

## **Progressive AE on Equal Employment Opportunity and Affirmative Action**

Progressive AE is committed to providing a workplace free of discrimination, harassment and retaliation. Progressive AE is also a federal contractor subject to Executive Order 11246, Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("VEVRAA") and Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"). As such, Progressive AE is committed to taking affirmative steps to promote the employment and advancement of minorities, women, persons with disabilities, and protected veterans. Progressive AE has developed and implemented Affirmative Action programs to further support its commitment to the principle of equal employment opportunity. Progressive AE provides reasonable accommodation to the known physical or mental limitations of an otherwise qualified employee or applicant for employment, unless the accommodation would impose undue hardship on the operation of the company's business.

At a minimum, Progressive AE expects all of its employees to comply with the principles and spirit of our Equal Employment Opportunity (EEO) and Affirmative Action commitments.

Our nondiscrimination policy, which applies to applicants as well as employees, mandates that all terms and conditions of employment (including recruiting, training, hiring, transfers, promotions, terminations, compensation, and benefits in all job titles) be administered without regard to race, color, religion, national origin, gender, sexual orientation, gender identity, age, physical or mental disability, or veteran status. Discrimination against or intimidation of any person based on any of these factors is strictly prohibited.

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:

- Filing a complaint.
- Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended (Section 503), or its implementing regulations, the Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA), as amended, or its implementing regulations, or any other federal, state, or local law requiring equal opportunity for individuals with disabilities or protected veterans.
- Opposing any act or practice made unlawful by Section 503, VEVRAA, their implementing regulations, or any other federal, state, or local law requiring equal opportunity for individuals with disabilities or protected veterans.

- Exercising any other right protected by Section 503, VEVRAA, or their implementing regulations.

Progressive AE expects all leaders to comply with the company's EEO and Affirmative Action policies. Leaders are required to understand these policies and immediately report any discrimination issues that arise. All complaints will be thoroughly investigated and appropriate corrective action—up to and including discharge—will be taken where indicated. Retaliation or harassment against any employee (or applicant) involved in the filing, investigation, or resolution of a discrimination complaint will not be tolerated.

Progressive AE's Human Resources Department has oversight of the development and implementation of the company's EEO and Affirmative Action programs. The Human Resources Department which is responsible for ensuring the implementation of affirmative action program activities, continually monitors progress and takes steps to ensure success. Progressive AE's AA program for individuals with disabilities and protected veterans is available for review by any employee or applicant for employment upon request, which may be made by calling 616-361-2664 during regular business hours. If you have questions about these policies and their implementation, or believe that the company's Equal Employment Opportunity and Affirmative Action policies have been violated, you should immediately contact Human Resources.

#### Maintaining an environment free from workplace and sexual harassment

Progressive AE is committed to maintaining a harassment-free work environment to ensure all Progressive AE employees work in an atmosphere free of abuse or intimidation.

Progressive AE has established policies and procedures mandating a work environment free from discrimination and harassment available in the PAE Employee Handbook. These policies prohibit harassment or discrimination based on the race, color, religion, national origin, gender, sexual orientation, gender identity, age, disability, or veteran status of employees or applicants.

Discrimination or harassment based on any of the above factors is prohibited, as is retaliation against a person who has made a complaint or given information regarding possible violations of these policies. Harassment can include offensive language, graffiti, slurs, jokes, threats or intimidation directed toward members of a particular group. Sexual harassment—which is one type of harassment—can include inappropriate touching, unwelcomed sexual advances, provocative posters and pictures, and e-mail jokes or pictures with gender-based content. Employees who engage in behavior that violates these policies

will be subject to corrective action, up to and including discharge.

Every employee is responsible for maintaining a harassment-free work environment.

Employees are expected and encouraged to immediately report any possible violations of these policies or complaints of discrimination to a manager or Human Resources representative

All complaints regarding violations of these policies will be thoroughly investigated, and appropriate corrective action will be taken. Retaliation for filing a complaint or cooperating with an investigation is strictly prohibited and will not be tolerated. All leaders are required to support our commitment to a harassment-free work environment by preventing and addressing discrimination and harassment. Leaders should understand and communicate this information to their teams.