

**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 1<sup>st</sup> 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:**

Loop Capital Markets LLC			
Name of Financial Institution			
12100 Wilshire Blvd., Suite 605	Los Angeles	CA	90025
Street Address	City	State	Zip Code
Clarence Bourne, Managing Director			
Contact Person Name and Title			
312.356.5009	clarence.bourne@loopcapital.com		
Telephone No.	Email Address		

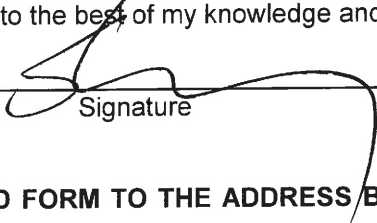
Please answer the following questions for the preceding calendar year.

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.

Stephen Berkeley, Chief Compliance Office & Regulatory Counsel	06/25/2019
Print Name, Title	Date



**PLEASE SEND THE ORIGINAL SIGNED FORM TO THE ADDRESS BELOW AND EMAIL A COPY TO [CAO.DEBT@LACITY.ORG](mailto:CAO.DEBT@LACITY.ORG).**

**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**

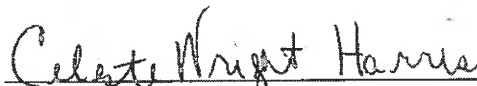
Name of Charitable Organization	Type	Amount (\$)
Special Olympics Southern California - 2019	Charitable Organization	\$1,000.00
Alameda County Women's Hall of Fame	Charitable Organization	\$2,000.00
Women in Public Finance San Diego Chapter	Industry Organization	\$1,000.00
Asian Americans in Public Finance	Industry Organization	\$500.00
Foundation for the Los Angeles Community Colleges	Charitable Organization	\$2,500.00
Special Olympics Southern California	Charitable Organization	\$500.00
Alameda County - Women's Hall of Fame	Charitable Organization	\$1,000.00
NUDC (National Utilities Diversity Council)	501C3	\$1,000.00



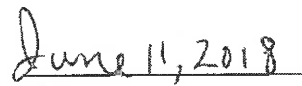
111 West Jackson Blvd.  
Suite 1901  
Chicago, IL 60604  
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Toll Free 888.294.8898  
[www.loopcapital.com](http://www.loopcapital.com)

## LOOP CAPITAL DIVERSITY POLICY STATEMENT

Loop Capital is committed to diversity both in its workforce and in its procurement activities. As a minority owned-business that has expanded from 6 employees to over 180 employees during the last 21 years, the firm has a keen interest in supporting the growth and establishment of other minority-owned, woman-owned and other emerging market businesses. Loop Capital regularly selects qualified minority and woman owned businesses as vendors and partners to support our business. Minority and woman owned businesses used as vendors and/or business partners by the firm include, but are not limited to, attorneys, insurance and real estate brokers, architects, consultants and photographers. Likewise, when an assignment necessitates the use of outside professionals, the firm seeks qualified minority and woman owned businesses who will allow us to provide comprehensive services and solutions to our clients. Even when considering firms who are not minority or woman owned, Loop Capital strives to support the development and growth of the minorities and women within those organizations by requesting minorities and women be given significant and substantive roles on the services to be performed.

  
\_\_\_\_\_  
Celeste Wright Harris

Chief Human Resources Officer

  
\_\_\_\_\_  
Date

**Equal Employment Opportunity Policy (EEO Policy)**  
*and*  
**Affirmative Action Program (AAP)**

*Effective March 1, 2019 through February 28, 2020*

Loop Capital adheres to the following rules, regulations and policies in the implementation of its Equal Employment Opportunity ("EEO") and Affirmative Action Program ("AAP").

***1. Background***

**A. The Laws**

- Title VII of the Civil Rights Act of 1964 ("Title VII") prohibits race, color, religion, gender and national origin discrimination. Title VII applies to employers with fifteen (15) or more employees.
- The Department of Labor's Employment Standards Administration's Office of Federal Contract Compliance Programs ("OFCCP") enforces the Executive Order 11246-Affirmative Action. Basically, all Federal contracts and subcontracts are covered under Executive Order 11246. OFCCP requires Loop Capital as a contractor or subcontractor with the federal government to maintain a written affirmative action program to recruit, hire, and promote women, minorities, disabled, and protected veterans; engage in a self-analysis for the purpose of discovering any barriers to equal employment opportunity. OFCCP refers complaints related to an individual to the EEOC for processing.
- The Age Discrimination in Employment Act of 1967 ("ADEA") prohibits age discrimination against individuals who are forty (40) years of age or older.
- Title I of the Americans with Disabilities Act of 1990 ("ADA") prohibits employment discrimination against qualified individuals with disabilities.
- The Equal Pay Act of 1963 ("EPA") prohibits wage discrimination between men and women in substantially equal jobs within the same environment.
- The Immigration Reform and Control Act ("IRCA") makes it unlawful for Loop Capital to hire any person who is not legally authorized to work in the United States. Loop Capital's Chief Human Resources Officer verifies employment eligibility of all new employees. IRCA prohibits discrimination in hiring and discharge based on national origin or on citizenship status. IRCA's anti-discrimination provisions are intended to prevent employers from attempting to comply with the Act's work authorization requirements by discriminating against foreign-looking or foreign sounding applicants rather than actual verification of documentation.

