



**L.J. GONZER
ASSOCIATES**
Staffing & Technical Services

L. J. GONZER ASSOCIATES

Contract Technical Staffing Services

Equal Employment Opportunity and Affirmative Action Policy



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Staffing & Technical Services

RECRUITING AND EMPLOYMENT POLICIES

EEO/Affirmative Action Policy

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Purpose and Overview

LJGA's Equal Employment Opportunity Policy is intended to be a set of uniform standards and procedures governing the equal employment opportunity and affirmative action for the company. Consistent with all local, state and federal guidelines it is our goal to exceed and promote all aspects of Equal Employment opportunity for all candidates. We agree to be held accountable for compliance with it. Whenever necessary, this Policy will be revised or supplemented to include any new guidelines as required.

The Policy sets forth our anti-discrimination, harassment, complaint procedures, EEO training and discussions about how work force data will be collected and reported.

Recognizing the crucial role of managers and supervisors in ensuring the equality of job opportunities created it is our responsibility to train all managers, supervisors, and new employees in EEO policy. This standard seeks to guide all employees in their individual rights and responsibilities under this Policy.

The Accountability and Reporting Standards section sets forth the chain of responsibility for implementing the policy. The responsibilities of managers and supervisors, including the requirement that they be familiar with these matters and that they cooperate with management investigating complaints and implementing agency plans and/or corrective strategies, are discussed. Reporting include annual preparation and review of the EEO-1 standard reporting form for employers.

Dissemination standards require that management communicate policies and the company's goals to employees individually. These policies will be made available to all employees and updates and revisions made available upon release.

Implementation

ANTI-DISCRIMINATION POLICY

Set forth below is LJGA's anti-discrimination policy. Included is a policy generally proscribing discrimination on all illegal bases, as well as separate policies setting forth specific information about sexual harassment and the rights of persons with disabilities which persons must know in order to understand the legal protections afforded them.

General Protections:

L. J. Gonzer Associates is an equal opportunity employer committed to compliance with federal, state, and local laws prohibiting employment discrimination. Employment decisions will be made solely on the basis of merit, fitness and equality of opportunity and without discrimination on the basis of:

Age	Race
Marital Status	Disability
National Origin	Religion
Color	Sexual Orientation
Creed	Gender

In addition to providing protections on the basis of the above categories, some federal, state, and local laws protect persons who are discriminated against because they are perceived to be in a protected class. For example, a person who is denied a job because s/he is perceived to have a disability may file a complaint of disability discrimination even though that person actually has no disability. The same is true of persons who may be perceived to be in any of the above listed categories including race, religion, etc.

Harassment based on a person's actual or perceived protected status is also prohibited. Thus, if a person is harassed because of skin color, for example,

s/he is protected by this Policy, as well as by federal, state and local anti-discrimination laws.

Consistent with the law, reasonable accommodations will be made for persons with disabilities and for religious observance.

Anti-discrimination protections apply to all of the terms and conditions of employment, including, but not limited to:

Recruitment	Work Assignments
Promotions	Discipline
Testing	Salary and Benefits
Training Opportunities	Discharge
Hiring	Performance Evaluations
Transfers	Working Conditions

LJGA is committed to preventing discrimination by ensuring that all employees are aware of their rights and obligations under this Policy and by encouraging work environments which appreciate and tolerate differences among .

Any person found to be engaging in discriminatory conduct or practices will be subject to discipline which may include a reprimand, suspension, probation, demotion, transfer, termination, and any other measures calculated to eliminate illegal or inappropriate behavior. In addition to implementing such disciplinary action, the company shall take such steps as may be necessary to address the impact that any unlawful discrimination has had on the complainant.

Specific Protections:

The issues pertaining to sexual harassment and disability are unique and must be discussed separately in order for individuals to understand their rights and responsibilities under the law. Therefore, this Policy includes separate policies proscribing sexual harassment and disability discrimination. Although the section on disability discrimination includes a policy statement requiring that reasonable accommodations are provided, the comprehensive policy and reasonable accommodations procedures are appended.

1. **Sexual Harassment:** Sexual harassment is a form of employment discrimination based on gender which is prohibited by law. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

(a) Submission to the conduct is made either explicitly or implicitly a term or condition of an individual's employment;

(b) Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or

(c) Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

A broad range of behaviors, in certain circumstances, can be considered sexual harassment, including sexually suggestive remarks, pictures, gesturing, verbal abuse or harassment of a sexual nature, subtle or direct propositions for sexual favors, and any unnecessary touching, patting, or pinching.

