**BHC, Inc.**

AFFIRMATIVE ACTION PROGRAMS

for the period

January 1, 2023 to December 31, 2023

**BHC, Inc.**

AFFIRMATIVE ACTION PROGRAMS

for the period

January 1, 2023 to December 31, 2023

Dean Pollnow, CEO

Date: January 1, 2023

**BHC, Inc.**

AFFIRMATIVE ACTION PROGRAM FOR

FEMALES AND MINORITIES

FOR AAP YEAR January 1, 2023 to December 31, 2023

Dean Pollnow, CEO

Date: January 1, 2023

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INTRODUCTION

BHC, Inc. (“BHC” or the “Company”) is fully committed to the goals of equal opportunity and affirmative action in all aspects of employment. This written Affirmative Action Program is designed to assure full implementation of our Equal Employment Opportunity Policy and full realization of our affirmative action commitment.

The terminology used in Executive Order 11246 and its implementing regulations has been used as a guide by the Company in preparing this AAP. Accordingly, the use of such terms as “underutilization,” “deficiency,” “problem area,” etc., should not be construed as an admission by the Company that any applicant, employee, or class of applicants or employees has been or is presently being discriminated against in any way by the Company in violation of federal, state, or local civil rights laws. Similarly, nothing else contained in the AAP should be construed as an implication or admission that the Company has violated any such federal, state, or local laws. Indeed, the Company’s position is that it is in full compliance with Executive Order 11246, the Rehabilitation Act, and applicable veterans statutes and regulations, as well as all other applicable federal, state, and local civil rights legislation.

The material set forth in this AAP is deemed to constitute confidential and proprietary information, within the meaning of the Freedom of Information Act, 5 U.S.C. § 552, Title VII of the Civil Rights Act of 1964 (as amended), 42 U.S.C. § 2000e *et seq*., and The Trade Secrets Act, 18 U.S.C. § 1905 and 44 U.S.C. § 3508, the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions. Moreover, the disclosure of this information would constitute the unwarranted invasion of the privacy of the Company’s applicants, employees, and former employees.

I. AFFIRMATIVE ACTION POLICY STATEMENT

This reaffirms the policy and commitment of the Company to equal employment opportunity for employees and job applicants. The Company endorses and will follow our Equal Employment Opportunity Policy in implementing all employment practices, policies, and procedures.

The Company will recruit, hire, train, place, and promote persons in all job titles, without regard to race, color, religion, national origin, sex, age, disability, sexual orientation, or gender identity. The Company will base decisions on employment so as to further the principle of equal employment opportunity. The Company will ensure that promotion decisions are in accord with principles of equal employment opportunity by imposing only valid requirements for promotional opportunities. And the Company will ensure that all personnel decisions and actions, such as compensation, benefits, transfers, layoffs, returns from layoff, Company‑sponsored training, education, tuition assistance, and social and recreation programs, will be administered without regard to race, color, religion, national origin, sex, age, disability, sexual orientation, or gender identity. Furthermore, the Company will not discharge or in any other manner discriminate against any employee or applicant for employment because such employee or applicant inquired about, discussed, or disclosed the compensation of the employee or applicant or another employee or applicant, unless the employee had access to compensation data as a part of the employee’s job duties and disclosed the information to others who do not have access to such information.

All employees are expected to comply with our Equal Employment Opportunity Policy and our AAP. Managers who are responsible for meeting business objectives are expected to cooperate fully in meeting our equal employment opportunity and affirmative action objectives and their overall performance will be evaluated accordingly.

It is of utmost concern to me that the Company accomplish its equal employment opportunity and affirmative action objectives. I will be receiving yearly reports on our progress and will take any measures necessary to resolve problems which deter meeting our stated goals. Please communicate any questions or concerns that you have to Nellie Williams, Chief Human Resource Officer, who serves as the EEO Officer.

Dean Pollnow, CEO

Date: January 1, 2023

II. RESPONSIBILITY FOR IMPLEMENTATION ‑ § 60‑2.17(a)‑‑

Dean Pollnow, Chief Executive Officer, has overall responsibility for implementation of the Affirmative Action Program.

A. EEO Officer’s Responsibilities

Nellie Williams, Chief Human Resource Officer, serves as the EEO Officer, and has the following equal employment responsibilities:

1. Developing policy statements, the AAP, and internal and external communication techniques;

2. Identifying problems and assisting management in problem resolution;

3. Designing and implementing audit and reporting systems that will measure the effectiveness of the program, indicate the need for remedial action, and determine the degree to which the Company’s goals and objectives have been attained;

4. Serving as liaison between the Company and enforcement agencies and relevant community organizations as necessary; and

5. Keeping management informed of the latest developments in the entire equal employment area.

B. Line Management Responsibilities

The equal employment responsibilities of line management include:

1. Assistance in the identification of problem areas and establishment of placement goals and objectives;

2. Active involvement with local minority organizations, women’s organizations, community action groups, and community service programs;

3. Periodic audit of training programs, hiring practices, and promotion patterns to remove impediments to the attainment of goals and objectives;

4. Regular discussion with local managers, supervisors, and employees to be certain the Company’s policies are being followed;

5. Review of the qualifications of all employees to ensure that minorities and women are given full opportunities for transfers and promotions;

6. Career counseling for all employees;

7. Periodic audit to ensure that each location is in compliance with all affirmative action plan requirements;

8. Supervisors will be informed that their work performance is being evaluated on the basis of their equal employment opportunity efforts and results, as well as other criteria; and

9. It shall be a responsibility of supervisors to take actions to prevent harassment of employees placed through affirmative action efforts.

III. ORGANIZATIONAL PROFILE ‑ § 60‑2.11‑‑

We have conducted an organizational profile in accordance with 41 CFR § 60‑2.11 utilizing the workforce analysis format. The forms that comprise Exhibit 1, included with this Program, show all employees by department, job title, pay range, race, and sex, from the lowest paid to the highest paid including departmental or unit supervision.