These laws prohibit employment discrimination based on race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information and prohibit Loop Capital or its managers from retaliation for opposing job discrimination, filing a charge with the Equal Employment Opportunity Commission ("EEOC") or other applicable entity or judicial jurisdiction by participating in proceedings under these laws.

### **B. Who is covered?**

All employees of Loop Capital are covered. An employee is someone with whom Loop Capital has an employment relationship. The existence of an employment relationship is most easily shown by a person's appearance on Loop Capital's payroll. Independent contractors, consultants, are not counted as employees.

### **C. Filing a Charge**

If you feel your employment rights have been violated because of race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information, you should immediately contact Loop Capital's Chief Human Resources Officer. If the Chief Human Resources Officer does not address the issue, you should contact Loop Capital's General Counsel. All employment rights matters and charges are treated confidentially.

Any Loop Capital employee who believes that his or her employment rights have been violated because of race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information or because of retaliation may file a charge of discrimination with the EEOC without reprisal by Loop Capital or its managers or employees. The EEOC has a free mediation process which is confidential and which Loop Capital supports.

### **D. Will Loop Capital take action against me if I file a charge with the EEOC?**

No, The EEOC-enforced statutes contain strong protections against retaliation for having filed an EEOC charge, even if the charge is later dismissed by the EEOC or rejected by a court. Loop Capital will not take any action that will affect your relationship with the firm for filing an EEOC claim.

## **2. Goals**

Affirmative action is necessary to prevent discrimination and to address stereotypical thinking and biases that impede employment opportunity. As a minority controlled firm, the goal of Loop Capital's management is to ensure that all individuals have an equal opportunity for employment without regard to race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information.

Loop Capital's Affirmative Action Program includes procedures designed to increase the number of minorities, women and handicapped persons at all levels and in all segments of the workforce where imbalances exist. The program includes an assessment of the existing workforce and the development of realistic goals for any necessary action. These goals, related procedures and timetables are not rigid quotas, but are commitments which Loop Capital makes every good faith effort to achieve.

## **3. Recruitment of Employees/Advertising**

Any solicitation or advertisement for employees will state that Loop Capital applicants will receive consideration for employment regardless of their race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information. When needed, to help address underutilization, help wanted advertising may also be placed in news media oriented towards women or minorities. Copies of approved employment advertisements will be kept on file for review by enforcement agencies.

When Loop Capital places help-wanted advertisements, we will not indicate a preference, limitation, or specification based on race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information. We will not allow any employment agency with which we work to express any such limitation on our behalf, and we will require that these agencies share our commitment to equal employment opportunities.

If Loop Capital posts or advertises positions externally, excluding postings to Loop Capital's website, the position will also be listed with the State of Illinois Workforce Centers, America's Job Bank, or similar governmental agencies as may be required by a particular Loop Capital contract.

As necessary, to ensure that a diverse pool of potential candidates are aware of job openings, we may contact community organizations focused on the employment of women, minorities, and people with disabilities (including but not limited to state vocational rehabilitation agencies or facilities, job training workshops, college placement offices, education agencies, or labor organizations). We will keep documentation of all contacts made and responses received, whether formal or informal for thirty days from the date of receipt. We will make every effort to give these agencies a reasonable amount of time to locate and refer applicants (preferably one month prior to the closing date for receipt of applications).

As may be necessary, we recruit candidates at relevant technical schools and colleges.

We further encourage currently employed minority, female and disabled employees to recruit other similarly situated candidates.

*Consideration of minorities and women not currently in the workforce:* We will take additional steps to encourage the employment of women, minorities, and people with disabilities who are not currently in the workforce, such as providing part-time employment, internships, or summer employment.

#### **4. Hiring Procedures**

All positions will be filled without regard to race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information. Loop Capital utilizes its best efforts to hire qualified minority applicants for employment when vacancies occur. Loop Capital maintains a policy of equal opportunity in employment which is communicated to all levels of management for hiring purposes.

- A. Hiring Managers are to provide copies of job descriptions, resumes and interview notes to the Human Resources Generalist for record retention. Hiring Managers should list basic qualifications relevant to the performance of the particular position in the job description. The Hiring Manager should not place a requirement in the job's qualification that is not necessary for the job as it may result in unintentional discrimination.
- B. Loop Capital reviews all supervisors' adherence to and performance under the EEO Policy and maintains documentation of the reviews.

