City of Los Angeles Responsible Banking Investment Monitoring Program For Investment Banks

Investment banks providing City investment banking services or seeking City investment banking business must complete and submit this form no later than July 1st of each year to the City Administrative Officer to comply with Chapter 5.1, Section 20.95.1 of the Los Angeles Administrative Code.

Contact Information:

Siebert Brandford Shank & Co., LLC Name of Financial Institution 94612 1999 Harrison Street, Ste. 2720 Oakland CA Street Address City State Zip Code Joseph Mendola Chief Compliance Officer Contact Person Name and Title 646-775-4841 jmendola@sbsco.com Telephone No. Email Address Please answer the following questions for the preceding calendar year. 1. Did your firm make monetary donations to charitable programs within the City limits? Yes ✓ No If yes, please complete the attached form. 2. Did your firm provide any scholarship awards to residents of the City of Los Angeles? Yes No ✓ a. How many scholarships were awarded? b. What was the total value of the awarded scholarships? 3. Does your firm have internal policies regarding utilization of subcontractors which are designated as "women owned," "minority owned," or "disabled" business enterprises? Yes No If yes, please provide a copy of your policies. **CERTIFICATION UNDER PENALTY OR PERJURY** I certify under penalty of perjury that I have read and understand the questions contained in this form and the responses contained in the form and on all the attachments. I further certify that I have provided full and complete answers to each question, and that all information provided in response to this form is true and accurate to the best of my knowledge and belief. Joseph Mendola, Chief Compliance Officer June 11, 2015 Print Name, Title

PLEASE SEND THE ORIGINAL SIGNED FORM TO THE ADDRESS BELOW AND EMAIL A COPY TO CAO.DEBT@LACITY.ORG.

Date

Office of the City Administrative Officer 200 North Main St. Room 1500 Los Angeles, CA 90012 Attention: Debt Management Group

Attachment for Question #1 - Responsible Banking Investment Monitoring Program for Investment Banks

Name of Charitable Organization	Type	Amount (\$)
Women in Public Finance (LA Chapter)	Community Development	\$1,500,00
Southern Area Youth Programs	Children & Youth Development	\$1,800,00
Women in Public Finance (LA Chapter)	Community Development	\$2.500.00
Youth Conversations	Children & Youth Development	#; 000:00 #250 00
Asian Americans in Public Finance	Community Development	\$500.00

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Affirmative Action Plan & Equal Employment Opportunity Policy Siebert Brandford Shank & Co., L.L.C.

Siebert Brandford Shank & Co., L.L.C. ("SBS") has developed this Affirmative Action Plan and Equal Employment Opportunity Policy with the objective of achieving genuine equal employment opportunity for all qualified individuals.

Recruitment

SBS should be identified in all employment advertisements as an "Equal Opportunity/Affirmative Action employer." Recruitment efforts at colleges, universities, high schools and vocational institutions with significant populations of women and minority students are encouraged. Through its many charitable donations, SBS also encourages the support of fraternal, sorority, civic and community-based organizations.

Hiring Procedures

In order to eliminate or minimize intentional or unintentional bias against minority applicants with regard to employee interviewing and selection procedures, all candidates will be interviewed by at least two, and preferably three, SBS employees prior to extending an offer. All offers of employment will be made by either the President & CEO or the Chairman of SBS.

Promotion Procedures

As a means of identifying qualified minority employees who are eligible for promotions or transfers to more upwardly mobile positions in the organization, SBS will conduct a standardized annual review process. All employees' self-reviews as well as manager reviews will be reviewed by both the President & CEO and the Chairman of SBS.

Training Procedures

SBS currently does not provide tuition reimbursement, as it hires professionals with past professional experience. The firm offers a number of educational programs equally to all employees, and encourages participation in industry seminars, conferences, and similar events.

Publicity (Internal and External)/Advertising

All RFP responses submitted on behalf of SBS should include a statement of the firm's commitment to providing genuine equal employment opportunity for all qualified individuals. SBS should be identified in printed material, e.g. newspapers, radio, trade journals, professional journals, web sites, company stationery, and oral pronouncements as an "Equal Opportunity/Affirmative Action employer."

Internally, SBS will continue to request that issuers have a formal policy to select MBEs/WBEs as senior and co-managers, as well as to make provisions in designation policies. The firm's Policies & Procedures Manual has been updated to include this policy.

Procurement

SBS does not discriminate against minority and women owned businesses in its own procurement of goods, supplies and services. In such instances, minority groups and agencies, e.g. government, educational, civic and/or community study groups, should be consulted for the purpose of identifying potentially qualified minority professional applicants.

Grievances

10.00

Any employee may bring matters of unfair treatment or other personal concerns to the attention of the Affirmative Action Officer, Sean Werdlow, (313) 496-4500.

Program Reporting

Employment statistical records relative to SBS' affirmative action policies are available for inspection during normal working hours to appropriate government representatives. These records are located in the Detroit office. Government representatives wishing to inspect these records should contact our Detroit office at 313-496-4500.

Annual Review

The Affirmative Action Plan shall be reviewed annually, and updated if necessary, as part of the annual review of the Firm's policies and procedures.

Minority/Women Participation

Our company has a very well-established Affirmative Action Policy. The following exemplify some of our special efforts aimed toward supporting the whole community.

- ✓ Our firm voluntarily undertakes work-study and internship programs to encourage students of diverse economic and cultural backgrounds to pursue an investment banking career;
- ✓ We have a policy to assist local and regional minority law firms to gain valuable municipal bond experience by selecting them as sole or co-underwriter's counsel when our firm acts as senior manager;
- ✓ As an underwriter, our firm consistently and successfully places significant minority firms in our financial transactions as co-underwriter, bond counsel, special counsel, and underwriters' counsel; and
- ✓ We make every effort to utilize Historically Underutilized Businesses for any available work associated with all financings undertaken by our company.

Sexual Harassment

Siebert Brandford Shank & Co. is committed to maintaining a workplace free of sexual harassment and will not tolerate sexually harassing behavior by its employees. Siebert Brandford Shank regards sexual harassment as a very serious matter and prohibits such harassment in the workplace by any person, in any form. Anyone who violates this policy will be subject to appropriate disciplinary action, up to and including immediate termination.

Sexual harassment is illegal under local, state and federal civil rights laws, and it is against company policy for any employee to subject any other employee to unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature at any time.