

AFFIRMATIVE ACTION AND EQUAL EMPLOYMENT OPPORTUNITIES

I. OBJECTIVE

To adopt, implement and update an Affirmative Action Plan and to establish an affirmative action and equal employment opportunities policy, both of which ensure that employees of GVEA receive equality of employment opportunities limited only by an employee's desire and ability, and also ensure that GVEA provides a work environment free of discrimination in employment because of race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, and to provide for reporting to and periodic review by the Board of Directors.

II. POLICY

- A. Consistent with the Objective, the requirements of the Americans with Disabilities Act (ADA) and any other applicable Federal or State statute or regulation, GVEA is committed to hiring the best qualified persons to perform the tasks involved in providing high quality service to its members. In fulfilling that commitment, GVEA will provide equal employment opportunities to all persons seeking employment, and will see that its hiring practices, working conditions, benefits and privileges of employment, compensation, training, opportunities for advancement, including upgrading and promotion, and transfers and termination of employment, including layoffs and recalls are such that there is no discrimination as to employees of GVEA.
- B. GVEA will not discriminate against any employee or applicant for employment because of physical or mental handicap or because he is a disabled veteran or any other eligible veteran in regard to any position for which the employee or applicant for employment is qualified. GVEA will, in all its employment practices, take affirmative action to employ, advance in employment and otherwise treat qualified disabled individuals, disabled veterans, and any other eligible veteran without discrimination based upon physical or mental handicap, disability or veteran status. Such affirmative action will include, but not be limited to, the following: employment promotion, demotion or transfer, recruitment, advertising, layoff or termination, rates of pay or other forms of compensation and selection for training, including apprenticeship.
- C. GVEA will comply fully with the letter and spirit of applicable local, state and federal laws and regulations implementing National Equal Employment Opportunity objectives.

- D. GVEA has adopted an Affirmative Action Plan designed to assure true equality of employment and a work environment without discrimination. Copies of the current Affirmative Action Plan adopted by GVEA will be available in the Human Resources Section. As opportunities for transfer, advancement, or promotion occur, including promotions into and within management, periodic reviews and analyses of personnel records will be conducted to assure that all persons continue to receive equal consideration and only valid requirements are imposed for these opportunities.
- E. GVEA's Affirmative Action Plan will be periodically updated as required by federal regulations.
- F. GVEA is committed to making a good faith effort to meet its goals so as to provide the opportunity for all employees to perform at full capacity in accordance with their qualifications and interests.
- G. At least annually, an Affirmative Action Report will be made available to the Board of Directors and its review will be a consent agenda item.

III. DISSEMINATION PROCEDURES

- A. All employees will receive a copy of GVEA's equal employment opportunities policy.
- B. GVEA's equal employment opportunities policy and Affirmative Action Plan will be described or featured periodically in GVEA's member newsletter.
- C. Meetings will be held at which management employees are advised by the President & CEO of the contents of and GVEA's support for the Affirmative Action and Equal Employment Opportunities policy.

GVEA's commitment to providing equal employment opportunities is demonstrated in its orientation program for new employees and supervisors.
- D. All GVEA's collective bargaining agreements will contain non-discrimination clauses.
- E. GVEA's equal employment opportunities policy is posted on GVEA bulletin boards and the GVEA website.
- F. Management and other employees engaged in employment, placement, training and transfer or promotion processing receive training in the applicable local, state and federal equal employment opportunity laws, the Affirmative Action Plan and

their individual responsibility for ensuring that GVEA meets its equal employment opportunities objective.

- G. Using techniques to improve recruitment and increase the number of minority and female applicants. GVEA presently undertakes the following actions:
 - 1. Include the phrase "GVEA is an Equal Opportunity Employer and Provider" in all printed employment advertisements;
 - 2. Place help wanted advertisement, when appropriate, in local minority news media and women's interest media;
 - 3. Disseminate information on job opportunities to organizations representing minorities, women and employment development agencies when job opportunities occur;
 - 4. Encourage all employees to refer qualified applicants;
 - 5. Actively recruit at appropriate secondary schools, junior colleges, colleges and universities with predominantly minority or female enrollments; and
 - 6. Request employment agencies to refer qualified minorities.
- H. Advertisements for employment by GVEA contain the phrase, "GVEA is an Equal Opportunity Employer and Provider" and such other legal and applicable RUS requirements.
- I. Company advertising features employees and non-employees of minority and non-minority groups and both men and women.
- J. GVEA's employment application contains the designation "GVEA is an Equal Opportunity Employer and Provider."
- K. Contracts, order forms, leases and other legal documents utilized by GVEA contain statements relating to the equal employment opportunities requirements of Federal Executive Orders and implementing regulations.
- L. GVEA affords the maximum practicable opportunity for minority business enterprises to enter into contracts with GVEA and to be suppliers of goods and services to GVEA.
- M. Equal employment opportunities posters that comply with RUS and other applicable legal requirements are permanently displayed in a conspicuous place in all buildings in which employees work.

IV. RESPONSIBILITY

A. Division Vice Presidents, Managers and Supervisors

It is the responsibility of all Vice Presidents, Managers and Supervisors to implement GVEA's Affirmative Action Plan. These responsibilities include, but are not limited to:

1. Assisting in the identification of problem areas, formulating solutions and establishing divisional goals and objectives when necessary.
2. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur; and
3. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities.

B. Human Resources Manager

The Human Resources Manager has the responsibility for designing and ensuring the effective implementation of GVEA's Affirmative Action Program (AAP).

These responsibilities include, but are not limited to, the following:

1. Developing Equal Employment Opportunity (EEO) policy statements, affirmative action programs and internal and external communication procedures;
2. Assisting in the identification of AAP/EEO problem areas.
3. Assisting management in arriving at effective solutions to AAP/EEO problems;
4. Designing and implementing an internal audit and reporting system that:
 - a. Measures the effectiveness of GVEA's program;
 - b. Determines the degree to which AAP goals and objectives are met; and
 - c. Identifies the need for remedial action;
5. Keeping GVEA's President & CEO informed of equal opportunity progress and reporting potential problem areas within the organization through quarterly reports;

6. Reviewing GVEA's AAP for qualified minorities and women with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
7. Auditing the contents of GVEA's bulletin board to ensure compliance information is posted and up-to-date; and
8. Serving as liaison between GVEA and enforcement agencies.

C. President & CEO

The President & CEO has the overall responsibility for implementing this policy.

ADOPTED: June 27, 1988
AMENDED: March 27, 2017