

Sabel Systems' Equal Employment Opportunity and Affirmative Action Policy

It is the policy of Sabel Systems Technology Solutions, LLC, (the "Company") not to discriminate or allow the harassment of employees or applicants on the basis of sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or expression (including transgender status), sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected Veteran status, actual or perceived ancestry, citizenship status, age, marital status, genetic information, natural or protective hairstyle or any other characteristic protected by law with regard to any employment practices, including recruitment, advertising, job application procedures, hiring, upgrading, training, promotion, transfer, compensation, job assignments, benefits, and/or other terms, conditions, or privileges of employment, provided the individual is qualified, with or without reasonable accommodations, to perform the essential functions of the job. This policy applies to all jobs at the Company. The Company will continue to ensure that individuals are employed, and that employees are treated during employment, without regard to their sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or expression (including transgender status), sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected Veteran status, actual or perceived ancestry, citizenship status, age, marital status, genetic information, natural or protective hairstyle or any other characteristic protected by law in all employment practices as follows:

Employment decisions at the Company are based on legitimate job-related criteria. All personnel actions or programs that affect qualified individuals, such as employment, upgrading, demotion, transfer, recruitment, advertising, termination, rate of pay or other forms of compensation, and selection for training, are made without discrimination based upon the individual's sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected Veteran status, or any other characteristic protected by law.

In addition to an opportunity to self-identify during the application process and time of hire, employees may choose to voluntarily disclose their sex, race, national origin, disability, and protected Veteran status at any time by contacting Human Resources (hr@sabelsystems.com). Such information will be maintained in a confidential manner and will not be used against an individual when making any employment decisions. Employees and applicants with disabilities and disabled Veterans are encouraged to inform Human Resources if they need a reasonable accommodation to perform a job for which they are otherwise qualified. The Company makes, and will continue to make, reasonable accommodations for the known physical or mental limitations of an otherwise qualified applicant or employee to promote the employment of qualified individuals with disabilities and disabled Veterans, unless such accommodations would impose an undue hardship on the operations of the Company's business.

Sabel Systems and its owners are fully committed to the principles of equal employment opportunity and affirmative action. As Director of Human Resources, I support the successful implementation of the Company's Affirmative Action Programs. I have appointed Kimberly Kenny, Affirmative Action Officer for the Company, with responsibility for implementation of the Company's affirmative action activities. The Affirmative Action Officer has the full support of top management and the staff necessary to fully implement this Program. All managers will take an active part in the Company's AAP to ensure all qualified employees and prospective employees are considered and treated in a nondiscriminatory manner with respect to all employment decisions. Furthermore, Sabel Systems will solicit the cooperation and support of all employees for the Company's Equal Employment Opportunity and Affirmative Action Policy.

The Company's Affirmative Action Programs include an audit and reporting system, which, among other things, uses metrics and other information to measure the effectiveness of all Programs. The Affirmative Action Officer has been assigned the responsibility for periodically reviewing progress in compliance and implementation of the policy of affirmative action. In accordance with public law, the Company's affirmative action programs for qualified individuals with disabilities and protected Veterans are available for inspection between the hours of 9-5 EST by reaching out to the Human Resources Department (hr@sabelsystems.com).

In addition, employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in, or may have engaged in, filing a complaint, assisting or participating in an investigation, compliance review or hearing, or other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Executive Order 11246, all as amended, and/or any other federal, state, or local law or regulation regarding equal employment opportunity, opposing any act or practice made unlawful, or exercising any other right protected by such laws or regulations. Sabel Systems 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 employer's legal duty to furnish information.

A handwritten signature in black ink, appearing to read "Lilli Carter". The signature is fluid and cursive, with a large initial "L" and "C".

Lilli Carter, PHR, SHRM-CP
Director of Human Resources

January 1, 2023