

**CATHOLIC CHARITIES OF THE ARCHDIOCESE OF ST. PAUL
AND MINNEAPOLIS**

AFFIRMATIVE ACTION PLAN

**MINNESOTA DEPARTMENT OF HUMAN
RIGHTS**

Catholic Charities
1200 2nd Avenue S.
Minneapolis, MN 55403

CEO
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Effective November 21, 2009

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II- DESCRIPTION OF CONTRACT

Catholic Charities of the Archdiocese of St. Paul and Minneapolis, is the human service arm of the twelve-county Catholic Archdiocese of St. Paul and Minneapolis. It is committed to work to alleviate human suffering and oppression. There are eight broad program areas as well as a corrections program.

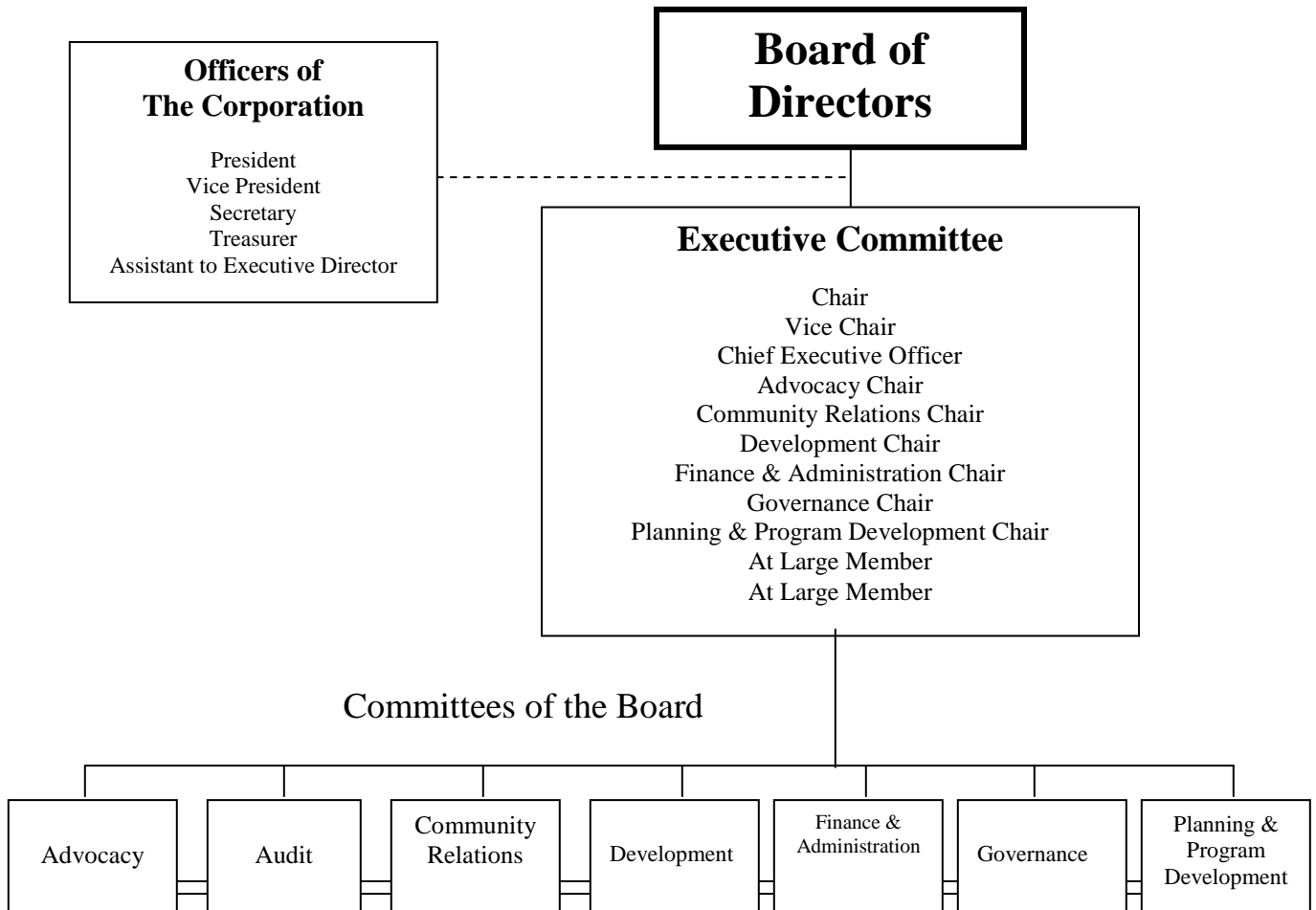
The Agency receives grant monies from the State of Minnesota in excess of \$100,000 in a year. Additionally, Catholic Charities receives various grant monies from the City of Minneapolis in excess of \$50,000 per year.

