

Equal Employment Opportunity/Nondiscrimination

It is the policy of the Company to:

- 1. Recruit, hire, train and promote, into all job classifications, the most qualified persons without regard to race, color, national origin, sex, sexual orientation, religion, age, status as a protected veteran, status as an individual with disability, gender identity or any other protected group status or non-job-related characteristic as directed by law.
- 2. Make employment and promotional decisions by utilizing reasonable standards based on the individual's qualifications and valid job requirements as they relate to a particular job vacancy, in accordance with equal employment opportunity requirements.
- 3. Administer all personnel actions relating to the terms, conditions, and privileges in a nondiscriminatory manner.

These actions include, but are not limited to the following: employment, promotion, demotion, transfer, recruitment, recruitment advertising, layoff, termination, rates of pay, other forms of compensation, and training.

This document is not to be considered an employment contract between the Company and its employees. We view the principle of equal employment opportunity as a vital element in the employment process and as a hallmark of good management. Recognizing that equal opportunity is achieved through leadership and the genuine implementation of a viable Affirmative Action Program, we will assign specific affirmative action and equal employment opportunity responsibilities to Managers and Supervisors. We expect all employees to demonstrate sensitivity to and respect for all individuals and to demonstrate commitment to the Company's equal employment opportunity and affirmative action objectives.

Any employee or applicant with questions or concerns about any type of discrimination in the workplace is responsible for bringing these issues to the attention of their immediate Supervisor or Human Resources Manager who is the local EEO Coordinator. The Human Resources Manager's responsibility is to implement and to monitor adherence to this policy. Employees and applicants can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion, or discrimination because they: (1) file a complaint with the Company or with federal, state, or local agencies; (2) assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute; (3) oppose any act or practice made unlawful by federal, state, or local law requiring equal employment opportunity or affirmative action; or (4) exercise any other employment right protected by federal, state, or local law or its implementing regulations.

As the President & CEO of this Company, I have the responsibility to ensure that equal employment and affirmative action receive our full commitment, attention, and management support. We will hold each Manager accountable for the prompt execution of necessary preventative, corrective, and affirmative actions.

I am personally committed to all of the objectives of equal employment opportunity and expect the cooperation and participation of all of our employees in achieving these objectives.

C. Shane Smith

President and Chief Executive Officer