



## POLICY STATEMENT

We are committed to our Equal Opportunity policy and Affirmative Action Plan. We prepared the Plan to accurately reflect our current status, our actions to date, and our intentions for the future. We assigned overall responsibility for fulfillment of the Equal Employment Opportunity policy and Affirmative Action Plan to Julianne C. Nevins, Chief Operations Officer, who will periodically conduct analyses of all personnel actions to ensure that we are living up to our stated intention.


Our management is responsible for the ongoing monitoring of all personnel actions in their respective areas of supervision and will carry out the intentions of the Equal Opportunity policy and Affirmative Action Plan to the fullest extent possible.


Our employment practices are non-discriminatory and are based upon factors that are job-related. Factors such as race, color, religion, creed, sex, marital status, familial status, national origin, ancestry, citizenship status, age, disability, medical condition, veteran status, military service, sexual orientation, genetic information, gender identity, or gender expression, and any other factor protected by state or local law, are not job-related. We designed the Affirmative Action Plan to report and monitor all related procedures that will include, but will not be limited to:

1. Recruiting, hiring, training, and promoting in all job classifications without discrimination;
2. Basing decisions on employment only upon factors that are job-related, so as to further the principle of equal employment opportunity;
3. Ensuring that promotion decisions are in accord with principles of equal employment opportunity by imposing only valid requirements for promotional opportunities; and
4. Ensuring that all other personnel actions, such as compensation, benefits, transfers, layoffs, return from layoffs, company-sponsored training, education, tuition assistance, social and recreational programs, will be administered without discrimination.

We promise not to retaliate against any person who files a complaint concerning Equal Opportunity or Affirmative Action and will ensure that no one harasses, intimidates, threatens, coerces, or discriminates against any individual exercising rights under this policy.

The Persons with Disabilities and Veterans Affirmative Action Plan is available for inspection in the Human Resources Department during normal business hours. Please contact Julianne C. Nevins, Chief Operations Officer, for further information.

  
Charles J. Russo  
CEO

  
Julianne C. Nevins  
Chief Operations Officer

## **PAY TRANSPARENCY NONDISCRIMINATION PROVISION**

We 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 us, or (c) consistent with our legal duty to furnish information. 41 CFR 60-1.35 (c)