III – ORGANIZATIONAL CHARTS

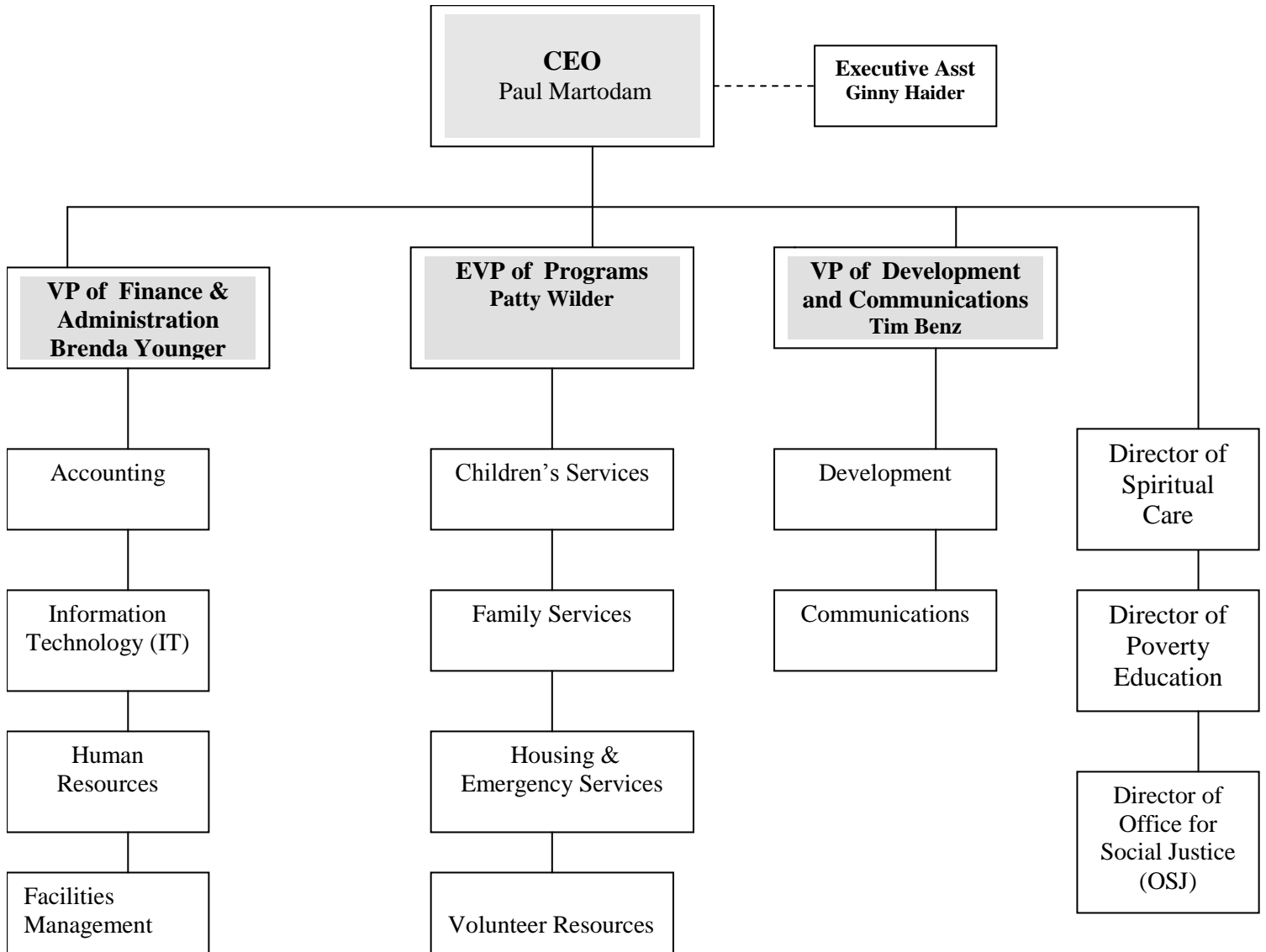
Attached are the organizational charts for Catholic Charities of the Archdiocese of St. Paul and Minneapolis.

