



Equal Employment Opportunity Policy

PURPOSE

To clearly state 1st American's (Company) policy regarding equal employment opportunity and its commitment to affirmative action programs.

SCOPE

This policy extends to all employees and applicants for employment and all aspects of the employment relationship including recruitment, hiring, promotion, transfer, training, compensation and benefits.

POLICY

The Company will recruit, hire, train and promote into all job levels the most qualified applicants and employees without regard to race, color, religion, gender, age, marital status, national origin, military status, veteran status or disability. All such decisions will be made by utilizing objective standards based on an individual's qualifications as they relate to the job opportunity and to the furtherance of equal employment opportunity.

All other employment decisions, such as compensation, benefits, transfers, terminations, Company sponsored training, educational assistance, and social and recreational programs, will be administered without regard to race, color, religion, gender, age, marital status, national origin, military status, veteran status or disability.

Individuals who feel that they have been denied an equal employment opportunity must immediately bring the matter to the attention of the management. The complainant may be requested to put the complaint in writing. Management shall investigate all allegations of discrimination immediately upon learning of the allegations. Management shall coordinate the matter, ensuring a reasonably prompt investigation and confidentiality to the extent feasible. Upon completion of the investigation, the complainant shall be advised of the conclusion.

An employee or applicant will not suffer adverse employment consequences for making a complaint or taking part in the investigation of a complaint. However, because of the serious nature of the alleged offense, employees who knowingly allege a false claim against a supervisor or any other employee may be subject to disciplinary action, up to and including termination of employment. Additionally, employees who fail to report violations of this policy or who fail to cooperate and facilitate an investigation may be subject to disciplinary action, up to and including termination of employment.

An employee who is found to have violated this policy will be subject to disciplinary action, up to and including termination of employment.

The Company will abide by all applicable federal, state, and local laws and regulations implementing equal employment objectives.

Affirmative Action policy

Purpose

The company, in accordance with all federal and state statutes, regulations, and executive orders has established its commitment to equal opportunity and affirmative action in employment and its programs. As a federal contractor, the company has an obligation to protect the employment rights of qualified individuals, and to provide redress against discrimination on the basis of race, color, religion, national



origin, ancestry, sex, age, disability, sexual orientation, marital status, or identity as a veteran, disabled veteran, Vietnam veteran, or any component of the military forces of the United States or this state.

The company has adopted an affirmative action program designed to promote the inclusion of minorities and women in all levels of employment, responsibility, and authority, representative of their availability in the relevant labor markets.

Policy

It is the policy of the company to be an equal opportunity and affirmative action employer. The company is committed to the full participation of members of protected groups, creating a diverse workforce representative of the labor markets consistent with the provisions of Title VII of the Civil Rights Act of 1964, the Uniformed Services Employment and Reemployment Rights Act of 1994, the Vocational Rehabilitation Act of 1974, and the Americans with Disabilities Act of 1990. The company will promote the full realization of equal opportunity for minorities, women, persons with disabilities, disabled veterans, and Vietnam veterans through a comprehensive affirmative action program.

It is the policy of the company that anyone having responsibility for official personnel actions shall be evaluated upon their good faith efforts in the recruitment and selection of women and minorities for positions in which they are underrepresented.

This policy covers all aspects of the employment relationship, including but not limited to recruitment, hiring, assignment and duties, promotion, tenure, compensation, selection for training, and termination. In regard to education and training, it is the company's policy that no person will be excluded from participation in, denied the benefits of, or subjected to discrimination in any educational or training program or activity on the basis of any protected classification. The policy applies to all locations and governs employment of all employees of the company.

All policy-making activities of the company, including those associated with planning, policy, or advisory groups, shall be models of equal opportunity and affirmative action. Company programs and activities shall be conducted in a manner free of discrimination. The use of any company resources shall be undertaken in a nondiscriminatory manner.

The company recognizes that disparate impact on the basis of race, color, sex/gender, religion, age, national origin, and disability are inherently suspect and that disparate treatment on any such basis is intolerable discrimination. It is the policy of the company to identify employment practices or activities which, though neutral in form, have adverse effects on members of protected groups. Such practices that cannot be justified on the basis of business necessity (not merely business convenience) will have to be eliminated.

Harassment of employees by supervisors or co-workers on the basis of sex, race, national origin, age, disability, or other protected status is prohibited. It is the policy of the company to prevent and eliminate all forms of unlawful harassment and retaliation in the workplace.

The company is committed to providing reasonable accommodation for disabled individuals to ensure equal access to employment. Also, the company will provide reasonable accommodation for religious practices upon request.

Consistent with its policy, the company is committed to the employment and advancement of qualified minorities, women, individuals with disabilities, special disabled veterans, veterans of the Vietnam era, recently separated and any other veterans who served on active duty during a war, and persons of all ethnic backgrounds and religions according to their abilities. All personnel will carry out the spirit and intent of this policy.



Reasonable Accommodation Policy

It is the Company's policy not to discriminate against qualified individuals with a disability with regard to any aspect of employment. The Company is committed to complying with the American with Disabilities Act, as amended.

