

STATEMENT OF POLICY
(41 CFR 60-250.44(a))

Newco, Inc. takes affirmative action as described in this Program to recruit, hire, train, and promote, special disabled veterans and veterans of the Vietnam era, and other veterans who are covered under the Veterans' Act. The company will ensure that its personnel actions are administered without regard to an individual's veteran status or disability and that employment decisions are based on valid job requirements.

To ensure equal opportunity, our Human Resources Director has overall responsibility for this Affirmative Action Program. She has delegated responsibility for program implementation and will monitor program performance and report to senior management on a regular basis.

It is also company policy that employees and applicants will not be subjected to harassment of any kind because they participated in an investigation requiring equal employment opportunity, or filed a complaint alleging unfair treatment.

REVIEW OF PERSONNEL PROCESSES
(41 CFR 60-250.44(b))

As part of its obligation under this Affirmative Action Program, Newco will review all personnel processes on a regular basis to determine whether they assure careful, thorough and systematic consideration of the job qualifications of disabled veterans, Vietnam era veterans and other covered veterans, applicants and employees for vacancies filled through hiring or promotion, and for all training opportunities offered or available. Procedures that are found inadequate in this regard may be changed to assure proper consideration of covered veterans.

In determining the qualifications of covered veterans, the company considers only those portions of military records, including discharge papers, relevant to specific qualifications for the job for which veterans are being considered. Newco will also ensure that its selection processes are not designed to stereotype covered veterans in a manner that may limit access to jobs for which they are qualified. In offering employment or promotions to covered veterans, we will not reduce the amount of compensation offered because of any disability income, pension, or other benefit he or she received from another source. To ensure compliance with the regulations, the following procedures have been designed to facilitate a review of the requirements:

- (1) Employment applications or resumes of individuals who are known to be covered veterans will be identified in a non-discriminatory way with regard to the opportunity for which they are being considered.
- (2) Personnel records of known covered veterans will include identifying the promotion or training opportunity for which the individual was considered.
- (3) Where an individual who is a known covered veteran is rejected for an employment, promotion, or training opportunity, a statement of the reason and a description of the accommodation(s) considered, if any, will be prepared.
- (4) Where individuals are selected for hire, promotion or training and the company undertakes any accommodation which makes it possible to place a special disabled veteran on the job, documentation will include a description of the accommodation. The information will be treated as confidential medical information.

PHYSICAL AND MENTAL QUALIFICATIONS
(41 CFR 60-250.44(c))

Newco will develop a process and maintain regular review of all physical and mental job qualifications to ensure that, to the extent qualification standards may screen out qualified special disabled veterans, they are job-related for the position in question and consistent with our business necessity.

In addition:

- (1) When physical or mental qualifications are applied to the employment, promotion, demotion or training process and the standards do screen out qualified special disabled veterans, the standards must then be related to the specific job (or jobs) for which the individual was considered, consistent with business necessity. The company understands that it will have the responsibility to demonstrate, through documentation or other non-discriminatory means, that it has met this requirement.
- (2) Newco may use as a defense, that an individual poses a direct threat to the health or safety of themselves or others in the workplace.

**REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS
(41 CFR 60-250.44(d))**

As a matter of non-discrimination and affirmative action, Newco will make reasonable accommodation to the known physical or mental limitations of an otherwise qualified special disabled veteran unless we can show that the accommodation(s) would impose an undue hardship on the operation of our business

As a matter of affirmative action, when an employee who is a special disabled veteran has significant difficulty performing his or her job, and it can reasonably be concluded that a performance problem is related to their disability, the company *may* inquire whether the problem is, in fact, related to the individual's disability. If the individual responds in the affirmative, Newco may then confidentially inquire whether the individual is in need of a reasonable accommodation.

**HARASSMENT
(41 CFR 60-250.44(e))**

Newco has developed and implemented procedures to ensure that employees are not harassed because of their status as special disabled veterans, veterans of the Vietnam era or veterans of any other conflict covered under the Veterans' Act of 1974, as amended.

**EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND POSITIVE RECRUITMENT
(41 CFR 60-250.44(f))**

[Company Name](#) will undertake appropriate outreach and positive recruitment activities to recruit qualified special disabled veterans, veterans of the Vietnam era and other covered veterans, consistent with our employment needs and resources. The scope of company efforts may include, but is not limited to, the following:

- (1) Enlisting the support of the Local Veterans' Employment Representative, or his/her designee in the local employment service office nearest to each facility, or, by registering all open positions with the following Federal government employment service:
America's Job Bank
<http://www.ajb.dni.us>
- (2) Contacting the Department of Veterans Affairs Regional Office nearest facility;
- (3) Contacting veterans' counselors and coordinators on college campuses;
- (4) Contacting local veterans' groups and service centers;
- (5) Holding briefings at our site with representatives from recruiting resources. Plant tours, explanations of current and future job openings, position descriptions, explanation of our personnel selection process and distribution of recruiting literature may be part of the briefings. Arrangements could be made for referral of applicants, follow up, and feedback on the disposition of applicants referred.

