Gonzaga University
502 E. Boone Avenue
Spokane, WA 99258

AFFIRMATIVE ACTION PLAN
In compliance with
Executive Order 11246
As amended, and 41 CFR 60-1, 2, & 3 requiring service and supply contractors and sub-contractors to take affirmative action on behalf of ethnic and racial minorities and women.

Establishing Plans for the Period:
From: 9/1/2015 To: 8/31/2016

Employer Federal Tax ID and EEO-1 ID Number: 91-0236600
Dun and Bradstreet Number: 079265732

Data Prepared By: ____________________________ Date: ____________________________
Christine Purviance, Assistant Director Equity and Inclusion 8-17-2015

Approved By: ____________________________ Date: ____________________________
Christine Purviance, Assistant Director Equity and Inclusion 8-17-2015

Kirk Wood-Gaines, Assistant Vice President-Human Resources 08-17-2015

Thayne McCullough, President August 19, 2015

With assistance from Associated Industries
1206 N. Lincoln, #200
Spokane, WA 99201
(509) 326-8985
Executive Order AAP for Minorities and Women

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Reaffirmation of our Commitment to Equal Opportunity

To: All Faculty, Staff, Job Applicants, Supervisors and Officials

Subject: Affirmative Action - Equal Employment Opportunity
41 CFR 60-1.4(a)1, 60-2.17(c)

Gonzaga is an equal opportunity, affirmative-action University. Gonzaga fosters a commitment to dignity of the human person, social justice, diversity, intercultural competence, and global engagement. We seek to nourish an environment characterized by mutual respect and the sustainable creation of a campus climate that attracts and retains members from diverse backgrounds. As part of this commitment, we cooperate with the government civil rights agencies in an effort to ensure equal opportunity in employment through a program known as “Affirmative Action”.

For purposes of this Affirmative Action Plan (AAP), it means we conduct detailed internal analysis and periodic reporting to the government on our employment and human resources practices to ensure they are free of bias related to ethnicity or color, gender, and national origin. Other laws require us to plan affirmative action efforts based on disability or veteran status.

These efforts take us beyond simple avoidance of illegal discrimination. Affirmative action means we are proactive in community efforts to encourage every eligible individual to participate in the workplace to the fullest extent of his or her individual talent and potential.

The specific efforts outlined in this federally prescribed Affirmative Action Plan focus on ethnic minorities and women. We ensure career paths are open to all, regardless of gender or ethnicity. We use only valid, job-related requirements for hiring and promotion. We evaluate faculty and staff as individuals in accord with their merit in achieving our high standards of service.

Each year we update our affirmative action program, just as we evaluate our effectiveness in other areas of our mission. It is imperative we keep these commitments continually in mind as they relate to our mission and our Catholic, Jesuit, and humanistic heritage and identity.

Christine Purviance, Assistant Director Equity and Inclusion, is responsible for the administration of this Affirmative Action Plan. I am confident that we can count on your full cooperation and support. Let us know if you have any questions.

Thayne McCulloh, President

August 19, 2015

Date
B. PURPOSE

The purpose of this Affirmative Action Plan (AAP) is to ensure that all citizens enjoy equality of opportunity in employment, and to eliminate employment discrimination due to ethnicity, color, gender, and national origin. Qualified persons with disabilities and veterans of the United States military are also covered, under other affirmative action commitments. Gonzaga University wants the most qualified, motivated and effective workforce possible. This policy sets forth a specific, results-oriented program by which Gonzaga University will measure its effectiveness and continually seek ways we can improve the campus climate of equal opportunity in employment.

C. CONFIDENTIAL TRADE SECRET NONDISCLOSURE  29 CFR 70.26

The Current Plan Year Report Section of this plan (sections 1 through 7) contains confidential and proprietary information and trade secrets. Any disclosure to persons outside the management of Gonzaga University, other than the US Dept. of Labor OFCCP acting in their statutory capacity, is prohibited without the express written permission of Gonzaga University. These materials and any supporting information are protected from disclosure to any outside party pursuant to 29 CFR 70.26 and the Trade Secrets Act (5 USC No 552 (b) (4) et seq.

