

Cascade Engineering Family of Companies

Cascade Engineering
3400 Innovation Ct SE
Grand Rapids MI 49512

Affirmative Action Plan for Individuals with Disabilities and for Certain Protected Veterans



**AFFIRMATIVE ACTION PLAN
FOR INDIVIDUALS WITH DISABILITIES
AND FOR CERTAIN PROTECTED VETERANS**

Cascade Engineering

Family of Companies

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Affirmative Action
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DEFINITIONS

INDIVIDUAL WITH A DISABILITY means a person who generally (i) has a physical or mental impairment that substantially limits one or more of his or her major life activities; (ii) has a record of such impairment; or (iii) is regarded as having such impairment.

For the purposes of this Plan, an individual with a disability is “substantially limited” if he or she is unable to perform a major life activity that most people in the general population can perform, or is significantly restricted as to the condition, manner, or duration under which a person can perform a particular major life activity as compared to the condition, manner, or duration under which most people in the general population could perform that same activity.

QUALIFIED INDIVIDUAL WITH A DISABILITY means an individual with a disability who satisfies the skill, experience, education and other job-related requirements of a particular position and who is capable of performing the essential functions of that position, with or without a reasonable accommodation for his or her disability.

PROTECTED VETERAN means a veteran who may be classified as a Disabled Veteran; Recently Separated Veteran; Active Duty Wartime or Campaign Badge Veteran; or an Armed Forces Service Medal Veteran.

DISABLED VETERAN means:

- (1) A veteran of the United States military, ground, naval, or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or
- (2) A person who was discharged or released from active duty because of a service-connected disability.

ACTIVE DUTY WARTIME OR CAMPAIGN BADGE VETERAN means a veteran who served on active duty in the United States military, ground, naval, or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the Department of Defense.

RECENTLY SEPARATED VETERAN means any veteran during the three-year period beginning on the date of such veteran’s discharge or release from active duty in the United States military, ground, naval, or air service.

ARMED FORCES SERVICE MEDAL VETERAN means any veteran who, while serving on active duty in the United States military, ground, naval, or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

QUALIFIED DISABLED VETERAN means a disabled veteran who has the ability to perform the essential functions of the employment position with or without reasonable accommodation.

A. EQUAL EMPLOYMENT OPPORTUNITY POLICY
41 C.F.R. §§ 60-741.44(a);60-300.44(a)

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Cascade Engineering (the “Company”) will be based on merit, qualifications, and abilities. The Company does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex (including pregnancy, childbirth or related medical conditions), national origin, age, non-disqualifying disability, veteran status, or any other characteristic protected by law.

The Company will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. The Company also prohibits harassment of any individual on the basis of any characteristic listed above. For information regarding the Company’s internal policies for addressing complaints of harassment, please refer to the Harassment Policy.

These policies govern all aspects of employment, including, but not limited to, selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Any employee with a question or concern about any type of discrimination or harassment in the workplace is encouraged to bring issues to the attention of his/her immediate supervisor or the Human Resources Department. Employees can raise legitimate complaints or concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion, or discrimination because they: (1) file a complaint with the Company or with federal, state, or local agencies; (2) assist or participate in any investigation, compliance review, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute; (3) oppose any act or practice made unlawful by federal, state, or local law requiring equal employment opportunity or affirmative action; or (4) exercise any other employment right protected by federal, state, or local law or its implementing regulations.

The Company maintains an audit and reporting system to determine overall compliance with its equal employment opportunity mandates and to respond to any specific complaints that applicants or employees file with the Company’s Human Resource office. Overall responsibility for the implementation of the Company’s equal employment opportunity programs and for affirmative action compliance activities is assigned to Kenyatta Brame, Executive Vice President.

The Company’s EEO Policy, as well as its affirmative action obligations, includes the full and complete support of the Company, including Mark Miller, President and CEO.

B. REVIEW OF PERSONNEL PROCESSES
41 C.F.R. §§ 60-741.44(b);60-300.44(b)

The Company ensures that its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities and for Protected Veterans for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available.

The Company also ensures that its personnel processes do not stereotype qualified disabled persons or Protected Veterans in a manner which limits their access to jobs for which they are qualified.