- C. Notification will be provided to the City when any process has impeded Loop Capital's efforts to maintain the EEO Policy.
- D. Loop Capital does not administer employment tests. Loop Capital uses an Internet application for candidates to submit their resumes or indications of interest.
- E. The Human Resources Generalist maintains records of job offers, and personnel files.

#### **5. Training Procedures**

Minority, female, and disabled employees will be afforded a full opportunity and will be encouraged to participate in all organization sponsored educational and training programs. Copies of training programs provided and attendance will be maintained by the Compliance Department.

We will seek the inclusion of qualified minority, female, and disabled employees in any apprenticeship program in which we participate.

The Human Resources Generalist is required to post all EEO posters in the lunchroom as they are received. Additional copies of the poster can be obtained from the OFCCP website.

#### **6. Promotion Process**

The promotion process has been developed and documented and only legitimate qualifications are considered in promotion decisions. We conduct adverse impact analyses to ensure that women, minorities, and employees with disabilities are promoted at rates substantially similar to those of men, non-minorities, and employees without disabilities.

Annually, the Affirmative Action Officer will prepare an analysis which reviews the Statistical Workforce and make recommendations, if applicable, or state that no changes are necessary as a result of the analysis performed.

#### **7. Termination Process**

We use progressive discipline before terminating employees, where appropriate. All employees are made aware of the discipline process. We conduct adverse impact analyses to ensure that women, minorities, and employees with disabilities do not leave our company at rates substantially dissimilar to those of men, non-minorities, and employees without disabilities.

As a part of our EEO commitment, Loop Capital has made a specific effort to ensure that race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information are not factors in recruitment, selection, promotion, transfer, termination, or participation in training. The following activities are undertaken to ensure religion and national origin are not used as a basis for employment decisions:

- Recruitment resources are informed of our commitment to provide equal employment opportunity.

- Our employees are informed of our policy and their duty to provide equal opportunity.

Employment practices exist and are reviewed by the Affirmative Action Officer annually to ensure that we implement equal employment opportunity without regard to race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information.

- The religious observances and practices of our employees are accommodated, except where the requested accommodation would cause undue hardship on the conduct of our business.
- Hiring managers may not discriminate against any qualified applicant or employee because of race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information in implementing Loop Capital's policies.
- As to former employees, an EEOC filing will not affect the nature of any references given by Loop Capital management or employees.
- Loop Capital may not terminate an employee for filing an internal grievance or external charge with the EEOC or within the judicial system.

#### **8. *Publicity (Internal and External)***

Loop Capital offers an opportunity for individual responsibility and growth in an environment of mutual respect, acceptance, and flexibility among people of all backgrounds. Our challenging yet very enjoyable environment allows for both the development of personal talents and the honing of collaborative work skills. We are constantly raising the bar to achieve the highest standards for our clients and the firm.

In our commitment to creating an environment where talented employees are recognized, and an individual is given the opportunity to do the best for him/herself, we are committed to hiring the best candidates for positions at Loop Capital regardless of race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information or cultural differences.

#### **9. *Program Reporting***

The Affirmative Action Program, along with all employment and other related statistics or records, is available for review during normal working hours. These records are located at Loop Capital, 111 West Jackson Boulevard, Suite 1901, Chicago IL 60604.

As Loop Capital has more than 100 employees, it is required to annually file The Standard Form 100, Employer Identification Report (EEO-1 Report) with the EEOC. The Human Resources Generalist will file the form annually, to the following address:

Equal Employment Opportunity Commission  
EEO-1 Joint Reporting Committee  
P.O. Box 19100  
Washington, DC 20036-9100

The Chief Human Resources Officer will contact the EEOC if there are any questions at 1-



866-286-6440.

**10. Procurement Policies**

It is the policy of Loop Capital and all of subsidiaries and affiliates to afford equal opportunity to all clients and service providers and not to discriminate against a firm based on the owner's race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information.

1. Loop Capital will solicit bids from all qualified firms, regardless of ownership.
2. Loop Capital will evaluate all bids so as to further the principles of non-discrimination and equal opportunity.
3. Loop Capital employees will ensure that final purchases are in accordance with the principles of equal opportunity.
4. All procurement actions such as repeat purchase, extensions change orders, acceptance policy, etc., will be administered by Loop Capital without regard to race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information.

I firmly endorse and support Loop Capital's Equal Employment Opportunity policy and have established an Affirmative Action Program to ensure our continued commitment. I am confident that all subsidiaries and affiliates will provide their full support, cooperation and effort to ensure the committed successful achievement of this program.

Celeste Wright Harris

Celeste Wright Harris

*Chief Human Resources Officer*

March, 2019

Date