1. Corporate Board
2. Senior Leadership

CATHOLIC CHARITIES BOARD OF DIRECTORS STRUCTURE



CATHOLIC CHARITIES SENIOR LEADERSHIP STRUCTURE



IV. EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

This is to affirm Catholic Charities of the Archdiocese of St. Paul and Minneapolis (Catholic Charities) policy of providing Equal Opportunity to all employees and applicants for employment in accordance with all applicable Equal Employment Opportunity/Affirmative Action Laws, directives and regulations of Federal, State and Local governing bodies or agencies thereof, specifically Minnesota Statutes 363.

Catholic Charities will not discriminate against or harass any employee or applicant for employment because of race, creed, color, religion, sex, national origin, age, marital status, disability, status with regard to public assistance, membership or activity in a local commission, sexual or affectional preference or orientation, ancestry, familial status, or any other legally protected group. The religious observances and practices of our employees are accommodated, except where the requested accommodation would cause undue hardship on the operation of the agency.

Catholic Charities will take Affirmative Action to ensure that all employment practices are free of such discrimination. Such employment practices include, but are not limited to, the following: hiring, upgrading, demotion, transfer, recruitment or recruitment advertising, selection, layoff, disciplinary action, termination, rates of pay or other forms of compensation, and selection for training, including internships. We will provide reasonable accommodation for applicants and employees with disabilities.

Catholic Charities will use its best efforts to afford minority and female business enterprises with the maximum practicable opportunity to participate in the performance of subcontracts for construction projects that this Agency engages in.

Catholic Charities will commit the necessary time and resources, both financial and human, to achieve the goals of Equal Employment Opportunity and Affirmative Action.

Catholic Charities fully supports incorporation of non-discrimination and Affirmative Action rules and regulations into contracts.

Catholic Charities will evaluate the performance of its management and supervisory personnel on the basis of their involvement in achieving these Affirmative Action objectives as well as other established criteria. In addition, all other employees of this Agency, or subcontractor to this Agency, who does not comply with the Equal Employment Opportunity Policies and Procedures as set forth in this Statement and Plan will be subject to disciplinary action. Any subcontractor not complying with all applicable Equal Employment Opportunity/Affirmative Action laws, directives and regulation of the Federal, State and Local governing bodies or agencies thereof, specifically Minnesota Statutes 363 will be subject to appropriate legal sanctions.

Catholic Charities has appointed Mary K. Jerome, Director of Human Resources, to manage the Equal Employment Opportunity Program. Her responsibilities will include monitoring all Equal Employment Opportunity activities and reporting the effectiveness of this Affirmative Action Program, as required by Federal, State and Local agencies. The Chief Executive Officer of Catholic Charities will receive and review reports on the progress of the program. If any employee or applicant for employment believes he/she has been discriminated against, please contact Mary K. Jerome, 1200 Second Avenue South, Minneapolis, MN 55403, or call 612-664-8500.

Paul Martodam, Chief Executive Officer

Date

Mary K. Jerome, Human Resources Director

Date

V. SEXUAL HARASSMENT IN THE WORKPLACE POLICY STATEMENT AND REPORTING PROCEDURE

Catholic Charities believes that every employee has the right to work in an environment free from sexual harassment. Accordingly, any form of sexual harassment is strictly prohibited. Any employee found to have acted in violation of this policy would be subject to appropriate disciplinary action, which may include termination of employment.

