



EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION POLICY STATEMENT AND POLICY AGAINST HARASSMENT, DISCRIMINATION AND RETALIATION

1.0 Policy Statement and Purpose

The Rehancement Group, Inc. is an Equal Opportunity Employer and maintains a work environment in which all employees are treated with respect and dignity. The Company has implemented this Equal Opportunity and Affirmative Action Policy Statement and Policy Against Harassment, Discrimination and Retaliation (the “Equal Opportunity Policy”) as part of its longstanding commitment to compliance with all applicable equal opportunity and affirmative action requirements. The purpose of these policies is to communicate the Company’s requirement for all employees to interact in a professional manner and contribute to a work environment that reflects the spirit of equal employment opportunity free from prohibited harassment, discrimination and/or retaliation. These policies also establish our reporting procedures and processes for responding to claims of inappropriate behavior and perceived harassment, discrimination and retaliation so that issues can be identified and remedied internally, promptly, thoroughly and effectively. These policies also align with our Company’s global Human Rights Policy.

2.0 Application

This Equal Opportunity Policy applies to all U.S. based employees of The Rehancement Group, Inc. Additionally, this policy applies whenever and wherever a covered Company employee is performing a function of his or her job, including all Company locations, customer worksites, and Company-sponsored or customer-sponsored business and social functions.

The employment aspects of this Equal Opportunity Policy require that all employment decisions regarding applicants and employees be non-discriminatory, based only on valid job requirements, and extend to all terms, conditions, and privileges of employment including, but not limited to, recruitment, selection, compensation, benefits, training, promotion, and disciplinary actions. Any employee who is found to have violated the anti-discrimination or anti-retaliation provisions of this Equal Opportunity Policy with respect to another individual will be subject to corrective action, up to and including termination.

3.0 Equal Opportunity and Discrimination,

The Company is committed to maintaining a work environment free from all forms of unlawful discrimination and harassment. It is the Company's policy to prohibit discrimination and harassment against any applicant or employee on the basis of race, color, religion (including religious dress and grooming), sex or gender, national origin, ancestry, age, mental or physical disability, medical condition, pregnancy, military or veteran status, genetic information, citizenship status, marital status, sexual orientation, or any other reason prohibited by law. It is also the Company’s policy to provide reasonable accommodation to qualified individuals with disabilities and to the sincerely held religious beliefs, practices or observance of applicants or employees so long as such accommodation does not pose an undue hardship. The Company also prohibits retaliation against any individual who in good faith complains of perceived harassing or discriminatory conduct, participates in a Company or agency investigation into such complaints, requests a reasonable accommodation, or engages in other protected activity.

4.0 Pay Transparency Policy

The Company will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job function cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the Company's legal duty to furnish information. 41 CFR 60-1.35(c)

A job function may be considered essential if: (i) The access to compensation information is necessary in order to perform that function or another routinely assigned business task; or (ii) The function or duties of the position include protecting and maintaining the privacy of employee personnel records, including compensation information.

5.0 Prohibition Against Workplace Harassment, Including Sexual Harassment

A key component of the Company's commitment to equal opportunity is zero tolerance for workplace discrimination and harassment based on, or because of, an individual's race, color, religion (including religious dress and grooming), sex or gender, national origin, ancestry, age, mental or physical disability, medical condition, pregnancy, military or veteran status, genetic information, citizenship status, marital status, sexual orientation, or any other reason prohibited by law. Such harassment, whether committed by Company personnel (including supervisors and managers) or by clients, customers, vendors, or other individuals doing business with the Company, is unlawful and will not be tolerated.

Harassment can be any single incident or pattern of behavior where the effect, intentional or unintentional, creates a hostile, offensive, or intimidating work environment based upon any of the above classifications. Harassing behaviors can include (but are not limited to) unwelcome comments that are gender-based, sexual, or ethnic in nature; religious slurs; racial insults; unwanted touching or sexual advances or requests; age-based remarks; jokes, epithets, inappropriate or derogatory comments, emails, voice mails, or written or pictorial material that makes fun of or insults an individual or a group based upon a protected classification; or similar inappropriate remarks or behavior. Harassment may also include inappropriate comments or conduct between or among individuals in the same protected classification.

Sexual harassment is a form of workplace harassment that is also prohibited by the Company's policy. Both quid pro quo ("this for that") and hostile work environment harassment are prohibited under the Company's Equal Opportunity Policy.

- Quid pro quo harassment may occur when someone in a position of authority or influence asks for or requests some romantic or sexual conduct from someone else, and in exchange, offers some benefit to the other person's employment if the request is accepted, or threatens some detriment to the other person's employment if the request is rejected.
- Hostile work environment harassment may occur when an individual engages in unwelcome visual, verbal, or physical conduct based on or because of sex (or any other characteristic covered by the Company's policy), and where this conduct is either so severe or pervasive that it unreasonably interferes with an employee's work performance or creates a hostile, intimidating, or offensive work environment.

Any employee who is found to have violated this Equal Opportunity Policy will be subject to appropriate corrective action up to and including termination of employment.

