

TO: All Nelnet Employees and Applicants

FROM: Jeffrey Noordhoek, CEO

DATE: January 1, 2018

It is the ongoing policy and practice of Nelnet to provide equal opportunity in employment to all employees and applicants. No person shall be discriminated against in any condition of employment because of race, color, national origin, sex, sexual orientation, gender identity, religion, age, genetic information, disability, veteran status or any other status protected by applicable law.

The policy of equal employment opportunity (EEO) shall apply to all terms, conditions, and privileges of employment, including hiring, probation, testing, training and development, promotion, transfer, compensation, benefits, educational assistance, termination, layoffs, social and recreational programs, and retirement. Nelnet is committed to making employment decisions based on valid requirements, without regard to race, color, national origin, sex, sexual orientation, gender identity, religion, age, genetic information, disability, veteran status or any other status protected by applicable law. Nelnet will analyze its personnel actions rigorously to ensure compliance with this policy.

Nelnet 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. 41 CFR 60-1.35(c)

Nelnet's EEO Coordinator is Kelly McKeever, Executive Director of People Services in Lincoln, NE, (402)458-2361. She is responsible for compliance with state and federal EEO laws and affirmative action regulations. She is also responsible for implementing Nelnet's Affirmative Action Plan (AAP), including equal employment practices, monitoring, and internal reporting. If you believe you have not been treated in accordance with this policy, please contact her. Our AAP in Veterans and the Disabled is available to you in her office during regular hours or by appointment. All employees and applicants for employment are protected by both company policy and equal employment opportunity/affirmative action regulations and law, from coercion, intimidation, interference, or discrimination for filing a complaint or assisting in an investigation.

I personally endorse the policy of equal employment opportunity. I ask your continued assistance and support in maintaining an environment that reflects Nelnet's commitment to equal and affirmative action. All personnel with responsibility for employment and personnel decisions are directed to perform their duties in accordance with this policy.

Jeffre Noordhoek, CEO