Specifically, all elements of the CURRENT PLAN YEAR REPORT, including Results, Impact Ratio Analysis, Workforce Analysis and Job Group Summary, Availability Analysis, Utilization Summary, Identification of Problem Areas, and Goals and Action Plans are hereby designated as confidential and privileged confidential information.

D. COMMUNICATION OF AAP POLICY  60-2.17(a)(c)

Gonzaga University will communicate this policy externally and internally in compliance with requirements:

1. External Dissemination

   a. Send notice to all vendors, suppliers, including recruiting sources, and any unions to request cooperation and appropriate action.

   b. Recruiting sources will be informed in writing of our policy. We will expect them to recruit and refer ethnic and racial minorities and women for any vacancy. Recruiting efforts will include placing orders and accepting referrals of qualified applicants from the State Employment Service.

   c. Develop appropriate outreach and recruitment actions.

   d. Applicable contracts and purchase orders will contain the Affirmative Action Clause as required by Executive Order 11246. Section 16 of this Plan contains the text of our Compliance Agreement Clause.

   e. Job advertisements will include reference to our status as an Equal Opportunity - Affirmative Action Employer.
2. Internal Dissemination

   a. This policy will be communicated to all faculty, staff, and supervisors through inclusion in Gonzaga University Policies & Procedures Manual.

   b. Supervisor meetings on EEO/Affirmative Action will include discussion of this policy.

   c. New Employee Orientation and supervisory training programs will include this Affirmative Action policy.

   d. All individuals involved in recruitment, screening, selection, discipline or any personnel decision shall be trained to ensure compliance with this plan.

   e. Periodic articles or announcements will be posted in various newsletters and communications, which could include special features on accomplishments of individuals covered by this plan.

   f. The policy will be posted on the Human Resources Equal Opportunity page of the Gonzaga University website. Any significant changes resulting from updates shall be communicated to faculty, staff, and applicants.

   g. Faculty and staff involved with agencies with interests in minority concerns will be encouraged to seek applicant referrals and communicate our policy.

E. RESPONSIBILITY FOR IMPLEMENTATION 60-2.17

Implementation and management of the Affirmative Action Plan is the responsibility of every supervisor. Specific responsibilities shall be allocated as follows:

1. Top Executives – President and Vice Presidents:
   Provides support to the overall Affirmative Action plan by working with the Affirmative Action Officer on meetings, problem solving, and communication of the policy. Evaluates supervisor effectiveness in supporting the policy. Approves required amendments and assists in coordinating other corporate activity with this policy.

2. The Affirmative Action Officer:
   Reporting to and with the full support of top management, Christine Purviance, Assistant Director Equity and Inclusion, is responsible for coordinating all compliance activities of the staff and management and filing related reports. Among the specific duties are:

   a. Oversees and enforces University compliance with federally-mandated Affirmative Action functions

   b. Develops communications materials, policies and procedures, and arranges for their approval and dissemination.
c. Identifies problem areas in conjunction with management and employees; suggesting resolutions, including prevention of harassment, career counseling, etc.

d. Serves as liaison with relevant agencies, in conjunction with Employment Specialist.

e. Serves as the contact person for the Office of Federal Contract Compliance Programs (OFCCP) and other compliance agencies.

f. Collaborates with University departments on strategies to increase diversity hiring and integrate Affirmative Action efforts with broader University-wide diversity initiatives.

g. Keeps management informed of new developments.

h. Reviews job requirements and evaluates selection practices in conjunction with Employment Specialist.

i. Trains those involved in selection and placement to support this policy.

j. In coordination with HRIS Manager, compiles annual statistics, supporting data and the Current Plan Year Report. Obtains needed information from supervisors and other sources and incorporates into the summary. Presents the summary to management and helps develop approaches to meet goals.

k. Ensures record keeping on personnel activity, compensation and applicant flow by job group, EEO class, ethnic background and sex. Ensures privacy and confidentiality.

l. Monitors reports to measure plan effectiveness and coordinates development of action plans from each year’s reports.

