



**To:** All current Employees and Applicants For Employment  
**From:** Kent Herber, Vice President of Operations  
**Date:** 1/1/2024  
**Re:** Equal Employment Opportunity Policy

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## **Purpose**

Communicate to all employees and applicants that Dynamic Metals Group will not *in any instance* tolerate unlawful discrimination of any kind. Employees found in violation of this policy will be disciplined, up to and including termination of employment.

## **Scope**

The policy of equal employment opportunity (EEO) and anti-discrimination applies to all aspects of the relationship between Dynamic Metals Group and its employees, including:

- Recruitment
- Employment
- Promotion
- Transfer
- Training
- Working conditions
- Wages and salary administration
- Employee benefits and application of policies

The policies and principles of EEO also apply to the selection and treatment of independent contractors, personnel working on our premises who are employed by temporary agencies and any other persons or firms doing business for or with Dynamic Metals Group.

## **Policy**

Dynamic Metals Group is an equal opportunity employer. In accordance with anti-discrimination law, it is the purpose of this policy to enforce these principles and mandates. Dynamic Metals Group prohibits discrimination and harassment of any type and affords equal employment opportunities to employees and applicants without regard to race, color, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, protected veteran status, or any other characteristic protected by law. Dynamic Metals Group conforms to the spirit as well as to the letter of all applicable laws and regulations.

## **Procedures**

Directors, managers, and supervisors are responsible for implementing equal employment practices within each department. The Human Resources (HR) department is responsible for

overall compliance and will maintain personnel records in compliance with applicable laws and regulations.

Dynamic Metals Group administers our EEO policy fairly and consistently by:

- Posting all required notices regarding employee rights under EEO laws in areas highly visible to employees and applicants.
- Advertising for job openings with the statement "*We are an equal opportunity employer, and all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, protected veteran status, or any other characteristic protected by law.*"
- Posting all required job openings with the appropriate state agencies.
- Forbidding retaliation against any individual who files a charge of discrimination, opposes a practice believed to be unlawful discrimination, reports harassment, or assists, testifies, or participates in an EEO agency proceeding.
- Requires employees to immediately report to a member of management or HR any apparent discrimination or harassment.
- Upon receiving a complaint or being advised by a supervisor or manager that violation of this policy may be occurring and/or has occurred, HR will notify senior management and review the complaint with the company's legal counsel, as needed.

### **Corrective Actions**

Violations of this policy, regardless of whether an actual law has been violated, will not be tolerated. Dynamic Metals Group will promptly, thoroughly, and fairly investigate every issue that is brought to its attention in this area and will take disciplinary actions, when appropriate, up to and including termination of employment.

### **Pay Transparency Policy Statement**

Company will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information. 41 CFR 60-1.35(c).