

REAFFIRMATION OF AFFIRMATIVE ACTION POLICY STATEMENT

The Company reaffirms its belief and commitment in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment.

The Company has developed and maintains a written Affirmative Action Program (AAP). The Company's Chief Executive Officer fully supports this AAP. Effective implementation and continuing administration of the AAP is the responsibility of the EEO/AA Administrator. Currently the EEO/AA Administrator is Susan Brewer who is responsible for reporting periodically to senior management on our equal employment efforts. The Company maintains an audit and reporting system to determine overall compliance with its equal employment opportunity mandates.

As part of the Company's commitment to equal employment opportunity, 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 race, color, religion, sex, sexual orientation, gender identity, national origin, disability (as defined under Section 503 of the Rehabilitation Act of 1973 ("Section 503"), or protected veteran status (as defined under Vietnam Era Veterans' Readjustment Assistance Act of 1974 ("VEVRAA")). The Company ensures all employment decisions are based solely on valid job requirements. Regular review helps to ensure compliance with this policy.

Employees and applicants shall not be subject to harassment due to their status described above, nor shall they be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities: (1) Filing of a complaint with the Company or with federal, state, or local agencies regarding status covered under this AAP; or (2) Assisting or participating in an investigation, compliance evaluation, hearing or any other activity related to the administration of the affirmative action provisions of VEVRAA, Section 503, and Executive Order 11246, or any other federal, state or local law requiring equal opportunity for women, minorities, veterans, or disabled individuals; or (3) Opposing any act or practice made unlawful by VEVRAA, Section 503, Executive Order 11246, or any of their implementing regulations, or any other federal, state, or local law requiring equal opportunity for women, minorities, veterans, or disabled individuals; or (4) Exercising any other right protected by VEVRAA, Section 503, Executive Order 11246, or their implementing regulations.

The Company's written AAP may be reviewed by applicants and employees upon request during normal business hours by contacting Susan Brewer at 859.281.9324 or sbrewer@gray.com. We must all realize that it is the responsibility of each and every employee of the Company to give our policy of equal employment opportunity real meaning and full support.



Stephen A. Gray
Chief Executive Officer, Gray, Inc.