

DEANSTEEL MANUFACTURING COMPANY

Equal Employment Opportunity Policy

The employment policy of Deansteel Manufacturing Company is to provide equal employment opportunity for all qualified employees and applicants without regard to race, color, ethnicity, gender (including pregnancy and gender identity), religion, national origin, age, disability, veteran status, sexual orientation, marital status, or other non-merit based factor and to ensure affirmative action is taken in fulfillment of this policy. This obligation shall apply to all employment practices including but not limited to:

- Recruiting, hiring, promotion, transfer, demotion, layoff, termination and training
- Treatment during employment
- Rates of pay or other forms of compensation and benefits
- Selection for training including apprenticeship and on-the-job training as applicable
- Social and recreational activities or programs

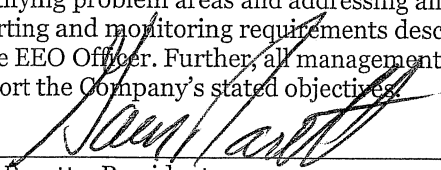
This policy is consistent with the requirements and objectives set forth by Executive Order 11246, as amended, Section 503 of the Rehabilitation Act of 1973, as amended, and the Vietnam Era Readjustment Assistance Act of 1974, as amended. In addition, Deansteel Manufacturing Company does not and will not discriminate against any employee or applicant for employment on any of the aforementioned factors in regard to any position for which the employee or applicant for employment is qualified. The chief United States executive of Deansteel Manufacturing Company, John Dean, has committed to and fully supports the principles of equal employment and affirmative action.

The objective at Deansteel Manufacturing Company is to employ individuals who are qualified or trainable for positions by virtue of job related standards of education, training, experience and other applicable and valid qualifications. Deansteel Manufacturing Company makes and will continue to make every effort to provide reasonable accommodations to any physical and mental limitation of individuals with disabilities and disabled veterans unless such accommodations would impose an undue hardship to Deansteel Manufacturing Company's business.

Harassment is both illegal and against the policy of Deansteel Manufacturing Company for any employee, supervisor, manager or independent contractor to harass anyone on the basis of race, color, ethnicity, gender (including pregnancy and gender identity), religion, national origin, age, disability, veteran status, sexual orientation, marital status, or other non-merit based factor. Ensuring compliance and continued implementation of Deansteel Manufacturing Company's equal employment opportunity policy is the responsibility of the undersigned. This responsible official will review this policy of equal employment opportunity at least annually and measure progress against these stated objectives.

In compliance with the Order and related regulations, this Affirmation Action Program will be updated and revised annually based on changes in the Company's workforce, changes in availability data, changes in goals and other changes, as well as revisions of applicable laws and regulations and processes. Parts of the Affirmative Action Program may be reviewed by an employee or applicant for employment as appropriate by making an appointment with the Human Resources representative during normal business days between the hours of 8:30 a.m. and 4:30 p.m.

I have designated Michael Gittinger to be the Equal Employment Opportunity Officer. Michael Gittinger has primary responsibility, with assistance from management personnel, for designing and implementing our affirmative action efforts, and for monitoring on an ongoing basis our compliance to stated objectives, identifying problem areas and addressing all areas of concern. Satisfactory and timely completion of the reporting and monitoring requirements described in the Affirmative Action Program is another requirement of the EEO Officer. Further, all management personnel are held accountable for completing specific tasks that support the Company's stated objectives.



Gary Rosetta, President

10-10-14
Date