



## BIO-NOMIC SERVICES, INC.

*Specializing in today's needs for environmental protection*

516 Rountree Road, Charlotte, NC 28217-2133

### AFFIRMATION OF EEO/AFFIRMATIVE ACTION POLICY

It is the policy of Bio-Nomic Services, Inc. to promote equal employment opportunities through a positive continuing program. This means that Bio-Nomic Services, Inc. will not discriminate against any employee or applicant for employment because of race, color, creed, religion, national origin, sex, age, mental or physical handicap, disability, or veteran status. The Company will take affirmative action to ensure that all employment practices are free of such discrimination.

To implement these policies, the Company will:

A. Recruit, hire, train, and promote persons in all job classifications without regard to race, color, creed, religion, national origin, sex, age, mental or physical handicap, disability, or veteran status.

B. Base its decisions on employment so as to further the principles of equal employment opportunity.

C. Ensure that all personnel actions, including but not limited to, hiring, upgrading, demotion, transfer, recruitment, advertising, selection, layoff, discipline, termination, employee benefits, rates of pay, training, and social recreation programs are administered without regard to race, color, creed, religion, national origin, sex, age, mental or physical handicap, disability or veteran status.

D. Ensure that promotion decisions are in accord with the principles of equal opportunity by imposing only valid requirements for promotion.

Equal employment opportunity is the law and the practice of this Company. I am personally committed to the goal of equal employment opportunity, and I expect each employee to cooperate to achieve this goal. To ensure that this policy is carried out I have named Jack Wales as the Equal Employment Opportunity Officer. As such, the Controller has the responsibility for the initiation and administration of the affirmation action plan. Any employee or applicant wishing to review the affirmative action plan should contact the Controller during regular office hours.

Sincerely,

Bio-Nomic Services, Inc.

Peter P. Fleetwood

President

## AFFIRMATIVE ACTION PLAN OF BIO-NOMIC SERVICES, INC.

### I. Purpose

The purpose of this Affirmative Action Plan is to comply with the Civil Rights Act of 1964, Executive Order 11246, and all applicable amendments. The program is designed to insure that specific procedures are applied in good faith to foster equal employment opportunity without regard for race, color, religion, national origin, age, sex or handicap. The program includes analyses of areas to determine whether or not Bio-Nomic Services, Inc. are deficient in the utilization of qualified minority people or females, so that good faith efforts will be directed to correct deficiencies at every level and in every segment of the act of the activities of Bio-Nomic Services, Inc.

### II. Statement of Policy

Bio-Nomic Services Inc. will administer their policies without regard to race, religion, sex, age, color, national origin, ancestry, or handicap, except where sex or age is a valid occupational qualification.

Bio-Nomic Services Inc. will comply with federal, state and local laws governing the equal employment opportunities employees and qualified applicants for employment.

Bio-Nomic Services Inc. will take affirmative action to insure that an increasing number of qualified members of minority groups and females, present in the employment.

Bio-Nomic Services Inc. will take affirmative action to insure that an increasing number of qualified members of minority groups and females, present in the employment areas of various company establishments are fairly evaluated for employment in various job classifications throughout the company.

### III. Responsibility for E.E.O. Policy

The Director of E.E.O. is responsible for overall administration of this program to assure that implementation of Bio-Nomic Services, Inc. Equal Employment Opportunity Policy.

The Director's responsibilities include:

1. Counsel division managers and management personnel on implementation of the company's Equal Employment Opportunity Policy.
2. Assure all recruiting sources are advised in writing of the corporate E.E.O. Policy.

3. Assist and counsel division managers in identifying areas of underutilization and establishing goals and timetables commensurate with the local area.
4. Conduct annual audits to insure compliance at each location.
5. Assure that required posters and notices are properly displayed.
6. Assure that all facilities are desegregated.
7. Disseminate the corporate E.E.O. Policy and assure that proper records are maintained internally at each location.
8. Assure that women and minorities have an equal opportunity to compete for any available position they are qualified to perform.
9. Disseminate the corporate E.E.O. Policy to the public.
10. Include in all orientation programs for new employees, corporate E.E.O. Policy.
11. Where possible, maintain an active association with local minority groups and women's organizations.

**IV. Publication of Policy and Compliance Program**

1. The E.E.O. Policy and Compliance Program will be communicated to all employees through employee publications, orientation programs, management training sessions, union representatives and labor union contracts.
2. The E.E.O. Policy statement and government E.E.O. posters and notices will be appropriately displayed.
3. Recruiting sources, advertising, employment agencies, schools, and colleges will be made aware of Bio-Nomic Services, Inc. commitment to hiring women or minority group employees under the corporate E.E.O. Policy
4. All purchase orders and sub-agreements shall contain an E.E.O. statement.

**V. Analysis of Employment**

1. Assist division managers in analyzing by job title or classification based on the labor statistics provided by the local employment services, to help determine the number of minorities, women, and potential age group applicants available in the local labor recruiting area if these figures are available.

2. Analyze current flow at each location, identifying women and minorities and protected age group applicants to determine the availability of these applicants.
3. Analyze all job titles to determine if minorities and women are being underutilized in any job classifications.
4. Compare the percentage of minorities and women in the present workforce with the workforce available in the immediate labor area.
5. Establish annual goals and timetables based on the above analysis, consistent with corporate policy statement on E.E.O. and the availability of applicants.

