

## Equal Employment Opportunity Statement

J.C. Higgins Corp. has an enduring commitment to the concept and practice of equal employment opportunity and affirmative action as well as to affirming the value of diversity and promoting a workplace free from discrimination.

It is the policy of J.C. Higgins Corp. to provide equal employment opportunities without regard to race, color, religion, sex, national origin, age, disability, marital status, veteran status, sexual orientation, gender identity or expression, 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. 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, J.C. Higgins Corp., 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.

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.

Concerns and complaints related to equal opportunity in employment based on aspects of diversity protected under federal, state, and local law, including sexual harassment complaints should be directed to the attention of Jay Layden, Treasurer/CFO. He may be contacted at (781) 886-1029.

J.C. Higgins Corp. is committed to assisting those persons with disabilities who have special needs related to their employment. Information on services provided to prospective and current employees with disabilities can be obtained by contacting Jay Layden. Prospective or current employees in need of a workplace accommodation pursuant to the Americans with Disabilities Act, the Rehabilitation Act, the Vietnam Era Veterans' Readjustment Assistance Act or applicable state statutes should contact Jay Layden.

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.

Jay Layden serves as our Affirmative Action Officer. He has been assigned to direct the establishment and monitor the implementation of Human Resources procedures to guide our affirmative action program throughout J.C. Higgins Corp. Further, you may have the opportunity to review the J.C. Higgins Corp.'s Affirmative Action Plan during normal business hours by contacting Jay Layden. This notice explaining the company's policy will remain posted in an area available to employees and applicants for employment. In addition, this notice will be included in any company policy manual or otherwise made available to employees.



Robert Gallagher  
President & Chief Executive Officer

05/01/18