

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT
41 C.F.R. Section 60-741.44(a); 60-300.44(a)

The employment policy of CDS Life Transitions and all entities is to provide equal opportunity to all persons. Our company, therefore, has made a commitment to equal employment opportunity through a positive and continuing affirmative action program. No employee or applicant for employment will be discriminated against because of race, color, religion, sex, sexual orientation, gender identity, national origin, disability, military and/or veteran status, or any other Federal or State legally-protected classes.

CDS Life Transitions will recruit, hire, train and promote qualified individuals in all job titles, and ensure that all other personnel actions are administered without regard to race, color, religion, sex, sexual orientation, gender identity, military and/or veteran status, or disability in accordance with Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, as amended, and the Vietnam Era Veterans Readjustment Assistance Act of 1974, which require affirmative action to ensure equal opportunity in all aspects of employment. CDS Life Transitions does not discriminate on the basis of national origin or citizenship status as provided under the Immigration Reform and Control Act of 1986.

To further implement these policies, CDS Life Transitions will continue to:

- A. Base decisions on employment so as to further the principle of equal employment opportunity;
- B. Ensure that promotion decisions are in accordance with the principles of equal employment opportunity by imposing only valid requirements for promotional opportunities;
- C. Ensure that all personnel actions (including but not limited to compensation, benefits, transfers, layoffs, return from layoffs, company-sponsored training, education, tuition assistance, social and recreational programs) are administered without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability, military and/or veteran status, or any other Federal or State legally-protected classes.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

- A. Filing a complaint;
- B. Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of affirmative action and equal opportunity regulations;
- C. Opposing any act or practice made unlawful by affirmative action and equal opportunity regulations, including Federal, State, and local law;
- D. Exercising any other right protected by affirmative action and equal opportunity regulations.

Deborah Bean, VP of Inclusion, Engagement, and Diversity, has been designated EEO Coordinator and is responsible for compliance with State and Federal equal employment opportunity laws, and for implementing the affirmative action program, including equal employment practices, monitoring, and internal reporting. Employees believing they have not been treated in accordance with this policy are encouraged to contact Deborah Bean at 585.347.1273 during regular business hours. The affirmative action plan is available for review at Deborah Bean's office during the business hours of 8 a.m. to 5 p.m. by appointment. Employees and applicants wishing to self-identify as a protected veteran or individual with disability, including voluntarily updating their disability status, or to request a reasonable accommodation necessary for the performance of the essential functions of a job, may do so by contacting Deborah Bean.

This policy statement has the support of the Sankar Sewnauth, President Chief Executive Officer. The continued success of our Affirmative Action Program requires maximum cooperation from every employee throughout our organization. Equal employment opportunity is not only the law, but it is a principle of CDS Life Transitions.

“EEO is the Law” Poster Supplement

Employers Holding Federal Contracts or Subcontracts Section Revisions

The Executive Order 11246 section is revised as follows:

RACE, COLOR, RELIGION, SEX, SEXUAL ORIENTATION, GENDER IDENTITY, NATIONAL ORIGIN

Executive Order 11246, as amended, prohibits employment discrimination based on race, color, religion, sex, sexual orientation, gender identity, or national origin, and requires affirmative action to ensure equality of opportunity in all aspects of employment.

PAY SECRECY

Executive Order 11246, as amended, protects applicants and employees from discrimination based on inquiring about, disclosing, or discussing their compensation or the compensation of other applicants or employees.

The Individuals with Disabilities section is revised as follows:

INDIVIDUALS WITH DISABILITIES

Section 503 of the Rehabilitation Act of 1973, as amended, protects qualified individuals with disabilities from discrimination in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. Disability discrimination includes not making reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, barring undue hardship to the employer. Section 503 also requires that Federal contractors take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels of employment, including the executive level.

The Vietnam Era, Special Disabled Veterans section is revised as follows:

PROTECTED VETERANS

The Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212, prohibits employment discrimination against, and requires affirmative action to recruit, employ, and advance in employment, disabled veterans, recently separated veterans (i.e., within three years of discharge or release from active duty), active duty wartime or campaign badge veterans, or Armed Forces service medal veterans.

Mandatory Supplement to EEOC P/E-1 (Revised 11/09) “EEO is the Law” Poster.

If you believe that you have experienced discrimination contact OFCCP: 1-800-397-6251 | TTY 1-877-889-5627 | www.dol.gov.