"Sexual harassment" includes unwelcome sexual advances, requests for sexual favors, sexually motivated physical contact or other verbal or physical conduct or communication of a sexual nature when:

Submission to that conduct or communication is made a term or condition, either explicitly or implicitly, of obtaining employment;

Submission to or rejection of that conduct or communication by an individual is used as a factor in decisions affecting that individual's employment; or

That conduct or communication has the purpose or effect of substantially interfering with an individual's employment or creating an intimidating, hostile or offensive employment environment; and the employer knows or should know of the existence of the harassment and fails to take timely and appropriate action.

Such behavior includes inappropriate remarks of a sexual nature.

If an employee believes he or she has been sexually harassed or offended by another employee, a supervisor or management person, a customer/client or any other person whom the employee encounters in the course of employment, whether the opposite or same sex, or if an employee observes suspected harassment, and the employee does not wish to deal with the problem directly, the employee should report the conduct to his or her supervisor, the Division Director, or the Director of Human Resources.

Any claims of sexual harassment or violations of the sexual harassment policy will usually be investigated by the Director of Human Resources unless another individual is more appropriate. If the facts appear to support a violation of this policy, appropriate action will be taken, up to and including termination of employment.

If the sexual harassment reoccurs, it should be immediately reported to any of the individuals listed above. Catholic Charities does not tolerate any retaliation or intimidation directed towards anyone who makes a complaint.

This policy applies to each and every employee of Catholic Charities, including full-time, part-time, temporary and on-call employees.

Paul Martodam, Chief Executive Officer

Date

Mary K. Jerome, Human Resources Director

Date

VI. REASONABLE ACCOMMODATION STATEMENT

Catholic Charities shall make a reasonable accommodation to the physical and mental limitations of an employee or applicant unless such an accommodation would impose an undue hardship on the operation of the business.

VII. STATEMENT OF FAIR COMPENSATION

In offering employment or promotions to disabled individuals, Catholic Charities shall not reduce the amount of compensation offered because of any disability income, pension, or other benefit the applicant or employee receives from another source.

VIII. PRE-EMPLOYMENT MEDICAL EXAM

Catholic Charities may require a comprehensive medical exam after a conditional offer of employment. The results of such an examination will not be used to screen out qualified disabled individuals. Information obtained in response to such inquiries or examination shall be kept confidential except that:

- (a) On a “need to know” basis, supervisors and managers may be informed regarding restrictions on the work or duties of disabled individuals and regarding accommodations,
- (b) first aid and safety personnel may be informed, where and to the extent appropriate, if the condition might require emergency treatment, and
- (c) officials, employees, representatives, or agents of the Minnesota Department of Human Rights or local human rights agencies investigating compliance with the act or local human rights ordinances shall be informed if they request such information.

IX. EEO/AA COORDINATOR RESPONSIBILITIES ASSIGNMENT OF RESPONSIBILITY FOR AFFIRMATIVE ACTION PROGRAM

Catholic Charities designates Mary K. Jerome, Director of Human Resources to monitor all employment-related activity to ensure that the Agency's EEO/AA policies are being carried out. She will be given the necessary top management support and staffing to fulfill the duties of the position. Human Resources staff members will assist in the responsibilities. Duties are outlined, but are not limited to the following:

- A. Develops the Agency's EEO/AA policy statement and Affirmative Action Plan/Program, consistent with the Agency's policies, and establishes affirmative action goals and objectives.
- B. Implements the Affirmative Actions Plan/Program including internal and external dissemination of Agency's EEO/AA policies and plan.
- C. Conducts and/or coordinates EEO/AA training and orientation of Agency's supervisors, managers, and subcontractors to inform them of their responsibilities pursuant to the Affirmative Action Plan/Program.
- D. Ensures that managers and supervisors understand it is their responsibility to take action to prevent the harassment of protected class employees and applicants for employment.