**VI. Job Classifications and Pay Scales**

1. Job descriptions and job requirements will be reviewed regularly to insure they do not discriminate against women or minorities.
2. Salaries and pay scales will be administered and regularly reviewed to assure that there are no differences in rates of pay based on an employee's race, color, age, religion, sex or national origin.

**VII. Affirmative Action**

Bio-Nomic Services Inc. are committed to take affirmative action to resolve the problem of underutilization of minorities and women. To this goal, the following points will be our guide.

1. We will continue to seek qualified women and minority applicants for all job categories and at all levels of employment.
2. We will continue to insure that schools, colleges, employment agencies and employment services are informed and understand our policy of Equal Employment Opportunity.
3. Standards for employment will be continually monitored to be certain that they are consistent with qualifications needed for satisfactory job performance.
4. Employment application forms will be reviewed to insure they conform with all legal requirements. All job applicants will be given an opportunity to fill out an application which will be held in an active status for six months from date of action.

5. Screening procedures, such as the interview, reference checks, and credit checks, will be conducted in accordance with applicable laws and personnel practices.
6. Bio-Nomic Services Inc. will insure that all qualified employees, including minorities and women receive equal consideration for opportunities for advancement, including promotions, salary increases, and transfers. In the event that reductions in the workforce become necessary, Bio-Nomic Services, Inc. will be certain that layoffs are made without regard to race, color, religion, age, sex or national origin.
7. As outlined in Analysis of Employment, Bio-Nomic Services, Inc. will periodically make reviews of underutilization of minorities and women. Included in the review will be:
  - a. Review will be made of the qualifications of all individual employees for selection, training, and/or advancement without discriminatory bias who are qualified for higher paying jobs.
  - b. Reasonable and appropriate objectives on a continuing basis for the upgrading of women and minorities will be an ongoing project. If the objectives cannot be met, good faith effort toward achievement will be shown.
  - c. Bio-Nomic Services, Inc. will make certain that promotional standards used in upgrading employees are realistically related to job requirements, and applied in a non-discriminatory manner.
8. All Bio-Nomic Services, Inc. facilities will continue to be maintained on a non-segregated basis.
9. Bio-Nomic Services, Inc. will support community educational, vocational training programs for minorities and women on an equal basis with all other employees and will take steps to inform the communities of this policy. Local media will be used to inform minorities and women of opportunities with Bio-Nomic Services, Inc.. All advertising will designate that Bio-Nomic Services, Inc. is an Equal Opportunity employer.
10. Each union contract will continue to contain a clause stating mutual obligation to assure non-discriminatory practices.
11. Bio-Nomic Services, Inc. are complying and will continue to comply with all reporting requirements of Executive Order 11246 and all applicable requirements of the Equal Employment Opportunity Commission and the Office of Federal Contract Compliance. Reports will be submitted to federal, state, or local agencies as they may be required by law. These reports will be made available for inspection by bona fide representatives of state and local compliance agencies.

### **VIII. Executive Order 11701 - Employment of Veterans**

Bio-Nomic Services, Inc. will continue their policy of recruiting and hiring qualified applicants who are veterans while striving to maintain the company's total affirmative action commitment to Equal Employment Opportunity for every job applicant.

### **IX. Affirmative Action for Employment of Handicapped Persons**

Bio-Nomic Services, Inc. will not discriminate against any employee or applicant because of physical or mental handicap in regard to any position for which the employee or applicant is qualified.

Bio-Nomic Services, Inc. will treat handicapped employees without discrimination in all employment practices and employee benefit programs. All qualified handicapped employees will be given equal consideration for advancement, including promotions and transfer.

### **X. Goals and Timetables**

Bio-Nomic Services, Inc. will strive to achieve the end of any underutilization of minorities and women working. To this end will undertake the following steps:

1. Continue our policy that minorities and women are in jobs where their training and abilities are appropriately utilized.
2. Examine pay scale relationships between women and men with the goal to equalize their status.
3. Where investigation reveal disproportionate ratios of women and minorities, set goals to correct this problem.
4. Bio-Nomic Services, Inc. will continue their open promotion policy. All promotional opportunities will be communicated to all employees. Objective selection procedures will be followed. They are: job requirements to be stated, evaluation of each candidate's qualifications, prepared reasons for selection of a specific candidate.
5. Where practical, women and minorities will be rotated in various job levels to provide developmental opportunities.
6. Women and minorities are encouraged to participate in study courses that would prepare them for future promotions.
7. Bio-Nomic Services, Inc. will actively recruit women and minorities for professional level jobs. To this end, a professional organization will be contacted for assistance.

8. Bio-Nomic Services, Inc. company's E.E.O. Policy will be communicated throughout the company. All officers, managers and supervisors will be aware of our policy and its meaning.
9. Auditing of all Bio-Nomic Services, Inc. company's personnel policies and procedures has been and continues to be an ongoing process. All policies and procedures will be periodically examined to assure that all employees are treated equally, without discrimination in all employment practices and employed benefit programs.
10. Specific timetables will be set for the preceding goals as soon as the annual analysis is completed.

BIO-NOMIC SERVICES, INC.

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Peter Fleetwood  
President