IV. JOB GROUP ANALYSIS ‑ §2.12‑

Pursuant to the guidelines contained in 41 CFR § 60‑2.12 and issued by the Office of Federal Contract Compliance Programs (“OFCCP”), the Company’s workforce has been divided into the following eight job groups:

1.1 Executive/Senior Level Officials and Managers

1.2 First/Mid-Level Officials and Managers

2. PROFESSIONALS

3. TECHNICANS

4. SALES WORKERS

1. OFFICE AND CLERICAL WORKERS
2. OPERATIVES
3. LABORERS AND HELPERS

JOB GROUPS BY JOB TITLE

1.1 Executive/Senior Level Officials and Managers

CEO / President

Chief Executive Officer

Chief Operating Officer

Director - Finance

Director - Human Resources

Director - Marketing

Director - Operations

Director - Regulatory

Director - Sales

Technical Director

1.2 First/Mid-Level Officials and Managers

Accounting Supervisor

Customer Service Supervisor

Director of Operations

Information Technology Manager

Operations Supervisor

Production Supervisor

Purchasing Manager

Senior Key Account Program Manager - East

2. PROFESSIONALS

Business Development Manager

Formulation Chemist

Graphic Designer

QA Chemist

3. TECHNICIANS

Key Account Program, Specialist

4. SALES WORKERS

Inside Sales Representative

International Business Manager

National Accounts Manager - Industrial Process

Product Line Manager

Sales Manager

Sales Specialist

5. OFFICE AND CLERICAL WORKERS

Accounts Receivable/Payable Specialist

Customer Service Rep II

Data Analyst

HR Generalist I

Purchasing Coordinator

Receptionist

1. OPERATIVES

Lead Shipping & Receiving Clerk

Order Filler

Production Operator

Shipping Clerk

Shipping and Receiving Clerk

1. LABORERS AND HELPERS

Maintenance A

V. PLACEMENT OF INCUMBENTS AND AVAILABILITY ‑ §§ 60‑2.13--2.14‑‑

A. Placement of Incumbents in Job Groups - § 60-2.13

In the forms that comprise Exhibit 2, the Company has identified the percentage of minorities and the percentage of women it employs in each job group established pursuant to § 60-2.12.

B. Determining Availability - § 60-2.14

We have prepared an availability assessment in accordance with the guidelines contained in § 60-2.14. Availability computations are contained in the forms that comprise Exhibit 2, included with this Program. Availability has been based upon factors authorized by the OFCCP with the following notes of explanation:

1. The reasonable recruitment area for Job Group 1.1 is the United States of America, for, Job Groups 1.2, 2, and 4 it is the State of Indiana, and for Job Groups 3, 5, 7, and 8 it is Indianapolis-Carmel-Anderson, IN Metro Area. These reasonable recruitment areas represent the geographical areas from which the Company usually seeks or reasonably can seek workers to fill these positions in the Company.

2. External Availability was determined using current and discrete statistical information evaluated and weighed on the basis of the degree of relevance of each source vis‑a‑vis the pool of qualified external applicants. Our value weights were based upon historical data on hires by job group from review of our present work force.

3. Internal Availability pools of promotable, transferable, and trainable employees were evaluated in accordance with the degree to which job groups have been historically used for internal promotions and using data based on present work force composition. Unless otherwise indicated, every minority and female in the selected internal pool has been considered as promotable without respect to experience, tenure, mobility, interests, or skill differences.

4. The computation of Final Availability was based upon an estimate of the balance between internal and external sourcing in filling positions within each job group. This estimate was determined using our historical experience relative to our present workforce composition.

VI. INCUMBENCY/AVAILABILITY ‑ § 60‑2.15‑‑

We have made an incumbency/availability analysis of all major job groups at the facility by comparing the percentage of minorities and women in each job group determined pursuant to § 60-2.13 with the availability for those job groups determined pursuant to § 60-2.14. When the percentage of minorities or women employed in a particular job group was less than would reasonably be expected given their availability for employment in that particular job group, the Company has established a Placement Goal using the one-person test of statistical significance. The terms used herein, such as “underutilization” and “availability,” are used totally in the context of the AAP for the purpose of complying with the affirmative action objectives of E.O. 11246. They have no meaning for any other purpose; they do not express or imply unlawful discrimination.

VII. ANNUAL PLACEMENT GOALS ‑ § 60‑2.16‑‑

Annual Placement Goals have been developed in all Job Groups in which the percentage of minorities or women employed in a particular job group is less than would reasonably be expected given their availability percentage in that particular job group. The Company will make a good faith effort to attain its Annual Placement Goals through implementation of action-oriented programs described elsewhere in this AAP.

As stated in the regulations, our determination that a placement goal is required constitutes neither a finding nor an admission of discrimination. These goals are contained on the forms designated as Exhibit 2. To prevent reverse discrimination, none of the placement goals exceeds external availability.

In establishing our placement goals, we have applied the following principles:

1. Placement goals may not be rigid and inflexible quotas which must be met, nor are they to be considered as either a ceiling or a floor for the employment of particular groups. Quotas are expressly forbidden.

2. In all employment decisions, we will make selections in a nondiscriminatory manner. Placement goals do not provide the Company with a justification to extend a preference to any individual, select an individual, or adversely affect an individual’s employment status, on the basis of that person’s race, color, religion, sex, or national origin.

3. Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.

4. Placement goals may not be used to supersede merit selection principles. Affirmative action programs prescribed by the regulations do not require us 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.

VIII. IDENTIFICATION OF PROBLEM AREAS ‑ § 60‑2.17(b)‑‑

A. Composition of the Workforce by Organizational Unit and Job Group

We have conducted workforce, job group, and utilization analyses in accordance with the standards set forth by the OFCCP. These analyses suggest that the Company is slightly underutilized with respect to females in Job Groups 1.1, 2, and 7, and more underutilized with respect to females in Job Groups 3 and 4. The analyses also suggest that the Company is slightly underutilized with respect to minorities in Job Groups 3 and 4. However, the Company is unable to utilize a composite availability figure for its utilization analyses, which would more accurately reflect the true availability relative to the actual positions within the job groups, because there are no census data pertaining to relevant Standard Occupational Classification codes for the reasonable recruitment area. Consequently, the Company must use census data for the generic job groups that do not accurately reflect the positions, which are unique to the Companying industry and to the Company itself, within each job group. For example, Job Group 2 general census data includes such heavily female dominated professions as nurses and teachers. Nonetheless, in all areas of underutilization, the Company will vigorously undertake recruitment efforts to attempt to achieve its goals, including consistent consulting with recruitment sources to attempt to eliminate underutilization where practicable.