- E. Holds regular discussions with administrators, project managers, supervisors and employees to ensure Agency's equal opportunity policies are being followed.
- F. Ensures all minorities, women and disabled employees are provided equal opportunity as it relates to agency-sponsored training programs, recreational/social activities, benefit plans, pay and other working conditions without regard to race, sex, color, disabled, etc.
- G. Reviews the qualifications of all employees to ensure that minorities, women, disabled employees and other protected classes are given full opportunities for transfers and promotions. When a position becomes open due to a termination, or a new position is created, the qualifications and physical requirements of the job are reviewed and modified if possible, to better attract and accommodate disabled candidates to the greatest extent possible.
- H. Periodically audits agency's policies and practices to remove impediments to the attainment of goals and objectives.
- I. Designs, implements and maintains EEO audit, reporting and record systems which measure the effectiveness of the Agency's Affirmative Action Plan/Program, determines whether or not Agency's goals and objectives have been attained and makes available to appropriate enforcement agencies.
- J. Maintains, monitors and measures the Agency's progress toward meeting its affirmative action goals.
- K. Identifies problem areas and recommends solutions to the problems.
- L. Coordinates the implementation of necessary remedial actions to meet compliance requirements and goals.
- M. Serves as liaison between the Agency and relevant or applicable governmental enforcement agencies.
- N. Serves as liaison between protected groups and the Agency.
- O. Coordinates recruitment and employment of women, minorities, persons with disabilities and other protected classes.
- P. Coordinates recruitment and utilization of women, businesses owned by minorities, disabled people and other protected classes.
- Q. Receives, investigates and attempts to resolve all EEO complaints.
- R. Keeps managements informed of latest developments in area of EEO.
- S. Monitors subcontractors and work sites to ensure compliance in such areas as:
 1. Proper employment of women and minorities.
 2. Proper posting of EEO posters.
 3. Female and minority employees working conditions are free from harassment and intimidation.

X. DISSEMINATION OF AFFIRMATIVE ACTION POLICY AND PLAN

The Agency's Equal Employment Opportunity/Affirmative Action (EEO/AA) policy will be adequately disseminated by Catholic Charities both internally and externally. Some methods used are outlined below:

A. INTERNAL DISSEMINATION

1. The policy statement and non-discrimination posters will be permanently posted and conspicuously displayed in areas available to employees and applicants for employment such as employee bulletin boards, lunchrooms, etc., throughout the Agency's sites.
2. The EEO/AA policy statement will be published in the Agency's newsletters, magazines, and communicated to employees in the same way that other major personnel policies or decisions are communicated to employees.
3. A statement describing the Agency's equal employment policy will be included in the Agency's Human Resources policies.
4. All executive, management and supervisory personnel will be furnished a full copy of the Affirmative Action Plan and amendments.
5. Each employee will be furnished a copy of the policy statement and have access to the Affirmative Action Plan. The policy will be made available to all employees including full-time, part-time, temporary and on-call employees.
6. Orientation and training sessions will be conducted to thoroughly inform all employees and management of the Agency's EEO/AA commitment and AAP and of individual responsibility for effective implementation.
7. Disseminate EEO/AA policy by including the words, "Equal Opportunity Employer/Affirmative Action," in all advertising in the news media, specifically including minorities, females and persons with disabilities for news media.
8. Review Agency's EEO/AA policies with all employees and management at least once a year.
9. Picture diverse groups when employees are featured in advertising, employee handbooks or similar publications.
10. A statement describing the Agency's equal opportunity employment policy will be included in any collective bargaining agreement.

B. EXTERNAL DISSEMINATION

1. The Agency will notify all recruitment sources, to include labor unions of its EEO/AA policies and encourage them to actively recruit and refer women, people of color and persons with disabilities to assist it in achieving its affirmative action objectives.

