

**EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT**  
**41 C.F.R. Section 60-741.44(a); 60-300.44(a)**

The employment policy of Gorbel, Inc. (“Gorbel”) is to provide equal opportunity to all persons. Our company, therefore, has made a commitment to equal employment opportunity through a positive and continuing affirmative action program. No employee or applicant for employment will be discriminated against because of race, color, religion, sex, sexual orientation, gender identity, national origin, disability status, military and/or veteran status, or any other protected characteristic under applicable Federal, State, or local law.

To further implement these policies, Gorbel will continue to:

- A. Base decisions on employment so as to further the principle of equal employment opportunity;
- B. Ensure that promotion decisions are in accordance with the principles of equal employment opportunity by imposing only valid requirements for promotional opportunities;
- C. Ensure that all personnel actions (including but not limited to compensation, benefits, transfers, layoffs, return from layoffs, company-sponsored training, education, tuition assistance, social and recreational programs) are administered without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability, military and/or veteran status, or any other Federal or State legally-protected classes.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

- A. Filing a complaint;
- B. Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of affirmative action and equal opportunity regulations;
- C. Opposing any act or practice made unlawful by affirmative action and equal opportunity regulations, including Federal, State, and local law;
- D. Exercising any other right protected by affirmative action and equal opportunity regulations.

Gorbel is committed to enforcing this policy against all forms of discrimination. However, the effectiveness of our efforts depends largely on employees telling us about inappropriate workplace conduct. If employees feel that they or someone else may have been subjected to conduct that violates this policy, they should report it immediately. If employees do not report discriminatory conduct, Gorbel may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

If you are subjected to any conduct that you believe violates this policy, you must promptly contact your direct supervisor or another member of management with whom you feel comfortable reporting such concern as soon as possible after the offending conduct. If, for any reason, you are uncomfortable reporting any of these individuals with your concerns (or if they are otherwise unavailable), you may directly contact the Director of Human Resources, Adrian Thurley, at (585) 924-6776. Upon receipt of any such concern, Gorbel will conduct a prompt investigation. Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. Gorbel will directly and thoroughly investigate the facts and circumstances of all claims of perceived discrimination and will take prompt corrective action, if appropriate.

No one will be subject to, and Gorbel prohibits, any form of discipline, reprisal, intimidation, or retaliation for good-faith reports or complaints of incidents of discrimination of any kind, pursuing any discrimination claim, or cooperating in related investigations.

Equal employment opportunity and affirmative action are not only the law, but are principles of Gorbel and require maximum cooperation from every employee throughout our organization.