

ALTARUM EQUAL EMPLOYMENT OPPORTUNITY POLICY

It is the policy of Altarum to:

- 1. Recruit, hire, train and promote, into all job classifications, the most qualified persons without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, or any other characteristic protected by applicable law.
- 2. Make employment and promotional decisions by utilizing reasonable standards based on the individual's qualifications as they relate to a particular job vacancy, in accordance with equal employment opportunity requirements.
- 3. Administer all personnel actions relating to the terms, conditions, and privileges in a nondiscriminatory manner.

Such action shall include, but not be limited to the following: employment, upgrading, demotion, transfer, recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship.

Lesa Litteral, EVP, Chief Administrative Officer is the designated EEO Coordinator at the company. The EEO Coordinator's responsibility is to implement and to monitor adherence to this policy. Employees should feel free to contact the EEO Coordinator should they experience any problems.

Any employees or applicants with questions or concerns about any type of discrimination in the workplace are responsible to bring these issues to the attention of their immediate supervisor or the EEO Coordinator. Employees and applicants can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion, or discrimination because they: (1) file a complaint with Altarum or with federal, state, or local agencies; (2) assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute; (3) oppose any act or practice made unlawful by federal, state, or local law requiring equal employment opportunity or affirmative action; or (4) exercise any other employment right protected by federal, state, or local law or its implementing regulations.

I personally make my commitment to all of the objectives of equal employment opportunity and expect the cooperation and participation of all employees of the company in achieving these objectives.

Michael Monson

Chief Executive Officer and President

Distributed: all personnel