CURRENT STATEMENT OF POLICY ON EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION

It is the policy of Orrick, Herrington & Sutcliffe LLP to provide equal employment opportunity to all employees and applicants for employment and to comply with all applicable federal, state and local laws. This Policy covers all aspects of employment including: recruitment, hiring, promotion, compensation, training, discipline, termination and other terms and conditions of employment. The Policy applies to all qualified employees and applicants for employment without regard to race, color, religion, gender (including pregnancy), gender identity and expression, sexual orientation, national origin, ancestry, citizenship status, age, marital status, genetic information, physical or mental disability, medical condition, veteran status and all other categories protected by federal, state or local laws, ordinances or regulations. Orrick will also undertake, through affirmative action efforts, to increase employment opportunities for minorities, women, veterans and individuals with disabilities.

Gary R. Siniscalco has been designated as the firm's Equal Employment Opportunity/Affirmative Action Officer (EEO Officer). His address and telephone number are as follows:

Orrick, Herrington & Sutcliffe LLP
The Orrick Building
405 Howard Street
San Francisco, California 94105-2669
Telephone: (415) 773-5700
Facsimile: (415) 773-5759

The plan narratives are available for review by US employees in the office of their Office Administrator during normal business hours.

This Policy, which is also part of the firm's affirmative action plan, is revised annually. This statement contains our current policy and shall remain in effect January 1 through December 31, 2015.

ORRICK, HERRINGTON & SUTCLIFFE LLP

Mitchell Zuklie, Chairman