIATE NAME (PRINT)

Date