B. Personnel Activity

1. Applicant Flow and Hiring

Applicant flow has been analyzed by minority group status and sex by job group according to the information provided by the applicant (see Personnel Transaction and Data analyses comprising the Forms designated as Exhibit 3 and included with this Program). In many instances, applicants have chosen not to self-identify either their minority group, the sex, or both. Based upon known information, hiring at the Company has been statistically consistent with applicant flow and availability. While the analysis did indicate potential for adverse impact on minorities and females in one job group, further investigation yielded no unlawful discrimination concerns.

2. Promotions, Terminations, and Other Personnel Actions

The Company has examined its total selection and retention process, including promotions, terminations, transfers, and other personnel actions to determine whether there have been any selection disparities based on minority group status or gender (see Exhibit 3). This analysis was performed by job group. The result of this review demonstrates that all personnel practices are being uniformly applied without regard to race or gender. While the analysis did indicate potential for adverse impact on minorities and females in some job groups, further investigation yielded no unlawful discrimination concerns.

3. Compensation System

The Company has analyzed its entire compensation system to determine whether there are any gender-, race-, or ethnicity-based disparities. The result of this review demonstrates that the compensation system is free from gender-, race-, or ethnicity-based bias. While the analysis did indicate potential for adverse impact on minorities and females in some job groups, further investigation yielded no unlawful discrimination concerns.

4. Selection, Recruitment, Referral, and Other Personnel Procedures

The Company has examined its selection, recruitment, referral, and other personnel procedures to determine whether they result in disparities in the employment or advancement of minorities or women. The result of this review demonstrates that all personnel procedures are being uniformly applied without regard to race or gender.

5. Other Problem Areas

The Company has performed an in-depth analysis of its total employment process to determine whether and where impediments to equal employment opportunity exist. The result of this review demonstrates that no impediments exist to achievement of the Company’s equal employment and affirmative action goals.

IX. PERSONNEL TRANSACTION DATA ‑ § 60‑2.17(b)(2)‑‑

The following personnel transaction analyses are broken down separately for the time period from January 1, 2022 to December 31, 2022, and are contained in Exhibit 3:

1. Applicant flow summary;

2. Hire summary;

3. Promotion summary; and

4, Termination summary.

X. ANNUALIZED COMPENSATION DATA

The chart comprising Exhibit 4 and included with this Program presents annualized compensation data by pay grade/salary range for 2022.

XI. DEVELOPMENT AND EXECUTION OF ACTION

ORIENTED PROGRAMS ‑ § 60‑2.17(c)‑‑

The Company has developed and executed action-oriented programs designed to correct any problem areas identified above and to attain established goals and objectives. In order for these action-oriented programs to be effective, the Company realizes it must ensure that they consist of more than following any previous procedures which did not produce adequate results. The Company will take good faith efforts to remove any identified barriers, expand employment opportunities, and produce measurable results. To ensure that our established goals and objections are achieved, we have undertaken the following steps:

A. Management Responsibility

We realize that the ultimate success of affirmative action efforts will depend upon the degree of commitment of management at all levels to achieving objectives in this area. Managers at all levels will be held accountable for and measured on their efforts in the areas of affirmative action as they are held accountable and measured on their efforts in their other managerial responsibilities.

B. Employment Procedures Analysis

We will continue to review our employment process to ensure that no practice or procedure has a disparate impact upon minority or female candidates or unfairly works to the disadvantage of any individual minority or female candidate. This review is the responsibility of Nellie Williams, EEO Officer. It will include but not be limited to the following:

1. Analysis of all requirements for all positions to ascertain their job‑relatedness;

2. Analysis of recruitment and selection procedures; and

3. Auditing of the hires and promotions of minorities and women to determine compliance with the objectives of the Affirmative Action Program.

C. Recruiting

1. Communications have been or will be established with referral organizations to increase the flow of minority and female applicants. The Company is using the following sources: Field of Talent, Ajilion / LHH Recruiting Solutions, Indiana Career Connect, Robert Half, LinkedIn, Indeed, Aerotek Temporary Staffing, Energeo Temporary Staffing, and Craigslist. BHC also works collaboratively with organizations that assist with employment of disabled individuals, such as Adult and Child Mental Health Center, Inc., Bosma Enterprises, Career Development Network (Damien Center), Easter Seals Crossroads Rehabilitation Center, Goodwill Industries of Central Indiana, and Noble of Indiana.

2. All referral sources used will receive a letter encouraging their adherence to affirmative action principles in their referrals.

3. All advertisements will contain the phrase or denotation, “An Equal Opportunity Employer.” Minority and female oriented media will be evaluated and used whenever it may productively assist us in increasing our applicant flow.

4. We encourage minority and female employees to refer applicants.

D. Promotions

In order to increase the opportunities of minorities and females for promotion and transfer we do the following:

1. Utilize a job posting system and training program and encourage minority and female employees to use them; and

2. Continue to stress to managers the need to increase their identification and development of promotable minorities and females and to provide appropriate counseling to facilitate their advancement in the Company.

E. Use of Training Institutions

1. We continue to support training programs and institutions as a resource for employee education through our educational assistance program, which is open to all employees for their use in self‑advancement.

2. Additionally, we may use local institutions as resources for employees or for employee development.

F. Future Action Program Development

We will develop any additional action‑oriented programs as may be necessary to correct any future problems which may arise relative to the attainment of our goals and objectives. We plan to make every good faith effort to make the Affirmative Action Program successful.

XII. INTERNAL REPORTING SYSTEM ‑ § 60‑2.17(d)‑‑

1. Internal Reporting

The Company has developed and implemented an auditing system that periodically measures the effectiveness of its total affirmative action program. The Company has undertaken each of the steps listed below to ensure the success of its efforts:

1. The Company periodically monitors records of all personnel activity, including referrals, placements, transfers, promotions, terminations, and compensation, at all levels to ensure the nondiscriminatory policy is carried out;

2. The Company requires internal reporting on a scheduled basis to determine the degree to which equal employment opportunity and organizational objectives are attained. In this regard, the following affirmative action reports will be generated by the EEO Officer and submitted to management:

(a) Applicant Flow Report;

(b) Hire Report;

(c) Promotion Report;

(d) Termination Report; and

(e) Compensation Summary.

All reports will present cumulative data and will be used to evaluate progress and assess problems which need to be corrected.

(3) Using cumulative data, the EEO Officer will also perform statistical comparisons of the minority and gender composition of individuals moving into job groups with applicable Annual Placement Goals to determine Annual Placement Goal Attainment.

