



SCHLEIFRING

**Schleifring North America, LLC
Equal Employment Opportunity (EEO) &
Affirmative Action Program (AAP) Policy**

Version 00, dated 2022.09.01

1.0 Definitions

Schleifring North America, LLC is referred to as “SNA” or “the Company”.

2.0 Reference Documents

Employee Handbook

Code of Ethics & Standards of Conduct

3.0 Equal Employment Opportunity (EEO) Policy

SNA is committed to the principles of equal employment. We are committed to complying with all Federal, State, and local laws providing equal employment opportunities, and all other employment laws and regulations. It is our intent to maintain a work environment which is free of harassment, discrimination, or retaliation because of sex, pregnancy (including childbirth, lactation, and related medical conditions), gender, race, religion, color, national origin, physical or mental disability, genetic information, marital status, age, sexual orientation, gender identity, military service, veteran status, or any other status protected by Federal, State, or local laws. The Company is dedicated to the fulfillment of this Policy in regard to all aspects of employment, including but not limited to recruiting, hiring, placement, transfer, training, promotion, rates of pay, and other compensation, termination, and all other terms, conditions, and privileges of employment.

4.0 Equal Employment Opportunity (EEO) Procedure

SNA will conduct a prompt and thorough investigation of all allegations of discrimination, harassment, or retaliation, or any violation of this Policy in a confidential manner. The Company will take appropriate corrective action, if and where warranted. The Company prohibits retaliation against any employee who provides information about, complains, or assists in the investigation of any complaint of discrimination or violation of this Policy. Discipline for violation of this Policy may include, but is not limited to reprimand, suspension, demotion, transfer, and discharge.

We are all responsible for upholding the Company's Equal Employment Opportunity Policy and any claimed violations of that policy should be brought to the attention of your Supervisor, Senior Management, Human Resources, or emailed to the ethics@schleifringna.com mailbox. Your obligations as an employee includes the reporting of any violations of the Policy.

5.0 Affirmative Action Policy

It is the policy of SNA to take affirmative action as called for by applicable laws and executive orders to provide equal employment opportunities to all qualified persons and to recruit, hire, train, terminate, promote, and compensate persons in all jobs without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information or characteristics, protected veteran status, or other protected classifications (Protected Persons) in accordance with Federal law.

6.0 Affirmative Action Procedures

SNA will follow the procedures below to ensure affirmative action is taken as called for by applicable laws and executive orders:

- Administer personnel actions such as compensation, benefits, transfers, layoffs and recalls, Company-sponsored education training, tuition assistance, and social and recreational programs to ensure that no employees are discriminated against.
- Ensure employment decisions are made in furtherance of the objective of equal employment including, but not limited to:
 - **Recruitment and selection** – Recruitment and hiring of all personnel is accomplished without discrimination against any Protected Persons whose status is protected by applicable State or local law.
 - **Promotion** – Individuals will be upgraded and promoted on the basis of their abilities, skills, and experience. The Company will undertake good faith efforts to ensure that Protected Persons, who are qualified, as well as those who become qualified through training, are considered for promotion.
 - **Transfers** – When vacancies occur, the Company will make a good faith effort to effect transfers of Protected Persons into areas where such employees may have been or may now be underutilized.
 - **Terminations** – When reductions in Company work force occur, they will be based on nondiscriminatory factors and make every good faith effort to ensure that Protected Persons are treated in a nondiscriminatory manner.

7.0 Disability Accommodation

SNA complies with the Americans with Disabilities Act (ADA), the Pregnancy Discrimination Act, and all applicable State and local fair employment practices laws. The Company is committed to providing equal employment opportunities to qualified individuals with disabilities, including pregnancy, childbirth, and related medical conditions, such as lactation or the need to express milk for a nursing child. Consistent with this commitment, the Company will provide reasonable accommodation to otherwise qualified individuals where appropriate to allow the individual to perform the essential functions of the job, unless doing so would create an undue hardship on the business.

If you require an accommodation because of your disability, it is your responsibility to notify your Supervisor. You may be asked to include relevant information such as 1) a description of the proposed accommodation, 2) the reason you need accommodation, and 3) how the accommodation will help you perform the essential functions of your job.

After receiving your request, the Company will engage in an interactive dialogue with you to determine the precise limitations of your disability and explore potential reasonable accommodations that could overcome those limitations. Where appropriate, we may need your permission to obtain additional information from your medical provider. All medical information received by the Company in connection with a request for accommodation will be treated as confidential.

The Company encourages you to suggest specific reasonable accommodations that you believe would allow you to perform your job. However, the Company is not required to make the specific accommodation requested by you and may provide an alternative accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on the Company.

If leave is provided as a reasonable accommodation, such leave may run concurrently with leave under the Federal Family and Medical Leave Act and/or any other leave where permitted by State and Federal law.

The Company will not discriminate or retaliate against employees for requesting accommodation.

8.0 Religious Accommodation

SNA is dedicated to treating the religious diversity of all our employees equally and with respect. Employees may request an accommodation when their religious beliefs deviate from SNA's dress code, schedule, basic job duties, or other aspects of employment. The Company will consider the request but reserves the right to offer its own accommodation to the extent permitted by law. Some, but not all, of the factors that the Company will consider are cost, the effect that an accommodation will have on current established policies and the burden on operations, including other employees, when determining a reasonable accommodation.

If an employee requests an absence for a religious observance, the employee must provide the Company with at least 10 days' notice. The Company may require the employee to make up the time lost if the employee does not have sufficient Paid Time Off (PTO) to use.

Religious accommodation requests should be addressed with the Human Resource Manager.

9.0 Pregnant Workers Fairness Act Notice

The Massachusetts Pregnant Workers Fairness Act prohibits discrimination against employees due to pregnancy or conditions related to pregnancy. The law also requires employers to provide reasonable accommodations to employees who are pregnant or have a condition related to pregnancy. Conditions related to pregnancy include, but are not limited to, morning sickness, lactation, or the need to express breast milk.

Where an individual is suffering from a pregnancy-related disability or condition, a reasonable accommodation may include, but is not limited to:

- More frequent or longer paid or unpaid breaks;
- Time off to attend to a pregnancy complication or recover from childbirth;
- Acquisition or modification of equipment or seating;
- Temporary transfer to a less strenuous or hazardous position;
- Job restructuring;
- Light duty;
- Private non-bathroom space for expressing breast milk;
- Assistance with manual labor; or
- A modified work schedule.

Additional Massachusetts requirements for an accommodation are described in the Massachusetts *MCAD Guidance, Pregnant Workers Fairness Act, Issued 1/23/2018*.

10.0 Posting of Openings

SNA desires to promote qualified employees from within where it believes that is possible, consistent with the need to assure that all positions are staffed by highly competent individuals. New job openings generally will be posted on the employee bulletin board, as well as on the Company internet site. Employees who refer a new employee may be eligible for a referral bonus. Please inquire through Human Resources.

11.0 References

Title VII of the Civil Rights Act of 1964, as amended (29 CFR §§1604, 1605, 1606, 1608.)

Pregnancy Discrimination Act, (29 CFR §1604.10)

Americans with Disabilities Act of 1990, (ADA), as amended (29 CFR §§1630, 1635, 1640, 1641)

(Note that the Referenced Regulations are not exhaustive but contain the essence of the particular statute.)

12.0 Revision History

Revision	Description of Change	Reason for Change	Document Owner	Date
00	Initial Release	Initial Release	Human Resources Department	09-01-2022