

Tolmar Inc. Policy on Equal Employment Opportunity

TO: Employees of Tolmar Inc. and Applicants for Employment

FROM: Anil D'Souza, Chief Executive Officer

DATE: November 20, 2019

It is the ongoing policy and practice of Tolmar Inc. to provide equal opportunity in employment to all employees and applicants. No person shall be discriminated against, in any condition of employment, because of age 40 and over, color, disability, gender identity, genetic information, military or veteran status, national origin, race, religion, sex, sexual orientation or any other applicable status protected by state or local law.

The policy of equal employment opportunity (EEO) shall apply to all terms, conditions, and privileges of employment, including hiring, probation, testing, training and development, promotion, transfer, compensation, benefits, educational assistance, termination, layoffs, social and recreational programs, and retirement. Tolmar Inc. is committed to making employment decisions based on valid requirements, without regard to age 40 and over, color, disability, gender identity, genetic information, military or veteran status, national origin, race, religion, sex, sexual orientation or any other applicable status protected by state or local law. Tolmar Inc. will analyze its personnel actions rigorously to ensure compliance with this policy.

Tolmar 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 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 41 CFR 60-1.35(c).

Tolmar Inc.'s EEO coordinator is Robyn Vilkaitis, at the Tolmar Inc. facility located at 9351 Eastman Park Dr. Windsor, CO. She is responsible for compliance with state and federal EEO laws and affirmative action regulations. She is also responsible for implementing the Tolmar Inc. Affirmative Action Plan (AAP) including equal employment practices, monitoring, and internal reporting. If you believe you have not been treated fairly in accordance with this policy, please contact the EEO Officer. Our AAP for Veterans and the Disabled is available to you in her office during regular office hours or by appointment. All employees and applicants for employment are protected by both company policy and equal employment opportunity/affirmative action regulations and law, from coercion, intimidation, interference, or discrimination for filing a complaint or assisting in an investigation.

I personally endorse the policy of equal employment opportunity. I ask your continued assistance and support in maintaining an environment that reflects Tolmar Inc.'s commitment to equal and affirmative action. All personnel with responsibility for employment and personnel decisions are directed to perform their duties in accordance with this policy.

Anil D'Souza

Anil D'Souza, Chief Executive Officer