

**NON-DISCRIMINATION
PROGRAM
FOR PROTECTED
VETERANS**

Neurelis Inc

San Diego, CA

July 1, 2025 through June 30, 2026

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Preface

Neurelis Inc, (also referred to as the Company), is committed to the concept and practice of equal opportunity and non-discrimination. In the preparation of this Non-Discrimination Program we have been guided by the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended by the Jobs for Veterans Act of 2002 (38 U.S.C. § 4212), and its implementing OFCCP regulations (41 C.F.R. Part 60-300). Nothing contained in this Non-Discrimination Program or its supporting data should be construed as an admission by the Company, in whole or in part, that it has contravened any federal, state, or local employment practice laws, or to sanction the discriminatory treatment of any person.

While the Company firmly believes in dissemination of its non-discrimination policies and equal employment opportunity practices and makes the non-data components of this Non-Discrimination Program available for review to employees and applicants upon request, the Non-Discrimination Program remains a proprietary document of the Company. Moreover, the data on which the Company has relied in preparing this Non-Discrimination Program are confidential and sensitive, and the Company believes release of the data would subject the Company to commercial harm. Reports that require specific data, such as names of employees and salary information, are not an official part of this Non-Discrimination Program. This information is on file at the Company as Documentation and Supporting Data for Non-Discrimination Program Reports, and is available for review only as required by law.

If this Non-Discrimination Program or any supporting data or documentation are submitted to any regulatory agency pursuant to the Vietnam Era Veterans' Readjustment Assistance Act and/or any implementing regulations (as any or all have been or may be amended), the Equal Employment Opportunity Commission, any local or state fair employment practice agency, or any other federal, state or local government agency, those documents and the information they contain are to be considered confidential and not subject to disclosure without notifying the Company of the agency's decision to disclose and providing the Company with ample time to contest the disclosure. Advance notice of disclosure should be sent to Shaun Winn. The Company requests this information be treated as exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. § 552.

No information contained in the Non-Discrimination Program or any supporting data or documentation is to be copied, removed from the premises, or released to other individuals without a prior notification to and permission from the Company.

This Non-Discrimination Program does not constitute an express or implied contract between the Company and its employees, job applicants, or other persons, nor does it

change in any way the basic at will employment relationship all Company employees have with the Company. Nothing in this Non-Discrimination Program creates a private right of action on behalf of any individual or group against the Company.

Equal Employment Opportunity and Non-Discrimination Statement of Policy

41 C.F.R. 60-300.44(a)

It is the policy of Neurelis Inc not to discriminate or allow the harassment of employees or applicants on the basis of protected veteran status or any other characteristic protected by law with regard to any employment practices, including but not limited to, recruitment, hiring, promotion, transfer, demotion, layoff or recall from layoff, termination, wage and benefit administration, and selection for training or other employment opportunities, provided the individual is qualified, with or without reasonable accommodation, to perform the essential functions of the job. This policy applies to all jobs at the Company. The Company will continue to ensure individuals are employed, and employees are treated during employment, without regard to their protected veteran status or any other characteristic protected by law in all employment practices as follows.

Employment decisions at the Company are based on legitimate job-related criteria. All personnel actions or programs that affect qualified individuals, such as employment, promotion, demotion, transfer, recruitment, advertising, termination, rate of pay or other forms of compensation, and selection for training, are made without discrimination because of any basis protected by law. Employees may choose to voluntarily disclose their protected veteran status at any time by contacting Human Resources. Such information will be maintained in a confidential manner and will not be used against an individual when making any employment decisions. Disabled veterans are encouraged to inform Human Resources if they need a reasonable accommodation to perform a job for which they are otherwise qualified. The Company makes, and will continue to make, reasonable accommodation to the known physical or mental limitations of an otherwise qualified applicant or employee to promote the employment of qualified disabled veterans, unless such accommodation would impose an undue hardship on the operations of the Company.

