

EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION POLICY STATEMENT

January 1, 2018

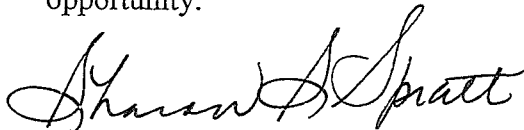
Federal and state laws prohibit employment discrimination. As Chief Executive Officer of Cottonwood, Incorporated (Cottonwood), I am committed to the principles and practices of equal employment opportunity and reaffirm our intent to comply with federal, state, and local laws and regulations prohibiting discrimination on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, disability, veteran status, or any other protected classes. Our intent is to ensure that personnel actions are administered in compliance with these laws and in conformance with our Affirmative Action Program (AAP). Personnel actions include, but are not limited to: employment, promotion, transfer, recruitment or recruitment advertising, layoff or termination, recall from layoffs, company-sponsored educational, social, and recreational programs, benefits, rates of pay or other forms of compensation, and training.

Dennis Meier, our HR Director and EEO Coordinator, is responsible for the implementation and administration of the AAP. With the cooperation and assistance of appropriate staff and operating personnel, the HR Director/ EEO Coordinator will monitor the company's performance and report the results to her. Data may include outside hires, promotions, transfers, terminations, identification of problem areas and, if necessary, a recommended plan of action. Any employee who has a question regarding our AAP may discuss the matter with Dennis Meier at 785-842-0550.

The Affirmative Action Program for Individuals with Disabilities and Protected Veterans is available for review by any employee or applicant for employment during normal business hours by contacting the HR Director/ EEO Coordinator at the above number.

Discrimination on-premises or on-the-job will not be tolerated. Employees of, and applicants to, Cottonwood will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have filed a complaint, assisted in a review, investigation, or hearing, or have otherwise sought to obtain their legal rights related to any federal, state, or local law regarding equal employment opportunity. Personnel found guilty of violating this directive will be subject to discipline and possible termination.

I ask your continued support in attaining Cottonwood's objective of equal employment opportunity.



Sharon S. Spratt
Chief Executive Officer

POLICY STATEMENT ON BEHALF OF PROTECTED VETERANS AND INDIVIDUALS WITH A DISABILITY – 41 CFR §§ 60-300.44(A), 741.44(A)

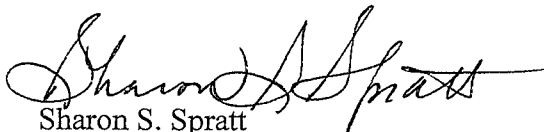
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It is the policy of Cottonwood, Incorporated (Cottonwood) not to discriminate against any employee or applicant for employment because he or she is a qualified individual with a disability, a disabled veteran, a newly separated veteran, a campaign veteran, or an armed forces service medal veteran (i.e., qualified protected veterans). It is also Cottonwood's policy to take affirmative action to employ and to advance in employment all persons regardless of their status as qualified individuals with disabilities or qualified protected veterans, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions including, but not limited to: recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship, at all levels of employment.

Employees of and applicants to Cottonwood will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint, assisting in a review, investigation, or hearing or have otherwise sought to obtain their legal rights related to any federal, state, or local law regarding equal employment opportunity for qualified individuals with disabilities or qualified protected veterans.

As Chief Executive Officer of Cottonwood, I am committed to the principles of affirmative action and equal employment opportunity. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company, I have selected the HR Director as the Equal Employment Opportunity (EEO) Coordinator for Cottonwood. One of his duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of the organization's programs.

To further our policy regarding affirmative action and equal employment opportunity, Cottonwood has developed the written Affirmative Action Program for Individuals with Disabilities and Protected Veterans that sets forth the policies, practices, and procedures, which we are committed to applying in order to ensure that our policy of non-discrimination and affirmative action for qualified individuals with disabilities and qualified protected veterans is accomplished. The Affirmative Action Program for Individuals with Disabilities and Protected Veterans is available for inspection by any employee or applicant for employment upon request, during normal business hours. Interested persons should contact the HR Director/EEO Coordinator at 785-842-0550.



Sharon S. Spratt
Chief Executive Officer