

EQUAL EMPLOYMENT OPPORTUNITY POLICY AND
AFFIRMATIVE ACTION PLAN

POLICY

"As President of Hoyle, Tanner & Associates, Inc., I am personally committed to the effective implementation of the company's Affirmative Action policy and program. I direct the full implementation, monitoring and enforcement of the program by all managerial and supervisory personnel, under the supervision of the Equal Employment Opportunity (EEO) Officer. Further, I direct that all designated personnel carry out their Affirmative Action responsibilities with the same dispatch and expertise normally applied to their regular job duties."

This firm will implement, monitor and enforce this Equal Employment Opportunity Policy and Affirmative Action Plan in conjunction with the applicable federal, state and local laws, regulations and executive orders listed below, as well as with the EEO contract provisions listed below:

- a) Civil Rights Act of 1964, as amended
- b) Presidential Executive Order 11375
- c) Title 23 U.S.C. 140
- d) Title 49 C.F.R. Part 23
- e) EEO Act of 1972
- f) Federal Aid Highway Acts
- g) Americans with Disabilities Act of 1990
- h) Public Act No. 91-58
- i) Civil Rights Act of 1991
- j) Governor's Executive Orders #3 and #17 *
- k) Connecticut Fair Employment Practices Act *
- l) Mayor's Executive Order 71, as amended by Executive Order 4, 7 and 23 **
- m) Ordinance 303-4, Art. 2 & 3 ***
- n) County Ordinance 82-37 ****
- o) State Executive Order #227, Governors Code of Fair Practice*****
- p) State Executive Order #246, Nondiscrimination for Disabled*****
- q) State Executive Order #240, Sexual Harassment*****

- * State of Connecticut
- ** New York City, New York
- *** City of Detroit, Michigan
- **** Metropolitan Dade County, Florida
- ***** State of Massachusetts

The firm will comply and submit documentation to substantiate efforts made and affirmative actions taken in an attempt to comply with the following EEO contract provisions contained in its contracts:

- 1) Specific Equal Employment Opportunity Responsibilities
- 2) Required Contract Provisions Federal Aid Construction Contracts
- 3) A (76) Affirmative Action Requirements
- 4) Training Special Provision
- 5) Minority Business Enterprises as Subcontractors
- 6) Standard Federal Equal Employment Opportunity Construction Contract Specification
- 7) Nondiscrimination Act

Further, the firm declares and understands that the sum of its Equal Employment Opportunity policy and Affirmative Action Plan comprises the policy and no person will be discriminated against or be denied the benefits of any activity, program or employment process receiving public funds.

This Policy applies to all persons, particularly those that are members of the protected classes based on race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information.

This firm will not discriminate against any person because of race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability, genetic information, religious creed, marital status, veteran status, national origin, ancestry, present or past history of mental disorder, learning disability or physical disability, including, but not limited to, blindness, except where any of the above is a bona fide occupational qualification or need.

It is the policy and practice of the firm to assure that no person will be discriminated against or be denied the benefits of any activity, program or employment process receiving public funds, in the areas of recruiting, advertising, hiring, upgrading, promoting, transferring, demoting, layoffs, terminations, rehiring, employment and/or rates of pay and other compensations.

In its pursuit of non-discrimination, the company will maintain no segregated facilities. The term "segregated facilities" means waiting rooms, work areas, rest and washrooms, restaurants and other eating areas, time clocks, locker rooms and other storage or dressing areas, parking lots, drinking fountains, recreation, transportation and housing facilities.

AFFIRMATIVE ACTION

The company has appointed and will continue to support an Equal Employment Opportunity (EEO) Officer whose responsibility it is to implement the company's Equal Employment Opportunity policy through a positive program of affirmative action designed to secure for the permanent and temporary company work force representative numbers of minority and female workers. The minority groups include, but are not necessarily limited to, Blacks, Hispanic (Latin American, Mexican, Puerto Rican), Asian, Pacific Islander, Oriental, American Indian, Native American, Alaskan Native and handicapped persons.

