

AFFIRMATIVE ACTION AND EQUAL EMPLOYMENT OPPORTUNITY POLICY

Fleming Advisors, LLC (Fleming Advisors) reaffirms its belief and commitment in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment.

Fleming Advisors has developed and maintained a written Affirmative Action Program (AAP). Fleming Advisors Managing Member, Christopher Fleming, EA, supports the affirmative action program and urges each employee to commit to carrying out the intent of this policy. Fleming Advisors maintains an audit and reporting system to determine overall compliance with its equal employment opportunity mandates.

As part of Fleming Advisors commitment to this overall process, it will seek to ensure that all aspects of employment, including recruitment, selection, job assignment, training, compensation, benefits, discipline, promotion, transfer, layoff and termination processes remain free of illegal discrimination based upon age, race, color, sex, sexual orientation, gender identity, national origin, religion, genetic information, disability (as defined under Section 503 of the Rehabilitation Act of 1973) or protected veteran status (as defined under Vietnam Era Veterans' Readjustment Assistance Act of 1974) other protected classifications. Fleming Advisors ensures that all employment decisions are based only on valid job requirements. Regular review helps to ensure compliance with this policy.

Fleming Advisors will ensure that employees and applicants shall not be subjected to harassment due to their status described above, or any harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities; (1) filing a complaint with Fleming Advisors or with federal, state, or local agencies regarding status covered under this AAP, (2) assisting or participating in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute pertaining to the status covered under this AAP, (3) opposing any act or practice made unlawful by section 503 and/or VEVRRA and (4) exercising any other right protected by section 503 and/or VEVRRA or its implementing regulations in this part.

Fleming Advisors 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.