

EQUAL EMPLOYMENT OPPORTUNITY POLICY

Community Access Unlimited provides equal employment opportunities to all employees and applicants for employment without regard to age, race, creed, color, national origin, nationality, ancestry, religion, sex (including pregnancy and sexual harassment), affectional or sexual orientation, marital status, domestic partnership status, civil union status, gender identity or expression, mental or physical disability, including AIDS and HIV related illnesses, atypical hereditary cellular or blood trait, liability for military service, genetic information, status as a Vietnam era, disabled or other covered Veteran, or any other protected characteristic as established by federal, state or local law. This policy applies to all terms and conditions of employment, including but not limited to, recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, benefits and training.

The Human Resources Department has overall responsibility for this policy and maintains reporting and monitoring procedures. Employees' questions or concerns regarding this policy should be referred to the Human Resources Department.

Each and every employee of CAU is responsible for carrying out the Agency's Equal Employment Opportunity Policy. Violation of this policy is strictly prohibited. Appropriate disciplinary action, up to and including suspension and discharge, may be taken against any employee willfully violating this policy.

NON-DISCRIMINATION & ANTI-HARASSMENT POLICY

Community Access Unlimited has adopted a policy of "zero-tolerance" with respect to any form of discrimination or harassment. It is the policy of CAU to ensure equal employment opportunity without discrimination or harassment on the basis of age, race, creed, color, national origin, nationality, ancestry, religion, sex (including pregnancy and sexual harassment), affectional or sexual orientation, marital status, domestic partnership status, mental or physical disability, including AIDS and HIV related illnesses, atypical hereditary cellular or blood trait, liability for military service, genetic information, or any other protected characteristic as established by federal, state or local law. To that end, Community

Access Unlimited will not tolerate, condone, or allow unlawful discrimination or harassment, whether engaged in by fellow employees, supervisors, or officers. Nor will the Agency tolerate such conduct when it involves Community Access Unlimited employees and outside vendors or customers (including, but not limited to, job applicants, contractors, clients or vendor personnel) who conduct business within Community Access Unlimited. Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

We will take appropriate remedial action, including discipline and, if necessary, suspension or dismissal of offending parties, to eliminate unlawful harassment and discrimination from our workplace.

Definitions of Harassment

1. Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example:

- submission to such conduct is either explicitly or implicitly made as a term or condition of employment;
- submission to or rejection of such conduct is used as the basis for an adverse employment decision regarding the employee; or
- such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creates an intimidating, hostile, or offensive working environment.

Sexual harassment can include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may take a variety of forms including, but not limited to, slurs, jokes, insults or pictures. The following is a non-exhaustive list of some examples of such prohibited conduct:

- Intentional physical conduct which is sexual in nature, such as unwelcome touching, pinching, patting, brushing against or poking another's body;
- Leering, staring, stalking;
- Rape, sexual battery or attempts to commit these acts;
- Persistent or repeated unwelcome flirting, pressure for dates, or sexual comments;
- Jokes or degrading comments about another based on one's personal attributes or sexually suggestive jokes or gestures directed toward another;
- Display of pictures, posters, calendars, graffiti or other materials or objects that are suggestive, sexually (or otherwise) demeaning, or pornographic and the transmission, downloading or display of any of the foregoing via Agency owned or leased electronic media (such as e-mail, the Internet or voice-mail messages);
- Display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group including the transmission of any of the foregoing via Agency owned or leased electronic media;
- Preferential treatment, or a promise of preferential treatment, in exchange for dates or sexual conduct; or the denial or threat of denial of employment benefits or advancement for refusal to consent to sexual advances;
- Epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and/or

- Any other conduct or behavior deemed inappropriate by Community Access Unlimited.

Sex-based harassment — that is, harassment not involving sexual activity or language (e.g., male manager yells only at female employees and not males) — may also constitute discrimination if it is severe or pervasive and directed at employees because of their sex.

2. Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her age, race, creed, color, national origin, nationality, ancestry, religion, sex (including pregnancy and sexual harassment), affectional or sexual orientation, marital status, domestic partnership status, civil union status, gender identity or expression, mental or physical disability, including AIDS and HIV related illnesses, atypical hereditary cellular or blood trait, liability for military service, genetic information, status as a Vietnam era, disabled or other covered Veteran, or any other protected characteristic as established by federal, state or local law, or that of his/her relatives, friends or associates, and that: (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities.

