



EQUAL EMPLOYMENT OPPORTUNITY (EEO) POLICY STATEMENT

Sterling Computers Corporation (“Sterling”) is an equal opportunity employer and is a company of values; from the beginning, we’ve prided ourselves on leading with integrity and on holding ourselves to the highest ethical standard. And that commitment isn’t going away anytime soon. Neither is our insistence on fostering a workplace environment that is inclusive, safe, and equitable for all. The Sterling culture, first and foremost, is one predicated on respect. As a company, therefore, we will never tolerate harassment, discrimination, or unlawful conduct of any kind. This EEO Policy Statement affirms Sterling’s commitment to the principles of equal employment opportunity. I trust each of us at Sterling will conduct ourselves in a manner which furthers those principles and will continue to inspire as exemplary models of The Sterling Way.

EEO POLICY

Sterling is committed to ensuring all qualified employees and applicants for employment receive equal employment opportunity in every aspect of the employment process in accordance with applicable law.

At Sterling, we will make employment decisions in a manner which will further the principles of equal employment opportunity and will ensure promotion decisions are in accord with the principles of equal employment opportunity by imposing only valid requirements for promotional opportunities. We will take affirmative action to employ and to advance in employment qualified employees and applicants for employment who are veterans, minorities, females, and disabled persons. We will ensure employment practices are free of discrimination and harassment, and we will provide reasonable accommodation to employees and applicants as required by applicable law.

This commitment applies to all terms and conditions and privileges of employment, including recruiting, hiring, upgrading, promotion, demotion, transfers, promotions, layoffs and terminations, leaves rates of pay and other forms of compensation, and selection and financial support for trainings, and company sponsored activities; and this commitment applies to all qualified persons in all job titles and at all levels of employment, regardless of age, race, color, creed, religion, disability, medical condition, economic status or status with regard to public assistance, citizenship status, national or social or ethnic origin, past or present membership in the uniformed services, protected veteran status, sex, pregnancy, marital or civil union or domestic partnership status, family or parental status, sexual orientation, gender expression or identity, family medical history or genetic information, HIV status, political belief, or any other status or characteristic protected by applicable law.

EEO PROGRAM

Sterling is committed to ensuring its EEO policy is implemented and complied with, both in letter and spirit, which we do through our EEO program.

Our EEO program includes developing our policy statements, affirmative action programs, training and awareness programs, internal and external communication techniques, and procedures for identifying and addressing problems areas. It also includes developing policies and procedures for monitoring and preparing reports on the overall effectiveness of our EEO program.

It continues to be important for all of us at Sterling to support our EEO program and to work together to promote and further the principles of equal employment opportunity. Overall responsibility of Sterling’s EEO program is assigned to the EEO Officer.



EEO OFFICER

Sterling designates as EEO Officer:

Rebecca Eberly
Sr. Director of Human Resources

POLICY VIOLATIONS

At Sterling, each of us are expected to comply with Sterling's EEO Policy and related applicable law. Any form of activity inconsistent with this policy is a violation of Sterling's values and company policy. Sterling will take action to investigate and address any allegation of discrimination or harassment confidentially and promptly.

Any employee or applicant for employment who believes they have been treated in a way that is inconsistent with Sterling's EEO policy should contact the EEO Officer or other management representative, including myself, through one of the following communication channels:

- EEO Officer, Rebecca Eberly, at rebecca.eberly@sterling.com
- Myself, Executive Chairman, Jean Moore, at jean.moore@sterling.com
- Sterling's internal ethics email maintained by the Ethics Hotline Team and which allows reporting confidentially (not anonymously), at ethics@sterling.com

NO RETALIATION

Sterling prohibits any form of retaliation against a person who honestly and in good faith reports, or participates in any investigation regarding, any known or suspected violation of Sterling's EEO Policy.

ORGANIZATIONAL STRUCTURE

This EEO Policy Statement applies to Sterling Computers Corporation, a private company incorporated in the State of California (Entity No. C1976745) with principal address at 303 Centennial Drive, North Sioux City, South Dakota 57049. This EEO Policy Statement also applies to Sterling's wholly owned subsidiary, Sterling Computers Corporation (UK) Ltd, a private limited company organized in England and Wales (Company No. 13862089) with registered office at 5 The Green, Richmond, England TW91PL. The terms "Sterling", "Sterling Group", "we", "us" and "our" as used in this EEO Policy Statement refers to Sterling and its wholly owned subsidiary.

Approval and Signature

I sign this EEO Policy Statement to affirm Sterling's commitment to, and my personal and professional support of, the principles of equal employment opportunity. I sign this EEO Policy Statement as Executive Chairman of Sterling Computers Corporation and as Director of Sterling Computers Corporation (UK) Ltd.

Jean M. Moore
Executive Chairman & Director

January 1, 2024