



EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

Eastern Controls is dedicated to the principles of equal employment opportunity. We prohibit unlawful discrimination against applicants or employees on the basis of age 40 and over, color, disability, gender identity, genetic information, military or veteran status, national origin, race, religion, sex, sexual orientation or any other applicable status protected by state or local law. This prohibition includes unlawful harassment based on any of these protected classes. Unlawful harassment includes verbal or physical conduct which has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment. This policy applies to all employees, including managers, supervisors, co-workers, and non-employees such as customers, clients, vendors, consultants, etc.

In order to provide equal employment and advancement opportunities to all individuals, ECI makes all of its employment decisions based upon merit, qualifications, abilities and an individual's conduct and performance. ECI will not make any of its decisions, and will not discriminate against any employee, applicant, or any other covered person because of race, color, religion, creed, national origin or ancestry, ethnicity, sex (including pregnancy), gender (including gender nonconformity and status as a transgender or transsexual individual), sexual orientation, age (40 and over), citizenship, past, current or prospective service in the uniformed services, genetic information, having a diploma based on passing a general educational development test as compared to a high school diploma, physical or mental disability, non-job related handicap or disability, known relationship or association with a person who has a handicap or disability, use of a guide or support animal because of blindness, deafness or physical handicap, or any other characteristic protected under federal, state or local law ("Protected Characteristic").

This Policy applies to all terms and conditions of employment, including, but not limited to, hiring, training, job assignment, promotion, compensation, benefits, discipline and termination.

Any person who has experienced or observed unlawful discrimination must immediately report the discriminatory conduct in accordance with the Complaint Procedure set forth in the ECI Employee Handbook.



ANTI-DISCRIMINATION AND ANTI-HARASSMENT POLICY

ECI strictly prohibits, and will not tolerate, any type of unlawful discrimination or unlawful harassment. This Policy, in addition to the Company's Equal Employment Opportunity Policy, is intended to assist you in complying with this requirement.

What is unlawful discrimination?

Unlawful discrimination means taking adverse action against a person (such as, for example, failing to hire, failing to promote, withholding employment benefits or advantages, or termination) because of that person's Protected Characteristic (as defined above). Unlawful discrimination also includes unlawful harassment.

Any person who has experienced or observed unlawful discrimination must immediately report the discrimination in accordance with the Complaint Procedure set forth in the ECI Employee Handbook.

Employees who report discrimination or who assist in the investigation of a complaint of discrimination will not be subject to retaliation, intimidation or reprisals of any kind. Any violation of this non-retaliation Policy should be reported in accordance with the Company's Anti-Retaliation Policy.

What is unlawful harassment?

Unlawful harassment is any conduct directed at a person because of any Protected Characteristic (as defined above), which has the purpose and/or effect of unreasonably interfering with that person's work performance by creating an intimidating, hostile or offensive work environment.

ECI will not tolerate any form of unlawful harassment in the workplace or at any Company sponsored events. This includes, for instance, verbal harassment (such as derogatory statements, slurs, jokes or threats); physical harassment (such as assault or inappropriate physical contact); written harassment (such as emails, text messages, social media, or other communications); or any other form of harassment (including any unwelcome behavior that is offensive, abusive, threatening, intimidating, humiliating or degrading to another individual).



This Policy applies to the Company's employees, applicants, contractors, visitors, customers and any other person associated with the Company.

Any person who has experienced or observed unlawful harassment must immediately report the harassment in accordance with the Complaint Procedure set forth in the ECI Employee Handbook.

Employees who report harassment or who assist in the investigation of a complaint of harassment will not be subject to retaliation, intimidation or reprisals of any kind. Any violation of this non-retaliation Policy should be reported in accordance with the Company's Anti-Retaliation Policy.

SEXUAL HARASSMENT POLICY

One type of unlawful harassment is sexual harassment. ECI will not tolerate any form of sexual harassment in the workplace or at any Company-sponsored events.

Sexual harassment means any harassment based on someone's sex or gender (including pregnancy and status as a transgender or transsexual individual) and regardless of the harasser's sex or gender. Sexual harassment also includes unwelcome sexual behavior by either men or women toward either men or women. It also includes sex-based harassment directed at someone because of their gender (including that individual's status as a transgender or transsexual individual). Importantly, sexual harassment includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature, when:

- Submission to the advance, request or conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- Submission to or rejection of the advance, request or conduct is used as a basis for an employment decision; or
- Such advances, requests or conduct have the purpose or effect of substantially or unreasonably interfering with an individual's work performance by creating an intimidating, hostile or offensive work environment.

Examples of sexual harassment or other harassing or offensive behaviors include, for example:



- Sexual flirtations, touching, advances, or propositions;
- Verbal abuse of a sexual nature;
- Sexual and other offensive jokes told in person or through any electronic device;
- Sexual innuendo, language or images sent through texts, instant messages, email or other electronic device;
- Posting harassing messages on social media sites;
- Graphic or suggestive comments about an individual's dress or body;
- Sexually degrading words to describe an individual;
- Displaying in the workplace any sexually suggestive objects or pictures;
- Subtle pressure for sexual favors;
- Direct propositions of a sexual nature;
- Remarks about sexual activity or speculations about previous sexual experiences;
- Using Company-provided electronic devices to display or distribute pornography or other sexual content;
- Sexual assault.