Neurelis Inc and its President & CEO are fully committed to the principles of equal employment opportunity and non-discrimination and support the successful implementation of the Company's Non-Discrimination Programs. Shaun Winn, Non-Discrimination Officer for the Company, has been appointed with responsibility for implementation of the Company's non-discrimination activities. The Non-Discrimination Officer has the full support of top management to fully implement this Program. All managers and supervisors will take an active part in the Company's Non-Discrimination Program to ensure all qualified employees and prospective employees are treated in a non-discriminatory manner with respect to all employment decisions. Furthermore, Neurelis Inc will solicit the cooperation and support of all employees for the Company's Equal Employment Opportunity and Non-Discrimination Statement of Policy.

The Company's Non-Discrimination Program includes an audit and reporting system, which, among other things, uses metrics and other information to measure the effectiveness of the Program. The Non-Discrimination Officer has been assigned responsibility for periodically reviewing progress with compliance and implementation of the Company's Non-Discrimination Policy. In accordance with public law, the Company's Non-Discrimination Program for protected veterans is available for inspection in the Human Resources Department, 9:00 - 5:00 upon request.

In addition, employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in, or may have engaged in, filing a complaint, assisting or participating in an investigation, compliance review hearing, or other activity related to the administration of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, and/or any other federal, state or local law or regulation regarding equal employment opportunity, opposing any act or practice made unlawful, or exercising any other right protected by such laws or regulations.

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Craig C. Chambliss

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Craig C. Chambliss

President & CEO

Definitions

41 C.F.R. 60-300.2

“DISABLED VETERAN” is (1) A veteran of the U.S. military, ground, naval, or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or (2) A person who was discharged or released from active duty because of a service connected disability.

“QUALIFIED DISABLED VETERAN” means a disabled veteran as defined above who has the ability to perform the essential functions of the employment position at issue with or without reasonable accommodation.

“RECENTLY SEPARATED VETERAN” means any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval or air service.

“ARMED FORCES SERVICE MEDAL VETERAN” is any veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

“ACTIVE DUTY WARTIME OR CAMPAIGN BADGE VETERAN” means a veteran who served on active duty in the U.S. military, ground, naval or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the Department of Defense.

“PROTECTED VETERANS” means Disabled Veterans, Recently Separated Veterans, Armed Forces Service Medal Veterans, and Active Duty Wartime or Campaign Badge Veterans.

Responsibility for Implementation

41 C.F.R. 60-300.44(i)

Neurelis Inc has assigned primary management responsibility and accountability for ensuring full compliance with the Non-Discrimination Program to Shaun Winn, the Non-Discrimination Officer of the Company. The Non-Discrimination Officer has the authority, resources, support of and access to top management necessary to ensure the effective implementation of the Non-Discrimination Program. The identity of the Non-Discrimination Officer appears on internal and external communications regarding the Company's equal employment opportunity and non-discrimination policies.

The duties of the Non-Discrimination Officer and designees include:

- Developing policy statements, Non-Discrimination Programs, and internal and external modes of communication
- Overseeing regular discussions with local managers, supervisors, and employees to ensure the Company's policies are being followed
- Training personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the Company's Non-Discrimination Program are implemented
- Advising managers and supervisors the Company is obligated to prevent discrimination and harassment of applicants and employees on any basis protected by law
- Identifying any problem areas in implementing the Non-Discrimination Program, and developing solutions
- Ensuring policies are in place to identify any barriers to employment for protected veterans, including those with known disabilities, and assisting managers in developing reasonable accommodations to ensure disabled veterans benefit from equal employment opportunities
- Designing and implementing an internal audit and reporting system to measure the effectiveness of the Company's Program, indicate the need for remedial action, determine the degree to which the Company's objectives have been attained, determine whether employees who are protected veterans have had the opportunity to participate in Company-sponsored educational, training, recreational, and social activities, and ensure each Company location is in compliance with applicable laws and regulations
- Serving as liaison between the Company and enforcement agencies, and between the Company and organizations of and for protected veterans
- Encouraging active involvement by Company representatives in the community service programs of local organizations of and for protected veterans

- Ensuring posters and notices are properly displayed or disseminated in ways that are accessible and understandable to applicants and employees and
- Keeping management informed of developments in the non-discrimination area.