The Company also periodically reviews its processes and makes any necessary modifications to ensure that these obligations are carried out. The following procedures facilitate a review of the implementation of these requirements and are drawn from, among other things, Appendix C of OFCCP's Regulations implementing Section 503 of the Rehabilitation Act of 1973 (41 CFR §60-741 et seq.) and VEVRAA of 1974 (41 CFR §§ 60-300 et. seq.), as amended:

1. The Company confidentially documents the application or resume credentials of each candidate with a known disability or known to be a Protected Veteran to identify each vacancy for which it considered the candidate. The form is quickly retrievable for review by Company officials for use in investigations and internal compliance activities.
2. The individual's confidential medical records contain a description of any accommodation which made it possible to place a qualified individual with a disability on the job.
3. The personnel or application records of each qualified individual with a known disability or a Protected Veteran include (i) identification of each promotion for which the qualified individual with a disability or Protected Veteran was considered, and (ii) the identification of each training program for which the qualified individual with a disability or Protected Veteran was considered.
4. In each case in which a qualified employee or applicant with a disability and/or Protected Veteran is rejected for employment, promotion, or training, the Company appends a statement of the reason to the personnel file or application form as well as a description of any accommodations considered if disability was the reason for rejection.
5. The application form or personnel record contains a description of any accommodation which made it possible to place a qualified individual with a disability or a Protected Veteran on the job. Additionally, the Company maintains Self-Audit Tables, tracking its review and modification where necessary, of personnel processes.

C. PHYSICAL AND MENTAL QUALIFICATIONS
41 C.F.R. §§ 60-741.44(c); 60-300.44(c)

The Company periodically reviews physical and mental job qualification requirements with operations management to ensure that, to the extent qualification requirements screen out or may screen out qualified applicants and/or employees with disabilities, or Protected Veterans, they are job-related and consistent with business necessity and the safe performance of the job. The schedule of the review is:

- (a) Annually; or
- (b) As new job qualification requirements are established.

To the extent that physical or mental job qualification requirements screen out or may screen out qualified disabled individuals or Protected Veterans in the selection of employees or applicants for employment or other changes in employment status such as promotion or training, the Company assures that the requirements are related to the specific job(s) for which the individual is being considered and are job related and consistent with business necessity and the safe performance of the job.

D. REASONABLE ACCOMMODATION OF PHYSICAL AND MENTAL LIMITATIONS
41 C.F.R. §§ 60-741.44(d);60-300.44(d)

The Company makes reasonable accommodation to the known physical or mental limitations of all otherwise qualified individuals with a non-disqualifying disability unless it can demonstrate that the accommodation would impose an undue hardship on the operation of the Company's business. If an employee with a known disability is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the Company will confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability. If the employee responds affirmatively, the Company will confidentially inquire whether the employee is in need of a reasonable accommodation.

Employees may contact their local human resources office and representative to request an accommodation.

E. HARASSMENT
41 C.F.R. §§ 60-741.44(e); 60-300.44(e)

The Company has developed and implemented procedures to ensure that its employees with disabilities and Protected Veterans are not harassed because of their disability, Protected Veteran status or other protected characteristic.

The Company's harassment policy includes a complaint procedure for employees to follow in reporting legitimate allegations of harassment and provides that legitimate complaints of harassment will be thoroughly investigated. The Company will promptly and appropriately remedy any policy violations, up to and including termination of employment.

F. EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND POSITIVE RECRUITMENT
41 C.F.R. §§ 60-741.44(f); 60-300.44(f)

The Company takes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified individuals with disabilities and protected veterans. The following are examples of the Company's recruitment activities.

1. The Company enlists the assistance and support of recruiting sources (including State employment security agencies, State vocational rehabilitation agencies or facilities, sheltered workshops, college placement officers, State education agencies, and organizations of or for individuals with disabilities, as applicable) to provide meaningful employment opportunities to qualified individuals with disabilities and Protected Veterans.
2. The Company sends purchase orders containing the Company's non-discrimination philosophy to subcontractors, vendors and suppliers and requests appropriate action.
3. The Company takes positive steps reasonably designed to effectively attract and recruit qualified individuals with disabilities and Protected Veterans not currently in the work force who have requisite skills and can be recruited through affirmative action measures. The Company locates these persons through various special interest organizations and associations related to individuals with disabilities and Protected Veterans.
4. The Company considers applicants with known disabilities and those known to be Protected Veterans for a reasonable period of time for available positions for which they may be qualified when the position(s) applied for is unavailable, subject to limits stated on the employment application or profile, or otherwise communicated in the employment application process.
5. The Company enlists the assistance and support of recruiting sources to provide meaningful employment opportunities to qualified individuals with disabilities and Protected Veterans.

G. INTERNAL DISSEMINATION OF POLICY
41 C.F.R. § 60-741.44(g); 60-300.44(g)

On a periodic basis, the Company reviews its outreach and recruitment efforts to evaluate their effectiveness in identifying and recruiting qualified individuals with disabilities and Protected veterans.