It is our goal to prevent any sexually intimidating or hostile work environment. Any employee who believes that s/he is being harassed is urged to contact the employment manager immediately

2. Disabilities:

Disabilities pose a special concerns and challenges for the organization since each disability and environment in which that person may work, may have many different requirements. Wherever possible we will seek to provide reasonable accommodations for those with disabilities. Discrimination against a person based upon that person's actual or perceived disability, record of disability, or that person's relationship with a person with a disability is prohibited. Disabilities are physical, mental, or psychological impairments of a body system which may limit one or more life activities of a person.

LJGA will make reasonable accommodations to qualified employees and applicants with disabilities, unless providing such accommodations would create undue hardship for the company. Whether an accommodation is reasonable generally depends upon the circumstances of each situation.

DISSEMINATION:

LJGA will disseminate this EEO policy through both internal means as well as external as required. Internal dissemination will relate to all general employment issues. External will involve the recruiting efforts made on behalf of our clients for staffing services, and the assignment of staff to our clients faculties.

Internal:

Publication of Policy in Employee Handbook which will include information regarding conduct, responsibility of each employee and the process for which problems may be addressed. Each Handbook will be signed by the employee

and copies kept on file to indicate the employees acceptance of the policy and the guidelines for conduct.

Discussions with employees in orientation programs and various management programs.

Executive meetings will be held regularly to discuss the policy implementation and managements continued role in the education and support of the policy.

External:

Make clear to recruiting sources and through company advertising the Company's policy. Indicate the company's support and sponsorship of the policy and conformance by such sources.

Notification to minority organizations, community agencies, job banks, schools etc of various position(s) that may be available. In addition, we will publish to these organizations, the company's support for EEO/AA programs. (See Appendix for additional Organizations.)

When Advertising portrays potential candidates and or staffing opportunities the use of minority and women candidates will be utilized. Also placement of advertising under joint headings HelpWanted (Male/Female) makes no mention of age or sex preference, and will display EEO tagline "Equal Opportunity Employer EOE/AA M/F/D/V".

COMPLAINT AND INVESTIGATION PROCEDURES

The purpose of this procedure is to provide guidance for employees in the handling of complaints of discrimination promptly and fairly. Employees must be urged to follow this procedure immediately whenever they believe they have a complaint or are aware of a problem possibly involving discrimination. The effective use of this procedure should result in an equitable resolution of the complaint and prevent any discriminatory practice from harming other employees.

When to File a Complaint:

An employee or applicant for employment should contact the employment manager if s/he believes that s/he is being discriminated against. The EM will assist the person to determine whether the issue s/he has raised is appropriate for resolution through the complaint process. Employees will not be retaliated against for consulting with an EM about a suspicion of discrimination or for filing a complaint or cooperating in an investigation.

Federal, state and city laws prohibit the following types of discrimination based on your actual or perceived membership in a protected group:

1. Discriminatory treatment of employees or applicants in hiring, testing, work assignments, working conditions, salary and benefits, evaluation, promotions, training, transfers, discipline, termination, and any other term and condition of employment;
 2. Policies that have a disproportionate impact on a group protected by law, unless they are justified by business necessity;
 3. Failure to make a reasonable accommodation for an employee with a disability, or for an employee's religious observance; or
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4. Discriminatory harassment, intimidation, ridicule or insults.

An employee has a right to meet privately with the EM. The EEO professional will arrange to meet with an employee at outside premises when necessary in order to ensure confidentiality. At the employee's request, arrangements may also be made to hold the meeting before or after office hours, or during the employee's lunch period. An employee or applicant may bring a representative of his or her choice to the meeting, provided advance notice is given to the EM.

Anonymous Complaints: Persons who wish to discuss a problem concerning discrimination without revealing their identity may do so by telephoning or writing the EM. Anonymous complainants should be aware that it may be necessary for the EM to investigate the alleged discriminatory behavior and to take or recommend action to remedy unlawful behavior on behalf of the Company.

Confidentiality: All matters will be handled under the strictest of confidence. All information will be handled solely through the Employment Managers office and will be used for the purpose of remedying any situation which is not compliant with this policy.

1. **Counseling:** The EM will discuss with the person seeking assistance, various options for handling the matter involved. These options may include further actions the employee could take on his or her own behalf.

2. **Mediation:** Mediation is a voluntary process and may be declined by either party involved. The person seeking assistance may file a request for mediation. When a request for mediation has been made, the EM shall attempt to help the parties involved resolve the matter in dispute. In this process, the EM officer shall consult with the person who filed the request, the person named in the request, and other persons as appropriate.

If the parties agree to a resolution of the situation, and any action needed to resolve the matter we will prepare a written report confirming the resolution. The report shall be signed by all parties, and copies shall be given to them.

The EM may terminate the mediation process if s/he deems that efforts at mediation have been unproductive. In such event both parties shall be given a written statement confirming the termination.

Investigation of Complaints:

A person may file a written complaint of discrimination with the company at any time within one year of the date that the events which are the subject of the

complaint occurred. Requests for reasonable accommodations are not subject to any time limitations.