This firm will act positively and aggressively and take effective steps to attract job applications from minority groups and women, and to hire those who are qualified. We will work with minority organizations as a source of obtaining qualified minority applicants of both sexes. When an applicant is interviewed, he or she will be told at the time of the interview that they will be notified whether or not they are qualified.

All recruitment sources utilized by the company will be advised of the company's EEO Policy at the time of recruitment.

When appropriate, advertisements to fill job openings will be placed in newspapers circulated in minority group areas. All such advertisements will include the words: "An Equal Opportunity Employer".

In implementing this policy and ensuring that equal opportunity is being provided to protected class members, this firm will contact and request referrals from a standing list (see Exhibit I-a following) of minority and women organizations, referral sources and minority media, as appropriate, each time a hiring opportunity occurs.

To substantiate the efforts made and the affirmative actions taken to provide equal opportunity to minorities and women in each instance of hire, this firm will maintain and submit, as requested, documentation such as referral request correspondences and copies of advertisements utilized in conjunction with the above listed sources. In

addition, to further substantiate such efforts and affirmative actions, this firm will maintain internal EEO/affirmative action audit procedures and reporting and record keeping systems and will submit such documentation upon request.

The firm is aware that failure to implement, monitor and enforce its Affirmative Action program, including the submission of the above documentation, may result in the firm being required to recommit itself to the Affirmative Action program to obtain renewed approval status.

The affirmative actions of the EEO Officer include the following:

Dissemination - Internally

Dissemination of company policy by all available office communication media.

Periodic meetings held with executives, managerial and supervisory personnel to explain the intent of the program and the responsibility for effective implementation of each company employee.

Maintaining close contact with other company employees engaged in the recruitment and hiring process, to make certain they are aware of and adhere to the spirit and intent of company equal employment opportunity policy.

Establishment of a system of "feedback" and control of company policy to ensure its total application and to promote the progress of the Equal Employment Opportunity program.

Meetings of supervisory personnel with staff to further implement and explain the program to all other employees.

As a part of our induction procedure, each new employee will be handed a copy of the Policy Statement, and after review by the new employee, an opportunity to ask questions will be provided.

Notices have been and will be posted about EEO programs, progress reports, wage and hour determinations and other pertinent information deemed necessary.

The Policy Statement, covering our Affirmative Action/Equal Opportunity Compliance Program, is posted on the company bulletin board.

Dissemination - Externally

Maintenance of contact with representative minority and female organizations for the purpose of keeping them informed of current and impending employment needs and where necessary seeking their assistance in securing qualified minority and female candidates for job vacancies.

Recruiting sources have been and will continue to be informed about our EEO policy and will be requested to actively recruit and refer minority and female applicants for all job openings.

All employment advertising includes reference to our EEO policy.

The EEO clause will be referenced in all subcontracts.

Minority and female organizations, community agencies, appropriate community leaders and colleges have been notified of company policy.

Our Affirmative Action/Equal Opportunity Compliance Program Policy Statement is posted on our bulletin board so that prospective employees may know of its existence and of its benefits.

Where appropriate, notification of our EEO policy will be made to subcontractors and suppliers.

Recruitment

The company will continue to seek qualified minority group and female applicants for all job openings, making a particular effort to increase minority and female representation in the work force at higher levels of skill and responsibility. Such applicants will be sought from schools and colleges and public or private employment agencies. These organizations will be advised of Company EEO policy and urged to refer qualified minorities and female applicants for employment consideration. School and college recruiting will include communication with institutions having substantial minority and/or female student bodies.

The company will not discriminate against a male applicant applying for a position traditionally held by a female and vice-versa.

Advertisements to fill job openings will be placed in newspapers having circulation in the minority community. All such advertisements will include the phrase "An Equal Opportunity Employer".

Current female and minority employees are encouraged to urge other minorities and females to seek employment with the company.

A record will continue to be kept listing the name, race and sex of persons who apply for work at this office, whether hired, and if not, the reason for rejection.

