



**Areté Associates**

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DATE: January 11, 2017

TO: Employees and Applicants for Employment

FROM: Lee Buchanan, President and CEO

RE: Areté Associates Reaffirmation of EEO/Affirmative Action Policy

Areté Associates reaffirms its commitment to providing Equal Employment Opportunity in its personnel policies and practices. It is Areté Associates' policy to recruit, hire, train and promote into all jobs levels, employees and applicants for employment without regard to race, color, religion, religious grooming practice, religious dress practice, pregnancy, sex (including perceived pregnancy, pregnancy, childbirth or related medical condition and breastfeeding), sexual orientation, gender identity or perceived sex or gender, gender expression, genetic information or characteristics (with respect to the applicant, employee, or a family member), national origin, ancestry, age, physical or mental disability, legally protected medical condition as defined under State law, marital status, domestic partner status, family care status, military caregiver status, veteran status, uniformed service, or other protected classification under federal, state, or local law. All such decisions are based on (1) individual merit, qualifications, and competence as they relate to the particular position, and (2) promotion of the principle of equal employment opportunity. All other personnel programs such as compensation, benefits, transfers, layoff, return from layoff, training, education, and social and recreational programs are administered without regard to any of the foregoing classifications ("Protected Categories").

In addition, Areté Associates is committed to providing a workplace free from harassment based on any of the classifications listed above, including sexual harassment. Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitute sexual harassment when submission to such conduct is made explicitly or implicitly a condition of an individual's employment or submission to or rejection of such conduct is used as a basis for an employment decision affecting the employee. No supervisor or manager shall threaten or insinuate, either explicitly or implicitly that an employee's submission to or rejection of sexual advances will in any way influence any personnel decision involving that employee.

Prohibited harassment includes conduct which has the purpose or effect of unreasonably interfering with the employee's work performance or creating an environment which is intimidating, hostile or offensive to the employee. Harassment based on a person's race is also prohibited. Individuals who believe they have been the victims of harassment or discrimination or believe they have witnessed such conduct should discuss their concerns with their immediate supervisor, area manager, Human Resources, or any member of the executive management team. Each complaint will be investigated and any violations will be remedied. Areté prohibits retaliation against any employee who has brought forth a complaint in good faith to the attention of the company.

Areté Associates certifies its commitment to providing Equal Employment Opportunity in its personnel policies and practices, and has developed and implemented an Equal Employment Opportunity Program to support its commitment to the principle of equal employment opportunity. Areté Associates is committed to complying with the regulations set forth in Executive Order 11246, as amended, Section 503 of the Rehabilitation Act of 1973, as amended, the Vietnam Era Veterans' Readjustment Act of 1974, as amended (38 U.S.C. 4212) and their implementing regulations. As part of our Affirmative Action Program the full Affirmative Action Program for Disabled Workers and qualified veterans shall be available for inspection by any applicant or employee upon request by appointment only. To view the plan, please make an appointment with Human Resources.

Areté Associates prohibits discrimination against females, minorities, qualified individuals on the basis of disability and veteran status, and requires affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified individuals with disabilities and qualified veterans.

Areté Associates complies with all provisions of Title VII of the Civil Rights Act of 1964 as amended, and of the rules, regulations and relevant orders of the Secretary of Labor. Areté Associates complies with all provisions of the state employment laws of AL, AZ, CA, CO, FL, VA, as well as the California Fair Employment and Housing Act of the State of California and local regulations hereinafter enacted. Sallie DiVincenzo, Chief Administrative Officer, has been appointed Corporate EEO Officer. She is responsible for administering the company's affirmative action program and will report to senior management on a continuing basis with regard to the progress being made under the Plan. Anyone having questions, comments or complaints regarding the company's equal and affirmative action policies should contact Sallie DiVincenzo at 520-571-8660.

Regards,

Lee Buchanan  
President and CEO