The Company recognizes some individuals with disabilities may require reasonable accommodations. If you are disabled or become disabled (meaning you have a mental or physical impairment substantially limiting one or more of the major life activities) and you require a reasonable accommodation, you must contact the HR Benefits Coordinator to begin the interactive process, which will include discussing your disability, limitations, and possible reasonable accommodations that may enable you to perform the functions or your position, make the workplace readily accessible to and usable by you, or otherwise allow you to enjoy equal benefits and privileges of employment.

Sexual Harassment Policy

The Company prohibits harassment based on race, color, religion, gender, age, marital status, national origin, military status, veteran status or disability. Harassment may be verbal, visual or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, gender, age, marital status, national origin, military status, veteran status or disability.

Unwelcome sexual advances, verbal, visual or physical conduct of a sexual nature will be considered sexual harassment when:

1. submission to such conduct is a condition of employment; or
2. submission to or rejection of such conduct is used as a basis for an employment decision; or
3. such conduct interferes with an individual's performance or creates an offensive work environment.

An employee will not suffer adverse employment consequences for making a complaint or taking part in the investigation of a complaint. However, because of the serious nature of the alleged offense, employees who knowingly allege a false claim against a supervisor or any other employee may be subject to disciplinary action, up to and including termination of employment. Additionally, employees or supervisors who fail to report violations of this policy or who fail to cooperate and facilitate an investigation may be subject to disciplinary action, up to and including termination of employment.

An employee who is found to have violated this policy will be subject to disciplinary action, up to and including termination of employment.

Racial and Ethnic harassment

Racial or ethnic harassment is a form of discrimination in violation of federal and state law and company policy and will not be tolerated. The company will respond promptly to all complaints of racial or ethnic harassment. Employees should be aware that violation of this policy will lead to disciplinary action up to and including dismissal.

Definition of Racial or Ethnic Harassment



Racial or ethnic harassment is any nonconsenting conduct based upon race, ethnicity, or national origin that creates a hostile work environment. Racial or ethnic harassment may include threats, physical contact, pranks, vandalism, or verbal, graphic, or written conduct directed at an individual or individuals because of their race or national origin. This includes such things as racial or ethnic slurs, jokes, or offensive or derogatory comments. Even if actions are not directed at specific persons, a hostile environment is created when the conduct is sufficiently severe, pervasive, or persistent to unreasonably interfere with or limit the ability of an individual to perform his or her job.

Reporting

Employees who feel that they have been a victim of Discrimination or harassment must immediately bring the matter to the attention of the management. The complainant may be requested to put the complaint in writing. Management shall coordinate the matter, ensuring a reasonably prompt investigation and confidentiality to the extent feasible. Upon completion of the investigation, the complainant shall be advised of the conclusion.



Drug- Free Workplace Policy

Purpose

This Company regards substance abuse, including drug and alcohol abuse, as a serious medical, business, social, and economic problem that cannot be tolerated. The health and safety of employees, the community, the Company, and customers are considered in establishing this Policy to reduce the potential adverse impact of substance abuse. This Policy is implemented to ensure compliance with all federal, state, and local laws, regulations, and ordinances.

Scope

This policy covers all Company facilities and applies to all employees and prospective employees. It includes Company philosophy about substance abuse and related rules, regulations, responsibilities, testing, and penalties for noncompliance. Each Company facility may have its own procedures for implementing this Policy. However, all procedures must be approved in writing by the corporate human resources department. To the extent possible, all contractors, vendors, and visitors will be informed of this Policy.

Policy

It is the Company's policy to maintain a drug-free workplace. Staff members are prohibited from illegally manufacturing, distributing, dispensing, possessing, using, or being under the influence of a controlled substance while conducting Company business (including business travel). Any violation of this policy will be grounds for disciplinary action up to and including termination of employment. Staff members who are found to be violating this policy may not remain on duty or perform in any position until management determines that the staff member may perform in such position.

Statement. The Company response to the problem of substance abuse in the workplace is one that Management believes to be appropriate, and is based on cooperation, communication, and trust. The Company is fighting substance abuse, not the abusers.

Definitions. The following definitions shall apply to words and phrases used in this Policy:

Authorized/unauthorized use. Use of alcohol or controlled substances as determined by Management.

Controlled substances. Those drugs that the U.S. Attorney General assigns to certain categories to prevent or regulate their manufacture and distribution, pursuant to the Controlled Substances Act of 1970. (For purposes of this Policy, any reference to "substance abuse" includes drug and alcohol abuse.)

Drug. Any chemical substance that, when consumed, tends to produce a physical, mental, or emotional change in an individual.

Drug abuse. The nonmedical use of a drug to produce an effect that impairs the user. (For purposes of this Policy, "drug addiction/dependency" is considered a problem associated with "drug abuse" and has the following meaning: a physical or psychological need for a drug or drugs by an individual that drives him or her to keep a minimum quantity of the substance in the bloodstream at all times.)



Illegal drugs. Those drugs listed by the federal government under the Controlled Substances Act of 1970 and subsequently prohibited under state law. The most common illegal drugs used in the workplace are marijuana, cocaine, crack, heroin, phencyclidine (PCP), and methamphetamine.

Each Government facility has the discretion to implement policies more stringent than specified above, including but not limited to inspection of a staff member's personal possessions and other items on the premises where the employees are working to determine the presence of prohibited substances, as well as policies addressing broader substance abuse issues such as abuse of alcohol and prescription drugs.