

It is the policy of Gordon Flesch Company that equal employment opportunity be provided in the employment and promotion for all persons regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity (as defined in Wisconsin State Statute s.111.32 (13M) as "... having a preference for heterosexuality, homosexuality, or bisexuality, having a history of such a preference or being identified with such a preference) and status as a protected veteran or individual with a disability at all levels of employment, including the executive level. Gordon Flesch Company does not and will not discriminate against any applicant or employee regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as a protected veteran and/or individual with a disability to any position for which the applicant or employee is qualified. In addition, Gordon Flesch Company is committed to a policy of taking affirmative action to employ and advance in employment qualified individuals to achieve a balanced workforce. Such affirmative action shall apply to all employment practices, including, but not limited to hiring, promotion, demotion or transfer, recruitment, recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship and on-the-job training. Decisions related to personnel policies and practices shall be made on the basis of an individual's capacity to perform a particular job and the feasibility of any necessary job accommodation. Gordon Flesch Company will make every effort to provide reasonable accommodations to any physical and mental limitations of individuals with disabilities and to disabled veterans.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any activity protected by state, federal or local anti-discrimination laws including the following activities:

(1) Filing a complaint;

(2) Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA) or any other Federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) or any other federal, state or local law requiring equal opportunity for disabled persons;;

(3) Opposing any act or practice made unlawful by VEVRAA or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or section 503 or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled persons; or

(4) Exercising any other right protected by VEVRAA or Section 503 or their implementing regulations.

Our obligations in this area stem from not only adherence to various state and federal regulations, but also from our commitment as an employer in this community to provide job opportunities to all persons regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as

a protected veteran or an individual with disability. Gordon Flesch Company's EEO policy and affirmative action obligations include the full support from the VP of Shared Services, Brad Olm who is responsible for planning and implementing our affirmative action plan. All personnel who are responsible for hiring and promotion employees and for the development an implementation of programs or activities are charged to support this program. They shall provide leadership in implementing affirmative action goals and initiatives.

Gordon Flesch Company will also continually design and implement audit and reporting systems that will measure the effectiveness and the compliance of the AAP, identify the need for remedial actions, determine if objectives were attained, and determine if opportunities to participate in company-sponsored activities were extended to all employees and applicants.

The Gordon Flesch Company is also committed to abiding with the Pay Transparency Nondiscrimination Provisions and therefore, will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. The Gordon Flesch Company's employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the Gordon Flesch Company's legal duty to furnish the information.

It is also Gordon Flesch Company's policy not to discriminate because of a person's relationship or association with a protected veteran. This includes spouses and other family members. Also, Gordon Flesch Company will safeguard the fair and equitable treatment of protected veteran spouses and family members with regard to all employment actions and prohibit harassment of applicants and employees because of their relationship or association with a protected veteran.

During the life of the contract with the State of Wisconsin, Gordon Flesch Company shall comply with S.16765, Wis, Stats., state regulations and federal laws relating to equal employment opportunities and affirmative action. The company shall continue to work cooperatively with government and community organizations to take affirmative action to ensure equal employment and advancement opportunities.

If you have any questions regarding our equal employment opportunity, harassment policies or the complaint procedure, you may contact your local Human Resources representative. The Affirmative Action Plan may be reviewed, as appropriate, by contacting the Human Resources Department.



(Signature)

Brad Olm
VP of Shared Services