- (6) Recruitment at educational institutions could incorporate special efforts to reach students who are covered veterans, including efforts to participate in work-study programs.
- (7) Contacting veterans' service organizations for purposes of advice, technical assistance and referral of potential employees. Technical assistance may consist of advice on proper placement, recruitment, training and accommodations.
- (8) Sending written notification of our EEO policy to all subcontractors, vendors and suppliers, requesting appropriate action on their part.
- (9) In making hiring decisions, the company may consider applicants who are known covered veterans for all available positions when a position applied for is unavailable.

**INTERNAL DISSEMINATION OF POLICY
(41 CFR 60-250.44(g))**

To ensure greater employee cooperation and participation, Newco will develop internal communication procedures for our affirmative action efforts to employ and advance in employment special disabled veterans and veterans of the Vietnam era and other covered veterans. These procedures are designed to promote understanding, acceptance and support among our managers and other employees to take actions necessary to aid in meeting our obligations. The scope of our efforts will depend upon many circumstances, such as the size of the company, our resources, and the extent to which our existing practices have been effective. The following are some actions contemplated:

- (1) Include the EEO policy in our Employee Handbook;
- (2) Inform employees and prospective employees of its commitment to engage in affirmative action to increase employment opportunities for covered veterans by periodically scheduling meetings to discuss policy and explain individual employee responsibilities;
- (3) Publicize the EEO policy in all company communications on an annual basis;
- (4) Conduct management meetings to explain the intent of the company's EEO policy; individual responsibility for implementation, and the company's commitment toward this Program;
- (5) Review our EEO policy in employee orientation and management training sessions;
- (6) As appropriate, publish articles on the accomplishments of special disabled veterans, veterans of the Vietnam era, and other covered veterans.

**AUDIT AND REPORTING SYSTEM
(41 CFR 60-250.44(h))**

As part of its obligation, Newco will design and develop an audit and reporting system to measure the effectiveness of our affirmative action efforts, including any need for remedial action. When fully implemented, the system will:

- (1) Determine the degree to which company objectives have been met;
- (2) Determine whether special disabled veterans, veterans of the Vietnam era, or other covered veterans, have had the opportunity to participate in company-sponsored educational, training, recreational and social activities;
- (3) Measure company compliance with affirmative action obligations; and,

- (4) Where Affirmative Action Program efforts and results have been ineffective, develop necessary actions to bring the program into compliance.

RESPONSIBILITY FOR IMPLEMENTATION
(41 CFR 60-250.44(i))

Our Human Resources Director is responsible for implementation of this Affirmative Action Program. She will be given all the necessary management support, staff, and other resources to manage and implement the Affirmative Action Program for special disabled veterans, veterans of the Vietnam era, and other veterans covered under this Act.

TRAINING
(41 CFR 60-250.44(j))

All personnel involved in the recruitment, screening, selection, promotion, disciplinary and other related processes, will be trained in their affirmative action responsibilities and Newco's obligations to ensure that the commitments stated in this Program are implemented.

RECORDKEEPING AND ACCESS TO RECORDS
(41 CFR 60-250.80 & 60-250.81)

- (a) **Recordkeeping – General Requirements.** All personnel or employment records made or kept by Newco will be preserved for a period of two years from the date of the making of the record or the personnel action involved, whichever occurs later. Such records include, but are not limited to: records relating to requests for reasonable accommodation; the results of any physical examination; job advertisements and postings; applications and resumes; tests and test results; interview notes; records having to do with hiring assignment, promotion, demotion, transfer, layoff or termination, rates of pay or other terms of compensation; and selection for training or apprenticeship.
- (b) **Failure to Preserve Records.** Newco understands that failure to preserve accurate and complete records may constitute noncompliance with the obligations. However, this presumption will not apply where failure to preserve records results from circumstances outside the control of the company.
- (c) **Access to Records.** Newco will permit access, during normal business hours, to our places of business for the purpose of conducting on-site compliance evaluations and complaint investigations and inspecting and copying such documents as may be relevant to the matter under investigation.

AVAILABILITY OF THE AFFIRMATIVE ACTION PLAN
(41 CFR 60-250.41)

This Affirmative Action Program is available for inspection by Newco employees or applicants for employment upon request. The location and hours during which the Program may be viewed shall be posted at each office.