Request for Self-Identification

41 C.F.R. 60-300.42

In order to notify applicants and employees of the existence of and the opportunity to participate in this Non-Discrimination Program and to provide sufficient data to allow Neurelis Inc to measure and improve, if necessary, the effectiveness of the Company's non-discrimination efforts, the Company invites applicants and employees to voluntarily self-identify as a protected veteran as follows:

- When an applicant applies or is considered for employment, the Company provides the applicant with an opportunity to voluntarily self-identify protected veteran status.
- Following an offer of employment but before an individual begins working, the Company provides an additional opportunity to voluntarily self-identify protected veteran status.
- The invitation to self-identify will state the Company is a federal contractor required to take proactive steps to employ and advance in employment protected veterans, and summarize the relevant portions of the applicable law and the Company's Non-Discrimination Program.
- The invitation to self-identify will state the information is being requested on a voluntary basis, it will be kept confidential, refusal to provide the requested information will not subject the applicant to any adverse treatment, and the information will not be used in a manner that is inconsistent with applicable law.
- The Company will keep all self-identification information confidential and maintains it in a data analysis file rather than in individual employee personnel or medical files.

Review of Personnel Processes

41 C.F.R. 60-300.44(b)

Neurelis Inc periodically reviews its personnel procedures to determine whether they ensure the careful, thorough, and systematic consideration of the job qualifications of employees or applicants who are protected veterans for jobs filled either by hiring or promotion and for educational or training opportunities.

Vacancies are advertised, and applications are accepted from any interested person. The Company's employment materials, including items such as its employment application, the careers section of its website, and job advertisements, will include a non-discrimination statement to further inform applicants of the Company's policy of equal employment opportunity. All non-executive positions lasting three days or more not expected to be filled from within will be referred to the appropriate state employment service delivery system. In addition, to ensure protected veterans are aware of job openings, the Company will send vacancy announcements to the employment sources listed in this Non-Discrimination Program.

The Company ensures its personnel processes do not limit, segregate, or classify an employee or applicant in a way that adversely affects employment opportunities or status because of status as a protected veteran. The Company makes sure when a protected veteran is considered for an employment opportunity, the Company relies only on that portion of the individual's military record, including military discharge papers, relevant to the requirements of the opportunity at issue.

The Company periodically reviews any physical and mental job qualifications to ensure they do not tend to screen out disabled veterans for reasons that are not job related or consistent with business necessity, or do not relate to ensuring the safe performance of the essential functions of the job. The Company reviews its personnel processes to ensure protected veterans are not stereotyped in a manner that limits their access to jobs for which they are qualified. The Company also ensures applicants and employees who are protected veterans and who meet job qualifications have equal access to its personnel processes, including those implemented through information and communication technologies, and provides necessary reasonable accommodation to ensure applicants and employees who are disabled veterans receive equal opportunity in the operation of personnel processes.

Review of Physical and Mental Job Requirements

41 C.F.R. 60-300.44(c)

Neurelis Inc reviews physical and mental job qualification requirements as job qualification requirements are established or revised to ensure qualification requirements do not screen out qualified disabled veterans for reasons that are not job related or consistent with business necessity and the safe performance of the essential functions of the job. This review occurs at regular intervals throughout each calendar year, such as when a job may be advertised or filled through hiring or promotion, when the duties of a position are significantly revised, and when considering requests for reasonable accommodation related to the performance of the functions of the position.

