

Section Name: CORPORATE POLICIES – EMPLOYEES
Section No: 2
Policy No: 2.1

Subject EQUAL EMPLOYMENT OPPORTUNITY AND
AFFIRMATIVE ACTION

Date: 10/16
Supersedes: 04/12

The Company is an equal employment opportunity/affirmative action ("EEO/AA") employer and is committed to the fair treatment of all employees and prospective employees, and to the respect of their dignity as individuals at all times. Any discrimination or harassment against employees or prospective employees because of race, color, religion, sex, pregnancy, national origin, ancestry, citizenship, age, marital status, physical disability, mental disability, medical condition, sexual orientation, gender identity or expression, veteran status or any other status protected by law shall be scrupulously avoided in applying and implementing all Company policies, procedures, and practices affecting employment, promotion, compensation, performance evaluation, and other conditions of employment. In furtherance of its policy to avoid discrimination on the basis of sex, the Company is committed to provide a working environment for its employees that is free of sexual harassment.

Company units shall actively pursue employment and promotion of women, minorities, disabled Vietnam-era veterans, and the handicapped.

Company units shall take appropriate steps to provide opportunities for training, transferring and promoting qualified women, minorities, disabled individuals, and veterans, in accordance with federal obligations.

PROCEDURE

Each business group and Human Resources shall communicate to employees the Company's policies prohibiting all forms of discrimination (including sexual harassment per Corporate Policy 2.8). Each business group and corporate function, in consultation with Human Resources, shall adopt and follow procedures consistent with Corporate and Human Resources policies for the confidential reporting, investigation and resolution of claims of discrimination.

Complaints

1. **By Employees** - Any allegation of discriminatory activity, including sexual harassment and harassment based on any other protected status, should be resolved in accordance with the unit's established procedure, if possible, prior to the filing of a formal complaint with a government agency. The Law Department shall be notified if resolution appears unlikely. Should a formal filing be made with a government agency, the matter shall be referred immediately to the Law Department.
2. **By Nonemployees** - The Law Department shall be notified immediately of any discrimination complaint generated by a nonemployee.

Affirmative Action (U.S.)

1. The Company's highest ranking Human Resources official shall be responsible for ensuring that appropriate steps are taken to fulfill the Company's affirmative action obligations, including designating one or more Human Resources employees to have

overall responsibility for affirmative action compliance. Human Resources, in consultation with the Law Department, shall design affirmative action plans and programs for women, minorities, qualified disabled veterans, Vietnam-era veterans and individuals with disabilities in accordance with applicable law.

2. Human Resources shall provide all United States-based units with a model Affirmative Action Plan.
3. Each business unit site in the United States shall implement the affirmative action plans and take the required steps to comply with their legal obligations, including:
 - a. Maintaining current, annual affirmative action plans, and conducting appropriate annual self-evaluations.
 - b. Setting annual goals to increase utilization of protected groups, as necessary to comply with legal guidelines.
 - c. Ensuring that the Company recruits qualified potential job candidates from diverse sources, in order to generate a diverse pool of qualified candidates, including appropriate annual outreach efforts for individuals with disabilities and veterans.
 - d. Ensuring equal access to opportunities for training and education for advancement in the Company.
 - e. Notifying employees and potential employees that the Company is an EEO/AA employer, including the posting and distribution of the Company's policies, and including EEO/AA statements in job advertisements and internet postings.
 - f. Ensuring the inclusion of appropriate EEO/AA clauses in sub-contracts, consulting contracts, supply contracts, and purchase orders and ensuring subcontracts comply with Executive Order 11246.
 - g. Communicating nondiscrimination and affirmative action policies to employees.
 - h. Making available for inspection by applicants and employees the Company's affirmative action plans.

Updates:

Human Resources

References:

Corporate Principle:

- 1.1, Legal and Ethical Conduct

Corporate Policy:

- 2.8, Sexual Harassment

U.S. Human Resources Policy Manual

U.S. EEO Commission "Best Practices of Private Sector Employers":

www.eeoc.gov/task/practice.html

Related Topics

Section Name	Policy No	Subject
CORPORATE POLICIES – EMPLOYEES	2.1	Equal Employment Opportunity and Affirmative Action
CORPORATE POLICIES – EMPLOYEES	2.8	Harassment and Violence-Free Workplace
CORPORATE PRINCIPLES	1.1	Legal and Ethical Conduct