2. The Agency will inform current and potential sources of workforce supply, including but not limited to, employment agencies, community action agencies, community leaders, schools, colleges, churches, or missions frequented by protected class persons, organizations of protected class persons, and the news media of our EEO/AA policies.
3. Include the statement "Equal Opportunity Employer and Service Provider" or "Affirmative Action Employer and Service Provider" on all company stationery letterhead, purchase orders, leases, contracts and in advertisements recruiting employees and on employment applications.
4. Will picture diverse groups in consumer or help wanted advertising.
5. Communicate to prospective employees the existence and contents of the Affirmative Action Plan and policies.
6. Notify subcontractors, vendors and suppliers of the Agency's EEO/AA policies.

XI. RECRUITMENT OF EMPLOYEES

- A. Catholic Charities advertisements for employees will state that all qualified applicants will receive consideration for employment regardless of their race, creed, color, religion, sex, national origin, age, marital status, disability, status with regard to public assistance, sexual or affectional preference or orientation, ancestry, familial status, or any other legally protected group. When needed, "help wanted" advertising will also be placed in "protected class" oriented news media. Copies of all advertisements for employees will be kept on file for review by enforcement agencies.
- B. Catholic Charities will not indicate, in help wanted advertisements, a preference, limitation, specification, or discrimination based on sex unless sex is a bona fide occupational qualification (BFOQ) for a particular job involved.
- C. Catholic Charities will contact minority, female and community organizations and agencies serving the disabled, requesting potential employees. We will keep documentation of all contacts made and responses received. When seeking to fill specific openings, it will give these agencies a reasonable amount of time to locate and refer applicants prior to the closing date for receipt of applications.
- D. Active recruiting programs, where applicable, will be carried out at secondary schools, community colleges, and colleges with predominantly diverse enrollments. Recruiting efforts at all schools will incorporate efforts to reach minority, females and disabled persons. All positions for which we advertise externally will be listed with State of Minnesota Workforce Centers, Americas Job Bank, or similar governmental agencies.
- E. Catholic Charities will make job opportunity information equally available to potential applicants from both protected and non-protected class groups, unless there is a BFOQ for a particular job.
- F. We will encourage present minority, female and disabled youth to recruit other employees.
- G. We will take additional steps to encourage the employment of women, minorities and persons with disabilities who are not currently in the workforce, such as providing part-time employment, internships, or summer employment.

XII. INTERNAL EEO COMPLAINT PROCEDURE

Catholic Charities believes that fair and equitable treatment of employees, volunteers and others is essential to fulfilling our mission. Therefore, Catholic Charities will not discriminate against any employee or applicant based upon race, color, creed, religion, sex, ancestry, national origin, age, disability, political affiliation, sexual orientation, income, status as a disabled veteran or a veteran of the Vietnam conflict.

The recruitment and staffing policies and practices of Catholic Charities are designed to affirmatively seek to recruit, hire, assign, promote and otherwise maintain employees without discrimination. Catholic Charities will not discharge, threaten or otherwise discriminate against or penalize an employee because the employee in good faith reports a violation of the law to Catholic Charities, or a governmental body or law enforcement agency.

PREVENTION OF HARASSMENT POLICY

Catholic Charities is committed to providing a work environment free from unlawful harassment. Harassment based upon a person's race, color, religion, gender, national origin, age, disability, creed, marital status, income, status with regard to public assistance or sexual orientation is unlawful under federal, state and/or local laws and will not be tolerated.

Harassment toward any employee or volunteer of Catholic Charities will not be tolerated. If investigation of a complaint of harassment produces evidence that such behavior has occurred, appropriate disciplinary or other action will be taken, up to and including termination of employment. All employees are expected to treat their co-workers, volunteers, direct reports and supervisors with respect at all times.

Harassment occurs when an individual shows hostility or aversion toward an individual because of their race, color, religion, gender, national origin, age, disability, creed, marital status, and income, status with regard to public assistance or sexual orientation and has the purpose or effect of creating an intimidating, hostile or offensive work environment that unreasonably interferes with an individual's work performance.

The following examples may constitute harassment, depending on the circumstances, and are intended to provide clarification, although they are not inclusive of all forms of possible harassment:

- Epithets, slurs, negative stereotyping or threatening, intimidating or hostile acts that relate to race, color, religion, gender, national origin, age, disability, creed, marital status, income, status with regard to public assistance or sexual orientation;
- Written or graphic material that denigrates, shows hostility or aversion toward an individual or a group because of race, color, religion, gender, national origin, age, disability, creed, marital status, income, status with regard to public assistance or sexual orientation that is placed on walls, bulletin boards or elsewhere on the agency's premises.