(4) Reports will be reviewed with all levels of management.

(5) The EEO Officer will advise top management of program effectiveness and submit recommendations to improve unsatisfactory performance.

1. Prior Year Placement Goals Attainment Results

The chart that comprises Exhibit 5 and is included with this Program outlines the Company’s placement goals attainment results for the period from January 1, 2022 to December 31, 2022.

The Company’s Affirmative Action Program describes all efforts that were undertaken to improve the opportunities for females and minorities in the Company during the previous year.

**BHC, Inc.**

AFFIRMATIVE ACTION PROGRAM FOR

WORKERS WITH DISABILITIES

AND PROTECTED VETERANS

FOR AAP YEAR January 1, 2023 to December 31, 2023

Dean Pollnow, CEO

Date: January 1, 2023

**VEVRAA/SECTION 503 AFFIRMATIVE ACTION PLAN**

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INTRODUCTION

Under the affirmative action obligations imposed by Section 503 of the Rehabilitation Act of 1973, 29 U.S.C. § 793, as amended by the Rehabilitation Act Amendments of 1974 (“Section 503”), and Section 402 of the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended (“VEVRAA”), the BHC, Inc. (“BHC” or the “Company”) is required to take affirmative action to employ and advance in employment qualified individuals with disabilities and disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans, and Armed Forces service medal veterans (collectively referred to herein as “protected veterans”). Such action applies to employment practices including, but not limited to, the following: hiring, promotion, demotion or transfer, recruitment or recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeships and on‑the‑job training programs.

This Affirmative Action Program has been developed to be in compliance with 41 C.F.R. § 60‑741 (Affirmative Action Obligations of Contractors and Subcontractors for Workers with Disabilities) and 41 C.F.R. § 60‑300 (Affirmative Action and Nondiscrimination Obligations of Contractors and Subcontractors Regarding Disabled Veterans, Recently Separated Veterans, Active Duty Wartime or Campaign Badge Veterans, and Armed Forces Service Medal Veterans). This program is reviewed and updated annually and is available for review by employees and applicants for employment during regular business hours upon request to the EEO Officer, Nellie Williams.

A.

EQUAL EMPLOYMENT POLICY

The Company will not discriminate against any employee or applicant for employment because he or she is a protected veteran or because of a physical or mental disability in regard to any position for which the employee or applicant is qualified. The Company agrees to take affirmative action to employ, advance in employment, and otherwise treat protected veterans and persons with disabilities without discrimination based upon their disability or protected veteran status in all employment functions. The Company will recruit, hire, train, and promote persons in all job titles and ensure that all other personnel actions are administered without regard to disability or protected veteran status; and will ensure that all employment decisions are based only on valid job requirements.

The Company’s CEO is fully supportive of this Policy and will ensure its implementation and compliance at all levels of the Company. The Company has designed and implemented an audit and reporting system that will, among other things, measure the effectiveness of the Company’s affirmative action program and indicate any need for remedial action. Nellie Williams, the Company’s EEO Officer, has been assigned primary responsibility for implementation of the Company’s affirmative action activities under this Policy.

The Company is fully committed to ensuring that employees and applicants are not 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 review, hearing, or any other activity related to the administration of the affirmative action provision of VEVRAA or Section 503, as amended, or any other federal, state, or local law requiring equal opportunity for protected veterans or individuals with disabilities;

3. Opposing any act or practice made unlawful by VEVRAA or Section 503 or their implementing regulations or any other federal, state, or local law requiring equal opportunity for protected veterans or individuals with disabilities; or

4. Exercising any other right protected by VEVRAA or Section 503 or their implementing regulations.

For individuals with disabilities or protected veterans, the Company will also:

1. Make this Program available for inspection to any employee or applicant for employment upon request. The location and hours during which the Program may be reviewed will be posted.

2. Invite all applicants and employees at the pre- and post-offer stages of the application process who believe themselves covered by the Rehabilitation Act and/or the Vietnam Era Veterans Readjustment Assistance Act and who wish to benefit under this Affirmative Action Program to identify themselves to a representative from personnel. This invitation will state that the information is voluntary, that it will be kept confidential, that refusal to provide it will not subject the applicant or employee to any adverse treatment, and that it will be used only in accordance with the Acts and their implementing regulations. If an applicant or employee so identifies himself or herself, the Company will seek the advice of the applicant or employee regarding proper placement and appropriate accommodation. See Appendix A.

B.

REVIEW OF PERSONNEL PROCESSES

The Company will ensure that its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities or who are known protected veterans for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available.

Additionally, the Company will ensure that when a protected veteran is considered for employment opportunities, the Company relies only on that portion of the individual’s military record, including his or her discharge papers, that is relevant to the requirements of the opportunity at issue.

The Company will also ensure that its personnel processes do not stereotype individuals with disabilities or protected veterans in a manner which limits their access to all jobs for which they are qualified.

In addition, the Company will ensure that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies. The Company will provide necessary reasonable accommodation to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes. The Company will also make its information and communication technologies accessible, even absent a specific request for reasonable accommodation.

Furthermore, the Company will periodically (in December of each year) review such processes and make any necessary modifications to ensure that these obligations are carried out. A description of the review and any necessary modifications to personnel processes or development of new processes shall be included in this Affirmative Action Program.

C.

PHYSICAL AND MENTAL QUALIFICATIONS

1. Physical and mental job qualification requirements and employment standards are examined and reviewed in December each year to ensure that they are consistently applied and reflect actual job duties and responsibilities; and that, to the extent the requirements and standards tend to screen out qualified individuals with disabilities or disabled veterans, they are job related and consistent with business necessity and the safe performance of the job.

2. Whenever the Company applies physical or mental qualifications standards in the selection of applicants or employees for employment or other change in employment status such as promotion, demotion, or training, to the extent that qualification standards tend to screen out qualified individuals with disabilities or disabled veterans, the standards will be related to the specific job or jobs for which the individual is being considered and consistent with business necessity and the safe performance of the job.

3. The Company may use as a defense to an allegation of a violation of paragraph (2) of this section that an individual poses a direct threat to the health or safety of the individual or others in the workplace. (*See* 41 C.F.R. § 60–300.2(g) defining direct threat.)

D.

