



## **EQUAL OPPORTUNITY EMPLOYMENT AND PAY PARITY**

Ocean Era, Inc. (“Ocean Era” or the “Company”) believes employees must be treated fairly and with dignity. We are committed to a work environment free from discrimination.

Company is an equal opportunity employer, and enthusiastically accepts its responsibility to make employment decisions without regard to race (including traits historically associated with race such as hair texture and protective hairstyles), color, national origin, ancestry, place of birth, citizenship, sex, pregnancy (including childbirth, breastfeeding or related medical conditions), sexual orientation, gender, gender identity or expression (including sex stereotyping), transgender status, age, religion or religious creed (including religious observances, practices, dress, head scarves, beards, and grooming standards associated with one’s religious beliefs or practices), physical, intellectual or mental disability, medical condition, family care or medical leave status, genetic information, AIDS/HIV status, marital or domestic partnership status, military service, veteran or military status, military caregiver status, status as a victim of domestic violence, assault or stalking, weight, height, criminal history (including arrests and records of conviction), political affiliation, position in a labor dispute, application or participation in a public assistance program, or any other characteristic or status protected by federal, state or local laws. Discrimination based on the perception of someone being in a protected class or affiliation with someone in a protected class is also unlawful. The spirit and intent of this policy also applies to all of our professional and client relationships.

Equal employment opportunity will be extended to all persons in all aspects of the employer-employee relationship, including advertising, recruitment, hiring, compensation, upgrading, training, promotion, transfer discipline, layoff, recall, termination, and other forms of compensation or benefits and training. Company does not discriminate against employees based on gender, race, ethnicity, or any other protected characteristic when making pay decisions. The company will not base pay decisions solely on considerations of prior wages or salaries. Employees who perform substantially similar work, as measured by the skill, effort, and responsibility required to perform under similar working conditions, will not be paid differently based on any protected characteristic, unless any such differences are job-related and consistent with business necessity (e.g., due to seniority, differences in quantity or quality of production, performance, education, training, or experience).

Ocean Era’s commitment to equal opportunity employment applies to all persons involved in the operations of Company including those who help Company to establish a business,

service or professional relationships and prohibits unlawful discrimination by any employee of Company including supervisors and coworkers, as well as outside third parties, including customers and vendors.

Any violation of this policy will not be tolerated and will result in appropriate disciplinary action, up to and including termination. If an employee believes someone has violated this policy, the employee should report it to any member of the management team or your Aspen Human Resources Representative. All reports will be promptly, thoroughly and objectively investigated. Any form of retaliation against anyone for reporting perceived violations of this policy, pursuing any such claim, or cooperating in any way in the investigation of such claims is strictly prohibited.