

HEALTH RESEARCH, INC.

HRI POLICY AND PROCEDURE MANUAL

AFFIRMATIVE ACTION

EQUAL EMPLOYMENT OPPORTUNITY POLICY

SECTION 4.18

Health Research, Inc. is committed to the principle of non-discrimination in all phases of its employment procedures and practices. Affirmative action, in the area of equal employment opportunity, is an extension of this commitment. Recruitment, training & education, promotions, compensation, benefits, layoffs and return to work practices must be handled without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, creed, age, disability, pregnancy-related condition, military or veteran status, marital or familial status, domestic violence victim status, citizenship status, genetic information, individual's relationship or association with a member of a protected category or any other basis protected by applicable state and federal law. Affirmative action requires outreach activities to identify qualified candidates among protected class members so they may be considered among other candidates for available positions in the organization.

In our effort to develop our Affirmative Action Program, we hereby reaffirm and formalize our commitment to the principles of equal employment opportunity.

This organization's policy is to ensure equal employment opportunity for all, without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, creed, age, disability, pregnancy-related condition, military or veteran status, marital or familial status, domestic violence victim status, citizenship status, genetic information, individual's relationship or association with a member of a protected category or any other basis protected by applicable state and federal law. While this document should not be considered an employment contract with Health Research, Inc., we view the principle of Equal Employment Opportunity as a vital element in the employment process and as a hallmark of good management.

In developing our Affirmative Action Program, we commit ourselves to:

Recruiting, hiring, training, and promoting persons in all job classifications without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, creed, age, disability, pregnancy-related condition, military or veteran status, marital or familial status, domestic violence victim status, citizenship status, genetic information, individual's relationship or association with a member of a protected category or any other basis protected by applicable state and federal law.

- Ensuring that promotion decisions are in accordance with equal employment requirements by imposing only valid, job-related requirements for promotional opportunities.
- Ensuring that all personnel transactions relating to compensation, benefits, discipline, transfers, terminations, training, and education are administered in a non-discriminatory manner.
- Ensuring that decisions relating to appointments are made in a non-discriminatory manner.
- Ensuring that HRI 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.
- Achieving a representative work force, with respect to protected classes, by applying this policy to every decision-making opportunity in the organization.
- In developing the Affirmative Action Plan, we have established goals and timetables to correct any deficiencies over a reasonable period of time.

It is our desire that the combination of measurable goals and directed effort will make equal employment opportunity a fact at this facility.

In compliance with Executive Order 11246, the Rehabilitation Act of 1973 and the Vietnam Era Veterans Readjustment Assistance Act of 1974, we maintain written Affirmative Action Programs. The non-confidential elements of these Programs are available upon request, through the Human Resources Department during normal business hours.

Health Research, Inc. makes reasonable accommodations to the physical and mental limitations of qualified individuals with disabilities and qualified protected veterans, unless the accommodation would impose an undue hardship.

Health Research, Inc. will take all necessary steps to ensure that no person intimidates, threatens, coerces, or discriminates against any individual because that individual has filed a complaint, furnished information, or assisted or participated in any manner in an investigation, compliance review, hearing or other activity related to the administration of this Policy.

We maintain an audit and reporting system to measure the effectiveness of the Affirmative Action Program and the implementation of this Policy.

To ensure that our goals for equal employment opportunity may be achieved through our good-faith efforts, we have established levels of responsibility for both the direction and the implementation of our Affirmative Action Program. Overall responsibility for directing and implementing this Policy and the Affirmative Action Program has been assigned to the Corporate Director of Human Resources, Marianne Castelot.

Individual managers and supervisors are responsible for ensuring that employment decisions comply with the principles of Title VII of the Civil Rights Act, the Equal Pay Act, the Age Discrimination in Employment Act, the Rehabilitation Act of 1973, the Vietnam Era Veterans Readjustment Assistance Act of 1974, Executive Order 11246, the Americans with Disabilities Act, E.O. No. 50, and the NYS Human Rights Law.

Each employee is responsible for bringing to the attention of the Corporate Director of Human Resources or his/her designee, any employment decision which he or she feels conflicts with the letter or spirit of the law.

This policy communicates the Executive Director for Health Research, Inc.'s support and commitment to Equal Employment Opportunity. Each manager will be held accountable for assisting in the fulfillment of this commitment by prompt execution of necessary preventive, corrective, and affirmative actions.