



## Equal Employment Opportunity/Affirmative Action Statement of Policy

It is the policy of Delon Hampton & Associates (DHA) to provide equal employment opportunities without regard to race, color, religion, national origin, sex, age, protected veteran or disabled status, disability, marital status, personal appearance, sexual orientation, gender identity or expressions, genetic information, family responsibilities, familial status, political affiliation, matriculation, source of income and place of residence or business.

The Genetic Information Nondiscrimination Act (GINA) took effect on November 21, 2009. GINA prohibits discrimination in hiring, training and placement of individuals because of their genetic information. GINA generally precludes employers from obtaining and sharing medical information that falls within the definition of genetic information (i.e. prohibits genetic testing and restricts the collection of genetic information). The Vice President of Human Resources is designated as the Company's Equal Employment Opportunity Officer and is responsible for providing direction and assistance to all managerial and supervisory personnel in administering specific affirmative action efforts in each organizational component.

This policy relates to all phases of employment, including, but not limited to, recruiting, employment, placement, upgrading, demotion or transfer, reduction of workforce and termination, rates of pay or other form of compensation, 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 DHA where appropriate.

As part of the DHA's equal employment opportunity policy, we 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 disabled persons are introduced into our workforce and considered for promotional opportunities as they arise

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.

The above-mentioned policies shall be periodically brought to the attention of the supervisors and shall be administered with a positive attitude. 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 Vice President of Human Resources is responsible for the establishment of and monitoring the implementation of personnel procedures to guide our affirmative action program. The Vice President of Human Resources has the responsibility to review and update the Company's affirmative action plan, including responsibility for the audit and reporting system.

This policy will be amended to comply with all new Federal and local laws, established after December 2017.

  
Michael McGuinness, Executive Vice President/COO