Our total selection process is nondiscriminatory, including job descriptions, job titles, worker specifications, interview procedures, referral procedures, final selection processes and similar factors. We will continue to monitor our selection process to make certain that it remains nondiscriminatory. Our selection process is as follows:

Applicants are requested to complete our employment application for and/or submit their resume.

Applicants are interviewed by the designated hiring supervisor and/or designated Hiring Official. Applicants who appear to qualify for existing openings where applicable are referred to and/or interviewed by Company Principal(s).

Those who are not qualified in the opinion of the designated Hiring Official are told so.

Those who are qualified in the opinion of the designated Hiring Official and/or the Company Principal(s) are told so.

The designated Hiring Official or the Company Principal(s) may check with previous employers, schools or personal references to determine best candidate.

Offer is made through the designated Hiring Official with concurrence of the Company Principal(s).

Placement and Promotion

The Company will periodically review all job categories and employee records to determine that the company EEO Policy is being effectively carried out. If an EEO Policy review reveals that problems might exist, one or more of the following remedial actions will be taken:

More vigorous recruitment of qualified minority and female candidates.

Special discussions with management, supervisory and other personnel regarding the company EEO Policy.

Re-evaluation of the qualifications of minority and female employees to determine whether their capabilities might be more fully utilized by upgrading or promotion to positions of greater skill or increased responsibility.

Review placement and promotion procedures at all levels to ensure that full and fair consideration has been and is being given to qualified minority and female employees.

Training

The Company will continue to afford full and equal opportunity to minorities and females in all training activities as follows:

All training, apprenticeship and educational programs in which the company participates or to which the company gives support or sponsorship will be reviewed periodically to ensure that qualified minority and female candidates are being given equal opportunity to participate.

Qualified minority and female employees will be encouraged to increase their skills and job potential through participation in training and educational programs in which the Company gives support or sponsorship.

Qualified minority and female employees will be given an opportunity to participate in supervisory training programs, if any.

Layoffs, Terminations, Downgradings, Demotions, Transfers and Recalls from Layoffs

Layoffs, terminations, downgradings, demotions, transfers and recalls from layoffs will be effected without consideration of race, creed, color, age, sex or national origin.

Employee Benefits and Status

The following actions will continue to be taken to ensure quality with respect to employee benefits and compensation status:

The company will continue to make certain that no disparity exists between pay rates and other forms of compensation paid to minorities and female employees and that paid other employees performing like work.

Opportunities for performing overtime work or otherwise earning increased compensation shall be afforded without discrimination of any kind.

In regard to Maternity Leave, it is the policy of the firm to consider maternity as any other non-work-related disability, such policy extending to sick pay, disability income benefits, job protection, accumulation of tenure-based benefits, and any and all benefits and considerations granted any employee with a medically certified disability. Maternity Guidelines are attached hereto as Exhibit I-d.

Progress

The company will maintain records and statistical data reflecting progress made in integrating its workforce under this plan.

Community Services

The company will encourage its employees to serve on community welfare organizations dedicated to improvement of conditions for minority groups and females and will consider in appropriate cases, granting time off during normal business hours to assist with meetings concerning these organizations.

Religion and National Origin

It is the company's policy not to discriminate on the grounds of an applicant's religion or national origin.

Complaints Procedure

The company has adopted as policy a standing procedure for handling discrimination complaints, which is attached hereto as Exhibit I-c.

Sexual Harassment

It is the company's policy that all employees have a right to work in an environment free from any type of discrimination, including freedom from sexual harassment. This policy covers sexual harassment of employees or applicants by the company, its agents or supervisors. The Sexual Harassment Policy is attached hereto as Exhibit I-b.

Disciplinary Action

The company will continue to inform all supervisors and employees that their work performance is being evaluated on the basis of their equal employment opportunity efforts and results, as well as other criteria.

Review


The Affirmative Action Plan will be updated once annually in the month of January.

