



NON-HARASSMENT POLICY

Alexander Capital, L.P. prohibits any type of harassment of any employee by a supervisor, co-worker, or other individual in the workplace or any other environment relating to work activities. Alexander Capital, L.P. has committed to maintaining a work environment free from any form of harassment, including that based on race, color, religious creed, national origin, ancestry, age, past or present history of mental disorder, mental retardation, learning disability, physical disability, sex, sexual orientation, marital status, veteran status, or any other characteristic protected under applicable state, federal, or local laws.

SEXUAL HARASSMENT POLICY

Alexander Capital, L.P. is firmly committed to providing a work environment in which all employees are treated with respect and one that is free of all forms of illegal discrimination, including sexual harassment.

Alexander Capital, L.P. prohibits harassment of one employee by another employee or supervisor on the basis of sex. The purpose of this policy is not to regulate our employees' personal morality. Rather, it is to ensure that, in the work place, no employee harasses another on the basis of sex. While it is not easy to define precisely what harassment is, it certainly includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature such as uninvited touching or sexually related comments. Any employee who feels that he or she has been subjected to sexual harassment should immediately report the matter to his/her supervisor, the Firm's General Counselor Chief Compliance Officer, or Human Resources. Violations of this policy may result in disciplinary action up to and including discharge.

Definition

Sexual harassment on the job is defined as any unwelcome sexually oriented behavior, demand, comment, or physical contact initiated by any individual at the workplace. This includes, but is not limited to:

- A term or condition of employment, or
- A basis for employment decisions, or
- That which interferes with the employee's work, or
- That which creates a hostile or offensive working environment.

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Acts that constitute unlawful sexual harassment may take many forms and include, but are not limited to, derogatory comments or unwanted sexual advances, display of sexually suggestive literature or cartoons, physical conduct or gestures, and threats or demands for sexual favors. Alexander Capital, L.P. does not tolerate actions of sexual harassment by employees, business vendors, or other visitors. This type of behavior is unacceptable at the workplace, in any work-related setting outside the workplace, and at business-related social events.

Procedure

Alexander Capital, L.P. encourages any individual who believes that he or she is being sexually harassed to address the issue regardless of the alleged offender's identity or position. It is not necessary for an employee to talk directly to the offender if he or she feels uncomfortable doing so or believes that employment consequences may result. In this case, the employee can report concerns to his/her manager, or, if the manager is the alleged harasser, you have the option of contacting the President of the Firm, or the Director of Human Resources, whichever makes you the most comfortable.

When claims of sexual harassment are brought to management's attention, it is the firm's policy to investigate such claims promptly and, where sexual harassment is found, to remedy the situation in a timely and effective manner.

Alexander Capital, L.P. has established the following practices to allow for prompt investigation and resolution of sexual harassment claims:

- The complaint and investigation will be handled with sensitivity. Confidentiality will be maintained to the utmost extent possible and within the appropriate limitations under the circumstances, keeping in mind the important privacy interests of all concerned.
- Employees whose actions are determined to be in violation of this policy will be subject to appropriate corrective and/or disciplinary action up to and including termination of employment.
- As is the policy concerning any other employee complaint, there will be no adverse consequences for any employee who seeks assistance.

All members of the management team and each employee at Alexander Capital, L.P. has the responsibility of ensuring that sexual harassment does not occur. Furthermore, supervisors and managers have the duty to take appropriate action if they become aware of incidents of this nature.

Alexander Capital, L.P. management philosophy stresses a work environment that fosters and encourages employee growth, involvement, commitment, achievement, and advancement. It is a philosophy that truly respects and invests in its human resources. Sexual harassment conflicts directly with every aspect of this management philosophy. There is simply no place for it in our firm.

Name of Registered Representative (Printed)

Date

Signature of Registered Representative