REASONABLE ACCOMMODATION TO PHYSICAL AND   
MENTAL LIMITATIONS OF EMPLOYEES

The Company will make reasonable accommodations to the known physical or mental limitations of an otherwise qualified individual with a disability or disabled veteran unless the Company can demonstrate that the accommodation would impose an undue burden on the operation of its business. In determining the extent of its obligation, the Company will consider business necessity and financial costs and expenses, among other factors.

If an employee with a known disability or is known to be a disabled veteran is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the Company will confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee’s disability. If the employee responds affirmatively, the Company will confidentially inquire whether the employee is in need of a reasonable accommodation.

E.

HARASSMENT

The Company has developed and implemented the following policy, which is conspicuously posted where it can be seen by all employees, to ensure that its employees with disabilities or protected veterans are not harassed because of their disabilities or their status as a disabled veteran or other protected veteran:

In providing a productive working environment, the Company believes that its employees should be able to enjoy a workplace free from all forms of discrimination, including harassment on the basis of race, color, religion, gender, national origin, age, disability, protected veteran status, sexual orientation or gender identity. It is the Company’s policy to provide an environment free from such harassment.

It is against the policy of the Company for any employee, whether a manager, supervisor, or coworker, to harass another employee. Prohibited harassment occurs when verbal or physical conduct that defames or shows hostility toward an individual because of his or her race, color, religion, gender, national origin, age, disability, protected veteran status, sexual orientation or gender identity, or that of the individual’s relatives, friends, or associates, creates or is intended to create an intimidating, hostile, or offensive working environment; interferes or is intended to interfere with an individual’s work performance; or otherwise adversely affects an individual’s employment opportunities.

Harassing conduct includes, but is not limited to:

● Epithets, slurs, negative stereotyping, or threatening, intimidating or hostile acts, which relate to race, color, religion, gender, national origin, age, disability, protected veteran status, sexual orientation or gender identity.

● Written or graphic material that defames or shows hostility or aversion toward an individual or group because of race, color, religion, gender, national origin, age, disability, protected veteran status, sexual orientation or gender identity and that is placed on walls, bulletin boards, or elsewhere on the Company’s premises, or that is circulated in the workplace.

Any employee who believes he or she has been harassed in violation of this policy should report the conduct immediately to his or her supervisor; or, if that person is responsible for the harassment, to the Human Resources Department. The employee always has the option of reporting the conduct directly to the Human Resources Department if he or she prefers.

A thorough and impartial investigation of all complaints will be conducted in a timely and confidential manner. Any employee of the Company who has been found, after appropriate investigation, to have harassed another employee in violation of this policy will be subject to disciplinary action up to and including termination.

F.

EXTERNAL DISSEMINATION OF POLICY,

OUTREACH, AND POSITIVE RECRUITMENT

The Company will undertake appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified individuals with disabilities and protected veterans. Those activities will include external dissemination of the Company’s policy and may include, but will not necessarily be limited to, the following:

1. All subcontractors, vendors, and suppliers have been or will be sent written notification of the Company’s Equal Employment Opportunity and Affirmative Action policy regarding the employment of qualified individuals with disabilities and qualified protected veterans. Furthermore, the Company will request that its subcontractors, vendors, and suppliers take all appropriate action to assist the Company in fulfilling its affirmative action obligations.

2. Below are examples of outreach and positive recruitment activities that the Company may utilize in its outreach efforts. This is an illustrative list, and the Company may choose from these or other activities, as appropriate.

(i) Enlisting the assistance and support of the following persons and organizations in recruiting and developing on-the-job training opportunities for protected veterans and individuals with disabilities, in order to fulfill its commitment to provide meaningful employment opportunities for such protected veterans and individuals with disabilities:

(A) The Local Veterans’ Employment Representative in the local employment service office (*i.e*., the One–Stop) nearest the Company’s establishment;

(B) The State Vocational Rehabilitation Service Agency (SVRA), State mental health agency, or State developmental disability agency in the area of the Company’s establishment;

(C) The Employment One–Stop Career Center (One–Stop) or American Job Center nearest the Company’s establishment;

(D) The Department of Veterans Affairs Regional Office nearest the Company’s establishment;

(E) Entities funded by the Department of Labor that provide recruitment or training services for individuals with disabilities, such as the services currently provided through the Employer Assistance and Resource Network (EARN) (www.earnworks.com);

(F) Local Employment Network (EN) organizations (other than the Company, if the Company is an EN) listed in the Social Security Administration’s Ticket to Work Employment Network Directory (www.yourtickettowork.com/endir);

(G) The veterans’ counselors and coordinators (“Vet–Reps”) on college campuses;

(H) The service officers of the national veterans’ groups active in the area of the Company’s establishment;

(I) Local veterans’ groups and veterans’ service centers near the Company’s establishment;

(J) Local disability groups, organizations, or Centers for Independent Living (CIL) near the Company’s establishment;

(K) Placement or career offices of educational institutions that specialize in the placement of individuals with disabilities;

(L) Private recruitment sources, such as professional organizations or employment placement services that specialize in the placement of individuals with disabilities;

(M) The Department of Defense Transition Assistance Program (TAP), or any subsequent program that, in whole or in part, might replace TAP; and

(N) Any organization listed in the Employer Resources section of the National Resource Directory (http://www.nationalresourcedirectory.gov/), or any future service that replaces or complements it.

(ii) The Company will also consider taking the actions listed below, as appropriate, to fulfill its commitment to provide meaningful employment opportunities to protected veterans and individuals with disabilities:

1. Formal briefing sessions may be held, preferably on Company premises, with representatives from recruiting sources. Company facility tours, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of the Company’s selection process, and recruiting literature should be an integral part of the briefing. At any such briefing sessions, the Company official in charge of the Company’s affirmative action program should be in attendance when possible. Formal arrangements should be made for referral of applicants, follow up with sources, and feedback on disposition of applicants.
2. The Company’s recruitment efforts at all educational institutions may incorporate special efforts to reach students who are protected veterans or individuals with disabilities.
3. An effort may be made to participate in work-study programs with Department of Veterans Affairs rehabilitation facilities which specialize in training or educating disabled veterans. Additionally, the Company may participate in work-study programs for students, trainees, or interns with disabilities. Such programs may be found through outreach to State and local schools and universities, and through EARN.
4. Protected veterans and individuals with disabilities may be made available for participation in career days, youth motivation programs, and related activities in their communities.
5. The Company may take any other positive steps it deems necessary to attract qualified protected veterans and individuals with disabilities not currently in the work force who have requisite skills and can be recruited through affirmative action measures. These persons may be located through the local chapters of organizations of and for any of the classifications of protected veterans, state, and local agencies supported by the U.S. Department of Education’s Rehabilitation Services Administration (RSA) (http://rsa.ed.gov/), local Ticket-to–Work Employment Networks, or local chapters of groups or organizations that provide services for individuals with disabilities.
6. The Company, in making hiring decisions, may consider applicants who are known protected veterans or known to have disabilities for all available positions for which they may be qualified when the position(s) applied for is unavailable.
7. The Company may consider listing its job openings with the National Resource Directory’s Veterans Job Company, or any future service that replaces or complements it.