This list is illustrative only, and not exhaustive. No form of sexual harassment will be tolerated. This Policy applies to the Company's employees, applicants, contractors, visitors, customers and any other person associated with the Company.

Any person who has experienced or observed sexual harassment must immediately report the harassment in accordance with the Complaint Procedure set forth in the ECI Employee Handbook. Employees who report sexual harassment or who assist in the investigation of a complaint of sexual harassment will not be subject to retaliation, intimidation or reprisals of any kind. Any violation of this non-retaliation Policy should be reported in accordance with the Company's Anti-Retaliation Policy.

PAY TRANSPARENCY NONDISCRIMINATION PROVISION

The contractor (Company) will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to



compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information. 41 CFR 60-1.35(c)

DISABILITY ACCOMMODATION

In addition to providing equal employment opportunities to qualified applicants and employees with disabilities, ECI is also committed to complying with the disability accommodation requirements under the Americans with Disabilities Act (ADA) and the Pennsylvania Human Relations Act (PHRA).

In accordance with all applicable laws, ECI will provide a reasonable accommodation to qualified individuals with a disability if the reasonable accommodation would allow the individual to perform the essential functions of the job, unless doing so would create an undue hardship to the Company.

Requesting a Reasonable Accommodation

If you believe you need an accommodation because of your disability, you are responsible for requesting a reasonable accommodation from your supervisor or Human Resources. You may make the request orally or in writing. However, ECI encourages employees to make their request in writing and to include relevant information, such as:

- A description of the accommodation you are requesting;
- The reason you need an accommodation; and
- How the accommodation will help you perform the essential functions of your job.

After receiving your oral or written request, the Company will engage in an interactive dialogue with you to determine the precise limitations of your disability and to explore potential reasonable accommodations that could help you overcome those limitations. You will be expected to actively participate in this interactive dialogue.

Medical Information

Depending on the circumstances, such as in the event your disability or need for accommodation is not obvious, ECI may ask you to provide supporting documents



(including medical documentation) showing that you have a disability within the meaning of the ADA and applicable state or local laws, and that your disability necessitates a reasonable accommodation. If the information provided in response to this request is insufficient, ECI may require that you see a health care provider of ECI's choice, at our expense. In those cases, if you fail to provide the requested information or see the designated health care professional, your request for a reasonable accommodation may be denied.

ECI will keep confidential any medical information that it obtains in connection with your request for a reasonable accommodation.

Accommodation Determinations

ECI makes determinations about reasonable accommodations on a case-by-case basis, based upon various factors and an individualized assessment of each employee's situation. We will consider the accommodation you request. However, ECI is not required to make the specific accommodation requested by you and may provide an alternative, effective accommodation, to the extent any accommodation can be made without imposing an undue hardship on ECI.

ECI strives to make determinations on reasonable accommodation requests expeditiously and will inform the individual once a determination has been made. If you have any questions about your reasonable accommodation request, please contact your supervisor or Human Resources.

Pregnancy Accommodation

As may be required by law, ECI will also accommodate any physical limitations imposed by pregnancy to the same extent it accommodates employees with a disability and will do so in accordance with the terms and conditions of this Policy.

Employees who are Handicapped or Have Disabled Veteran or Vietnam Era Status

ECI is a government contractor subject to Section 503 of the Rehabilitation Act of 1973 and Section 402 of the Vietnam Era Veterans Readjustment Assistance Act of 1974, which requires government contractors to take affirmative action to employ and advance in employment, qualified handicapped individuals, disabled veterans, and veterans of the Vietnam era. If you are handicapped or a disabled veteran and



would like to be considered under the Affirmative Action Program, please inform Human Resources.

Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. Information obtained concerning individuals shall be kept confidential, except that (1) your supervisor may be informed regarding restrictions on the work or duties of handicapped individuals and disabled veterans and regarding necessary accommodations, and (2) first aid personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment, and (3) government officials investigating compliance with the Acts shall be informed.

If you have a handicap or disability which might affect your performance or create a hazard to yourself or others in connection with the job for which you are applying, please state the following:

- (a) the skills and the procedures you use or intend to use to perform the job notwithstanding the handicap or disability; and
- (b) reasonable accommodations we could make which would enable you to perform the job properly and safely.

The above information should be submitted to Human Resources who also may require additional information.

Voluntary Self-Identification of Disabilities and Veteran Status

As a government contractor, ECI must ask applicants and their entire workforce every five years to complete disability self-identification forms as part of fulfilling our affirmative action requirements. Self-identification of veteran status, if any, will also be solicited in accordance with existing law. Your voluntary disclosure will be confidential and will not negatively impact your employment. Your participation will greatly assist the Company with meeting its reporting obligations and help with more effective outreach, recruitment, and accommodations if required.