3. Department Chairs and Supervisors:
    a. Advise Affirmative Action Officer of any potential problems pertinent to this policy as early as possible, and cooperate fully and candidly with any necessary internal investigation.

    b. Refer inquiries or requests from outside third parties to the Affirmative Action Officer, while asserting that we are an affirmative action employer.

    c. Develop and use only job related criteria for selection, evaluation, and other decisions. Review qualifications of all faculty and staff to ensure that minorities and women are given full opportunities for promotion.

    d. Report promptly any employee involved in harassment of others; assist and comply with investigation as required.
e. Cooperate in identifying problem areas, executing action plans, and assessing progress toward goals.

f. Provide objective individualized career counseling as needed. Encourage ethnic and racial minorities and women to participate in employer-sponsored activities.

g. Evaluate assigned staff in their compliance with this policy.

4. All Faculty and Staff
   a. Promote our Affirmative Action efforts by referring qualified ethnic and racial minorities and women they may know.
   
   b. Treat fellow faculty and staff with acceptance, inclusion and respect, avoiding unwelcome ethnic, sexual, or gender-based joking.
   
   c. Use proper supervisor channels or the Affirmative Action Officer to report potential problems early.

F. ANALYSIS OF EMPLOYMENT ACTIVITY 60-2.17(b)(2)(4)

Each year we review our personnel actions to ensure against any bias, to include the following:

1. The total selection process, including any position descriptions, specifications, requisition forms, job titles, application forms, interview procedures, screening steps, test validity and administration, promotion decisions and referrals.

2. Transfer, layoff, termination, leave of absence, benefits, recall, education and training opportunities, and social, recreational and civic or community involvement and sponsorship.

3. A statistical analysis of applicants, hires, promotions and terminations by job group by race and sex will be included in Section 2 of the Plan Year Report.

G. ORGANIZATIONAL PROFILE - WORKFORCE ANALYSIS 60-2.11

The following reports are prepared annually as Section 3 of the Plan Year Report:

1. JOB GROUP SUMMARY – A listing of all our Job Groups with the male, female and minority staff total and percent for each.

2. WORKFORCE ANALYSIS - Shows each department (and progression-line, if any) with each job title listed from lowest to highest paid, its Job Group, occupational category, pay grade, total incumbents, total males, total females, total minorities, and separate totals by gender for Hispanic, and Non-Hispanic Black, Asian, Pacific Islander, American Indian and two or more ethnicities.
3. JOB GROUP ANALYSIS - This report lists our Job Groups, showing all jobs assigned to it, with the same ethnicity and gender totals as the Workforce Analysis. It also shows the percent of the Job Group’s total population represented in each job title.

H. AVAILABILITY ANALYSIS AND UTILIZATION SUMMARY 60-2.14

1. AVAILABILITY ANALYSIS – 41 CFR 60-2.14 (Report section 4)

This is an annual estimate of the percent of qualified women and minorities available for recruitment for each job group, using the “most current and discrete statistical information available, including data from the census, local job service offices, and colleges or other training institutions,” and our internal sources. Availability percents are based on at least the following factors:

a. Reasonable Recruiting Area - The reasonable recruitment area is the geographic area or areas from which we reasonably could seek workers for jobs in a given group. This may be local for some job groups and national for others. Where a job group contains titles of different availability rates, a composite rate is calculated by weighting the availability percents for each job title by the proportion of its population within the job group. The sum of these weighted availability rates is the composite availability for the job group.

b. Internal Sources - The percentage of minorities and women among those promotable, transferable and trainable within Gonzaga’s institution.

c. Other factors that we may use to appropriately estimate availability rates are:
   i. The percentages of minorities or women graduates from training or educational institutions from which we can reasonably recruit.
   ii. Minority or female workforce percents in the immediate labor area.
   iii. Our own applicant rates for minorities or women resulting from good faith affirmative action recruiting.