Sexual Harassment

One specific form of prohibited harassment is sexual harassment. It is the policy of Catholic Charities to abide by the federal, state and local laws that prohibit sexual harassment and to maintain an employment atmosphere free of sexual harassment, intimidation or coercion.

The following are some examples of conduct, which may be sexual harassment:

- Use of offensive or demeaning terms that have sexual connotations;
- Objectionable physical closeness, behavior, actions or contact;
- Unwelcome suggestions regarding, or invitations to, social engagements or work-related social events;
- Any indication, expressed or implied, that an employee's job security, job assignment, conditions of employment or opportunities for advancement may depend on the granting of sexual favors;
- Any action relating to an employee's job status which is in fact affected by consideration of the granting or refusal of social or sexual favors;
- Deliberate or careless creation of an atmosphere of sexual harassment or intimidation;
- Deliberate or careless jokes or remarks of a sexual nature to or in the presence of any employee who may find the remarks or jokes offensive;
- Showing or sending materials (such as cartoons, articles, picture, etc.), whether by written or electronic communications, of a sexual nature to employees who may find such materials offensive.

Scope of This Policy

This policy covers all employees. Catholic Charities will not tolerate harassment of any nature, whether engaged in by fellow employees, supervisors, volunteers; or by other non-employees who conduct business with the agency. In addition, the agency will not tolerate harassment engaged in by an individual who is not an employee of the agency (e.g., clients, outside vendors, affiliated organizations and suppliers) to the extent that it affects any employee of Catholic Charities.

Reporting Harassment

Catholic Charities encourages reporting of all incidents of harassment, regardless of who the offender may be. Reports of sexual harassment may be brought to the Human Resources Department, or to any manager or supervisor. If the person to whom harassment would normally be reported is the individual accused of harassment, reports may be made to any other manager or supervisor. All managers and supervisors are required to notify the Director of Human Resources, who is responsible to review and investigate sexual harassment complaints when a report is received. Human Resources will respond to the greatest extent possible to reports of sexual harassment brought anonymously. However, the response to such reports may be limited if information contained in the report cannot be verified during the course of the investigation. Catholic Charities will investigate any incident of alleged harassment by a person who is not an employee of the agency to the extent practical and will take any action it deems appropriate after evaluating all the circumstances. The agency will take any action necessary to stop the conduct and, if not stopped, the agency will terminate its relationship with the clients, outside vendors and suppliers, if appropriate.

How To Report A Complaint or Concern

a) *Early Resolution*

Catholic Charities encourages individuals who believe they are being harassed to clearly and promptly notify the offender that his/her behavior is unwelcome. If for any reason an individual does not wish to approach the offender directly or if such discussion does not successfully end the harassment, then the individual should notify their supervisor and/or Human Resources who will talk to the alleged harasser or arrange for mediation between the individual and the alleged harasser with a third person acceptable to both. This early resolution procedure is not a required first step for the reporting individual.

b) Formal Procedure

In the event that the employee does not wish to pursue the informal procedure, or in the event that the informal procedure does not produce a satisfactory result, the following steps should be followed to report the sexual harassment complaint and to initiate a formal procedure. Prompt reporting of complaints is strongly encouraged, since it enables Human Resources to investigate the facts, determine the issues and provide an appropriate resolution, including any necessary disciplinary action.

i.) Notification of a Member of the Staff

An individual who believes he or she has been subjected to harassment should immediately report the incident to their supervisor, and/or Human Resources. If reporting to any of these is not possible the employee should inform the Vice President of Finance and Administration or CEO immediately.

iv) Protection Against Retaliation

Catholic Charities will not retaliate against an individual who makes a report of sexual harassment, nor permit any employee to do so. Retaliation, such as threats and intimidation, is a very serious violation of this policy and should be reported immediately.

