

## EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

Employment decisions at GROWMARK will be based on merit, qualifications, work history, abilities, and business needs in order to provide equal employment and advancement opportunities to all qualified individuals.

GROWMARK will not discriminate against any employee or applicant for employment because of the individual's race, color, sex, sexual orientation, gender identity, age, religion, national origin, disability, marital status, protected veteran status, or any other characteristic protected by applicable law. GROWMARK will recruit, hire, train and promote persons in all job titles, and ensure that all other personnel actions are administered, without regard to race, color, sex, sexual orientation, gender identity, age, religion, national origin, disability, marital status, protected veteran status, or any other characteristic protected by applicable law and ensure that all employment decisions are based only on valid job requirements. The Company will comply with any and all state or federal laws or regulations pertaining to equal employment opportunity and affirmative action which are applicable to the Company or its employees, including any such laws that may arise because of the Company's contractual relations with the federal government or any state government, or divisions thereof.


The Company is a federal government contractor and is subject to Executive Order 11246, Section 503 of the Rehabilitation Act of 1973 and the Vietnam Era Veterans Readjustment Assistance Act of 1974 which require government contractors to take affirmative action to employ and advance in employment qualified minorities, women, persons with disabilities, and protected veterans. GROWMARK's affirmative action programs have the total support of its top management and the Company's Board of Directors.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities in good faith:

- 1) Filing a complaint of discrimination or harassment;
- 2) Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA), or any other federal, state, or local law requiring equal opportunity;
- 3) Opposing any act or practice made unlawful by the above laws or regulations; or
- 4) Exercising any other right protected by the above laws or regulations.

As required by federal law, the Company has developed written Affirmative Action Plans for minorities, women, people with disabilities, and protected veterans. These Affirmative Action Plans include audit and reporting systems that, among other things, measure the effectiveness of the programs. The Affirmative Action Plans for people with disabilities and protected veterans (excluding certain data metrics per federal regulations) are available for review by employees and applicants during regular business hours by contacting the Company's human resources department. The Company's Senior Manager, Talent Acquisition, Aubrey Freitag, is responsible for implementation of the Affirmative Action Programs.

With this policy statement, I am reaffirming my and the Company's support for our equal opportunity and affirmative action programs and reminding all employees of the expectation that they comply with these policies at all times.

  
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Jim Spradlin  
Chief Executive Officer  
September 1, 2017