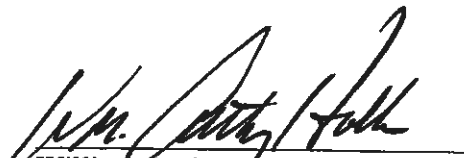


## EQUAL EMPLOYMENT OPPORTUNITY POLICY

1. Edfinancial Services, LLC through responsible managers shall recruit, hire, train, and promote in all job titles without regard to race, color, national origin, religion, sex, disability, age or status as a disabled veteran or veteran of the Vietnam Era.
2. Managers shall insure that all other personnel actions such as compensation, benefits, Company sponsored training, transfer, demotion, termination, layoff, return from layoff, and social recreation programs shall be administered without regard to race, color, national origin, religion, sex, physical, age, or status as a disabled veteran or veteran of the Vietnam Era.
3. Managers shall base employment decisions on the principles of equal employment opportunity and with the intent to further the Company's affirmative action program goals.
4. Managers shall take affirmative action to ensure that minority group individuals, females, veterans of the Vietnam Era and qualified disabled persons and disabled veterans are hired and that these employees are encouraged to aspire for promotion and are considered as promotional opportunities arise.
5. Each year the policy statement will be reaffirmed and reissued. All employees will be informed of the reaffirmation of the policy by the posting of the policy statement on bulletin boards.



William Anthony Hollin, CEO

## **II. Policy Statement on Equal Employment Opportunity for Individuals with Disabilities [41 CFR 60-741.44(a)]**

As the Chief Executive Officer of EdFinancial Services, LLC, I am committed to the principles of affirmative action and equal employment opportunity for individuals with disabilities. Therefore, it is the policy of EdFinancial Services not to discriminate on the basis of disability and to take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels within the company. EdFinancial Services will ensure that all employment actions, including but not limited to recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, will be administered without regard to disability. EdFinancial Services will also provide qualified applicants and employees with disabilities with needed reasonable accommodations, as required by law, and will ensure that all employment decisions are based only on valid job requirements.

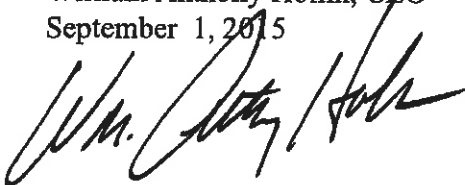
EdFinancial Services prohibits harassment of employees and applicants on the basis of disability and will conduct training to try to prevent any harassment or discrimination before it occurs. EdFinancial Services also prohibits retaliation or punishment against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing regarding EdFinancial Services's employment practices, or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for individuals with disabilities. Prohibited retaliation includes, but is not limited to harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

In furtherance of EdFinancial Services's policy regarding affirmative action and equal employment opportunity, EdFinancial Services has developed a written Affirmative Action Program (AAP) that sets forth the policies, practices and procedures that EdFinancial Services is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified individuals with disabilities is accomplished.

This AAP is available for inspection by any employee or applicant for employment upon request, during normal business hours, in the Human Resources office. Interested persons should contact the Human Resources office for assistance.

In order to ensure employment opportunity and affirmative action throughout all levels of EdFinancial Services, I have designated EdFinancial Services's Director of Recruiting & Retention, Vicki Summers, as the Equal Employment Opportunity (EEO) Officer for EdFinancial Services. The EEO Officer will establish and maintain an internal audit and reporting system that will track and measure the effectiveness of EdFinancial Services's AAP and show where additional action is needed to meet EdFinancial Services's objectives.

William Anthony Hollin, CEO  
September 1, 2015



## **II. Policy Statement on Equal Employment Opportunity for Protected Veterans [41 C.F.R. § 60-300.44(a)]**

As the CEO of Edfinancial Services, LLC, I am committed to the principles of affirmative action and equal employment opportunity for protected veterans. Therefore, it is the policy of Edfinancial Services not to discriminate because of protected veteran status and to take affirmative action to employ and advance in employment qualified protected veterans at all levels within the company. Edfinancial Services will ensure that all employment actions, including but not limited to recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, will be administered without regard to status as a protected veteran. Edfinancial Services will also provide qualified applicants and employees who are disabled veterans with needed reasonable accommodations, as required by law, and will ensure that all employment decisions are based only on valid job requirements.

Edfinancial Services prohibits harassment of employees and applicants because they are protected veterans and will conduct training to try to prevent any harassment or discrimination before it occurs. Edfinancial Services also prohibits retaliation against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for protected veterans. Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

In furtherance of Edfinancial Services's policy regarding affirmative action and equal employment opportunity, Edfinancial Services has developed a written Affirmative Action Program (AAP) that sets forth the policies, practices and procedures that Edfinancial Services is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified protected veterans is accomplished. This AAP is available for inspection by any employee or applicant for employment upon request, during normal business hours, in the Human Resources office. Interested persons should contact the Human Resources office for assistance.

In order to ensure employment opportunity and affirmative action throughout all levels of Edfinancial Services, I have designated Edfinancial Services's Director of Recruiting & Retention, Vicki Summers, as the Equal Employment Opportunity (EEO) Officer for Edfinancial Services. The EEO Officer will establish and maintain an internal audit and reporting system that will track and measure the effectiveness of Edfinancial Services's AAP and show where additional action is needed to meet Edfinancial Services's objectives.

William Anthony Hollin, CEO  
September 1, 2015