An investigation will be conducted by the EM or a person acting under the direction of the EM or other corporate officer. Investigations may be made based on complaints or based on activities that the EM or other corporate officer's witness that would lead them to believe that discriminatory or other non-appropriate conduct is occurring.

Any person who is interviewed in the course of an investigation shall have the right to be accompanied by a representative of his or her choice.

If after investigating, the EM concludes that a violation of anti-discrimination laws or corporate policy has occurred, s/he shall recommend appropriate corrective action. The Corporate Officers will review the findings and take any corrective action that s/he deems appropriate.

Discipline and Other Corrective Action: Management will review any report and take any corrective action that it deems appropriate. Corrective action may include disciplinary measures such as formal reprimand, suspension, probation, transfer, demotion, fine or termination. Disciplinary measures shall be taken in accordance with any applicable provisions of law, rules and regulations, and collective bargaining agreements. Corrective action may also include measures necessary to address the impact that any conduct in violation of the law.

Additional sources of information regarding these topics may be obtained through the following sources:

UNITED STATES EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
New York District Office
33 Whitehall Street
New York, NY 10004
(212) 336-3620
(212) 748-8399 (TTY)

In addition to filing with the agencies listed above, a person with a complaint alleging discrimination based on disability may file with:

UNITED STATES DEPARTMENT OF JUSTICE
Constitution Avenue & Tenth Street, N.W.
Washington, DC 20530
(202) 514-0301 (Voice)
(202) 514-0381 (TTY)
(202) 514-0383 (TTY)

ACCOUNTABILITY

Management accepts the responsibility of the policy and the implementation thereof. Ultimately the management is responsible for all activities of the company and insuring a safe and productive work environment.

In addition to support from employees, the success of this Plan depends upon commitment from managers and supervisors. Consistent with the concepts of this Policy, managers and supervisors must strive to create a work environment in which there is equality of job opportunity. They must receive orientation in EEO laws, and the company's Policy as well as processes for carrying out managerial and supervisory responsibilities related to equal employment opportunity and respect for the diversity of all employees.

Managers and supervisors are accountable to management and the EM who are discharging their responsibilities under this policy, including achieving education objectives, investigating and resolving complaints, and modifying procedures to ensure equal employment opportunity for applicants and employees.

REPORTING

LJGA will accumulate yearly, as required, hiring data using the standard EEO-1 format for employers. As a staffing agency we are not required to make EEO-1 submissions however for data collection and dissemination we will utilize the standardized format to record data. In addition, a summary of any EEO incidents that have been filed during the course of the measurement period will be prepared and presented to management. These statistics will be review by management and discussed with the Employment Manager. Determinations will be made as to the effectiveness of the policy and a full review of the policy will take place. This review will allow for any legal changes in labor law or EEO requirements to be integrated as well as changes to improve the overall effectiveness of the policy.

APPENDIX

Additional Staffing Organization Resources

1. Urban League Offices

(a) National Urban League - (212) 926-8000

(b) Urban League of Essex County - (973) 242-7902

2. Minority Sources

(a) NJ Department of Law & Public Safety, Div. On Human Rights
Newark Regional Office – (973) 648-2700

(b) New Jersey State Employment Council – (609) 292-8125 .

(c) N.J. State Employment Service - Prof. & Tech. - (973) 648-7000

(d) Essex County Vocational & Technical schools,
Administration Department (973) 961-7719

(e) Newark Manpower Training Skills Center
(973) 648-2460

(f) NCE, and Essex Community College

(g) Diversity.com Internet Minority Employment Source
www.diversity.com

3, Other Sources, Additionally we will promote Equal Employment Opportunity at any of the following recruiting resources:

Various Job Fairs

Vocational Schools

Trade Publications

Internet Recruiting

John Doe
123 Main Street
Anytown, ZZ 12345

Dear Sir:

I am sure you are familiar with Executive Order No. 11246 and the obligations and responsibilities of contractors and sub-contractors.

L. J. Gonzer Associates has always subscribed to, and applied, a complete policy of nondiscrimination in its employment practices and all dealings with its employees. However, we wish to reiterate this policy and advise you that we are "An Equal Opportunity Employer".

I know your organization is as anxious as we are to cooperate in complying with the spirit and intent of Executive Order No. 11246. It is my personal hope that you will assist us in our application of this policy by continuing to refer to this facility all qualified applicants regardless of race, color, religion, sex, veteran, marital status, national origin or handicapped.

Your cooperation in the past has been greatly appreciated and we anticipate many more years of mutually beneficial association. Please acknowledge receipt of this letter.

Very truly yours,

L. J. GONZER ASSOCIATES
Daniel J. Muhlfelder
Executive Vice President