

COMPANY NAME

AFFIRMATIVE ACTION POLICY

Month/Day/Year

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Description of organization

State your company's name, main address, and the addresses of any other facilities represented in this plan. Include key contact person name, email and telephone.

Assignment of responsibility for affirmative action plan

(Name and title) is designated as the company's EEO manager and is tasked with monitoring all employment activity to ensure that our EEO/AA policies are being carried out. The EEO/AA manager has been given the necessary staffing and support from senior management to fulfill the duties of the position. These duties include, but are not limited to, the following:

1. Implement an EEO policy statement and Affirmative Action Plan ("AAP") that are consistent with the company's EEO policies and establish our affirmative action goals and objectives.
2. Develop and implement internal and external strategies for disseminating the company's AAP and EEO policies.
3. Conduct and/or coordinate EEO/AA training and orientation.
4. Ensure that our managers and supervisors understand it is their responsibility to take action to prevent the harassment of employees and applicants for employment.
5. Ensure that all people of color, women, and disabled employees are provided equal opportunity as it relates to organization-sponsored training programs, recreational/social activities, benefit plans, pay and other working conditions.
6. Implement and maintain EEO audit, reporting, and record-keeping systems in order to measure the effectiveness of our Affirmative Action Plan and to determine whether our goals and objectives have been attained.
7. Receive, investigate and attempt to resolve all EEO complaints. Notify employees with EEO complaints of their right to file said complaint with the Minnesota Department of Human Rights (MDHR) or the U.S. Equal Employment Opportunity Commission (EEOC).
8. Coordinate the implementation of necessary affirmative action to meet compliance requirements and goals.
9. Serve as liaison between our organization and relevant governmental enforcement agencies.
10. Coordinate the recruitment and employment of women and people of color, and coordinate the recruitment and utilization of businesses owned by women and people of color.

11. Coordinate employee and company support of community action programs that may lead to the full employment of women and people of color.
12. Monitor subcontractors and vendors to ensure compliance in such areas as:
 - a. Employment of women and minority employees;
 - b. Displaying EEO posters on the construction sites; and
 - c. Maintaining a work environment free of harassment and intimidation based on race, color, creed, etc.
13. Keep management informed of the latest developments in the area of EEO.

Dissemination of affirmative action policy and plan

A. Internal dissemination

1. Our EEO policy statement is included in our employee handbooks.
2. We will publicize our EEO policy in any newsletters, magazines, annual reports, or other media the company utilizes.
3. Schedule special meetings all other employees to discuss the policy and explain individual employee responsibilities;
4. We will discuss the policy thoroughly during both employee orientation and management training programs;
5. If applicable we will meet with union officials to provide notice of our EEO policy and ask for their cooperation in implementing the policy.
6. If applicable we will include non-discrimination clauses in all of our union agreements and review all contractual provisions to ensure they are non-discriminatory.
7. We will publish articles in any company publications covering our affirmative action plan, progress reports, and the accomplishments of female employees and employees of color.
8. Our EEO policy statement and non-discrimination posters will be permanently posted and conspicuously displayed in areas available to employees and applicants for employment.
9. When employees are featured in product or consumer advertising, employee handbooks, or similar publications, we will include images of male and female and employees of color.

10. Communicate at least annually to employees the existence of our affirmative action plan and make available the elements of the plan as well as enable prospective employees to know and avail themselves of all of our plan's benefits.
11. All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes are carefully selected and trained to ensure that the goals and commitments in the company's affirmative action plan are implemented.

B. External dissemination

1. We will notify all recruiting sources of the company's EEO policy, stipulating that these sources actively recruit and refer women and people of color for all positions listed.
2. We will hold formal briefing sessions with representatives from recruiting sources. As an integral part of these briefings, we will include facility tours; clear and concise explanations of current and future job openings; position descriptions; worker specifications; explanations of the company's selection process; and, recruiting literature. We will make formal arrangements regarding applicant referrals, and follow-up with referral sources regarding the disposition of applicants.
3. We will use all available resources to continue or establish on-the-job training programs.
4. We will incorporate the equal opportunity clause into all purchase orders, leases, and contracts.
5. We will send written notification of the company's EEO policy to all sub-contractors, vendors, and suppliers, and request cooperative action from them.
6. When employees are featured in consumer or help wanted advertising, we will include images of male and female employees and employees of color.
7. We will communicate the existence of our EEO policy to prospective employees and provide sufficient information to enable prospective employees to avail themselves of the policy's benefits.

