

EQUAL EMPLOYMENT OPPORTUNITY POLICY AND
AFFIRMATIVE ACTION PLAN

POLICY

"As President of Hoyle, Tanner & Associates, Inc., I am personally committed to the effective implementation of the company's Affirmative Action policy and program. I direct the full implementation, monitoring and enforcement of the program by all managerial and supervisory personnel, under the supervision of the Equal Employment Opportunity (EEO) Officer. Further, I direct that all designated personnel carry out their Affirmative Action responsibilities with the same dispatch and expertise normally applied to their regular job duties."

This firm will implement, monitor and enforce this Equal Employment Opportunity Policy and Affirmative Action Plan in conjunction with the applicable federal, state and local laws, regulations and executive orders listed below, as well as with the EEO contract provisions listed below:

- a) Civil Rights Act of 1964, as amended
- b) Presidential Executive Order 11246, as amended, and 11375
- c) Title 23 U.S.C. 140
- d) Title 49 C.F.R. Part 23
- e) EEO Act of 1972
- f) Federal Aid Highway Acts
- g) Americans with Disabilities Act of 1990
- h) Public Act No. 91-58
- i) Civil Rights Act of 1991
- j) Governor's Executive Orders #3 and #17 *
- k) Connecticut Fair Employment Practices Act *
- l) Mayor's Executive Order 71, as amended by Executive Order 4, 7 and 23 **
- m) Ordinance 303-4, Art. 2 & 3 ***
- n) County Ordinance 82-37 ****
- o) State Executive Order #227, Governors Code of Fair Practice*****
- p) State Executive Order #246, Nondiscrimination for Disabled*****
- q) State Executive Order #240, Sexual Harassment*****

- * State of Connecticut
- ** New York City, New York
- *** City of Detroit, Michigan
- **** Metropolitan Dade County, Florida
- ***** State of Massachusetts

The firm will comply and submit documentation to substantiate efforts made and affirmative actions taken in an attempt to comply with the following EEO contract provisions contained in its contracts:

- 1) Specific Equal Employment Opportunity Responsibilities
- 2) Required Contract Provisions Federal Aid Construction Contracts
- 3) A (76) Affirmative Action Requirements
- 4) Training Special Provision
- 5) Minority Business Enterprises as Subcontractors
- 6) Standard Federal Equal Employment Opportunity Construction Contract Specification
- 7) Nondiscrimination Act

Further, the firm declares and understands that the sum of its Equal Employment Opportunity policy and Affirmative Action Plan comprises the policy and no person will be discriminated against or be denied the benefits of any activity, program or employment process receiving public funds.

This Policy applies to all persons, particularly those that are members of the protected classes based on race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information.

This firm will not discriminate against any person because of race, color, religion, sex (including pregnancy, gender identity,

and sexual orientation), national origin, age (40 or older), disability, genetic information, religious creed, marital status, veteran status, national origin, ancestry, present or past history of mental disorder,, learning disability or physical disability, including, but not limited to, blindness, except where any of the above is a bona fide occupational qualification or need.

It is the policy and practice of the firm to assure that no person will be discriminated against or be denied the benefits of any activity, program or employment process receiving public funds, in the areas of recruiting, advertising, hiring, upgrading, promoting, transferring, demoting, layoffs, terminations, rehiring, employment and/or rates of pay and other compensations.

In its pursuit of non-discrimination, the company will maintain no segregated facilities. The term "segregated facilities" means waiting rooms, work areas, rest and wash rooms, restaurants and other eating areas, time clocks, locker rooms and other storage or dressing areas, parking lots, drinking fountains, recreation, transportation and housing facilities.

AFFIRMATIVE ACTION

The company has appointed and will continue to support an Equal Employment Opportunity (EEO) Officer whose responsibility it is to implement the company's Equal Employment Opportunity policy through a positive program of affirmative action designed to secure for the permanent and temporary company work force representative numbers of minority and female workers. The minority groups include, but are not necessarily limited to, Blacks, Hispanic (Latin American, Mexican, Puerto Rican), Asian, Pacific Islander, Oriental, American Indian, Native American, Alaskan Native and handicapped persons.