The Company also regularly reviews its personnel processes to ensure any medical exams or inquiries are conducted in accordance with applicable law. Information regarding the medical condition or history of an individual obtained as a result of any such inquiry or exam is collected and maintained on separate forms and in separate medical files and treated as a confidential medical record.

To the extent any physical or mental job qualification measurements are found to potentially screen out qualified disabled veterans in the selection of employees or applicants for employment or in other changes in employment status such as promotion or training, the Company will ensure the requirements are related to the specific job(s) for which the individual is being considered and are consistent with business necessity and the safe performance of the job.

Every position has a written job description that addresses the qualifications.

Reasonable Accommodations

41 C.F.R. 60-300.44(d)

Neurelis Inc has made and will continue to make reasonable accommodation to the known physical and mental limitations of otherwise qualified employees and job applicants who are disabled veterans unless such accommodation would impose an undue hardship.

If a veteran has a disability, the Company encourages the individual to request reasonable accommodation to enable the individual to perform a job safely. Such accommodations may include special equipment, changes in the physical layout of the job, modification of job duties, or other reasonable accommodations. The Company will inform employees and applicants of the process for requesting reasonable accommodation.

Where an employee who is known to be a veteran with a disability is having significant difficulty performing job duties and the Company reasonably concludes the performance issues may be related to a known disability, the Company may notify the employee of the performance problem and confidentially inquire whether the problem is related to the employee's disability. If the employee indicates a disability is impacting performance, the Company will engage in confidential discussions with the employee about the performance problem and the need for reasonable accommodation.

Compensation

41 C.F.R. 60-300.21(i)

In offering employment or promotions, Neurelis Inc does not reduce the amount of compensation offered to protected veterans because of any disability income, pension, or other benefit the employee receives from another source. Similarly, the Company does not reduce the amount of compensation offered to an employee or applicant because of the actual or anticipated cost of a reasonable accommodation needed, requested, or anticipated.

Harassment

41 C.F.R. 60-300.44(e)

Neurelis Inc has developed and implemented policies and procedures to ensure employees who are protected veterans are not harassed because of their veteran status.

A copy of the Company's Equal Employment Opportunity and Non-Discrimination Statement of Policy, which forbids harassment against individuals based on protected characteristics, is included in this Non-Discrimination Program.

Training

41 C.F.R. 60-300.44(j)

Neurelis Inc trains personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the Company's Non-Discrimination Program are implemented.

Internal Dissemination of Policy

41 C.F.R. 60-300.44(g)

Neurelis Inc recognizes that, however strong its outreach program, internal support from supervisory management and other employees is necessary to ensure maximum effectiveness of its Non-Discrimination Program for protected veterans. The Company may utilize the following procedures to enhance the internal implementation and dissemination of its Equal Employment Opportunity and Non-Discrimination Statement of Policy, as appropriate:

- The Company's Equal Employment Opportunity and Non-Discrimination Statement of Policy will be made available to applicants and employees. The policy includes a statement that employees and applicants are protected from coercion, intimidation, and interference or discrimination for filing a complaint or assisting in an investigation under the Vietnam Era Veterans' Readjustment Assistance Act, of 1974, as amended.
- An invitation to participate in the Company's Non-Discrimination Program by voluntarily self-identifying as a protected veteran will be disseminated to all applicants, as well as to all employees once the Company has extended a job offer, but before beginning employment duties.
- The Company will publicize the policy in Company's publications.
- The Company will hold meetings with executive, management and supervisory personnel to explain the Company's policy of non-discrimination and to make clear the President & CEO's support for the policy.
- The Company will inform applicants and employees of its commitment to engage in non-discrimination, including by discussing the policy in various employee and manager training sessions.
- When employees are featured in employee handbooks or similar publications, efforts will be made to include protected veterans.
- Company publications will include articles on accomplishments of all employees, including protected veterans.