Examples of improper conduct -- whether inadvertent or on purpose, whether in jest or in earnest or otherwise -- include, but are not limited to the following:

- Verbal --includes, but is not limited to, for example, making a joke, derogatory comment, vulgar or profane words, expressions or slurs, that refer to a certain age, race, creed, color, national origin, nationality, ancestry, religion, sex (including pregnancy and sexual harassment), affectional or sexual orientation, marital status, domestic partnership status, civil union status, gender identity or expression, mental or physical disability, including AIDS and HIV related

illnesses, atypical hereditary cellular or blood trait, liability for military service, genetic information, status as a Vietnam era, disabled or other covered Veteran, or any other protected characteristic as established by federal, state or local law.

- Physical – includes, but is not limited to, for example, blocking, impairing or otherwise physically interfering with an individual's normal work or movement.
- Visual – includes, but is not limited to, for example, such items as derogatory posters, cartoons, drawings and electronic images.

Retaliation Is Prohibited

CAU prohibits retaliation against any individual who, in good faith, reports discrimination or harassment or participates in an investigation of such reports. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action, up to and including suspension and termination. Anyone who feels they have been subjected to any acts of retaliation should immediately report such conduct, as set forth below.

Reporting an Alleged Incident of Harassment, Discrimination or Retaliation

The Agency strongly urges the reporting of all complaints or concerns of discrimination, harassment or retaliation, regardless of the offender's identity or position, so that an investigation can be conducted promptly. Any employee who believes that he or she has been a victim of harassment, discrimination or retaliation by any employee, supervisor, manager or by someone not directly connected to CAU (e.g., vendor or contractor), should immediately contact their Department Head or a Human Resources Representative. Individuals should not feel obligated to file their complaints with their immediate

supervisor first before bringing the matter to the attention of one of the other CAU designated representatives identified above.

Any CAU supervisor who receives a report of discrimination, harassment or retaliation, or who learns that conduct of the nature prohibited by this policy is occurring, must report that offense immediately to a Human Resources Representative. Any supervisor not complying with this policy will be subject to disciplinary action, up to and including suspension and termination.

Prompt reporting of complaints is expected so that Community Access Unlimited can respond to the complaint and take appropriate action.

The Investigation

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly, thoroughly and impartially. Depending on the individual situation, the investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action, and to the extent permitted by law. Individuals involved in an investigation are expected to fully cooperate and maintain the confidentiality of the investigation.

Responsive Action

If it is determined that an Agency employee has engaged in harassment, discrimination or retaliation in violation of CAU policy, corrective action will be taken promptly, ranging from verbal or written warnings up to and including termination. Responsive action may include, for example, training, referral to counseling, monitoring of the offender and/or disciplinary action such as verbal or written warning,, withholding of a promotion or pay increase, reduction of wages, demotion, reassignment, temporary suspension without pay or termination, as CAU believes appropriate under the circumstances. In the case of discrimination, harassment, or retaliation of or by job applicants, contractors, clients or vendor personnel, appropriate corrective action will be taken.

NON-DISCRIMINATION AND ACCOMMODATION OF INDIVIDUALS WITH DISABILITIES

Community Access Unlimited complies with the Americans with Disabilities Act (“ADA”) and applicable federal, state and local laws providing for nondiscrimination in employment against qualified individuals with disabilities. Community Access Unlimited provides reasonable accommodation to the known physical or mental limitation of a qualified applicant or employee with a disability, unless an undue hardship on business operations would result. Qualified individuals with disabilities may make requests for reasonable accommodation to their supervisors or the Human Resources Department. Employees are expected to cooperate with CAU in determining the appropriate accommodation for the employee’s disability, and may be required to provide information from their physician regarding the disability.

It is the policy of Community Access Unlimited to ensure that qualified individuals with disabilities are treated in a nondiscriminatory manner in the pre-employment, application and hiring process, and that employees with disabilities are treated in a nondiscriminatory manner in regard to advancement, discharge, compensation, training, and all terms, conditions, and privileges of employment.