

PURPOSE:

To demonstrate Chatham Area Transit Authority's (CAT) commitment to Equal Employment Opportunity (EEO) and the company's affirmative action initiatives.

DEFINITIONS:

Covered Veteran- disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans, and armed forces service medal veterans.

SPECIFICS:

A. General

Chatham Area Transit Authority is dedicated to the principle of equal employment opportunity for all employees and prospective employees and to the employment and advancement of people based upon their individual qualifications, skills and abilities. We are committed to the creation of a work environment in which employees can perform their jobs and pursue their careers free from discrimination and harassment and without regard to their:

- race
- color
- religion
- sex
- pregnancy
- national origin
- disability
- age
- veteran status
- sexual orientation
- gender identity
- genetic information
- membership in any other class protected by applicable federal, state, local or foreign anti-discrimination law

To implement this commitment to equal employment opportunity, CAT adheres to the following practices:

- to recruit and hire the most qualified individuals based upon a fair and objective assessment of their skills, abilities, experience and other relevant non-discriminatory factors;
- to make decisions about promotions and advancement based solely upon valid job-related requirements;
- to make opportunities for training, education, transfers, promotions and other developmental opportunities for advancement available to all employees on a non-discriminatory basis.

B. Affirmative Action Initiatives

CAT takes affirmative action to ensure that it recruits applicants and seeks employees without regard to their race, color, religion, sex, pregnancy, national origin, disability or status as a Covered Veteran, and to ensure that employees are treated without regard to their race, color, religion, sex, pregnancy, national origin, disability or status as a Covered Veteran in connection with employment, promotion, upgrading, demotion, transfer, layoff, termination, selection for training or compensation. CAT

- Affirmative Action Initiative for Women and Minorities. CAT is required to maintain affirmative action initiative for minorities and women to the extent required by 49 C.F.R. Part 21.
- Affirmative Action Initiative for Individuals with Disabilities. CAT is required to maintain an affirmative action plan for individuals with disabilities as required by 49 C.F.R. Part 27, and must otherwise comply with their reporting and other obligations under the Rehabilitation Act of 1973.
- Affirmative Action Initiative for Veterans. CAT maintains an affirmative action initiative for disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans, and armed forces service medal veterans

C. Non-Discrimination in Employment

CAT does not tolerate discriminatory treatment of employees or prospective employees based upon their race, religion, color, national origin, sex, pregnancy, age, disability, sexual orientation, gender identity, status as a veteran or membership in any other class protected by applicable law from discrimination in employment. CAT adheres to a policy of non-discrimination with respect to all aspects of its employment policies and practices, including, without limitation, recruitment, hiring, promotion, pay, discharge, layoff, opportunities for advancement, discipline, and all other terms, conditions and privileges of employment.

D. Workplace Harassment

An important part of CAT's policy on equal employment opportunity involves our commitment to take reasonable measures to prevent workplace harassment based upon an employee's race, religion, color, national origin, sex, pregnancy, age, disability, sexual orientation, gender identity or status as a veteran. When CAT receives a complaint of workplace harassment, CAT's policy is to respond in a prompt and effective manner in order to prevent a recurrence of such harassment that is unlawful or is in violation of this policy. The policies and practices of CAT and all its associated contractors must comply with the standards set forth in the Code of Business Conduct and must provide for a procedure that enables employees to report incidents of unlawful harassment without fear of reprisal.

E. Accommodation of Disabled Employees

CAT follows a policy of providing reasonable accommodations for qualified individuals with mental or physical disabilities, as required by the Americans with Disabilities Act of 1990 (as amended), the Rehabilitation Act of 1973 (as amended), and other applicable state or local laws, taking into account the limitations of undue hardship and risks to the health and safety of disabled individuals and others. Where a job or work assignment is subject to health or medical standards required for assignments or deployments in support of the military, this policy does not require employment of an employee or prospective employee who cannot satisfy those standards.

Employees may request an accommodation by contacting the HR department at 912-629-3906 or hr@catchacat.org.