If the Company has or becomes party to collective bargaining agreements, union officials will be informed the Company is bound by the terms of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, and is committed to take proactive steps to employ and advance in employment protected veterans, and the Company will not discriminate against protected veterans. For those sites not subject to a collective bargaining agreement, no notification of union officials is necessary.

Outreach, Positive Recruitment and External Dissemination of Policy

41 C.F.R. 60-300.44(f)

Neurelis Inc has reviewed its employment practices to determine whether its personnel programs are designed to effectively recruit and advance in employment protected veterans. While the Company believes there are no deficiencies in its current employment practices with respect to applicants and employees who are protected veterans, it engages in outreach, positive recruitment, and external dissemination programs to augment its existing non-discrimination efforts. The Company engages in or has made plans to implement the activities outlined in this Non-Discrimination Program, as appropriate.

The Company will inform recruiting sources of Neurelis Inc's policy of non-discrimination for protected veterans. Recruiting sources will be requested to actively recruit and refer qualified protected veterans for all positions.

The Company will make the Equal Employment Opportunity Clause part of all covered contracts and purchase orders.

The Company will inform subcontractors, including subcontracting vendors and suppliers, of its Equal Employment Opportunity and Non-Discrimination Statement of Policy, and request appropriate action on their part.

The Company will post all job vacancies (other than some executive and senior management positions or positions lasting three days or less) for which it considers external applicants with the local employment delivery system where the opening occurs. These postings will occur before or concurrently with the use of other recruitment efforts to fill the job and will be provided in the manner and format specified by the relevant agency that will allow the agency to provide priority referral of protected veterans.

The Company will notify the employment service delivery system in each state where it has establishments that it is a federal contractor and it desires priority referrals of protected veterans for job openings in that state. The Company also will provide the employment service delivery system with the name and location of all hiring locations within the state and the contact information for an employee who can answer questions about such job listings. The notice also will include the names and contact information for job search organizations the Company uses to assist in hiring, if any. If any of the information in this disclosure changes, the Company will send an update with the next relevant job listing.

The Company will identify local organizations and/or community agencies specializing in placing and/or developing training programs for protected veterans and send them notices of vacant positions. Examples of these outreach efforts include contacting the following:

- Local Veterans' Employment representatives in the Employment One-Stop Career Centers near the facilities covered in this Non-Discrimination Program Department
- of Veterans Affairs offices close to the facilities covered in this Non-Discrimination Program
- Placement or career offices of educational institutions specializing in the placement of protected veterans
- Private recruitment sources, such as professional organizations or employment placement services specializing in the placement of protected veterans
- Local veterans' groups and veterans' service centers near the facilities covered in this Non-Discrimination Program
- Department of Defense Transition Assistance Program (TAP)
- Via VSG: Wounded Warrior

West Point Military Academy

Recruitment efforts at educational institutions may incorporate special efforts to reach students who are protected veterans.

Efforts will be made to have employees who are protected veterans serve as company representatives during career days, job fairs, and related recruitment efforts.

Advertisements or solicitations for prospective employees will indicate the Company is an equal opportunity employer.

Assessment of Outreach and Recruitment Efforts

41 C.F.R. 60-300.44(f)(3)

Neurelis Inc evaluates available data regarding the effectiveness of its outreach and recruitment efforts on an annual basis. For areas where the Company concludes the totality of its efforts were not effective in identifying and recruiting qualified protected veterans, Neurelis Inc will identify and implement alternative efforts.

Criteria used to evaluate the effectiveness of outreach efforts may include:

- Results of hiring benchmark analysis for protected veterans
- Available data related to applicant and hires
- Whether the activity increased the Company's ability to include protected veterans in its workforce
- Whether the activity attracted qualified protected veterans
- Whether the activity resulted in the selection of qualified protected veterans

The following lists the outreach programs Neurelis Inc participated in from July 01, 2024 to June 30, 2025: Via VSG: Wounded Warrior

West Point Military Academy

The Company will continue to monitor and review outreach sources to evaluate the effectiveness of outreach and recruitment efforts.