7.0 Complaint and Investigation Procedure and Obligations of Company Personnel

This Equal Opportunity Policy shall be posted in all Company facilities, and electronically, in the company's Employee Portal, accessible to all employees. All managers of the Company are responsible for abiding by the terms set forth in this Policy, establishing equal opportunity and affirmative action as an integral part of their personnel decisions, encouraging employees to bring their concerns forward and preventing harassment, discrimination, and/or retaliation in the workplace. All managers and supervisors who receive a complaint of or otherwise observe or become aware of any potential discrimination, harassment, or retaliation, or who receive a request or are aware of an individual's potential need for an accommodation with regard to their employment, must promptly report that issue to Human Resources or Employee Relations for appropriate investigation and handling. Failure by a manager or supervisor to properly report concerns or misconduct of which the manager or supervisor is aware could lead to disciplinary action, up to and including termination of employment. Since all of The Rehancement Group, Inc. personnel have an obligation to contribute to a discrimination- and harassment-free workplace, all employees are strongly encouraged to report any violation of the Company's Equal Opportunity Policy through one of the Company reporting avenues identified below. If you believe that you have been subjected to discrimination, harassment or retaliation, or other behavior that violates the Company's Equal Opportunity Policy, you should tell the offender that his or her behavior is offensive and should be stopped. You should also promptly report your concerns to any of the following:

- Your manager or next-level manager
- Your Human Resources Manager (see additional contact information below)

Every employee is encouraged to come forward without fear of reprisal, as the Company's Equal Opportunity Policy prohibits any and all forms of retaliation against anyone who makes a good faith complaint pursuant to this Policy, or who otherwise participates in a Company or agency investigation into such complaints, even if sufficient evidence is not found to substantiate the complaint. If you believe that you have been or may be subjected to retaliation for making or cooperating in the investigation of a complaint under this Equal Opportunity Policy, please promptly notify the Company through one of the reporting avenues set forth in this Policy. Concerns of retaliation will be investigated and addressed in the same manner as allegations of discrimination and harassment. After the Company receives a complaint alleging a violation of the Company's Equal Opportunity Policy, the Company will conduct a prompt, thorough, and impartial investigation and take corrective action as appropriate based upon information obtained during its investigation. Employee complaints and investigations will be kept confidential to the extent possible. However, complete confidentiality is not guaranteed. No one, regardless of position or length of service, is exempt from this Policy.

8.0 Questions

If you have any questions regarding this Equal Opportunity Policy, wish to report a complaint or concern of harassment, discrimination, retaliation or other perceived misconduct, or need to discuss a request for a reasonable accommodation, please contact your direct manager, next-level manager, or the Human Resources Department.

9.0 Responsibility for Implementation - Statement from David S. Baker, President

As President of The Rehancement Group, Inc., I am committed to the principles of Equal Employment Opportunity and Affirmative Action set forth in this Policy. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company, I have designated Dawn Newton, HR Manager for The Rehancement Group, Inc. to oversee our Company's efforts related to this policy. The HR Manager oversees ensuring adherence to all applicable policies, laws, and regulations in the areas of equal employment opportunity and affirmative action. Further, the HR Manager is responsible for establishing and maintaining an internal audit and reporting system to allow for effective measurement of, and compliance with, the company's affirmative action programs.



David S. Baker
President

We have listed the affirmative action laws we are governed by and their implementing regulations for your easy reference:

- **The Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended**
For more information, please visit: <https://www.dol.gov/agencies/ofccp/vevraa/as-amended>
- **Section 503 of the Rehabilitation Act of 1973, as amended**
For more information, please visit: <https://www.dol.gov/agencies/ofccp/section-503/law>

Notice of Disclaimer – Right to Vary, Terminate or Amend Policy

The Rehancement Group, Inc. ("the Company," "TRG") intends to notify employees of changes to its policies and procedures. However, TRG reserves the right to change, revise, withdraw, or add to its policies, processes, procedures, or guidance at any time, at its sole discretion, with or without notice, if necessary, in accordance with applicable law and regulations by providing such notice as may be required by applicable law. If there is any discrepancy between local law, labor agreements, including works council agreements, or custom and the content of this policy, then local law, labor agreements and/or custom will always govern. This policy does not create any contractual rights or obligations, whether expressed or implied.

Notice of Disclaimer – Contract of Employment

TRG's policies and associated processes, procedures, and guidance are not contracts of employment nor are they intended to create contractual rights or obligations for TRG. The terms of this policy do not create a contract of employment or alter the at-will employment relationship between the Company and Employees in all jurisdictions where employment at-will is permitted. In instances where a contract of employment exists the terms of this policy are not incorporated into an employee's contract of employment with the Company.

Nothing in this policy is to be construed as prohibiting an employee from filing a charge of discrimination with the U.S. Equal Employment Opportunity Commission, an unfair labor practice charge with the National Labor Relations Board, or a similar administrative charge, claim or complaint with any other government agency. Moreover, nothing in this policy is to be construed as restricting any employee's rights under the National Labor Relations Act, Title VII of the Civil Rights Act of 1964, or any other federal, provincial, state, or local law. Nothing in this policy is designed to interfere with, restrain, or prevent employee communications regarding wages, hours, or other terms and conditions of employment. Employees have the right to engage in or refrain from such activities.