Internal audit and reporting systems

Our EEO manager has responsibility for implementing and monitoring our affirmative action programs. Department heads, managers, and supervisors are responsible for providing the EEO manager with information and/or statistical data as necessary to measure our good faith efforts to implement our programs. In addition, they are also responsible for submitting formal reports to the EEO Manager on a scheduled basis regarding the degree to which corporate or unit goals are attained and timetables are met.

Problem area identification

Our company periodically conducts an in-depth analysis of its total employment process to determine whether and where impediments to equal employment opportunity may exist. We evaluated:

1. **Personnel activity:** We will routinely conduct adverse impact analyses to analyze our personnel activities, including applicant flow, hires, promotions, terminations and other personnel actions, to determine if there are selection disparities between men and women, people of color and nonminority (and within specific racial groups, if appropriate) applicants or employees. For tests are used as a part of our selection process, we confirm these tests are job-related and are validated. We have taken corrective action to remove any barriers to hiring or retaining women and people of color.
2. **Compensation system:** We will routinely review our compensation system, including rates of pay and bonuses, to determine whether there is any gender, race, or ethnicity-based disparities. If any disparities are identified, we take prompt action to resolve the disparity.
3. **Personnel procedures:** We will routinely review all of our personnel procedures and processes, including selection, recruitment, referral, transfers and promotions, seniority provisions, apprenticeship programs and company-sponsored training programs and other company activities to determine if all employees or applicants are fairly considered.
4. **Any other areas that might impact the success of our Affirmative Action Plan:** We continually analyze any other areas that may impact our success, such as accessibility of our facility to the available workforce, the attitude of our current workforce towards EEO, proper posting of our EEO policy and required governmental posters, proper notification of our subcontractors or vendors, and retention of records in accordance with applicable law. We take prompt action to remedy any problems in these areas through training of staff or other methods.

Action-oriented programs

Selection process

We will evaluate our selection process using an adverse impact analysis to determine if our requirements screen out a disproportionate number of people of color and women. All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes will be carefully selected and trained to ensure that there is a commitment to the affirmative action plan and its implementation.

Recruitment of employees

Required. You may add additional recruitment procedures that are appropriate for your company operations.

1. All solicitation or advertisements for employees will state that applicants will receive consideration for employment regardless of their race, color, creed, religion, national origin, sex, sexual orientation, disability, age, marital status, or status with regard to public assistance. When needed, to help address underutilization, help wanted advertising will also be placed in news media oriented towards women or people of color. Copies of advertisements for employees will be kept on file for review by enforcement agencies.
2. When we place help-wanted advertisements, we will not indicate a preference, limitation, or specification based on sex, age, national origin, or other protected characteristic, unless that characteristic is a bona fide occupational qualification for a particular job. We will not allow any employment agency with which we work to express any such limitation on our behalf, and we will require that these agencies share our commitment to Equal Employment Opportunity.
3. As necessary to ensure that potential candidates are aware of job openings, we will contact community organizations focused on the employment of women, people of color, and individuals with disabilities (including state vocational rehabilitation agencies or facilities, sheltered workshops, college placement offices, education agencies, or labor organizations).
4. We will carry out active recruiting programs at relevant technical schools and colleges, including the Hennepin County's [approved training programs](#), where applicable.
5. We will encourage existing people of color and female employees to recruit additional candidates for employment opportunities.
6. *Consideration of people of color and women not currently in the workforce:* We will take additional steps to encourage the employment of women and people of color who are not currently in the workforce, such as providing part-time employment, internships, or summer employment programs.

Sex discrimination guidelines

We incorporate the following commitments into this AAP to ensure that all laws related to the prohibition of discrimination based on sex are followed:

1. Employment opportunities and conditions of employment are not related to the sex of any applicant or employee. Salaries are not related to or based upon sex.

