

## AFFIRMATIVE ACTION AND EQUAL EMPLOYMENT OPPORTUNITY POLICY

Newcomb and Company (hereinafter "Company") 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 the Company to provide equal employment opportunities without regard to race, color, religion, sex, sexual orientation, gender identity or expression, national origin, genetic information, age, disability, marital status, veteran status, or a person's relationship or association with a protected veteran, including spouses and other family members or any other protected characteristic under applicable law. This policy relates to all aspects of employment, including recruitment, selection, job assignment, training, compensation, benefits, discipline, promotion, transfer, the use of facilities, participation in all company-sponsored employee activities, layoff, and termination processes. Provisions in applicable laws providing for bona fide occupational qualifications, business necessity or age limitations will be adhered to by the company where appropriate. Regular review helps ensure compliance with this policy.

The Company has developed and maintained a written Affirmative Action Program (AAP). The Company maintains an audit and reporting system to determine overall compliance with its equal employment opportunity mandates. I have delegated overall responsibility of the AAP to the Affirmative Action Officer, Tammy Leuthold, Human Resources Manager. Tammy Leuthold oversees the affirmative action plan development, modification, implementation, effectiveness, reporting requirements and conducts management updates. The Company invites any applicant and/or employee to review the Company's written Affirmative Action Plan. This plan is available for inspection during normal business hours. Please request an appointment by contacting Tammy Leuthold at 919-862-3012.

The Company will ensure that employees and applicants shall not be subjected to harassment due to their status described above, or any harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities; (1) filing a complaint with the Company or with federal, state, or local agencies regarding status covered under this AAP, (2) assisting or participating in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute pertaining to the status covered under this AAP; (3) opposing any act or practice made unlawful by section 503 and/or VEVRAA, and (4) exercising any other right protected by section 503 and/or VEVRAA or its implementing regulations in this part. Concerns and complaints related to equal opportunity based on aspects of diversity protected under federal, state, and local law, including sexual harassment complaints should be directed to the attention of Tammy Leuthold at 919-862-3012.

As CEO & President of Newcomb and Company, I fully support our affirmative action program and am committed to the implementation of the company's equal opportunity and affirmative action policies. I urge each employee to commit to carrying out the intent of these policies. Specifically, it is the responsibility of the each supervisor to ensure implementation of these policies to avoid any discrimination in employment. Violation of these policies is a disciplinary offense.

07/01/2020



---

Paul Thomas  
CEO & President