This firm will act positively and aggressively and take effective steps to attract job applications from minority groups and women, and to hire those who are qualified. We will work with minority organizations as a source of obtaining qualified minority applicants of both sexes. When an applicant is interviewed, he or she will be told at the time of the interview that they will be notified whether or not they are qualified.

All recruitment sources utilized by the company will be advised of the company's EEO Policy at the time of recruitment. When appropriate, advertisements to fill job openings will be placed in newspapers circulated in minority group areas. All such advertisements will include the words: "An Equal Opportunity Employer".

In implementing this policy and ensuring that equal opportunity is being provided to protected class members, this firm will contact and request referrals from a standing list (see Exhibit I-a following) of minority and women organizations, referral sources and minority media, as appropriate, each time a hiring opportunity occurs.

To substantiate the efforts made and the affirmative actions taken to provide equal opportunity to minorities and women in each instance of hire, this firm will maintain and submit, as requested, documentation such as referral request correspondences and copies of advertisements utilized in conjunction with the above listed sources. In addition, to further substantiate such efforts and affirmative actions, this firm will maintain internal EEO/affirmative action audit procedures and reporting and record keeping systems and will submit such documentation upon request.

The firm is aware that failure to implement, monitor and enforce its Affirmative Action program, including the submission of the above documentation, may result in the firm being required to recommit itself to the Affirmative Action program to obtain renewed approval status.

The affirmative actions of the EEO Officer include the following:

Dissemination - Internally

Dissemination of company policy by all available office communication media.

Periodic meetings held with executives, managerial and supervisory personnel to explain the intent of the program and the responsibility for effective implementation of each company employee.

Maintaining close contact with other company employees engaged in the recruitment and hiring process, to make certain they are aware of and adhere to the spirit and intent of company equal employment opportunity policy.

Establishment of a system of "feedback" and control of company policy to ensure its total application and to promote the progress of the Equal Employment Opportunity program.

Meetings of supervisory personnel with staff to further implement and explain the program to all other employees.

As a part of our induction procedure, each new employee will be handed a copy of the Policy Statement, and after review by the new employee, an opportunity to ask questions will be provided.

Notices have been and will be posted about EEO programs, progress reports, wage and hour determinations and other pertinent information deemed necessary.

The Policy Statement, covering our Affirmative Action/Equal Opportunity Compliance Program, is posted on the company bulletin board.

Dissemination - Externally

Maintenance of contact with representative minority and female organizations for the purpose of keeping them informed of current and impending employment needs and where necessary seeking their assistance in securing qualified minority and female candidates for job vacancies.

Recruiting sources have been and will continue to be informed about our EEO policy and will be requested to actively recruit and refer minority and female applicants for all job openings.

All employment advertising includes reference to our EEO policy.

The EEO clause will be referenced in all subcontracts.

Minority and female organizations, community agencies, appropriate community leaders and colleges have been notified of company policy.

Our Affirmative Action/Equal Opportunity Compliance Program Policy Statement is posted on our bulletin board so that prospective employees may know of its existence and of its benefits.

Where appropriate, notification of our EEO policy will be made to subcontractors and suppliers.

Recruitment

The company will continue to seek qualified minority group and female applicants for all job openings, making a particular effort to increase minority and female representation in the work force at higher levels of skill and responsibility. Such applicants will be sought from schools and colleges and public or private employment agencies. These organizations will be advised of Company EEO policy and urged to refer qualified minorities and female applicants for employment consideration. School and college recruiting will include communication with institutions having substantial minority and/or female student bodies.

The company will not discriminate against a male applicant applying for a position traditionally held by a female and vice-versa.

Advertisements to fill job openings will be placed in newspapers having circulation in the minority community. All such advertisements will include the phrase "An Equal Opportunity Employer".

Current female and minority employees are encouraged to urge other minorities and females to seek employment with the company.

A record will continue to be kept listing the name, race and sex of persons who apply for work at this office, whether hired, and if not, the reason for rejection.

Our total selection process is nondiscriminatory, including job descriptions, job titles, worker specifications, interview procedures, referral procedures, final selection processes and similar factors. We will continue to monitor our selection process to make certain that it remains nondiscriminatory. Our selection process is as follows:

Applicants are requested to complete our employment application for and/or submit their resume.

