



Equal Opportunity, Statement of Affirmative Action and Commitment to Diversity

Hogan maintains an environment free of discrimination and harassment, and therefore any practice that disrespects an individual is harmful to the company's purpose.

To give equal employment and advancement opportunities to all people, we make employment decisions at Hogan based on each person's performance, qualifications, and abilities. It is the policy of Hogan to provide equal employment opportunities without regard to race, color, national origin, gender identity, sex, sexual orientation, pregnancy, age (40 and older), religion, protected veteran status, genetic information (including family medical history), or the presence of a Disability or any other status protected by applicable law. This policy relates to all phases of employment, including, but not limited to, recruiting, selection, job assignment, employment, placement, promotion, transfer, demotion, discipline, reduction of workforce and termination, rates of pay or other forms of compensation, access to benefits, selection for training, the use of all facilities, and participation in all company-sponsored employee activities. Provisions in applicable laws providing for bona fide occupational qualifications, business necessity or age limitations will be adhered to by the Company where appropriate.

As part of the company's equal employment opportunity policy, Hogan will also take affirmative action as called for by applicable laws and Executive Orders to ensure that minority group individuals, females, disabled veterans, recently separated veterans, other protected veterans, Armed Forces service medal veterans, and qualified individuals with disabilities are introduced into our workforce and considered for promotional opportunities. Hogan will make reasonable accommodations for qualified individuals with known disabilities unless making the accommodation would result in an undue hardship to Hogan.

Hogan expressly prohibits any form of unlawful employee harassment or discrimination based on any of the characteristics mentioned above. Improper interference with the ability of other employees to perform their expected job duties is absolutely not tolerated.

Employees and applicants shall not be subjected to harassment, intimidation or any type of retaliation because they have (1) filed a complaint; (2) assisted or participated in an investigation, compliance review, hearing or any other activity related to the administration of any federal, state or local law requiring equal employment opportunity; (3) opposed any act or practice made unlawful by any federal, state or local law requiring equal opportunity; or (4) exercised any other legal right protected by federal, state or local law requiring equal opportunity.

Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of their immediate supervisor,



Human Resources or the Affirmative Action Officer. The Company will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. If an employee feels he or she has been subjected to any such retaliation, he or she should bring it to the attention of the Affirmative Action Officer.

Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below. "Adverse conduct" includes but is not limited to:

- (1) shunning and avoiding an individual who reports harassment, discrimination or retaliation;
- (2) express or implied threats or intimidation intended to prevent an individual from reporting harassment, discrimination or retaliation; or
- (3) denying employment benefits because an applicant or employee reported harassment, discrimination or retaliation or participated in the reporting and investigation process.

The above-mentioned policies shall be periodically brought to the attention of supervisors and shall be appropriately administered. It is the responsibility of each supervisor of the Company to ensure affirmative implementation of these policies to avoid any discrimination in employment. All employees are expected to recognize these policies and cooperate with their implementation. Violation of these policies is a disciplinary offense.

The Affirmative Action Officer has been assigned to direct the establishment and monitor the implementation of personnel procedures to guide our affirmative action program throughout Hogan. A notice explaining the Company's policy will remain posted.