



April 1, 2012

EQUAL EMPLOYMENT OPPORTUNITY  
POLICY STATEMENT

Crescent Crown Distributing, LLC has followed an established policy of nondiscrimination in all matters relating to employment practices and procedures and the treatment of our employees and applicants for employment. Accordingly, it is now time to reaffirm this longstanding policy.

The policy and practice of Crescent Crown Distributing, LLC is to ensure equal employment opportunities without regard to race, color, age (40 and above), sex, national origin, religion, disability or veteran status where otherwise qualified in accordance with national policy. Our policy emphasizes equality of opportunity for all persons with respect to recruitment, hiring, placement, pay, promotion, and other employment-related status, and in all other matters concerning how applicants for employment and our employees are treated. The Company will ensure that all personnel actions are administered without regard to nondisqualifying disabilities and that all employment decisions are based only upon relevant job requirements. Furthermore, employees and applicants for employment 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: (1) filing a complaint; (2) assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA), as amended, or any other Federal, state or local law requiring equal opportunity for special disabled veterans or Vietnam era veterans; (3) opposing any act or practice made unlawful by VEVRAA; or (4) exercising any other right protected by VEVRAA or its implementing regulations.

This policy, however, does not create any contract of employment, either express or implied, nor does it create any legal rights or causes of action. To maintain a sound competitive position for the Company, we are committed to selecting and employing the best qualified and otherwise most suitable person for each job opening without unlawful discrimination of any kind.

Crescent Crown Distributing, LLC has developed written Affirmative Action Plans for females and minorities, qualified individuals with disabilities, and Covered Veterans as defined herein. In this regard, qualified individuals with disabilities, Disabled Veterans,<sup>1</sup> Recently Separated Veterans,<sup>2</sup> Armed Forces Service Medal Veterans,<sup>3</sup> and Other Protected

---

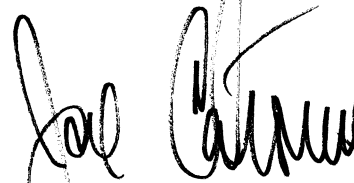
<sup>1</sup>**Disabled Veteran** - Refers to a veteran who is entitled to compensation (or who, but for the receipt of military retiree pay, would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs or who was discharged or released from active duty because of a service-connected disability.

<sup>2</sup>**Recently Separated Veteran** - Refers to any veteran during the 3-year period from the date of such veteran's discharge or release from active duty.

Veterans<sup>4</sup> are invited, but are under no obligation, to identify themselves if they wish to do so. This voluntary disclosure can be made now or at any time in the future. The information provided will, to every reasonable extent possible, remain confidential and will be used only for purposes allowed by applicable federal laws and implementing regulations. Refusal of an employee or applicant to provide such information will not subject him or her to any adverse treatment whatsoever.

Lisa Macafee-Richey, VP – Human Resources, has the overall responsibility of coordinating our Affirmative Action Plans. She will keep me informed of our progress and will also keep managers and supervisors informed of our status so that they will be better equipped to achieve the objectives of these plans.

The Company's Affirmative Action Plans for the disabled and Covered Veterans may be made available for review upon request and at a mutually agreed-upon time during normal office hours. Questions regarding our EEO policy or the implementation of our Affirmative Action Programs should be directed to Lisa Macafee-Richey or other members of management.

A handwritten signature in black ink, appearing to read 'Joe Gotroneo', written over a horizontal line.

Joe Gotroneo  
Sr. Vice President/GM

---

<sup>3</sup>**Armed Forces Service Medal Veteran** - Refers to a person who, while serving on active duty, in the Armed Forces, participated in a U.S. military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985 (62 FR 1209).

<sup>4</sup>**Other Protected Veteran** - Refers to a veteran who served on active duty during a war or in a campaign or expedition for which a campaign badge has been authorized, under laws administered by the Department of Defense.