


Title: EQUAL EMPLOYMENT OPPORTUNITIES		No. HR-02
 West <i>Corporate Policy and Procedure</i>	Responsible Function: Corporate Human Resources	
	Reviewed: 10/01/2018	Effective: 10/01/2018
	Supersedes: n/a	
Preparer: Sr. Specialist, HR Diversity	Owner: SVP & CHRO	Approver: President & CEO

1. PURPOSE

This policy describes our obligations as an equal opportunity employer and sets forth our promises to our employees and applicants and how we will fulfill them.

2. SCOPE

This policy applies to all U.S.-based employees, including Puerto Rico.

3. POLICY

The Company complies with all applicable laws, fair employment practices, and is an equal opportunity employer. As stated in our Prohibition of Discrimination and Harassment Policy (HR-01), the Company does not discriminate against employees, applicants or any other covered persons because of any characteristic protected under applicable federal, state or local law. All employees, other workers and representatives are prohibited from engaging in unlawful discrimination.

In addition, the Company will reasonably accommodate any disabled individual, unless doing so would create an undue hardship as described in our Accommodating Persons with Disabilities Policy (HR-20), and will also, where appropriate, provide reasonable accommodations for an employee's religious beliefs or practices.

As an equal opportunity employer, we will ensure that:

- Administration of all employment practices will not unlawfully discriminate on the basis of sex (including pregnancy, childbirth, or related medical conditions), race, age, religion, color, sexual orientation, gender identity or expression, veteran or military status, national origin, disability, or any other basis prohibited under applicable law.
- Reasonable accommodations for religious beliefs or practices and for persons with covered disabilities are compliant with applicable legal requirements.
- Hiring, placement, promotion and transfer of employees are based solely on each individual's qualifications for the position available.
- Disciplinary actions, layoffs and terminations are made without regard to any protected characteristic.

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- Participation in all training and educational programs is offered to all employees who meet the eligibility requirements. These eligibility requirements are established and amended as necessary without regard to any protected characteristic.
- Social and recreational events and facilities are open to all regular employees.
- All jobs at the Company are evaluated and graded based solely upon their content. Employees performing the same jobs are paid according to the wage schedule established for that particular job, regardless of any protected characteristic.

Equal opportunity can only be achieved through leadership and commitment to our Affirmative Action Program (“AAP”). Our AAPs cover minorities, women, qualified individuals with disabilities, and protected veterans, and all have been adopted in compliance with applicable laws, regulations and Executive Orders. The Company takes positive measures to ensure that its workforce is diverse through Affirmative Action measures. AAPs have been developed and implemented, including auditing and reporting systems, to ensure the Company has a diverse workforce at all levels. The Company invites any employee or any applicant to contact our EEO Officer, during normal business hours, if you have any questions or concerns about the Company’s AAP or if you want to review the Affirmative Action Plan for individuals with a disability or for protected veterans.

In addition, to satisfy its regulatory obligations and support the company's commitment to build and maintain a diverse and inclusive workplace, the Company encourages its current employees and applicants to voluntarily and confidentially self-identify race or ethnicity, gender, protected veteran and disability status.

If an employee, applicant or other covered person believes that he or she has been discriminated against in violation of this policy, that individual must report the alleged discrimination to the Company in accordance with the procedures established under our Prohibition of Discrimination and Harassment Policy(HR-01).

Anyone, regardless of position or title, whom the Company determines has violated this policy, will be subject to discipline, up to and including termination.

No one will be subject to and the Company prohibits, any form of discipline, reprisal, intimidation or retaliation against an employee who, in good faith, reports incidents of violations of this policy, pursues any claim based on a violation of this policy or cooperates in a related investigation.

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4. RESPONSIBILITY

As President and Chief Executive Officer, I am committed to the principles of Affirmative Action and Equal Employment Opportunity. Overall responsibility for directing and implementing the Equal Employment Opportunity Policy as described here and the Company’s AAP has been assigned to Sandy Keller who serves as the EEO Officer. The Human Resources head for each of the Company’s establishments is responsible for local Affirmative Action efforts. All members of management must be familiar with this policy, must fully support it, and are responsible for applying these principles in good faith. All employees must comply with this policy and are expected to demonstrate commitment to our Affirmative Action efforts to ensure that equal opportunity is available to all, to encourage diversity within the Company and to demonstrate sensitivity to and respect for others.

APPROVED:

 President & Chief Executive Officer