Applicants are interviewed by the designated hiring supervisor and/or designated Hiring Official.

Applicants who appear to qualify for existing openings where applicable are referred to and/or interviewed by Company Principal(s).

Those who are not qualified in the opinion of the designated Hiring Official are told so.

Those who are qualified in the opinion of the designated Hiring Official and/or the Company Principal(s) are told so.

The designated Hiring Official or the Company Principal(s) may check with previous employers, schools or personal references to determine best candidate.

Offer is made through the designated Hiring Official with concurrence of the Company Principal(s).

Placement and Promotion

The Company will periodically review all job categories and employee records to determine that the company EEO Policy is being effectively carried out. If an EEO Policy review reveals that problems might exist, one or more of the following remedial actions will be taken:

More vigorous recruitment of qualified minority and female candidates.

Special discussions with management, supervisory and other personnel regarding the company EEO Policy.

Re-evaluation of the qualifications of minority and female employees to determine whether their capabilities might be more fully utilized by upgrading or promotion to positions of greater skill or increased responsibility.

Review placement and promotion procedures at all levels to ensure that full and fair consideration has been and is being given to qualified minority and female employees.

Training

The Company will continue to afford full and equal opportunity to minorities and females in all training activities as follows:

All training, apprenticeship and educational programs in which the company participates or to which the company gives support or sponsorship will be reviewed periodically to ensure that qualified minority and female candidates are being given equal opportunity to participate.

Qualified minority and female employees will be encouraged to increase their skills and job potential through participation in training and educational programs in which the Company gives support or sponsorship.

Qualified minority and female employees will be given an opportunity to participate in supervisory training programs, if any.

Layoffs, Terminations, Downgradings, Demotions, Transfers and Recalls from Layoffs

Layoffs, terminations, downgradings, demotions, transfers and recalls from layoffs will be effected without consideration of race, creed, color, age, sex or national origin.

Employee Benefits and Status

The following actions will continue to be taken to ensure equality with respect to employee benefits and compensation status:

The company will continue to make certain that no disparity exists between pay rates and other forms of compensation paid to minorities and female employees and that paid other employees performing like work.

Opportunities for performing overtime work or otherwise earning increased compensation shall be afforded without discrimination of any kind.

In regard to Maternity Leave, it is the policy of the firm to consider maternity as any other non-work-related disability, such policy extending to sick pay, disability income benefits, job protection, accumulation of tenure-based benefits, and any and

all benefits and considerations granted any employee with a medically certified disability. Maternity Guidelines are attached hereto as Exhibit I-d.

Progress

The company will maintain records and statistical data reflecting progress made in integrating its workforce under this plan.

Community Services

The company will encourage its employees to serve on community welfare organizations dedicated to improvement of conditions for minority groups and females and will consider in appropriate cases, granting time off during normal business hours to assist with meetings concerning these organizations.

Religion and National Origin

It is the company's policy not to discriminate on the grounds of an applicant's religion or national origin.

Complaints Procedure

The company has adopted as policy a standing procedure for handling discrimination complaints, which is attached hereto as Exhibit I-c.

Sexual Harassment

It is the company's policy that all employees have a right to work in an environment free from any type of discrimination, including freedom from sexual harassment. This policy covers sexual harassment of employees or applicants by the company, its agents or supervisors. The Sexual Harassment Policy is attached hereto as Exhibit I-b.

Disciplinary Action

The company will continue to inform all supervisors and employees that their work performance is being evaluated on the basis of their equal employment opportunity efforts and results, as well as other criteria.


Review

The Affirmative Action Plan will be updated once annually in the month of January.

1/19/2021
Date


Christopher R. Mulleavy, President/CEO

1/19/2021
Date


Judith Donovan Hann, VP
Director of Human Resources

"I commit myself and this firm to the Equal Employment Opportunity Policy and Affirmative Action Plan as outlined herein and do hereby appoint Judith Donovan Hann as Equal Employment Opportunity Officer of the firm.