2. UTILIZATION SUMMARY (Report section 5)

The Utilization Summary compares, for each job group, our percent of minorities and women to the estimated availability rates. Where our internal rate is below the availability rate, underutilizations are identified.
I. IDENTIFICATION OF PROBLEM AREAS

1. We identify the organization units or departments which most contribute to the underutilizations in section 6 of the Plan Year Report.

2. We study our employment activity (applicant flow, hires, terminations, promotions), and other personnel actions to determine whether there are unexplained disparities. A complete Impact Ratio Analysis is prepared and included in section 2 of the Plan Year Report.

3. Compensation practices are reviewed to determine whether there are disparities based on gender or ethnicity.

4. Other areas are monitored that might impact the success of the affirmative action program.

J. ESTABLISHMENT OF GOALS

When there are fewer minorities or women than may be expected by their availability (underutilization), the Affirmative Action Officer will set plan year goals. A goal is equal to the availability percent of an underutilized job group. Goals are not quotas. They are our best estimate of the percent of women or minorities we might find in a pool of job candidates by "casting a wide net", assuming accurate data for our estimates. Where appropriate, we will identify separate goals for individual minority groups.

In compliance with the regulations on which this policy is based (41 CFR 60-2.16), goals are not an admission or finding of discrimination. "They may not be used to extend a preference to any individual, and are not intended to achieve equal representation or results. They may not be used to supersede merit selection principles." All our personnel decisions are free from any consideration of gender or ethnicity. To do otherwise would be a serious violation of State and Federal Civil Rights law.

Section 7, Goals and Action Plans, of the Plan Year Report will list these goals.

K. ACTION PLANS

After establishing goals, Gonzaga University establishes action plans for good faith outreach and development efforts to remove identified barriers, address any problem areas, expand recruiting efforts, and ensure measurability of results as 7 of the Plan Year Report.

University-wide activities designed to prevent discrimination and promote equal opportunity may include encouraging faculty and staff to attend training, review of position descriptions for consistency and valid job requirements. Faculty and staff involved in recruiting, screening or selection will be sufficiently trained and supported to eliminate unlawful discrimination and improve the validity of all procedures.
L. INTERNAL AUDIT AND REPORTING SYSTEMS

Gonzaga University audits all HR systems to ensure the effectiveness of the affirmative action program. This may include:

1. Monitoring records of personnel activity, including referrals, interviews, offers, placements, new hires, transfers, promotions, terminations, selection for training opportunities and compensation at all levels.

2. Internal Management Reports - Supervisors may be asked to assist in developing goals and action plans for their department, and to report on activities and accomplishments.

3. Applicant Flow – We will gather information on the sources of external and internal applicants, their voluntarily supplied affirmative action data, screening and testing decisions, and selection/rejection ratios so that these can be tracked and audited by job group. Voluntary ID forms will be filed separately from application information.

M. COMPLIANCE WITH SEX DISCRIMINATION GUIDELINES

1. Recruitment and Advertisement - Gonzaga University shall recruit members of both sexes for all jobs. Advertisements or verbal contacts with any recruiting source for employment shall not express a sex preference.

2. Employment Practices - We will not make any distinction based on sex in employment, wages, salaries, hours of work or benefit plans.

3. Marital Status - No distinctions shall be made on the basis of marital status or to whom an employee is married, nor on the basis of having young children at home. However, we reserve the right to avoid nepotism by prohibiting married persons or close relatives from working in the same department or line of control as long as such policy is applied in a non-discriminatory way.

