

An Employee Owned Company

STATEMENT OF EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION POLICY

It is, has been, and will continue to be the policy of Phoenix International Holdings, Inc. to provide equal employment opportunity without regard to race, color, age, religion, sex, pregnancy, sexual orientation, gender identity, national origin, disability, or veteran status. Further, it is the policy of Phoenix International to undertake affirmative action in compliance with all federal, state, and local requirements. This document is a formal reaffirmation of this policy and serves to assure each applicant, employee and party with whom we do business of my personal commitment to our equal opportunity and affirmative action objectives.

Our continued success depends heavily on the full and effective utilization of qualified persons. I will continue to direct our employment practices toward ensuring equal opportunity for all. Phoenix International intends that all matters related to recruiting, hiring, training, compensation, benefits, promotions, transfers, terminations, layoffs and recalls, as well as all company-sponsored social and recreational programs and all treatment on the job, be free of unlawful discriminatory practices.

As a government contractor we are obliged to keep records, make reports to the federal government, develop written Affirmative Action Programs, and otherwise document the results of our good faith efforts to ensure equality of employment opportunity at Phoenix International.

While, as President, I retain the overall responsibility for Phoenix International's Equal Employment Opportunity Affirmation Action Programs, the administration and implementation of these important programs for women, minorities, individuals with disabilities and protected veterans are the responsibility of Phoenix International's Human Resources Manager. I ask that each manager and supervisor join me in full support of the principles of equal opportunity and affirmative action, and I invite any applicant or employee to direct any concerns or questions regarding these programs to our Human Resources Manager. If the circumstances make contacting the Human Resources Manager difficult, feel free to contact any member of management. Retaliation against any employee for

making an EEO claim or participating in the investigation of a complaint is strictly prohibited and will not be tolerated.

On a strictly voluntary basis, Phoenix International invites all individuals with a disability and protected veterans who are either employees or applicants for employment, and who wish to participate under our Affirmative Action Plan to identify themselves to their supervisor or the Human Resources Manager. Any individual who identifies him/herself will not be subjected to any form of harassment or retaliation based on his/her status or self-identification. Furthermore, this self-identification will be kept confidential. If you are interested in viewing the Affirmative Action Plan for Individuals with Disabilities and/or Protected Veterans, please contact the Human Resources Manager during regular working hours.