



SPIROL International Corporation

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

It is the policy of SPIROL International Corporation not to discriminate against any employee or applicant for employment because of his or her race, color, religion, sex, sexual orientation, gender identity, national original, or because he or she is an individual with a disability or disabled veteran, Armed Forces service medal veteran, or thereafter referred collectively as "protected veterans." It is also the policy of SPIROL International Corporation to take affirmative action to employ and to advance in employment, all persons regardless of their status as individuals with disabilities or protected veterans, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship, at all levels of employment. Furthermore, the company will provide qualified applicants and employees who request an accommodation due to a disability with reasonable accommodations, as required by law.

SPIROL International Corporation prohibits harassment of employees and applicants because they are individuals with disabilities or protected veterans. SPIROL International Corporation also prohibits retaliation against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation or hearing or otherwise seeking to obtain their legal rights under any Federal, State or local EEO law requiring equal employment opportunity for individuals with disabilities and protected veterans. Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

As Chairman of SPIROL International Corporation, I am committed to the principles of affirmative action and equal employment opportunity. In order to ensure dissemination and implementation of equal employment opportunity and affirmation action throughout all levels of the company, I have selected Sandra Boudreau as the HR Manager of SPIROL International Corporation. One of the HR Manager's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of SPIROL International Corporation's programs.

In furtherance of SPIROL International Corporation's policy regarding affirmative action and equal employment opportunity, SPIROL International Corporation has developed a written Affirmative Action Program (AAP) which sets forth the policies, practices and procedures that SPIROL International Corporation is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified individuals with disabilities and qualified protected veterans is accomplished. This AAP is available for inspection by any employee or applicant for employment upon request between 8 a.m. – 5 p.m. at the Human Resources Department. Any questions should be directed to me, your supervisor, or Sandra Boudreau, HR Manager.

Jeffrey Koehl

Chairman

SPIROL International Corporation

April 26, 2018