4. Facilities - Appropriate facilities useable by both sexes will be provided for and maintained in all major permanent locations, unless added construction is unreasonable due to expense or lack of space.

5. Leave Policies - If a female employee meets other requirements under our leave policies, child bearing will be considered a justifiable reason for such leave. Following childbirth and uponsignifying her intent to return within a reasonable time, such employee shall be reinstated to her original job or to a position of like status and pay without loss of service credits.

6. Compensation – All forms of compensation, pay categories, classifications jobs, titles, are not limited or segregated by gender. Jobs appearing to be dominated by one gender will be investigated.

7. Seniority - Distinctions in seniority systems shall not be based on sex.
Summary — In the spirit of Affirmative Action we encourage faculty and staff of both sexes to develop their potential and participate in education, training and career development. We encourage women to seek careers in areas in which they may have traditionally not taken part, and we will do our part to remove barriers to their progress.

N. POLICY ON RELIGIOUS OR NATIONAL ORIGIN DISCRIMINATION  60-50

It is the policy of Gonzaga University that all persons, regardless of religion or national origin, are due the full respect and dignity that are the rights of all persons. However, this program and its federal regulations recognize our right to fully implement our Catholic, Jesuit mission and therefore to consider a person's faith or support thereof in cases where we deem these to be essential criteria to perform work connected with the pursuit of that mission.

Otherwise, we will consider reasonable accommodations to different religious persuasions where we can do so without hindrance to our mission, values and obligations, and without undue hardship.
Gonzaga University designates appropriate Job Groups for analysis under this plan and includes a list of each group and assigned titles as part of its annual report. Each Job Group shall be based on the following EEO-1 Categories. If a category includes a variety of jobs of significantly different pay, content and opportunity, Job Groups will be created to accommodate the grouping of jobs with closer similarities. The following is an EXAMPLE of typical job groups:

<table>
<thead>
<tr>
<th>EEO CATEGORY</th>
<th>JOB GROUP CODE</th>
<th>DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive and Cabinet</td>
<td>11A</td>
<td>Executive Officers &amp; Cabinet</td>
</tr>
<tr>
<td>Academic Deans</td>
<td>12A</td>
<td>Academic Deans</td>
</tr>
<tr>
<td>Other Leadership &amp; Managers</td>
<td>12B</td>
<td>Associate and Assistant Vice Presidents, Associate Deans, Department Managers, Directors of major programs</td>
</tr>
<tr>
<td>Other Managers</td>
<td>12 C</td>
<td>Other Managers, Directors and Supervisors</td>
</tr>
<tr>
<td>Faculty</td>
<td>20A</td>
<td>Full Rank, Associate Rank Faculty</td>
</tr>
<tr>
<td>Faculty</td>
<td>20B</td>
<td>Assistant Rank, Instructors, Fixed Term</td>
</tr>
<tr>
<td>Faculty</td>
<td>20C</td>
<td>Department Chair designation, Adjunct Faculty</td>
</tr>
<tr>
<td>Professionals</td>
<td>20D</td>
<td>Non-managerial, professional level jobs requiring at least a college degree or equivalent background and usually advanced study or training such as Engineers, Systems Analysts, Programmers, Accountants, Chaplains, Curators, Registered Nurses etc.</td>
</tr>
<tr>
<td>Technicians</td>
<td>30A</td>
<td>Jobs normally requiring a combination of manual and scientific skill attained via two years education beyond high school or equivalent. Includes Network Technicians, Drafters, Engineering Technicians, Lab Technicians, Library Technicians and similar jobs.</td>
</tr>
<tr>
<td>Senior Admin Support</td>
<td>50A</td>
<td>Jobs requiring experience in particular field like Specialists, Counselors, Data Analysts, Advisors.</td>
</tr>
<tr>
<td>Other Admin. Support</td>
<td>50B</td>
<td>All jobs providing office administrative support, secretarial, bookkeeping or clerical jobs, coordinators, regardless of difficulty or department.</td>
</tr>
<tr>
<td>Hourly Lead Workers</td>
<td>60A</td>
<td>Foreman, shift supervisors, etc.</td>
</tr>
<tr>
<td>Craft (skilled) Trade Workers</td>
<td>60B</td>
<td>Skilled occupations such as Journeyman Mechanic, Carpenter Electrician, Machinist, HVAC, Skilled Craft Maintenance trades.</td>
</tr>
<tr>
<td>Operatives</td>
<td>70A</td>
<td>Jobs performing operations with machinery, vehicles, equipment or other complex tools as opposed to lower skilled manual hand tools.</td>
</tr>
<tr>
<td>Service</td>
<td>90A</td>
<td>Security Guards, Janitors, Cooks, and other service jobs with similar pay, content, and opportunity.</td>
</tr>
</tbody>
</table>
P. EQUAL OPPORTUNITY CLAUSE FOR CONTRACTS 60-1.4

