

Adelman Travel Group maintains a continuing policy of nondiscrimination in all employment practices and decisions, ensuring equal employment opportunities for all qualified individuals without regard to race, color, religion, sex, gender identity or expression, sexual orientation, pregnancy, national origin, , age, disability, veteran status, or any other protected status. It is the intent of the Company to conform to the content and spirit of applicable equal employment opportunity and affirmative action laws. This policy applies to both Adelman Travel Group employees and applicants for employment with Adelman Travel Group.

## PROVISIONS

In keeping with this policy, Adelman Travel Group will adhere to the following personnel practices:

Recruitment, hiring, and promotion of individuals in all job classifications will be carried out without regard to race, color, religion, sex, gender identity or expression, sexual orientation, pregnancy, national origin, age, a disability that can be reasonably accommodated, veteran status, or any protected status, except where a bona fide occupational qualification exists. A bona fide occupational qualification exists when an occupational qualification that may be discriminatory is reasonably necessary to the normal operation of Adelman Travel Group's business.

Employment and promotional decisions will be made to further the principle of equal employment opportunity when possible, based upon selection criteria that are strictly job-related.

All other personnel actions such as compensation, employee benefits, transfers, workforce adjustments, training, educational programs, tuition aid, and social and recreational programs will be administered without regard to race, color, religion, sex, gender identity or expression, sexual orientation, pregnancy, national origin, age, a disability that can be reasonably accommodated, veteran status, or any other protected status, except where a bona fide occupational qualification exists.

The responsibility for carrying out this Equal Employment Opportunity policy is assigned to all Adelman Travel Group personnel involved in employment-practice decisions.

The Director, People & Culture has been designated as the Equal Employment Opportunity Officer of Adelman Travel Group.

# PROCEDURES

Adelman Travel Group will use the following means to ensure that its Equal Employment Opportunity policy (hereinafter referred to as "EEO policy") is adhered to.

1. Adelman Travel Group's EEO policy will be posted on Company bulletin boards.
2. All external recruitment sources used by Adelman Travel Group will be notified of the Company's EEO policy.
3. Adelman Travel Group's employment application will contain a statement indicating that Adelman Travel Group is an equal opportunity employer.
4. All classified advertising placed by Adelman Travel Group will indicate that the Company is an equal opportunity employer.
5. The qualifications of all employees will be reviewed when employment decisions are being made to ensure that persons in protected classes are given full opportunity for advancement.

# EXCEPTIONS

None