Investigation of the Formal Complaint

Generally, the Director of Human Resources will coordinate any investigation of an allegation of harassment. However, if the allegation involves the Human Resources Department, the Office of the CEO will coordinate the investigation. An external investigator may be used if appropriate.

Confidentiality

Any allegation of harassment brought to the attention of a supervisor, Human Resources and/or the Vice President of Finance and Administration will be promptly investigated. Confidentiality will be maintained throughout the investigation process to the extent possible and appropriate under the circumstances.

Sanctions for Harassment

Individuals found to have engaged in misconduct constituting harassment shall be disciplined. In addressing incidents of harassment, Catholic Charities' response at a minimum will include disciplining the offender and preparing a written record. Additional action may include referral for counseling or termination of employment.

If an investigation results in a finding that the reporting individual falsely and maliciously accused another of sexual harassment, the reporting individual will be subject to appropriate discipline including the possibility of termination of employment..

Appeals Process

If either party directly involved in a harassment investigation is dissatisfied with the outcome or resolution, that individual has the right to appeal the decision. The dissatisfied party should submit written comments in a timely manner to the Human Resources Director.

The Vice President of Finance and Administration will review the objecting employee's position

and the entire record and present their findings within 10 business days of receiving the written objection.

XIII. Workforce Analysis – Narrative of Goals and Timetables

At the present time, there is no underutilization in any job group. Therefore, we will continue to monitor all employment practices to continue these results, and make specific good faith efforts to exceed the availability percentages for minorities or women whenever possible. We will also continue our efforts to recruit and retain individuals with disabilities in all levels of our workforce.

XIV. PROBLEM AREA IDENTIFICATION AND ANALYSIS

Catholic Charities periodically conducts an in-depth analysis of its total employment process to determine whether and where impediments to equal employment opportunity may exist. We routinely conduct adverse impact testing to analyze all of our personnel activities. We evaluated:

1. Workforce composition – We have identified no underutilization of women or minorities in our current workforce. We will continue to monitor our workforce composition to ensure that no problems arise.
2. Applicant flow composition - applicant flow process is consistent agency wide.
3. Total selection process – No deficiencies.
4. Transfer and promotion practices – No deficiencies.
5. Organization facilities and employer-sponsored activities - No deficiencies.
6. Seniority practices – No deficiencies.
7. Internship programs – No deficiencies.
8. Employer training programs – Minorities, female, and disabled employees are given full opportunity to participate in all organization sponsored education and training programs. No deficiencies.
9. Termination Process – Catholic Charities uses progressive discipline before terminating an employee, where appropriate.

Update on Goals Established by Catholic Charities AAP in 2006

1. In 2006 Catholic Charities reported underutilization of minorities (4) in the service worker category, a female (1) in the IT Department, and females (2) and minorities (2) in the Professional category. Catholic Charities met the hiring goals that it established for those categories and eliminated the underutilization.
2. Catholic Charities reported disability information in its 2006 AAP and provided limited disability information in this report. Catholic Charities remains committed to meeting its hiring obligations and fully understands that it needs to work toward the 8% goal required by the City of Minneapolis.

XV. INTERNAL AUDIT AND REPORTING SYSTEM

The EEO/AA Officer, Mary K. Jerome, will continue to monitor applicant flow, hiring, promotions, terminations, training, and the overall function of internal audit and reporting. Semi-annual reports will be forwarded to the Minnesota Department of Human Rights.

Applicant flow is reported by a potential employee filling out a self-report. These voluntary reports are kept confidential by the HR Department.

Terminations are discussed with, the supervisor and Mary K. Jerome, Human Resource Director. Prior to a termination, warning letters and individual meetings are usually conducted unless the situation calls for immediate termination, e.g., gross misconduct.

XVI. SIGNATURES

We have prepared this Affirmative Action Plan for Catholic Charities. We agree to carry out the terms and conditions of this Affirmative Action Plan.

Paul Martodam, Chief Executive Officer

Date

Mary K. Jerome, Human Resources Director

Date

Section XVII – ATTACHMENTS
