

I. EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

[41 C.F.R. §§ 60-300.44; 60-741.44]

BrightRidge is an Equal Employment Opportunity Employer. BrightRidge is fully committed to guaranteeing to its employees and all applicants for employment equal employment opportunities regardless of race, color, religion, sex, gender, sexual orientation, gender identity, genetic information, national origin, age, disability, veteran status, or any other applicable protected status. This policy includes the strict prohibition of harassment, whether such harassment originates from a supervisor or co-worker. The Company's commitment to equal employment opportunity is applicable to hiring, promotion, demotion, transfer, recruitment and recruitment advertising, selection for training, layoff, recall from layoff, discipline, termination, rates of pay, other forms of compensation, and all other employment-related decisions and actions. BrightRidge shall actively seek, to the best of its ability, to employ and provide promotion and advancement opportunities to the most qualified persons in a nondiscriminatory fashion. As an employee of the Company, it is expected that you will not practice discrimination or show prejudice in any matters concerning customers, visitors, fellow employees, or anyone else associated with the Company under any circumstances.

In addition, BrightRidge is an affirmative action employer. Our Affirmative Action Plan provides in detail the steps we are taking to provide equal employment opportunities for minority groups, women, Veterans, individuals with disabilities, and all other persons for whom affirmative action is required. This Affirmative Action Plan is available for review by employees from 9:00 a.m. to 4:00 p.m., Monday through Friday in our Human Resources Office or by appointment. Applicants for employment with the Company may make an appointment with the Human Resources Office to review our Affirmative Action Plan.

Employees and applicant shall not be subjected to retaliation, harassment, intimidation, threats, coercion or discrimination because they have engaged or may engage in any of the following activities:

- (a) Filing a complaint;
- (b) Assisting or participating in an investigation, compliance evaluation, hearing or other activity related to the administration of the affirmative action provisions of the Executive Order 11246, as amended, the Veterans' Readjustment Assistance Act of 1974, as amended ("VEVRAA"), Section 503 of the Rehabilitation Act of 1973 ("Section 503"), or any other federal, state, or local law requiring equal opportunity for protected veterans or individuals with disabilities or any other state or federal law prohibiting discrimination;
- (c) Opposing any act or practice made unlawful by Executive Order 11246, VEVRAA, Section 503, or their implementing regulations, or any other

federal, state, or local law requiring equal opportunity for protected veterans or individuals with disabilities or any other state or federal law prohibiting discrimination;

- (d) Inquiring about, discussing, or disclosing the compensation of the employee or applicant or another employee or applicant; or
- (e) Exercising any other right protected by any federal, state or local law pertaining to equal employment opportunity or affirmative action.

BrightRidge expects employees to accomplish their work in a lawful, professional, and business-like manner. BrightRidge routinely instructs employees that the Company strictly prohibits unlawful discrimination and/or harassment against any co-worker, customer, or visitor. The Company does not tolerate any form of unlawful harassment. This prohibition includes, but is not limited to, sexual or ethnic remarks, gestures, physical contact, circulation of written material or pictures derogatory to either gender or to any racial, ethnic or religious group and any other offensive verbal or physical behavior. Violations of BrightRidge's policy is grounds for discipline, up to and including discharge.

To discover possible violations of BrightRidge's policies and take remedial actions if violations are identified, BrightRidge has implemented an employee reporting procedure. Any employee who believes that the verbal or physical conduct of another violates this policy - especially if the employee believes that such conduct is interfering with their work performance or is creating an intimidating, hostile or offensive work environment - the employee must immediately bring the matter (including any supporting documentation) to the attention of the employee's supervisor, and must initiate and follow through to completion the formal problem solving/grievance process contained in BrightRidge's Employee Handbook. However, if the employee is uncomfortable reporting the matter to his/her supervisor, the employee must report his/her concerns to the Human Resources Department. BrightRidge and its management treat reports as confidentially as the circumstances allow. The facts of the employee's report will be investigated promptly and dealt with as BrightRidge believes is appropriate under the circumstances. The Company will not authorize, condone, or permit any form of retaliation against any employee for making a good faith claim of harassment.



Jeffery Dykes, Chief Executive Officer