1/19/2021
Date


Christopher R. Mulleavy, President/CEO

EXHIBIT I-a

Standing Lists of
Minority and Women Recruiting Organizations
and Referral Sources

MINORITY/WOMEN RECRUITING AND INFORMATION SOURCES

NEW HAMPSHIRE

New Hampshire Women's Foundation
Tanna Clews, CEO
18 Low Ave, Suite 205
Concord, NH 03301
603.226.3355
tanna@nhwomensfoundation.org

Y.W.C.A.
Jessica Sugrue, M.S., CEO
72 Concord Street
Manchester, NH 03101
(603) 625-5785
jessicasu@ywcanh.org

So. N.H. Outreach for Black Unity
PO Box 3323
Nashua, NH 03061-3323
603-888-1311

MINORITY MEDIA:

Bay State Banner
23 Drydock Avenue
Boston, MA 02210

MINORITY/WOMEN RECRUITING AND INFORMATION SOURCES

MASSACHUSETTS

Employment Resource Center
Urban League of Eastern Massachusetts
88 Warren Street
Roxbury, MA 02119
(617) 442-4519

Gaston Institute - UMASS Boston
Dr. Lorna Rivera, Director
100 Morrissey Boulevard
Boston, MA 02125
617-287-5790

Centro Presente
Patricia Montes, Executive Director
12 Bennington St Ste 202
East Boston, MA 02128
(857) 256-2981

NAACP
Tanisha M. Sullivan, Esq. President
330 Martin Luther King Blvd
Boston, MA 02119
617.427.9494

Office of Affirmative Action
Sandra Borders, Director
One Ashburton Place
Room 301
Boston, MA 02108
(617) 727-7441

North American Indian Center
Raquel Halsey
Interim Executive Director
105 S. Huntington Avenue
Boston, MA 02130
(617) 277-4804

MINORITY MEDIA:

Bay State Banner
23 Drydock Avenue
Boston, MA 02210

MINORITY/WOMEN RECRUITING AND INFORMATION SOURCES

OVIEDO, FLORIDA

Metropolitan Orlando Urban League
Karen Massey
Workforce Development Manager
2804 Belco Drive
Orlando, FL 32808
(407) 841-7654

City of Orlando
Minority & Women Business Enterprise
Kevin Walsh, Assist. Director
City Hall - Personnel Management Bureau
400 S. Orange Avenue
Orlando, FL 32801
(407) 246-2623

Orange County MBE/WBE
Orange County Business Development Division
PO Box 1393
Orlando, FL 32802
(407) 836-7317

Minority/Women Business Enterprise Alliance
Carrie Williams
135 E. Colonial Drive, 2nd Floor
Orlando, FL 32801
(407) 428-5860

MINORITY MEDIA:

LA GACETA
PO Box 5536
Tampa, FL 33675
(813) 248-3921

MINORITY MEDIA:

WESTSIDE GAZETTE
545 N.W. 7th Terrace
Fort Lauderdale, FL 33311
(954) 525-1489

MINORITY/WOMEN RECRUITING AND INFORMATION SOURCES

BURLINGTON, VERMONT

State of Vermont
Department of Employment & Training
John Vowles, Manager
63 Pearl Street
Burlington, VT 05401
(802) 863-7676

Vermont Refugee Resettlement Program/USCRI
Amila Merdzanovic, Director
462 Hegeman Ave, Suite 101
Colchester, VT 05446
802-655-1963
Email: vrrp@uscrtvt.org

Champlain Valley Office of Economic Opportunity
Chittenden Community Action
Jan Demers, Executive Director
255 South Champlain Street
Burlington, VT 05402
(802) 862-2771

Addison County Community Action Group
Jeanne Montross, Exec. Director
282 Boardman Street
PO Box 165
Middlebury, VT 05753
(802) 388-3608

YWCA Vermont
Deb Sawyer Jorschick
Executive Director
76 Pearl Street, Suite 205
Essex Junction, VT 05452
(802) 862-7520

MINORITY MEDIA:

Bay State Banner
23 Drydock Avenue
Boston, MA 02210

MINORITY/WOMEN RECRUITING AND INFORMATION SOURCES

YARMOUTH, MAINE

Bureau of Employment Services
55 State House Station
Augusta, Maine 04333-0055
Phone: 207-623-7981

Maine Department of Labor
Division of Migrant and Immigrant Services
Jorge A. Acero, State Monitor Advocate
55 State House Station
Augusta, ME 04330
Phone: 207- 623-7928

John Wagner
Local Veterans Employment Representative
Lewiston Career Center
5 Mollison Way
Lewiston ME 04240
Phone: 207-753-9086

MINORITY MEDIA:

Bay State Banner
23 Drydock Avenue
Boston, MA 02210

EXHIBIT I-b

SEXUAL HARASSMENT POLICY
HOYLE, TANNER & ASSOCIATES, INC.

