

Equal Employment Opportunity and Affirmative Action Program Policy Statement

MTU America has implemented the following policies and procedures as part of its longstanding commitment to compliance with all applicable equal opportunity and affirmative action requirements.

Equal Employment Opportunity (EEO) Policy

MTU America is committed to maintaining a work environment that is free from any and all forms of unlawful discrimination and harassment. It is therefore the company's policy to prohibit discrimination and harassment against any applicant, employee, vendor, contractor, customer, or client on the basis of race, color, religion, sex, sexual orientation, gender identity and expression, national origin, age, disability, pregnancy, veteran status, genetic information or any other basis prohibited by law. It is also the company's policy to prohibit any and all forms of retaliation or threats of retaliation against any individual for engaging in protected activity, including complaining of harassing or discriminatory conduct, or participating in an investigation or proceeding related to such complaints.

Affirmative Action Policy

MTU America is also a federal contractor subject to Executive Order 11246, Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("Section 4212") and Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"). As such, MTU America is committed to taking positive steps to implement the employment-related aspects of the company's EEO policy. Accordingly, it is MTU America's policy to take affirmative action to employ, advance in employment, and otherwise treat qualified minorities, women, protected veterans, and individuals with disabilities without regard to their race/ethnicity, sex/sexual orientation/gender identity and expression, veteran status, or physical or mental disability. Under this Affirmative Action Policy, MTU America also will provide reasonable accommodation to the known physical or mental limitations of an otherwise qualified employee or applicant for employment, unless the accommodation would impose an undue hardship on the operation of the company's business.

The company's Affirmative Action Policy also prohibits employees and applicants from being subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503, Section 4212, or any other Federal, state or local law requiring equal employment opportunity for disabled persons or covered veterans; (3) opposing any act or practice made unlawful by Section 503 or Section 4212 and their implementing regulations, or any other Federal, state or local law requiring equal opportunity for disabled persons or covered veterans; or (4) exercising any other right protected by Section 503 or Section 4212 or their implementing regulations.

The non-confidential portions of the affirmative action program for individuals with disabilities and protected veterans shall be available for inspection upon request by any employee or

applicant for employment. The plans can be reviewed Monday through Friday between the hours of 9:00am to 5:00pm. Submit requests to Human Resources.

Application of Equal Employment Opportunity and Affirmative Action Policies

These policies apply whenever and wherever a company employee is performing a function of his or her job, including all MTU America locations, client worksites, and company-sponsored or client-sponsored business and social functions. The company's equal employment opportunity and affirmative action policies require that employment decisions be based on legitimate job related criteria, and extend to all terms, conditions, and privileges of employment including, but not limited to, recruitment, advertising, job application procedures, hiring, training, promotion, transfer, compensation, job assignments, benefits, and/or other terms, conditions, or privileges of employment. Employees may choose to voluntarily disclose their sex, race, national origin, disability and protected veteran status at any time through the company's Human Resources Information System. Such information will be maintained in a confidential manner and will not be used against an individual when making any employment decisions. Employees and applicants with disabilities and disabled veterans are encouraged to inform Human Resources if there is a need for a reasonable accommodation to perform a job for which individuals are otherwise qualified to perform.

Workplace Harassment, Including Sexual Harassment

A key component of the company's commitment to equal employment opportunity is to prohibit workplace harassment based on, or because of, an individual's race, color, religion, creed, sex, sexual orientation, gender identity and expression, national origin, age, disability, pregnancy, veteran status, citizenship status, or any other reason prohibited by law. Such harassment, whether committed by company personnel or by clients, customers, vendors, or other individuals doing business with MTU America, will not be tolerated.

Prohibited harassment occurs when a supervisor, co-worker, or even a non-employee behaves or acts in such a way that creates a hostile work environment for another employee based on an individual's race, color, religion, creed, sex, sexual orientation, gender identity and expression, national origin, age, disability, pregnancy, veteran status, citizenship status, or other protected characteristic. Prohibited harassment may also occur when submission to or rejection of unwanted sexual conduct by an individual is used as the basis for an employment decision affecting that individual. MTU America management is responsible for ensuring compliance with all aspects of this equal employment opportunity policy and for developing implementation strategies that promote its intent.

Obligations of Company Personnel

All managers and supervisors will take an active part in embedding the principles as ways of working to ensure all qualified employees and prospective employees are considered and treated in a nondiscriminatory manner. All MTU America employees must cooperate with the company's Equal Employment Opportunity and Affirmative Action Policy.

MTU America personnel have an obligation to contribute to a harassment- and discrimination-free workplace. Any employee who suffers or observes harassment or any other violation of this policy is strongly encouraged to notify your manager, People Partner or your Local Ethics Advisor. MTU America will promptly and thoroughly investigate the alleged misconduct and, if a violation of this policy is found, will take immediate and appropriate corrective action.

Anti-Retaliation

Every employee is encouraged to come forward without fear of reprisal, as MTU America's Equal Employment Opportunity and Affirmative Action Policies prohibit any and all forms of retaliation or threats of retaliation against anyone who in good faith complains that these policies are not being followed, or who otherwise participates in an investigation or proceeding related to such complaints, even if sufficient evidence is not found to substantiate the complaint. If you believe that you have been subjected to retaliation, your complaint should be directed to your manager, People Partner or your Local Ethics Advisor.

After receiving a complaint involving a violation of the company's Equal Employment Opportunity or Affirmative Action Policy, the Company will investigate and take corrective action, as appropriate. Complaints and investigations will be kept strictly confidential to the maximum extent possible. No one, regardless of position or length of service, is exempt from these policies.

Responsibility for Implementation

As President I fully support our Affirmative Action Program and am committed to the implementation of the Company's Equal Employment Opportunity and Affirmative Action Policies. I have delegated overall responsibility for these policies to the respective site leaders at the company's U.S. facilities. Each site leader along with the People Partner is responsible for the implementation and auditing of these policies. Complaints should first be directed to a member of management, the site People Partner or your Local Ethics Advisor.



April 5, 2020

David W. Sears,
President, MTU America