AFFIRMATIVE ACTION /EO CLAUSE UNDER EXECUTIVE ORDER 11246
Applicable to nonexempt contracts and purchase orders in excess of $10,000, or which may in the aggregate exceed $10,000 in any 12-month period (41 CFR 60-1.4)

EXECUTIVE ORDER 11246 AS AMENDED requires paragraphs 1 through 7 below to be included in all applicable contracts and purchase orders. DOL requires contractors to notify its subcontractors of the EEO-1 report rule. This obligation exists by operation of law even if not cited in the contract.

Inclusion by reference: “During the performance of this contract, the Contractor agrees to comply with any applicable requirements of Executive Order 11246 (as amended by EO 11375, 12486, et al) and its implementing regulations at 41 CFR 60-1, 2, 3 and 4, prohibiting discrimination based on race, gender, ethnicity, national origin or religion and requiring affirmative action and EEO reporting to promote equal opportunity. The relevant sections required by 41 CFR 60-1.4 are hereby incorporated by reference.”

Verbatim Clause:
1. The Contractor will not discriminate against any employee or applicant for employment because of race, color, religion, sex or national origin. The Contractor will take affirmative action to ensure that applicants are employed and that employees are treated during employment without regard to their race, religion, sex or national origin. Such action shall include but not be limited to the following: employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training including apprenticeship. The Contractor agrees to post in conspicuous places, available to employees and applicants for employment, notices to be provided by the contracting officer setting forth the provisions of this nondiscrimination clause.

2. The Contractor will, in all solicitations or advertisements for employees placed by or on behalf of the Contractor, state that all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, or national origin.

3. The Contractor will send to each labor union or representative of workers with which the Contractor has a collective bargaining agreement or other contract or understanding, a notice advising the labor union or workers’ representative of the Contractor’s commitments under Section 202 of the Executive Order 11246 of September 24, 1965, and shall post copies of the notice in conspicuous places available to employees and applicants for employment.

4. The Contractor will comply with all provisions of Executive Order 11246 of September 24, 1965, and with the rules, regulations and relevant orders of the Secretary of Labor.

5. The Contractor will furnish all information and reports required by Executive Order 11246 of September 24, 1965, and by the rules, regulations and orders of the Secretary of Labor pursuant thereto, and will permit access to the Contractor’s books, records, and accounts by the contracting agency and the
Secretary of Labor for purposes of investigation to ascertain compliance with such rules, regulations and orders.

6. In the event of the Contractor's noncompliance with the affirmative action and equal opportunity clauses of this contract or with any such rules, regulations or orders, this contract may be canceled, terminated or suspended in whole or in part, and the Contractor may be declared ineligible for further Government contracts or subject to other sanctions or remedies in accordance with the procedures authorized in Executive Order 11246 of September 24, 1965, or by relevant rules, regulations and orders of the Secretary of Labor, or as otherwise provided by law.

