EQUAL EMPLOYMENT OPPORTUNITY / AFFIRMATIVE ACTION

Gowanda GEC, LLC is committed to providing equal employment opportunity for all employees and applicants for employment. The Company does not discriminate in employment opportunities or practices based on race, color, religion, sex, sexual orientation, gender identity, national origin, marital or veteran status, age, ancestry, physical disability (including HIV and AIDS), mental disability, medical condition, genetic information, or any other characteristic protected by law. We base all employment decisions - including recruitment, selection, training, compensation, benefits, discipline, promotions, transfers, lay-offs, return from lay-off, terminations and social/recreational programs - on valid job requirements and the principles of equal employment opportunity.

Our employees have diverse backgrounds, skills and ideas that collectively contribute to greater opportunities for innovation. Our Affirmative Action Program is designed to attract a diverse pool of talent so that we may select the best candidates and open doors at all levels of this organization. I have appointed Karlynne Hathaway as our EEO Officer responsible for maintaining an audit and reporting system to monitor compliance with our Affirmative Action Program and EEO/AA Policy. Gowanda will take affirmative action to employ and advance in employment qualified women, minorities, disabled individuals, and protected veterans. We will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. The Company strictly prohibits harassment of any individual based on any characteristic listed above.

Managers at all levels share the responsibility for promoting and complying with this policy. Employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to their immediate supervisor or to the EEO Officer. In addition, employees and applicants can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion or discrimination because they: 1) file a complaint with the Company or with federal, state, or local agencies; 2) assist or participate in any investigation, compliance evaluation, or any other activity related to the administration of any federal, state or local equal employment opportunity or affirmative action statue; 3) oppose any act or practice made unlawful by any federal, state, or local law requiring equal employment opportunity or affirmative action; or 4) exercise any other employment right protected by federal, state or local law.

Equal employment opportunity at Gowanda is everyone's business. Every employee is responsible for complying with this policy. An employee or applicant for employment who feels that he or she has been treated contrary to this policy should contact a supervisor, Karlynne Hathaway, or me. Any employee who is found to have violated this policy will be subject to the disciplinary action up to and including discharge.

Our Affirmative Action Plan for Individuals with Disabilities and Protected Veterans may be reviewed (and employees may update their disability status) upon request. Please contact Karlynne Hathaway in Human Resources to make an appointment during regular business hours.

I fully endorse our Affirmative Action Program and this Policy. At Gowanda, we are committed to providing equal opportunity for all.

Sarah Harris

President & CFO