

## **AFFIRMATIVE ACTION POLICY**

### **COMPANY POLICY**

Our Company provides opportunity for employment to all qualified persons and to prohibit discrimination because of race, color, sex, sexual orientation, gender identity, pregnancy, genetic information, religion, age, disability, military or veteran status, national origin, or ancestry. The Controller of The Righter Co., Inc. who also serves as its EEO Officer, is committed to providing equal employment opportunities to all qualified persons and to prohibit discrimination and/or harassment because of race, color, sex, sexual orientation, gender identity, pregnancy, genetic information, religion, age, disability, special disabled veteran status, veteran of the Vietnam era status, recently separated veteran status, or other protected veteran status.

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 race, color, age, disability, sex, sexual orientation, gender identity, pregnancy, genetic information, national origin, age, special disabled veteran, Vietnam era veteran, recently separated veteran, and other protected veteran status. The Company will ensure that all employment decisions are based only on valid job requirements. Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

- Filing a complaint alleging a violation of the Vietnam Era Veterans' Readjustment Assistance Act of 1944, as amended ("VEVRAA"), Title VII, the Age Discrimination in Employment Act, or The Americans With Disabilities Act;
- Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of the VEVRAA or any other Federal, state or local law requiring equal opportunity for individuals based on their race, color, age, disability, sex, national origin, disability, special disabled veteran, veteran of the Vietnam era, recently separated veteran, or other protected veterans' status;
- Opposing any act or practice made unlawful by VEVRAA or its implementing regulations in this part or any other Federal, state, or local law requiring equal opportunity for individuals based on their race, color, age, disability, sex, national origin, special disabled veteran, veteran of the Vietnam era, recently separate veteran, or other protected veterans' status; or
- Exercising any other right protected by VEVRAA, Title VII, the Age Discrimination in Employment Act, the Americans With Disabilities Act, or their implementing regulations in this part.
- The Company will annually review all physical and mental job qualification standards to ensure that, to the extent qualification standards tend to screen out qualified special disabled veterans, they are job-related for the position in question and are consistent with business necessity.

### **ASSIGNMENT OF EQUAL EMPLOYMENT OPPORTUNITY RESPONSIBILITIES**

Our Company has appointed an Equal Opportunity Policy Officer with the responsibility of implementing our affirmative action program. This official will coordinate efforts of department heads to advise and assist top management. The Equal Employment Opportunity Officer is:

Tracy Ferguson  
2424 Harrison Road  
Columbus, Ohio 43204  
614.272.9700

## RECRUITMENT

Our Company, when hiring on project or office site, will hire qualified applicants who apply for the job, without regard to race, color, sex, sexual orientation, gender identity, pregnancy, genetic information, religion, age, disability, military or veteran status, national origin, or ancestry. We shall also encourage our current employees to refer to us qualified minority group and veteran employees. Any advertisement for qualified personnel shall contain the notation "An Equal Opportunity Employer," and shall be inserted in newspapers having a large general circulation in the area and among minority and veteran groups.

## EMPLOYMENT PROVISIONS OF THE AMERICANS WITH DISABILITIES ACT (ADA)

Title I of the Americans With Disabilities Act prohibits discrimination in any terms or conditions of employment for qualified individuals with a disability.

The Americans With Disabilities Act requires that employment decisions be based on the ability of a person to perform the essential functions of a job and not the person's disability or limitations.

Further, it requires management to reasonably accommodate individuals with disabilities when necessary.

To comply with the employment provisions of the American With Disabilities Act, The Righter Co., Inc., will:

- identify the essential functions of a job;
- determine whether a person with a disability, with or without accommodation, is qualified to perform the essential job functions; and,
- determine whether a reasonable accommodation can be made for a qualified individual.