

Affinius Capital Equal Employment Opportunity Statement

Affinius Capital has a long-standing commitment to equal employment opportunity. We recognize and value the benefits and strengths that diversity brings to our employees and the company. We thrive in an environment that encourages respect and trust. Our commitment includes fostering a work environment of inclusion and respect for others that is free from discrimination, harassment, and inappropriate conduct. It is our policy to continue to provide equal employment opportunity to all applicants and employees without regard to race, color, religion, sex, national origin, sexual orientation, gender identity, age, disability, protected veteran status, or any other protected characteristic. Pursuant to Executive Order 11246, Section 503 of the Rehabilitation Act and the Vietnam Era Veterans' Readjustment Assistance Act, we have developed Affirmative Action Programs to assist with the recruitment and advancement of individuals covered by these laws.

Affinius Capital is committed to recruiting, hiring, training, and promoting persons in all job titles, as well as ensuring that all other personnel actions are administered, without regard to the protected characteristics outlined above. All employment decisions will be based on valid job requirements or other legitimate, non-discriminatory reasons. Our employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in activities such as: (1) filing a complaint; (2) assisting or participating in an investigation, compliance evaluation, hearing, or any other related activities associated with the administration of the affirmative action provisions of the laws set forth above, or any other Federal, state, or local law requiring equal opportunity; (3) opposing any act or practice made unlawful by the laws set forth above or their implementing regulations, or any other Federal, state, or local law requiring equal opportunity; or (4) exercising any other right protected by the laws set forth above or their implementing regulations.

In addition, Affinius Capital has designed and implemented an audit and reporting system that will: (1) measure the effectiveness of our Affirmative Action Programs; (2) indicate any need for remedial action; (3) determine the degree to which objectives have been attained; (4) determine whether individuals with protected characteristics have had the opportunity to participate in all company-sponsored educational, training, recreational, and social activities; (5) measure our compliance with the Programs' specific obligations; and (6) document the actions taken to perform items (1) through (5) above. If, after performing this audit, we determine that our MP's are deficient, we will undertake necessary action to bring our Programs into compliance.

Leonard O'Donnell, President and CEO, has the responsibility for ensuring full compliance with the provisions of the above-referenced laws and other applicable directives. Responsibility for implementing and monitoring these Programs is assigned to our EEO Officer - Roxanne Bond, Managing Director of Human Resources. Our Affirmative Action Plans for Individuals with a Disability and Protected Veterans are available to applicants and employees, upon request, on regularly scheduled workdays by contacting our EEO Officer. Any applicant or employee who has a disability and needs access to this Policy Statement in a different format should contact the EEO Officer - employment@affiniuscapital.com. In addition, employees may voluntarily self-identify as an individual with a disability or a protected veteran at any time by contacting our EEO Officer.



Leonard J. O'Donnell
President & CEO



Roxanne Bond
Managing Director, Human Resources