The Company recognizes that even a strong outreach program will be ineffective without adequate internal support from supervisory and management personnel and other employees, who may have had limited contact with individuals with disabilities and Protected Veterans in the past. To assure greater employee cooperation and participation in the Company's efforts with respect to the disabled and Protected Veterans, the Company will follow internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities and Protected Veterans. These procedures are designed to foster understanding, acceptance and support among the Company's management, supervisory and other employees and to encourage such persons to take the necessary actions to aid the Company to meet its obligations.

Through its equal employment opportunity and harassment policy(ies), the Company periodically informs all employees and applicants of its commitment to engage in affirmative action to increase employment opportunities for qualified individuals with disabilities and Protected Veterans. The Company schedules meetings periodically with employees to discuss human resources policies and to explain, among other things, individual employee responsibilities not to discriminate against or to harass other employees. From time-to-time, the Company conducts meetings with management and supervisory personnel to explain the intent of the Company's equal employment opportunity and harassment policies and individual employee responsibility for effective implementation, making clear management's attitude. The Company discusses the policy thoroughly at both employee orientation and management training programs.

The Company attempts to include individuals with disabilities and Protected Veterans in its various publications, including the employee handbook, when employees are featured in them.

H. AUDIT AND REPORTING SYSTEM
41 C.F.R. §§ 60-741.44(h); 60-300.44(h)

The Company undertakes a periodic assessment of its personnel processes that is designed to:

1. Measure the effectiveness of the Company's affirmative action program.
2. Indicate any need for remedial action.
3. Determine the degree to which the Company's employment-related objectives are being attained.
4. Determine whether known individuals with disabilities and Protected Veterans have had the opportunity to participate in all Company sponsored educational, training, recreational and social activities.
5. Measure the Company's compliance with the affirmative action program's specific obligations.

If the Company finds the affirmative action program to be deficient, the Company will undertake necessary action to bring the program into compliance.

I. RESPONSIBILITY FOR IMPLEMENTATION
41 C.F.R. §§ 60-741.44(i); 60-300.44(i)

The Executive Vice President is designated administrator of the Company's EEO and affirmative action activities and has overall responsibility for implementing, monitoring, and administering the program.

The Executive Vice President has been given the President and CEO's support and the necessary staff to manage implementation of this program. He will continue to:

1. Develop policy statements, affirmative action programs, and internal and external communication techniques including discussions with managers, supervisors and employees to ensure the Company's employment-related policies are followed.
2. Advise supervisors that they are responsible to prevent employees from being harassed due to their disability or Protected Veteran status.
3. Identify problem areas with operations management in the implementation of the EEO/Affirmative Action program, and develop solutions to such problems.
4. Maintain an audit and reporting system to monitor the progress of the EEO/Affirmative Action program.
5. Serve as liaison between the Company and the various employment-related governmental enforcement agencies, community groups and vocational rehabilitation organizations.
6. Serve as liaison between the Company and organizations for disabled persons and Protected Veterans.
7. Inform management of the latest developments in the area of equal employment opportunities and affirmative action.
8. Arrange career counseling for disabled employees and Protected Veterans when requested.

J. TRAINING
41 C.F.R. §§ 60-741.440(j); 60-300.44(j)

The Company trains all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure that the commitments in the Company's affirmative action program are implemented as to qualified disabled individuals and Protected Veterans.

K. DATA COLLECTION ANALYSIS
41 C.F.R. §§ 60-741.440(k); 60-300.44(k)

The Company documents the following information on all applicants and hires on an annual basis and maintains such information for a period of three (3) years:

- The number of applicants who self-identify as individuals with disabilities or Protected Veterans;
- The total number of job openings and the total number of jobs filled;
- The total number of applicants for all jobs;
- The number of individuals with disabilities or Protected Veterans hired; and
- The total number of applicants hired.

L. UTILIZATION GOALS / BENCHMARKS FOR HIRING
41 C.F.R. §§ 60-741.45; 60-300.45

The Company applies a Utilization Goal of 7 percent for employment of qualified individuals with disabilities for each job group in the Company's workforce. The purpose of this utilization goal is to establish a target against which the Company must measure the representation of individuals within each job group in its workforce. The Company conducts such evaluation on an annual basis. When the percentage of individuals with disabilities in one or more groups is less than the 7 percent Utilization Goal, the Company takes steps to determine whether and where impediments to equal employment opportunity exist. If the Company identifies any problem areas, it develops and executes action-oriented programs designed to correct any identified problem areas.

The Company also applies the Benchmark established by OFCCP for employment of Protected Veterans. The purpose of this Benchmark is to create a quantifiable method by which the Company can measure its progress towards achieving equal employment opportunity for Protected Veterans.