

SUBJECT: Employment of Individuals with Disabilities and Protected Veterans

APPLIES TO: All Employees and Applicants for Employment

DATE: January 1, 2015

Sotera Wireless provides equal employment opportunities for all prospective and current employees. Sotera Wireless does not discriminate on the basis of race, color, national origin, religion, gender, gender identity, sexual orientation, age, protected veteran status, disability, genetic information, or any other status protected by law. Sotera Wireless takes affirmative action to ensure equal employment opportunity. Affirmative Action is a results-oriented program designed to ensure that each individual can participate equally in all employment opportunities at Sotera Wireless.

Sotera Wireless recruits, hires, trains, and promotes persons in all job titles and ensures that all personnel actions are based on merit, qualifications, and abilities, without regard to disability or status as a disabled veteran, a recently separated veteran, an active duty wartime or campaign badge veteran, or an armed forces service medal veteran. This policy governs all aspects of employment, including application, hiring, compensation, promotion, discipline, termination of employment, and access to benefits and training.

Sotera Wireless encourages any employee with questions or concerns about equal employment opportunity or discrimination in the workplace to bring these issues to our attention. 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: filing a complaint; assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmation action provisions of the Vietnam Era Veterans' Readjustment Assistance Act ("VEVRAA"), Section 503 of the Rehabilitation Act, or any other federal, state, or local law requiring equal opportunity for individuals with a disability or with a status as protected veteran; opposing any act or practice made unlawful by VEVRAA or the Rehabilitation Act; or exercising any other right protected by VEVRAA or the Rehabilitation Act.

Sotera Wireless managers and supervisors take affirmative action to ensure adherence to equal employment opportunity practices and provide appropriate training of personnel in their areas of responsibility. The implementation of this policy requires the understanding and cooperation of all employees, supervisors, and managers.

Sotera Wireless maintains an affirmative action program for employment of individuals with disabilities and status as a disabled veteran, a recently separated veteran, an active duty wartime or campaign badge veteran, or an armed forces service medal veteran. The program will be audited periodically, updated annually, and made available for applicant and employee inspection during normal business hours. To review the plan, please contact Phyllis Balan, Director, Human Resources at 858-427-4629.

The top executive of our corporation fully supports our equal employment opportunity and affirmative action efforts. As CEO of Sotera Wireless, I am committed to the principles of equal employment opportunity and affirmative action. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company, I have selected Phyllis Balan as the EEO officer for Sotera Wireless. One of the EEO officer's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of our Affirmative Action Program.

Tom Watlington CEO