



Policy Statement Affirmative Action Program

The directors and officers of Vigor Industrial LLC and its wholly owned subsidiaries have long held the belief that our objectives can best be achieved by utilizing to the fullest extent the human resources available to us. This policy statement is intended to remind employees that our policy is to not discriminate in employment. We take affirmative action so that discrimination does not occur on the basis of race, color, sex, sexual orientation, gender identity, religion, national origin, physical or mental disability, or veteran's status. Employment decisions will be made so as to further the principle of equal employment opportunity.

Vigor strives to hire, recruit, train, and promote employees in job classifications without regard to race, color, sex, sexual orientation, gender identity, religion, national origin, disability, or veteran's status. Employment decisions, such as compensation, benefits, transfers, layoffs, return from layoffs, training, Vigor-sponsored education, tuition assistance, social, and recreation programs will be administered without discrimination. Only valid job requirements will be imposed for promotional opportunities, so that promotion decisions are in accordance with the principles of equal employment opportunity.

Vigor also prohibits any harassment of employees based on race, color, sex, sexual orientation, gender identity, religion, national origin, disability, or veteran's status. Any incidents of harassment should be reported to a member of the Human Resources team or to anyone in management with whom he/she is comfortable. Reports will be investigated and appropriate disciplinary action will be taken, which may include discharge, if prohibited harassment is found to have occurred.

Vigor prohibits discrimination against applicants or employees based on inquiring about, disclosing, or discussing their compensation or the compensation of other applicants or employees.

Each manager, supervisor, and employee is responsible for carrying out our equal employment policy. Overall responsibility is assigned to Dawn Cartwright, VP, HR Services and Risk Management, who may be reached at 5555 North Channel Avenue, Portland, OR 97217, (503) 247-1373. She will monitor compliance with this policy and will report to me on a regular basis.

As of June 1, 2021


James Marcotuli
CEO



Policy Statement

[60-741.44(a)]

Affirmative Action for Individuals with Disabilities

It is the policy of Vigor Industrial LLC and its wholly owned subsidiaries not to discriminate against any employee or applicant for employment because of mental or physical disability, in regard to any position for which the employee or applicant is qualified, and to take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels of employment, including the executive level.

An "individual with a disability" includes any person who has a physical or mental impairment that substantially limits one or more of that person's major life activities, has a record of such an impairment, or is regarded as having such an impairment.

We recognize our obligation to communicate this policy in such a manner as to foster understanding, acceptance, and support among our managers, supervisors, and other employees.

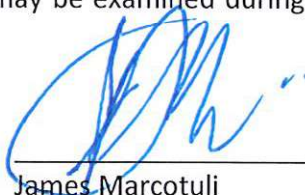
We are committed to personnel practices that recruit, hire, train, and promote persons in all job titles. We make good faith efforts so that all personnel actions are administered without regard to disability, and that employment decisions are based only on valid job requirements.

We have implemented an audit and reporting system to assist our organization in: measuring the effectiveness of this Program; indicating the need for remedial actions; determining the degree to which our objectives are being attained; determining whether individuals with known disabilities are able to participate in Vigor-sponsored educational, training, recreational, and social activities; and otherwise measuring our compliance with our Affirmative Action Program.

Our policy is that employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination for filing a complaint, assisting or participating in an investigation, or any other activity related to the administration of section 503 or any other Federal, State, or local law requiring equal opportunity for individuals with disabilities.

Dawn Cartwright, VP, HR Services and Risk Management, has been appointed EEO Officer and is assigned responsibility for implementing this Program. She has the necessary top management support for implementation of the Affirmative Action Plan and may be reached at 5555 North Channel Avenue, Portland, OR 97217, (503) 247-1373. Appropriate sections of the Affirmative Action Plan for Individuals with Disabilities may be examined during regular business hours by arrangement with Dawn Cartwright.

As of June 1, 2021



James Marcotuli
CEO



Policy Statement
[60-300.44(a)]
Affirmative Action for Protected Veterans

Vigor Industrial LLC and its wholly owned subsidiaries, an equal opportunity employer, pledges that it is and has been our policy to take affirmative action to employ and advance in employment qualified Protected Veterans at all levels of employment, including the executive level, and not to discriminate against any employee or applicant for employment because of any individual's status as a Protected Veteran.

We recognize our obligation to communicate internally and externally in a manner that fosters understanding, acceptance, and support among our executives, managers, supervisors, and other employees.

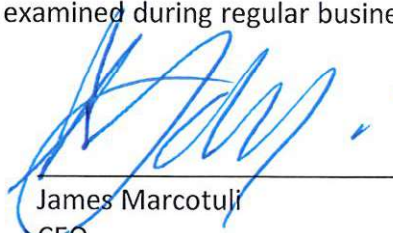
Vigor will ensure that applicants and employees who are Protected Veterans are informed of the contents of this policy (e.g., providing the policy in Braille or large print, or posting the policy on a bulletin board low enough to enable an individual in a wheelchair easy access).

Vigor has implemented an audit and reporting system to assist our organization in measuring the effectiveness of this Program. We are committed to personnel practices that recruit, hire, train, and promote persons in all job titles. We make good faith efforts so that personnel actions are administered without regard to an individual's status as a Protected Veteran, and that employment decisions are based only on valid job requirements.

Our policy is that employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination for any of the following activities: filing a complaint; assisting or participating in an investigation, compliance evaluation, hearing, any other activity related to the administration of the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA) of 1974 as amended, or any federal, state, or local law requiring equal opportunity for Protected Veterans; opposing any act or practice made unlawful by VEVRAA or its implementing regulations; or exercising any other right protected by VEVRAA or its implementing regulations.

Dawn Cartwright, VP, HR Services and Risk Management, has been appointed EEO Officer and is assigned responsibility for implementing this Program. She has the necessary top management support for implementation of the Affirmative Action Plan and may be reached at 5555 North Channel Avenue, Portland, OR 97217, (503) 247-1373. Appropriate sections of the Affirmative Action Plan for Protected Veterans may be examined during regular business hours by arrangement with Dawn Cartwright.

As of June 1, 2021



James Marcotuli
CEO