Audit and Reporting Systems

41 C.F.R. 60-300.44(h)

It is the responsibility of the Company's Non-Discrimination Officer to monitor employment and personnel practices to ensure compliance with applicable regulations and adherence to the Company's Equal Employment Opportunity and Non-Discrimination Statement of Policy, to report specific problems to the appropriate management personnel, and to measure the effectiveness of Neurelis Inc's Non-Discrimination Program.

The Company's audit and reporting system is designed and implemented to:

- Measure the effectiveness of the Non-Discrimination Program
- Identify any need for remedial action
- Determine the degree to which the Company's objectives are being attained
- Determine whether individuals who are known protected veterans have had the full opportunity to participate in all Company sponsored educational, training, recreational and social activities
- Measure the Company's compliance with the Non-Discrimination Program's specific obligations, and
- Document the actions taken to monitor the Company's compliance with the Non-Discrimination Program's specific obligations.

To measure the effectiveness of the Non-Discrimination Program, the Company may take the following actions:

- Audit the Company's voluntary self-identification process to monitor the number of protected veterans who choose to self-identify and evaluate whether changes could be made to the self-identification process to encourage greater voluntary self-identification by protected veterans
- Monitor records of applicant flow, referrals, placements, training, transfers, promotions, terminations, and compensation decisions to evaluate the degree to which equal employment opportunity and organizational objectives are being obtained
- Report on the organization's progress towards equal employment opportunity and any identified problem areas so appropriate steps can be taken to resolve any issues
- Examine available hiring benchmark data regarding protected veterans
- Review available data computations and analyses regarding applicants and hires
- Review the effectiveness of the Company's recruitment and outreach activities
- Use a schedule to regularly assess any mental and physical qualifications to ensure they are job-related and consistent with business necessity
- Regularly assess the Company's personnel processes to ensure protected veterans have equal opportunity in employment

- Audit communications with vendors and subcontractors to ensure such communications reflect the Company's commitment to equal employment opportunity and non-discrimination for protected veterans
- Audit communications with applicants and employees to ensure such communications reflect the Company's commitment to equal employment opportunity and non-discrimination for protected veterans
- Audit job listings to ensure the postings reflect the Company's commitment to equal employment opportunity and non-discrimination for protected veterans
- Audit personnel policies to ensure such policies reflect the Company's commitment to equal employment opportunity and non-discrimination for protected veterans

Where the Non-Discrimination Program is found to be deficient, the Company shall endeavor to undertake necessary action to improve the Program.

Data Collection Analysis

41 C.F.R. 60-300.44(k)

Neurelis Inc documents computations or comparisons pertaining to applicants and hires on an annual basis and maintains the documentation for a period of three years.

Hiring Benchmarks

41 C.F.R. 60-300.45

Neurelis Inc will establish a benchmark for hiring protected veterans. In establishing a hiring benchmark, the following principles apply:

- The purpose of establishing a hiring benchmark is to provide the Company with a quantifiable method by which it can measure its progress toward achieving equal employment opportunity for protected veterans.
- The hiring benchmark is not a quota that must be met, nor is it a ceiling that limits or restricts the employment of protected veterans.
- In all employment decisions, the Company makes selections in a nondiscriminatory manner. Hiring benchmarks do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, because of that individual's veteran status.
- Hiring benchmarks do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
- Hiring benchmarks are not used to supersede merit selection principles, nor do they require the Company to hire a person who lacks qualifications to perform the job successfully or hire a less qualified person in preference to a more qualified one.
- A finding that the hiring benchmark has not been attained does not constitute a finding nor admission of discrimination.

Neurelis Inc has established its benchmark in accordance with the national percentage of veterans in the civilian labor force as published by the regulating agency. As of July 01, 2025, this benchmark percentage is 5.2 percent.