SEXUAL HARASSMENT POLICY

- 1. PURPOSE:** Hoyle, Tanner & Associates, Inc. (Hoyle, Tanner) is committed to preserving a working environment free from sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by this organization. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is similarly unlawful and will not be tolerated. To achieve our goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees.

Because Hoyle, Tanner takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate. If you have witnessed sexual harassment, you are urged to report the incident so that prompt action may be taken.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

- 2. SCOPE:** This policy covers sexual harassment of or by Hoyle, Tanner employees, clients, vendors or any other person dealing with the Company.

- 3. POLICY GUIDELINES:** **DEFINITION OF SEXUAL HARASSMENT**
Sexual harassment consists of unwelcome sexual advances, requests for sexual favors or unwanted sexual attention by anyone associated with the company, whether male or female. Harassment may include references to employment status or conditions or may serve to create a hostile, intimidating or uncomfortable work environment. Harassment includes, but is not limited to, obscene jokes, lewd comments, sexual depictions, repeated requests for dates, touching, staring or other sexual conduct committed either on or off company premises.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable

SEXUAL HARASSMENT POLICY

reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances - whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, cartoons;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one's sexual experiences; and,
- Discussion of one's sexual activities.

A victim of sexual harassment can be a man or a woman. The victim can be of the same sex as the harasser. The harasser can be a supervisor, co-worker, other Company employee, or a non-employee who has a business relationship with the Company.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this organization.

COMPLAINTS OF SEXUAL HARASSMENT



EFFECTIVE DATE: January 1, 2017

POLICY TITLE: **SEXUAL HARASSMENT POLICY**

SUPERSEDES: May 22, 1997

SEXUAL HARASSMENT POLICY

If any of our employees believes that he or she has been subjected to sexual harassment, the employee has the right to file a complaint with our organization. This may be done in writing or orally.

If you would like to file a complaint you may do so by contacting the appropriate manager within your division or Julie Roberts, the Equal Employment Opportunity Officer at Hoyle, Tanner & Associates, Inc., 150 Dow Street, Manchester, NH 03101 or telephone 603-669-5555. This person is also available to discuss any concerns you may have and to provide information to you about our policy on sexual harassment and our complaint process.

SEXUAL HARASSMENT INVESTIGATION

When we receive the complaint, we will promptly investigate the allegation in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation will include a private interview with the person filing the complaint and with witnesses. When we have completed our investigation, we will, to the extent appropriate inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate we will also impose disciplinary action.

DISCIPLINARY ACTION

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment, and may include such other forms of disciplinary action as we deem appropriate under the circumstances.

STATE AND FEDERAL REMEDIES

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either the nearest federal or appropriate state agency set forth below, or both. Using our complaint process does not prohibit you from filing a complaint with these agencies.

U.S. Equal Employment Opportunity
Commission ("EEOC")
131 M Street, NE
Washington, DC 20507
Phone: 202-663-4900

Maine Human Rights Commission
(FEPA)
51 State House Station
Augusta, ME 04330
Phone: 207-624-6062



EFFECTIVE DATE: January 1, 2017

POLICY TITLE: **SEXUAL HARASSMENT POLICY**

SUPERSEDES: May 22, 1997

SEXUAL HARASSMENT POLICY

U.S. Equal Employment Opportunity
Commission
Miami Tower
100 SE 2nd Street, Suite 1500
Miami FL 33131
Phone: 1-800-669-4000

Florida Commission on Human
Relations (FEPA)
4075 Esplanade Way, Room 110
Tallahassee, FL 32399
Phone: 850-488-7082

