

POLICY ON AFFIRMATIVE ACTION

PURPOSE OF THE AFFIRMATIVE ACTION PROGRAM

The Corporation's Affirmative Action Program is a set of specific and results-oriented procedures to which we are committed. The procedures, coupled with our good faith efforts, will ensure equal employment opportunity.

AFFIRMATIVE ACTION POLICY

It is the policy of the Corporation to hire well-qualified people. An integral part of this policy is to provide equal employment opportunity for all persons and to recruit and administer hiring, working conditions, benefits and privileges of employment, compensation, training, appointments for advancement including upgrading and promotion, transfers, and terminations of employment including layoffs and recalls for all employees, without discrimination because of race, color, religion, national origin, sex, sexual orientation, gender identity, age, veteran status, or disability.

"Pay Transparency Policy Statement: The contractor will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information."

In order to implement the foregoing policy, the Corporation will consider qualified applicants from all sources to ensure equal consideration of individuals. Additionally, the Corporation will continue to maintain all Establishment facilities on a completely non-segregated basis and will fully cooperate with all authorized individuals and agencies responsible for administering laws and regulations in the area of equal employment opportunity and fair employment practice. This policy extends to all employees and all aspects of the employment relationship and all personnel are hereby directed to take all reasonable efforts to carry out the spirit and intent of the Corporation's policy. Violations of this policy by any employee will be met with appropriate action.

The Corporation shall disseminate this policy to all its employees, and encourage all indirect sources of job applicants, such as employees, suppliers, shippers, customers, and other contractors, to refer qualified and interested minorities, females, veterans and disabled individuals. The Corporation further pledges to implement additional measures designed to achieve the goals established by this plan.

Responsibility for the direction of equal employment opportunity policy, programs and practices has been assigned to the Establishment EEO/AA Officer.

The objective of the Corporation's Affirmative Action program is to ensure that all employees receive equality of opportunity limited only by each employee's desire and ability. The objective calls for a work environment free of discrimination in employment because of race, color, religion, national origin, sex, sexual orientation, gender identity, age, veteran status, or disability.

The Corporation is assuring the full realization of our stated objective through a continuous process of monitoring and reporting.



January 1, 2022

John Zanin, Controller