7. The Contractor will include paragraphs 1 through 7 in every subcontract or purchase order unless exempted by Executive Order 11246 and the relevant rules, regulations and orders of the Secretary of Labor pursuant thereto, so that such provisions will be binding upon each subcontractor or vendor. The Contractor will take such action with respect to any subcontract or purchase order as may be directed by the Secretary of Labor as a means of enforcing such provisions including sanctions for noncompliance: provided, however, that in the event the Contractor becomes involved in, or is threatened with, litigation with a subcontractor or vendor as a result of such direction, the Contractor may request the United States to enter into such litigation to protect the interests of the United States.

Contractors with 50 or more employees and non-exempt contracts, purchase orders or bills of lading in excess of $50,000 in any 12-month period, and financial institutions that are issuing and paying agents for U.S. Savings bonds, or depositaries of Government funds in any amount:

8. During the performance of this contract, the Contractor agrees to fulfill all of the requirements contained in paragraphs 1 through 7 above, and all of the requirements of 41 CFR 60 – 2, 3 and 4 as applicable.

AFFIRMATIVE ACTION FOR VETERANS
Applicable to all nonexempt contracts and purchase orders of at least $100,000 a year
41 CFR 60-300.5(a) - This contractor and subcontractor shall abide by the requirements of 41 CFR 60-300.5(a). This regulation prohibits discrimination against qualified protected veterans, and requires affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified protected veterans. (The government requires this text in bold type.) See also 38U.S.C. 4212 (VEVRAA and the JVA). (Rev 2013)

AFFIRMATIVE ACTION FOR PERSONS WITH DISABILITIES
Applicable to all non-exempt contracts and purchase orders of at least $10,000 a year
41 CFR 60-741.5(a) - This contractor and subcontractor shall abide by the requirements of 41 CFR 60-741.5(a). This regulation prohibits discrimination against qualified individuals on the basis of disability, and requires affirmative action by covered prime contractors and
subcontractors to employ and advance in employment qualified individuals with disabilities. (The government requires this text in bold type.) (Rev 2013)

Language for Contracts/Purchase Orders under Exec. Order 13496:
Executive Order 13496 of January 30, 2009 may require our suppliers and subcontractors to post notices of employee union rights, and notify their contractors of same. 29CFR Part 471, Appendix A to Subpart A is hereby incorporate by reference.

SHORT FORM FOR PURCHASE ORDERS
EXECUTIVE ORDER 11246 – Affirmative Action for Minorities and Women
During the performance of this contract, the Contractor agrees to comply with any applicable requirements of Executive Order 11246 (as amended by EO 11375, 12486, et al) and its implementing regulations at 41 CFR 60-1, 2, 3 and 4, prohibiting discrimination based on race, gender, ethnicity, national origin or religion and requiring affirmative action and EEO reporting to promote equal opportunity. The relevant sections required by 41 CFR 60-1.4 are hereby incorporated by reference

AFFIRMATIVE ACTION FOR VIETNAM ERA & OTHER VETERANS
Applicable to all nonexempt contracts and purchase orders of at least $100,000 year.
This contractor and subcontractor shall abide by the requirements of 41 CFR 60-300.5(a). This regulation prohibits discrimination against qualified protected veterans, and requires affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified protected veterans.

AFFIRMATIVE ACTION FOR PERSONS WITH DISABILITIES
Applicable to all non-exempt contracts and purchase orders of at least $10,000 a year.
This contractor and subcontractor shall abide by the requirements of 41 CFR 60-741.5(a). This regulation prohibits discrimination against qualified individuals on the basis of disability, and requires affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified individuals with disabilities.

Executive Order 13496 of January 30, 2009 may require our suppliers and subcontractors to post notices of employee union rights, and notify their contractors of same. 29CFR Part 471, Appendix A to Subpart A is hereby incorporate by reference.