

II. Policy Statement

Equal Opportunity Employer Policy Statement

FREESE & NICHOLS, INC. is an equal opportunity employer and supports this philosophy through its employment policies and practices. We seek and encourage a diversity of skills, talents and viewpoints in our workforce. We strive to place the best available persons in every job and make employment decisions based on merit. Senior management is committed to the principles of equal employment opportunity and to developing a diverse workforce. The top United States executive(s) at FREESE & NICHOLS, INC. support this Affirmative Action program.

All of us are responsible for actively supporting a work environment which provides qualified employees and applicants with equal employment opportunity on a nondiscriminatory basis without regard to race, color, age, national origin, religion, sex, gender identity and sexual orientation, ancestry, marital status, disability, medical condition, veteran status, genetic information, or any other non-job-related basis prohibited by applicable federal, state or local law. Harassment of all kinds is prohibited.

Our equal employment opportunity policies apply to all applicants and employees of the Company and to all areas of organizational life and employment practices. This includes but is not limited to recruitment, hiring, job assignment, training, compensation, benefits, promotion, demotion, dismissal, working conditions and all other conditions and privileges of employment.

If anyone is aware of noncompliance with these principles, it should be immediately reported to a supervisor or a member of Human Resources.

PAY TRANSPARENCY POLICY STATEMENT

FREESE & NICHOLS, INC. 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.

1-1-19

Date

Brian Coltharp