2. Women are encouraged to attend all training or development programs to facilitate their opportunities for promotion, and to apply for all positions for which they are qualified.
3. We do not deny employment to women or men with young children and do not penalize, in conditions of employment, women or men who require time away from work for parental leave.
4. Appropriate physical facilities are provided to both sexes.

Prevention of harassment and discrimination

Our company has developed policies prohibiting the harassment of or discrimination against any employee because of any characteristic protected under civil rights laws. Senior management will distribute these policies routinely to current employees and incorporate these policies as a part of new employee orientation. Employees are made aware of contact persons to report any violation of these policies.

Anti-harassment policy

As a part of our commitment to equal opportunity, our company has adopted an anti-harassment policy. Any employee who engages in harassment on the basis of race, color, creed, religion, national origin, sex, sexual orientation, marital status, status with regard to public assistance, membership or activity in a local human rights commission, disability, age, or other legally protected characteristics; any employee who permits employees under his/her supervision to engage in such harassment; or any employee who retaliates or permits retaliation against an employee who reports such harassment is guilty of misconduct and shall be subject to remedial action which may include the imposition of discipline or termination of employment.

Examples of harassment may include derogatory comments regarding a person's race, color, religion, or other protected characteristics, sexually explicit or other offensive images (whether printed or displayed on a computer), and jokes that are based on stereotypes of particular races, sexual orientations, ages, religions, or other protected characteristics.

Sexual Harassment is prohibited and includes any unwelcome sexual advance, request for sexual favor and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made, either explicitly or implicitly, as a term or condition of employment;
- Submission to or rejection of such conduct is used as a factor in any employment decision affecting any individual; or

- Such conduct has the purpose or effect of unreasonably interfering with any employee’s work performance or creating an intimidating, hostile or offensive working environment.

Although the intent of the person engaging in the conduct may be harmless or even friendly, it is the perception of the conduct by the recipient that is relevant to whether the conduct is harassment. Given the difficulty of judging whether the conduct is welcome or unwelcome in particular situations, the company prohibits all employees from engaging in any conduct of a sexual nature or amounting to harassment based on any protected category in the work setting.

This policy applies to everyone in the organization as well as senior management. No retaliation or intimidation directed towards anyone who makes a complaint will be tolerated.

If you believe you have been a victim of harassment, take the following steps:

- Discuss the matter with your supervisor or manager.
- If, for any reason, you would prefer not to speak to your supervisor (for example, if you believe your supervisor to be the source of or a party to the harassment), you may talk to any other member of management or the EEO manager.

The company will investigate and attempt to resolve your complaint promptly. If, for any reason, you believe this has not occurred within a reasonable period of time, refer the matter to a member of senior management up to and including the CEO of our company.

Problem resolution policy

In any organization, dissatisfaction may arise because an employee does not know, understand, or agree with certain policy interpretations or management decisions. Such dissatisfactions are commonly referred to as grievances. We believe that if any employee has a grievance concerning his/her wages, hours of work, or other terms or conditions of employment, the matter should receive attention from management.

An employee who feels aggrieved is urged to take the matter up immediately with his/her supervisor. Your supervisor is required to investigate your grievance and provide you a response or decision within a reasonable period of time. This investigation may consist of, but is not limited to, gathering information from other employees involved, reviewing company policy, and any other action necessary to understand the matter completely.

If you are not satisfied with the response/decision from your immediate supervisor, you are encouraged to notify the next level of management in writing. This next level of supervision will have a reasonable period of time in which to investigate the matter and respond to you in writing.

If, after these steps are taken, you believe inadequate action has been taken to resolve your complaint, contact the human resources department or the EEO manager who will investigate the issues. It is the policy of this organization to respond to any and all complaints, and to take immediate and necessary actions to resolve the issue.

There will be no adverse action taken against a complaining employee as a result of making the complaint, regardless of the outcome of the investigation.

If you have a problem which is more specifically addressed by the Anti-Harassment Policy, please follow the procedure described in the Anti-Harassment Policy section.