RELIGIOUS ACCOMMODATION

In addition to providing equal employment opportunities to qualified applicants and employees regardless of their religious beliefs or practices, ECI is also committed to complying with the religious accommodation requirements as defined under federal and state law. Accordingly, ECI will reasonably accommodate an applicant's or employee's sincerely held religious belief if the accommodation would resolve a conflict between the individual's religious beliefs or practices and a particular work requirement, unless doing so would create an undue hardship for ECI.

Requesting a Reasonable Accommodation

If you believe you need an accommodation because of your religious beliefs or practices or lack thereof, you should request an accommodation from your supervisor or Human Resources. You may make the request orally or in writing. However, ECI encourages employees to make their request in writing and to include relevant information, such as:

- A description of the accommodation you are requesting;
- The reason you need an accommodation; and
- How the accommodation will help resolve the conflict between your religious beliefs or practices, and one or more of your work requirements.

After receiving your oral or written request, the Company will engage in an interactive dialogue with you to explore potential accommodations that could resolve the conflict between your religious beliefs or practices and one or more of your work requirements. You will be expected to participate actively in this interactive dialogue, and to provide additional information as reasonably required. ECI may ask you to provide additional information about your religious practices or beliefs and the accommodation requested. If you fail to provide the requested information, your request for an accommodation may be denied.

Accommodation Determinations

ECI makes determinations about reasonable accommodations on a case-by-case basis, based upon various factors and an individualized assessment of each employee's situation. We will consider the accommodation you request. However, ECI is not



required to make the specific accommodation requested by you and may provide alternative, effective accommodation, to the extent any accommodation can be made without imposing an undue hardship on ECI.

ECI strives to make determinations on reasonable accommodation requests expeditiously and will inform you once a determination has been made. If you have any questions about your reasonable accommodation request, please contact your supervisor or Human Resources.

ANTI-RETALIATION POLICY

Unlawful retaliation is any form of discipline, reprisal, intimidation or other form of retaliation against an employee for participating in any activity protected by law. ECI strictly prohibits and will not tolerate unlawful retaliation against any employee, by any employee. Any violation of this non-retaliation Policy should be reported to your supervisor or Human Resources at your first opportunity.

Examples of activities protected by law include:

- Submitting a good faith complaint (written or oral) in accordance with Company procedures respecting unlawful discrimination or harassment;
- Participating in ECI's internal investigation into allegations of unlawful discrimination or harassment;
- Supporting another employee's good faith complaint of unlawful discrimination or harassment;
- Requesting in good faith a disability or religious belief/practices accommodation under the Americans with Disabilities Act or under the Pennsylvania Human Relations Act;
- Requesting or taking leave under any federal, state or local leave law;
- Filing a worker's compensation claim; and
- Engaging in any activities protected by Section 7 of the National Labor Relations Act.

The examples above are illustrative only, and not exhaustive.



COMPLAINT PROCEDURE

If you are subjected to, or if you witness, conduct you believe to be unlawful or conduct you believe to be in violation of this Handbook, you must report this conduct to your direct supervisor at your earliest opportunity. If the conduct involves your direct supervisor, or if you believe it would be inappropriate to report the conduct to your direct supervisor, then you must report this conduct to Human Resources at your earliest opportunity.

When possible, ECI encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. ECI recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

Your complaint should be as detailed as possible, including all pertinent facts and circumstances, the names of all individuals involved, and the names of all witnesses.

No employee shall be discharged or retaliated against in any manner because that employee made a bona fide complaint in compliance with this Complaint Procedure or assisted in the investigation of a complaint. Any violation of this non-retaliation Policy should be reported in accordance with the Company's Anti-Retaliation Policy.

Once a complaint is received, the Company will conduct an impartial investigation in compliance with the law. All employees are required to cooperate in these investigations by, for example, providing all pertinent information to the Company. Although the facts gathered during the investigation and the Company's findings will be considered confidential, information will be shared on a need-to-know basis.

Any employee who is found to have engaged in improper conduct shall be subject to disciplinary action, up to and including termination, depending on the circumstances.

If you have made a complaint which has not been promptly handled, or if you are not satisfied with the investigation or disposition of the complaint, you should report the basis for your dissatisfaction to your supervisor or Human Resources at your first opportunity.



Employees must be truthful in reporting complaints and providing information during the course of an investigation. An employee who intentionally makes a false complaint under this Policy or intentionally provides false information during the course of an investigation of a complaint will be subject to discipline, up to and including termination.

I personally endorse the policy of equal employment opportunity. I ask your continued assistance and support in maintaining an environment that reflects Eastern Controls commitment to equal and affirmative action. All personnel with responsibility for employment and personnel decisions are directed to perform their duties in accordance with this policy.

A handwritten signature in black ink that reads "Clifton E. McLaughlin, Jr." The signature is written in a cursive style.

Clifton E. McLaughlin, Jr.
President