U.S. Equal Employment Opportunity
Commission
John F. Kennedy Federal Building
475 Government Center
Boston, MA 02203
Phone: 617-565-3200

The Massachusetts Commission
Against Discrimination ("MCAD")
One Ashburton Place - Room 601
Boston, MA 02108
Phone: 617-727-3990

New Hampshire Commission For
Human Rights (FEPA)
2 Chenell Drive
Concord, NH 03301-8501
Phone: 603-271-2767

Vermont Attorney General's Office -
Public Protection Division Civil Rights
Unit (FEPA)
109 State Street
Montpelier, VT 05609-1001
Phone: 802-828-5511

The Company reserves the right to add to, delete from, terminate or modify any provision of this policy, either on an individual or company-wide basis. Such additions, deletions, terminations or modifications shall be effective when approved by the Company. This policy is not intended to and does not create contractual obligations for the Company.

EXHIBIT I-c

DISCRIMINATION COMPLAINT PROCEDURE

HOYLE, TANNER & ASSOCIATES, INC.

DISCRIMINATION COMPLAINT PROCEDURE

The Hoyle, Tanner & Associates, Inc. (HTA) Complaint Procedure addresses discrimination complaints, including those regarding race, color, religion, age, sex, marital status, physical disability (including, but not limited to blindness), criminal record, national origin or ancestry, or mental disorder (or history thereof), from both current and prospective employees. These individuals have the right to make full utilization of this Complaint Procedure without in any way jeopardizing their current or prospective employment status.

The components of the HTA Complaint Procedure are the following:

The Equal Employment Opportunity Officer will receive all written complaints of discrimination. These may be direct from the employee or upon referral from a supervisor who has received a complaint from an employee.

All discrimination complaints filed under this procedure will be accepted for investigation up to, and including, thirty (30) days after the date of the alleged discriminatory act.

All complaints will be recorded on HTA "Notice of Discrimination Complaint" form and signed by the complainant. At this time, the complainant will be counseled as to the other avenues of redress open to him or her; e.g., the complaint procedure of the State Commission on Human Rights and Opportunities.

The Bureau of Administration and the Transportation Commissioner will be notified simultaneously of all complaints and of the complainant's ultimate resolution.

All complaints will be investigated and processed by the Equal Employment Opportunity Officer within thirty (30) days of receipt.

The complainant will be notified, in writing, by the Equal Employment Opportunity Officer regarding the results of the investigation and the final disposition of the complaint, including any proposed remedial action.

Should the complainant disagree with the Equal Employment Opportunity Officer's decision, he or she can still avail himself or herself of any, or all, of the other avenues of redress previously explained (see third paragraph).

In the event of a complaint against the Equal Employment Opportunity Officer, complainants will be advised to utilize the procedures of the State Commission on Human Rights and Opportunities.

The Equal Employment Opportunity Officer will take the necessary steps to ensure the confidentiality of all Title VII complaint records and of any counseling done in the course of the complaint procedure.

EXHIBIT I-d

MATERNITY GUIDELINES

HOYLE, TANNER & ASSOCIATES, INC.

MATERNITY GUIDELINES

It is the policy of the firm to consider maternity as any other non-work-related disability, such policy extending to sick pay, disability income benefits, FMLA leave, job protection, accumulation of tenure-based benefits and any and all benefits and considerations granted any employee with a medically certified disability.

Disability Income

Hoyle, Tanner & Associates, Inc. does not provide short-term disability (STD) income benefits to any of its employees.

Long-term disability (LTD) income benefits are a part of each full-time (30 hrs. minimum per week) employee's benefit package with the company. There is no employee contribution through payroll deduction. LTD insurance benefits pay 60% of wages (with bonus income included). The maximum benefits vary, and should be reviewed in the plan booklet, but are generally not a concern to employees on maternity disability, as there is a waiting period of 90 days (i.e., benefits are payable on the 91st and subsequent days of disability).

EXHIBIT II

RESPONSIBILITIES STATEMENT

RESPONSIBILITIES STATEMENT

Judith Donovan Hann, Vice President of Corporate & Human Resources, serves as the Equal Employment Opportunity Officer for Hoyle, Tanner & Associates, Inc.