F. Accommodation of Religious Practices

CAT will consider requests by employees and prospective employees for accommodation of their sincerely held religious beliefs or practices unless the requested accommodation is unreasonable, would create an undue hardship or would infringe upon other employees' rights.

G. Preferential Treatment

Nothing in this policy is intended to entitle any employee or prospective employee to preferential treatment because of his or her race, color, religion, sex, pregnancy, national origin, disability, age, veteran status, sexual orientation or gender identity.

H. Third Parties in the Workplace

- Discrimination and harassment of CAT employees by consultants, contract employees or other individuals employed by a subcontractor, supplier, vendor or other entity in the workplace should not be tolerated. When notified of any such conduct, management should take prompt and effective action to eliminate and prevent the recurrence of the offending conduct.
- When dealing with consultants, contract employees or other individuals employed by a subcontractor, supplier, vendor or other entity in the workplace, CAT personnel are expected to treat such individuals on a non-discriminatory basis and avoid conduct that would constitute discrimination or harassment that is unlawful or in violation of this policy.

I. Reporting and Retaliation

Individuals who believe that they have been subjected to discrimination or harassment that is unlawful or in violation of this policy should promptly report it to the EEO Officer, Ethics and Compliance Hotline, Human Resources Department or contact Compliance Department. **Reports may be made anonymously and will be treated in a confidential manner.**

Human Resources: 912-629-3906 or hr@catchacat.org
Compliance Department: 912-629-3958 or david.stearns@catchacat.org

Ethics and Compliance Hotline

Website: www.lighthouse-services.com/catchacat

Toll-Free Telephone:

- English speaking USA and Canada: **833-222-3243**
- Spanish speaking USA and Canada: **800-216-1288**
- Spanish speaking Mexico: **01-800-681-5340**
- French speaking Canada: **855-725-0002**

E-mail: reports@lighthouse-services.com

(must include company name with report)

Fax: (215) 689-3885 *must include company name with report*

CAT prohibits any form of retaliation or reprisal against any employee because he or she reported, tried to report, or assisted in the reporting of conduct or opposed taking any action that he or she in good faith believed to be in violation of this policy or the equal employment opportunity and nondiscrimination laws of any federal, state and local in which CAT operates.

J. Responsibility

a. EEO Officer and Human Resources

The EEO Officer and Human Resources department are responsible for complying with federal, state and local equal employment opportunity laws and for implementing the Affirmative Action Program, which includes equal employment practices, program monitoring and internal reporting. In addition, Board members, the CEO, Divisional Chiefs and all others in management positions are responsible for administering this policy.

b. Employees

The continued success of this policy and our EEO/Affirmative Action Initiatives requires maximum cooperation from every employee throughout our organization. Equal

employment opportunity is not only a CAT principle, it's the law. Full cooperation is expected from everyone to achieve this goal.

Employees who believe that they have not been treated in accordance with this policy are encouraged to contact their immediate supervisor, the EEO Officer, HR Department, Ethics and Compliance Hotline, or the Compliance Department.

REFERENCES:

- Equal Pay Act of 1963, 29 U.S.C. 201
- Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d
- Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e
- Age Discrimination in Employment Act of 1967, 29 U.S.C. 633a
- Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794
- 28 CFR Part 42, Subpart F, "Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs"
- 29 CFR Part 1605, "Guidelines on Discrimination Because of Religion"
- 29 CFR Part 1606, "Guidelines on Discrimination Because of National Origin"
- 29 CFR Part 1607, "Uniform Guidelines on Employee Selection Procedures"
- 29 CFR Part 1620, "The Equal Pay Act"
- 29 CFR Part 1625, "Age Discrimination in Employment Act"
- 49 CFR Part 21, "Nondiscrimination in Federally Assisted Programs of the Department of Transportation Effectuation of Title VI of the Civil Rights Act of 1964"
- 49 CFR Part 27, "Nondiscrimination on the Basis of Handicap in Financial Assistance Programs"
- FTA C 4704.1A, FTA EEO Circular
- Part II, Section 110(a) of the FTA Standard Grant Contract, dated 9-87
- CAT's Equal Employment Opportunity Program

APPLIES TO:

All CAT employees and Departments.

ATTACHMENTS:

EEO Complaint Form