



EQUAL EMPLOYMENT OPPORTUNITY POLICY

It is the policy of The Blakley Corporation, Inc. to provide equal employment opportunities to all individuals without regard to race, color, religion, gender, sexual orientation, gender identity, ethnicity, national origin, age, disability or veteran status. This policy covers all phases of employment, including but not limited to, recruiting, hiring, placement, upgrading, promotion, demotion or transfer; layoff, recall and termination; rates of pay or other forms of compensation, fringe benefits and selection for training; to the use of all facilities and to participation in all company sponsored employee activities. To ensure that employment and promotional decisions are made in accordance with equal employment opportunity, the company imposes only valid requirements for these opportunities. This policy shall be periodically brought to the attention of the supervisory force and shall be administered with a positive attitude.

It is the responsibility of each supervisor to ensure affirmative implementation of this policy in order to avoid any discrimination in employment. All employees are expected to recognize this policy and cooperate with its implementation. Violation of this policy is a disciplinable offense.

The Blakley Corporation, Inc. will evaluate the performance of its management and supervisory personnel on the basis of their involvement in achieving these equal employment opportunity objectives as well as other established criteria. In addition, all other employees are expected to perform their job responsibilities in a manner that supports equal employment opportunity for all.

I have appointed Melissa Ritter, Human Resources Manager as EEO Officer to manage the Equal Employment Opportunity Program. This person's responsibilities will include monitoring all Equal Employment Opportunity activities and reporting the effectiveness of the company's Affirmative Action Program, as required by Federal, State and Local agencies. I fully support this policy and our Affirmative Action Program. Employees are encouraged to contact the EEO Officer with any questions, concerns or complaints they may have regarding equal employment.

If any employee or applicant believes he or she has been treated in a way that violates this policy, they should contact Melissa Ritter, Human Resources, (317) 576-8390, or any other representative of management, including myself. Responsible parties will investigate allegations of discrimination or harassment as confidentially and promptly as possible and we will take appropriate action in response to these investigations. We prohibit retaliation against an individual for reporting a concern, participating in an investigation, or taking other action in opposition of any discriminatory or harassing conduct.

William F. Sullivan, CEO

January 1, 2018