3. The Company shall, on an annual basis (in December of each year), review the outreach and recruitment efforts it has taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified protected veterans and individuals with disabilities. The Company shall document each evaluation, including at a minimum the criteria it used to evaluate the effectiveness of each effort and the Company’s conclusion as to whether each effort was effective. Among these criteria shall be the data collected pursuant to 41 C.F.R. § 60-300.44(k) and 41 C.F.R. § 60-741.44(k) for the current year and the two most recent previous years. The Company’s conclusion as to the effectiveness of its outreach efforts must be reasonable as determined by OFCCP in light of these regulations. If the Company concludes the totality of its efforts were not effective in identifying and recruiting qualified protected veterans or qualified individuals with disabilities, it will identify and implement alternative efforts listed in subsections (2)(i) or (2)(ii) of this section in order to fulfill its obligations.

4. The equal employment opportunity clause concerning the employment of qualified individuals with disabilities and qualified protected veterans are included in all nonexempt subcontracts and purchase orders.

5. The Company shall document all activities it undertakes to comply with the obligations of this section and retain these documents for a period of three (3) years.

G.

INTERNAL DISSEMINATION OF POLICY

The Company recognizes that a strong outreach program will be ineffective without adequate internal support from supervisory and management personnel and other employees. In order to assure greater employee cooperation and participation in the Company’s efforts, the Company shall develop the internal procedures listed in this section for communication of its obligation to engage in affirmative action efforts to employ and advance in employment qualified protected veterans. It is not contemplated that the Company’s activities will be limited to those listed. These procedures shall be designed to foster understanding, acceptance, and support among the Company’s executive, management, supervisory and other employees and to encourage such persons to take the necessary actions to aid the Company in meeting this obligation.

The Company shall implement and disseminate this policy internally as follows:

* 1. Include it in the Company’s policy manual or otherwise make the policy available to employees;
  2. If the Company is party to a collective bargaining agreement, it shall notify union officials and/or employee representatives to inform them of the Company’s policy and request their cooperation;
  3. The Company is encouraged to additionally implement and disseminate this policy internally as follows:
  4. Inform all employees and prospective employees of its commitment to engage in affirmative action to increase employment opportunities for protected veterans and individuals with disabilities. The Company will periodically schedule special meetings with all employees to discuss policy and explain individual employee responsibilities;
  5. Publicize it in the Company newspaper, magazine, annual report, and other media;
  6. Conduct special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation, making clear the chief executive officer’s support for the affirmative action policy;
  7. Discuss the policy thoroughly in both employee orientation and management training programs;
  8. When employees are featured in employee handbooks or similar publications for employees, include disabled veterans and individuals with disabilities.

H.

AUDIT AND REPORTING SYSTEM

1. The Company will design and implement an audit reporting system that will:

(A) Measure the effectiveness of its affirmative action program;

(B) Indicate any need for remedial action;

(C) Determine the degree to which the Company’s objectives have been attained;

(D) Determine whether known individuals with disabilities and known protected veterans have had the opportunity to participate in all Company-sponsored educational, training, recreational, and social activities;

(E) Measure the Company’s compliance with the affirmative action program’s specific obligations; and

(F) Document the actions taken to comply with the obligations of paragraphs (A) through (E) above, and retain these documents as employment records subject to the recordkeeping requirements of 41 C.F.R. § 60–300.80 and 41 C.F.R. § 60–741.80.

2. Where the affirmative action program is found to be deficient, the Company will undertake necessary action to bring the program into compliance.

I.

RESPONSIBILITY FOR IMPLEMENTATION

Nellie Williams, Chief Human Resource Officer, has been designated as the Company’s EEO Officer. Her name will appear on all internal and external communications regarding the Company’s affirmative action programs. She has been given necessary top management support and staff to manage the implementation of this Program.

J.

TRAINING

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes will be trained to ensure that the commitments of the Company’s Affirmative Action Program are implemented.

K.

DATA COLLECTION ANALYSIS

The Company will document the following computations or comparisons pertaining to applicants and hires:

1. The number of applicants who self-identified as protected veterans or individuals with disabilities pursuant to 41 C.F.R. § 60–300.42(a) or 41 C.F.R. § 60–741.42(a), or who are otherwise known as protected veterans or individuals with disabilities;
2. The total number of job openings and total number of jobs filled;
3. The total number of applicants for all jobs;
4. The number of protected veteran applicants or applicants with disabilities hired; and
5. The total number of applicants hired.

APPENDIX A

Form for Employees

This employer is subject to Section 503 of the Rehabilitation Act of 1973 and Section 402 of the Vietnam Era Veterans Readjustment Assistance Act of 1974. These Acts require depositories of federal funds and issuing and paying agents for U.S. savings bonds or savings notes to take affirmative action to employ and advance in employment qualified individuals with disabilities and disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans, and Armed Forces service medal veterans (collectively referred to herein as “protected veterans”). If you have a disability or are a protected veteran and would like to be considered under the Affirmative Action Program, please tell us. You may inform us of your desire to benefit under the program at this time and/or at any time in the future. This information will assist us in placing you in an appropriate position and in making accommodations for your disability if you have one.

The Company agrees to take affirmative action to employ, advance in employment, and otherwise treat protected veterans and persons with disabilities without discrimination based upon their disability or protected veteran status in all employment functions. The Company will recruit, hire, train, and promote persons in all job titles and ensure that all other personnel actions are administered without regard to disability or protected veteran status, and it will ensure that all employment decisions are based only on valid job requirements.

Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. Information you submit will be kept confidential, except that (i) supervisors and managers may be informed regarding restrictions on the work or duties of individuals with disabilities and disabled veterans and regarding necessary accommodations; (ii) first aid and safety personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment; and (iii) Government officials engaged in enforcing laws administered by OFCCP or the Americans with Disabilities Act, may be informed. The information provided will be used only in ways that are not inconsistent with Section 503 of the Rehabilitation Act or the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended.

If you are an individual with a disability or a protected veteran, we would like to include you under the Affirmative Action Program. If you are an individual with a disability or a protected veteran it would assist us if you tell us about (i) any special methods, skills, and procedures which qualify you for positions that you might not otherwise be able to do because of your disability so that you will be considered for any positions of that kind, and (ii) the accommodations which we could make which would enable you to perform the job properly and safely, including special equipment, changes in the physical layout of the job, elimination of certain duties relating to the job, provision of personal assistance services or other accommodations.

We also make our Affirmative Action Programs available to all employees and applicants upon request. If you would like to view the Program covering this facility, it will be available for inspection in our Human Resources Department between 8:00 a.m. and 4:00 p.m. each business day. Please arrange an appointment to review our Program with any of our Human Resources representatives at a time of mutual convenience. **[Pre-Offer Form]**

**PRE-OFFER VOLUNTARY SELF-IDENTIFICATION OF RACE, GENDER, VETERANS AND DISABILITIES**

BHC, Inc. is subject to Executive Order 11246, Section 503 of the Rehabilitation Act of 1973 and Section 402 of the Vietnam Era Veterans Readjustment Assistance Act of 1974. These Acts require depositories of federal funds and issuing and paying agents for U.S. savings bonds or savings notes to take affirmative action to employ and advance in employment minorities, females, qualified individuals with disabilities, qualified disabled veterans, recently separated veterans, other protected veterans, and Armed Forces service medal veterans. Solely to help us in these endeavors, we request your cooperation in completing this form. **Completion of this form is strictly voluntary**. All information you provide will be kept confidential and used only in accordance with applicable law.

Date: \_\_\_\_\_\_\_\_\_\_

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Position (or Position Applied To): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**RACE OR ETHNIC IDENTITY**

Please check one of the boxes below:

* + **Hispanic or Latino**

A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.

* + **White (Not Hispanic or Latino)**

A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

* + **Black or African American (Not Hispanic or Latino)**

A person having origins in any of the black racial groups of Africa.

* + **Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino)**

A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

* + **Asian (Not Hispanic or Latino)**

A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

* + **American Indian or Alaska Native (Not Hispanic or Latino)**

A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.

* + **Two or More Races (Not Hispanic or Latino)**

All persons who identify with more than one of the above five races.

* + I do not wish to answer

**GENDER**

Please check one of the boxes below:

* + Male
  + Female
  + I do not wish to answer

**VETERAN STATUS:**

As a depository of federal funds and an issuing and paying agent for U.S. savings bonds or savings notes, we are required to take affirmative action to employ and advance in employment: (1) disabled veterans; (2) recently separated veterans; (3) active duty wartime or campaign badge veterans; and (4) Armed Forces service medal veterans. These classifications are defined as follows:

* A “disabled veteran” is one of the following:
  + 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**
  + a person who was discharged or released from active duty because of a service-connected disability.
* A “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.
* An “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.
* An “Armed forces service medal veteran” means a 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.

We are also required to submit a report to the United States Department of Labor each year identifying the number of our employees belonging to each specified “protected veteran” category. If you believe you belong to any of the categories of protected veterans listed above, please indicate by checking the appropriate blanks below.

I BELONG TO THE FOLLOWING CLASSIFICATIONS OF PROTECTED VETERANS (CHOOSE ALL THAT APPLY):

DISABLED VETERAN \_\_\_\_

RECENTLY SEPARATED VETERAN \_\_\_\_

ACTIVE WARTIME OR CAMPAIGN BADGE VETERAN \_\_\_\_

ARMED FORCES SERVICE MEDAL VETERAN \_\_\_\_

I am a protected veteran, but choose not to self-identify the classifications to which I belong \_\_\_\_

I am NOT a protected veteran \_\_\_\_

If you are a disabled veteran it would assist us if you tell us whether there are accommodations we could make that would enable you to perform the essential functions of the job, including special equipment, changes in the physical layout of the job, changes in the way the job is customarily performed, provision of personal assistance services, or other accommodations. This information will assist us in making reasonable accommodations for your disability.

1. **Submission of this information is voluntary** and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are not inconsistent with the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended.
2. The information you submit will be kept confidential, except that (i) supervisors and managers may be informed regarding restrictions on the work or duties of disabled veterans and regarding necessary accommodations; (ii) first aid and safety personnel may be informed, when and to the extent appropriate, if you have a condition that might require emergency treatment; and (iii) Government officials engaged in enforcing laws administered by the Office of Federal Contract Compliance Programs, or enforcing the Americans with Disabilities Act, may be informed.

The reasonable accommodations that would permit me to perform the essential functions of my job notwithstanding my disability or disabilities are:

**DISABILITY STATUS:**

**Why are you being asked to complete this form?**

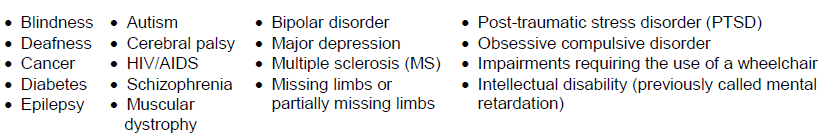
Because we are a depository of federal funds and an issuing and paying agent for U.S. savings bonds or savings notes, we must reach out to, hire, and provide equal opportunity to qualified people with disabilities. To help us measure how well we are doing, we are asking you to tell us if you have a disability or if you ever had a disability. **Completing this form is voluntary,** but we hope that you will choose to fill it out. If you are applying for a job, any answer you give will be kept private and will not be used against you in any way.

If you already work for us, your answer will not be used against you in any way. Because a person may become disabled at any time, we are required to ask all of our employees to update their information every five years. You may voluntarily self-identify as having a disability on this form without fear of any punishment because you did not identify as having a disability earlier.

**How do I know if I have a disability?**

You are considered to have a disability if you have a physical or mental impairment or medical condition that substantially limits a major life activity, or if you have a history or record of such an impairment or medical condition.

