COLDSPRING®

Policy Number:	Revision:	Issue Date:	Original Issue Date:	Page
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Subject/Title: Equal Employment Opportunity

Rev H has been flagged for 2022 Annual Refresher Training. No Changes.

1.0 Purpose:

The purpose of this policy is to set forth Coldspring's commitment to the principles of equal employment opportunity.

2.0 Scope:

This policy applies to all employees and applicants for employment at all locations of the Company and any of its subsidiaries.

3.0 Policy:

3.1 It is the policy of the company not to discriminate against any employee or applicant for employment based on race, religion, color, gender identity, sexual orientation, parental status, national origin, age, disability, family medical history or genetic information, political affiliation, military service, protected veterans status or any other non-merit based factor. These protections extend to all management practices and decisions, including recruitment and hiring practices, appraisal systems, promotions, and training and career development programs.

3.2 **Prohibition of forced labor.** Coldspring supports Convention #29 and #105 of the International Labor Organization regarding force labor. Specifically, it is the policy of Coldspring that there shall be no use of forced or compulsory labor, which is defined as work or service under threat or penalty, or any form of indentured labor. Coldspring policy shall be only to employ persons who offer themselves voluntarily to employment by the company.

3.3 **Prohibition of child labor.** Coldspring supports Convention #182 of the International Labor Organization regarding forced labor. It is the policy of Coldspring not to utilize child labor in any form. Coldspring shall follow the minimum age guidelines of the State of Minnesota and the United States of America, whichever shall be more restrictive in this regard.

3.4 All levels of management will be responsible for ensuring compliance with this policy and its procedures. Primary responsibility is placed on supervisors to prevent any acts of discrimination. Supervisors will treat every employee complaint of discrimination seriously.

3.5 The company will take those actions necessary to ensure that all employment practices are free of such discriminations. Such employment practices include, but are not limited to, the following: hiring, upgrading, demotion, transfer, recruitment, advertising, selections for layoff, disciplinary action, termination, rates of pay or other forms of compensation, and selection for training.

4.0 Procedure:

4.1 The Company has appointed each Department Manager as the Department EEO Coordinator. The Director of Human Resources is the Corporate EEO Officer.

4.2 Any employee or applicant for employment who believes he/she has been discriminated against should contact their supervisor, the Department Manager or the Corporate EEO Officer.

4.3 Supervisors must report all complaints to their Department Manager AND the Director of Human Resources.

4.4 The Director of Human Resources, along with the assistance of the Supervisor and the Department Manager, will investigate all complaints of discrimination as promptly and yet as discreetly as possible, with due regard for the rights of all parties.

4.4.1 After completing the investigation, appropriate action will be taken and will depend upon the nature and facts of the evidence supporting the complaint and other surrounding circumstances.

4.4.2 Discrimination can be grounds for disciplinary action up to and including termination.

4.5 All levels of management will ensure that no reprisals stem from the filing of complaints with respect to the complainant, the accused or any witness.

4.6 When an employee or applicant makes known their disability to the Company, the Company will explore reasonable accommodations and implement reasonable accommodations as required by law.