

## **Equal Opportunity and Affirmative Action Policy for Protected Veterans and Disabled Individuals**

It is the policy of Sargent Aerospace & Defense to provide equal employment opportunities without regard to race, color, religion, sex, national origin, age, disability, marital status, veteran status, sexual orientation, genetic information or any other protected characteristic under applicable law. This policy relates to all phases of employment, including, but not limited to, recruiting, employment, placement, promotion, transfer, demotion, reduction of workforce and termination, rates of pay or other forms of compensation, selection for training, the use of all facilities, and participation in all company-sponsored employee activities. Employees and applicants of Sargent Aerospace & Defense will not be subjected to any form of harassment or discrimination for exercising rights protected by, or because of their participation in an investigation or compliance review related to, the Americans With Disabilities Act, Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, the Veterans Employment Opportunities Act of 1998, or any other federal or state non-discrimination law, rule, or regulation.

If you believe that you have been discriminated against in any manner as described above, you should notify Human Resources at 520-744-1000. Sargent Aerospace & Defense will continue to direct management personnel to take such action as may be required to prevent behavior prohibited by this policy. All matters will be investigated and appropriate disciplinary action will be taken, up to and including termination of employment, if necessary. Retaliation against anyone who complains of or witnesses behavior contrary to this policy is also prohibited.

Sargent Aerospace & Defense also maintains affirmative action programs to implement our equal employment opportunity policy for disabled individuals and protected veterans. Employees or applicants who wish to review appropriate portions of Sargent Aerospace & Defense's affirmative action program for disabled individuals and protected veterans may schedule an appointment to do so by contacting Human Resources during normal business hours.



Jeff Post  
President

## Harassment Policy

Sargent Controls & Aerospace is committed to providing a work environment that is free of unwanted, discriminatory, and illegal behavior. In adhering to this philosophy, as well as to Title VII of the Civil Rights Act of 1964 and State Fair Employment Acts, the Company will not discriminate against its employees on the basis of sex. Accordingly, Sargent prohibits any form of harassment or discrimination based on race, color, religion, sex, age, national origin, disability, veteran status or other characteristics protected by law.

Sargent required that all Employees refrain from conduct that is, or could be considered, harassing or discriminatory. As a result, this policy against sexual harassment, other harassment or retaliation, discrimination, and other inappropriate or unprofessional conduct applies to conduct by Employees (including Supervisors) toward their co-workers, as well as conduct by or toward the Company's customers, suppliers, vendors or third parties.

Some examples of conduct that would be considered sexual harassment and/or inappropriate or unprofessional sexual conduct may include but are not limited to:

- Unwanted sexual advances, flirtations, propositions, suggestive insulting, pressure or requests for dates, or sexual comments leering or whistling;
- Intentional physical conduct which is sexual in nature, such as touching, pinching, brushing against another employee's body, assault, or coerced sexual acts;
- Preferential treatment or promises of preferential treatment to an employee (or potential employee) for submitting to sexual conduct;
- Soliciting an employee to engage in sexual activity for compensation, reward, or benefit;
- Sexually-oriented, explicit, offensive, or obscene gestures, remarks, jokes, sexually degrading words (including profanity), gossip of a sexual nature; or comments/questions about a person's sexuality, sexual conduct, or sexual experience; and
- Displaying in the workplace or use of the Company's communications systems (e.g., telephone, e-mail, voicemail, etc...) to transmit or disseminate sexually suggestive objects, pictures, calendars, posters, cartoons, messages, etc., or other materials that are sexual in nature.

An employee who believes he/she has been subjected to sexual harassment, other harassment or retaliated against for making a report of harassment should immediately report the incident to any of the following: his/her Supervisor or Manager and the Human Resources Manager. The complaint, whether made in writing or verbally, will be investigated. All complaints will be treated in a confidential manner. Only those who have a need to know will be made aware of the complaint. People who would be considered as those who need to know could include the alleged harasser(s), witnesses, and select members of the Management Team.

All parties contacted in the course of an investigation will be advised that the individuals involved in the complaint are entitled to respect and that the matter is to be dealt with on a confidential basis. Retaliation by anyone, in any form, against any person who makes a report, participates in any investigation into a report or provides testimony at any proceeding related to a report made under this policy is strictly prohibited. If either party disagrees with the result, a written request for review must be made within ten (10) calendar days after notification of decision. All employees just fully assist and cooperate with any investigation conducted, including, among other things, providing information that is truthful, accurate and complete.

Harassment and retaliation are considered serious violations of our Code of Conduct and will result in appropriate disciplinary action being taken with any employee who violates these policies. Based on the seriousness of the offense, disciplinary action may include written reprimand, suspension or termination.

A handwritten signature in black ink, appearing to read "Jeff Post". The signature is written in a cursive, flowing style with a long horizontal stroke extending to the right.

Jeff Post  
President