Disabilities include, but are not limited to:

****

Please check one of the blanks below:

YES, I HAVE A DISABILITY (or previously had a disability) \_\_\_\_

NO, I DON’T HAVE A DISABILITY \_\_\_\_

I DON’T WISH TO ANSWER \_\_\_\_

**Reasonable Accommodation**

Federal law requires employers to provide reasonable accommodation to qualified individuals with disabilities. Please tell us if you require a reasonable accommodation to apply for a job or to perform your job. Examples of reasonable accommodation include making a change to the application process or work procedures, providing documents in an alternate format, using a sign language interpreter, or using specialized equipment.

The reasonable accommodations that would permit me to perform the essential functions of my job notwithstanding my disability or disabilities are:

**Once completed, please e-mail this document to Nellie Williams at nwilliams@brulin.com.**

**[Post-Offer Form]**

**POST-OFFER VOLUNTARY SELF-IDENTIFICATION OF VETERANS AND DISABILITIES**

BHC, Inc. is subject to Executive Order 11246, Section 503 of the Rehabilitation Act of 1973 and Section 402 of the Vietnam Era Veterans Readjustment Assistance Act of 1974. These Acts require depositories of federal funds and issuing and paying agents for U.S. savings bonds or savings notes to take affirmative action to employ and advance in employment minorities, females, qualified individuals with disabilities, qualified disabled veterans, recently separated veterans, other protected veterans, and Armed Forces service medal veterans. Solely to help us in these endeavors, we request your cooperation in completing this form. **Completion of this form is strictly voluntary**. All information you provide will be kept confidential and used only in accordance with applicable law.

Date: \_\_\_\_\_\_\_\_\_\_

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Position (or Position Applied To): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**VETERAN STATUS:**

As a depository of federal funds and an issuing and paying agent for U.S. savings bonds or savings notes, we are required to take affirmative action to employ and advance in employment: (1) disabled veterans; (2) recently separated veterans; (3) active duty wartime or campaign badge veterans; and (4) Armed Forces service medal veterans. These classifications are defined as follows:

* A “disabled veteran” is one of the following:
  + 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**
  + a person who was discharged or released from active duty because of a service-connected disability.
* A “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.
* An “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.
* An “Armed forces service medal veteran” means a 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.

We are also required to submit a report to the United States Department of Labor each year identifying the number of our employees belonging to each specified “protected veteran” category. If you believe you belong to any of the categories of protected veterans listed above, please indicate by checking the appropriate blanks below.

I BELONG TO THE FOLLOWING CLASSIFICATIONS OF PROTECTED VETERANS (CHOOSE ALL THAT APPLY):

DISABLED VETERAN \_\_\_\_

RECENTLY SEPARATED VETERAN \_\_\_\_

ACTIVE WARTIME OR CAMPAIGN BADGE VETERAN \_\_\_\_

ARMED FORCES SERVICE MEDAL VETERAN \_\_\_\_

I am a protected veteran, but choose not to self-identify the classifications to which I belong \_\_\_\_

I am NOT a protected veteran \_\_\_\_

If you are a disabled veteran it would assist us if you tell us whether there are accommodations we could make that would enable you to perform the essential functions of the job, including special equipment, changes in the physical layout of the job, changes in the way the job is customarily performed, provision of personal assistance services or other accommodations. This information will assist us in making reasonable accommodations for your disability.

1. **Submission of this information is voluntary** and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are not inconsistent with the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended.
2. The information you submit will be kept confidential, except that (i) supervisors and managers may be informed regarding restrictions on the work or duties of disabled veterans and regarding necessary accommodations; (ii) first aid and safety personnel may be informed, when and to the extent appropriate, if you have a condition that might require emergency treatment; and (iii) Government officials engaged in enforcing laws administered by the Office of Federal Contract Compliance Programs, or enforcing the Americans with Disabilities Act, may be informed.

The reasonable accommodations that would permit me to perform the essential functions of my job notwithstanding my disability or disabilities are:

**DISABILITY STATUS:**

**Why are you being asked to complete this form?**

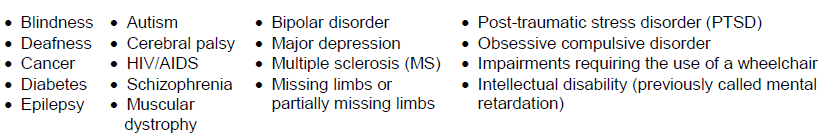
Because we are a depository of federal funds and an issuing and paying agent for U.S. savings bonds or savings notes, we must reach out to, hire, and provide equal opportunity to qualified people with disabilities. To help us measure how well we are doing, we are asking you to tell us if you have a disability or if you ever had a disability. **Completing this form is voluntary,** but we hope that you will choose to fill it out. If you are applying for a job, any answer you give will be kept private and will not be used against you in any way.

If you already work for us, your answer will not be used against you in any way. Because a person may become disabled at any time, we are required to ask all of our employees to update their information every five years. You may voluntarily self-identify as having a disability on this form without fear of any punishment because you did not identify as having a disability earlier.

**How do I know if I have a disability?**

You are considered to have a disability if you have a physical or mental impairment or medical condition that substantially limits a major life activity, or if you have a history or record of such an impairment or medical condition.

Disabilities include, but are not limited to:

****

Please check one of the blanks below:

YES, I HAVE A DISABILITY (or previously had a disability) \_\_\_\_

NO, I DON’T HAVE A DISABILITY \_\_\_\_

I DON’T WISH TO ANSWER \_\_\_\_

**Reasonable Accommodation**

Federal law requires employers to provide reasonable accommodation to qualified individuals with disabilities. Please tell us if you require a reasonable accommodation to apply for a job or to perform your job. Examples of reasonable accommodation include making a change to the application process or work procedures, providing documents in an alternate format, using a sign language interpreter, or using specialized equipment.

The reasonable accommodations that would permit me to perform the essential functions of my job notwithstanding my disability or disabilities are:

**Once completed, please e-mail this document to Nellie Williams at nwilliams@brulin.com.**

**BCH, INC.’S AFFIRMATIVE ACTION PLAN**

**Salary Code**

**Salary Range Code**

**$1 - $9,999 I**

**$10,000 - $19,999 H**

**$20,000 - $29,999 G**

**$30,000 - $39,999 F**

**$40,000 - $49,999 E**

**$50,000 - $59,999 D**

**$60,000 - $74,999 C**

**$75,000 - $99,999 B**

**$ 100,000 + A**

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