1/30/2025



Christopher R. Mulleavey, President/CEO


1/30/2025



Judith Donovan Hann, SVP
Director of Human Resources

"I commit myself and this firm to the Equal Employment Opportunity Policy and Affirmative Action Plan as outlined herein and do hereby appoint Judith Donovan Hann as Equal Employment Opportunity Officer of the firm.

1/30/2025



Christopher R. Mulleavey, President/CEO

EXHIBIT I-a

Standing Lists of Minority and Women Recruiting Organizations and Referral Sources

MINORITY/WOMEN RECRUITING AND INFORMATION SOURCES
NEW HAMPSHIRE & OFCCP

**New Hampshire
Employment Security**
45 South Fruit Street
Concord, NH 03301
(603)228-4115
www.nhjobs.nh.gov

**Southern New Hampshire Outreach for
Black Unity**
PO Box 3323
Nashua, NH 03061
(603)943-5721
<https://www.snhobu.com>

**NH Employment Security
Veterans Service Representatives**
2000 Lafayette Road
Portsmouth, NH
(603) 436-3702
<https://www.nhes.nh.gov/services/job-seekers/veterans>

Women For Hire
155 W 72nd St #403
New York, NY 10023
(212) 290-2600
<http://womenforhire.com>

Employ Diversity
1671 Alameda Ave
San Jose CA 95126
(408)293-1299
<https://employdiversity.com>

MilitaryVetJobs.com
26 Eastmans Rd
Parsippany, NJ 07054
(973) 992-7311
<https://militaryvetjobs.com>

EqualityMagazines.com
5301 Camino del Rancho
Las Vegas, Nevada 89130
(702) 563-4412
<https://equalitymagazines.com>

MINORITY/WOMEN RECRUITING AND INFORMATION SOURCES
MASSACHUSETTS & OFCCP

Massachusetts Division of
Unemployment Assistance
19 Staniford St
Boston, MA 02114
(617) 626-5300
<https://www.mass.gov/masshire-career-centers>

Boston NAACP (Employer
Outreach)
330 Martin Luther King Blvd.
Boston, MA 02119
(617) 427-9494
<http://www.bostonnaacp.org/>

Women Veterans Network
600 Washington Street
Boston, MA 02111
(877) 449-6836
<https://www.mass.gov/orgs/massachusetts-women-veterans-network>

Women For Hire
155 W 72nd St #403
New York, NY 10023
(212) 290-2600
<http://womenforhire.com>

Employ Diversity
1671 Alameda Ave
San Jose CA 95126
(408)293-1299
<https://employdiversity.com>

MilitaryVetJobs.com
26 Eastmans Rd
Parsippany, NJ 07054
(973) 992-7311
<https://militaryvetjobs.com>

EqualityMagazines.com
5301 Camino del Rancho
Las Vegas, Nevada 89130
(702) 563-4412
<https://equalitymagazines.com>

MINORITY/WOMEN RECRUITING AND INFORMATION SOURCES
FLORIDA & OFCCP

Employ Florida
CareerSource Central Florida
1209 West Airport Blvd
Sanford, FL 32773
(407)531-1231
<https://www.employflorida.com/vosnet/>

Metropolitan Urban League
2804 Belcoe Dr
Orlando, FL 32808
(407)841-7654
<http://www.cful.org/>

City of Orlando-Multicultural Affairs
(Employer Outreach)
400 S. Orange Ave
Orlando, FL
(407)246-3211
<https://www.orlando.gov/Our-Government/Departments-Offices/Executive-Offices/Office-of-Multicultural-Affairs>

Women For Hire
155 W 72nd St #403
New York, NY 10023
(212) 290-2600
<http://womenforhire.com>

Employ Diversity
1671 Alameda Ave
San Jose CA 95126
(408)293-1299
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MilitaryVetJobs.com
26 Eastmans Rd
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(973) 992-7311
<https://militaryvetjobs.com>

EqualityMagazines.com
5301 Camino del Rancho
Las Vegas, Nevada 89130
(702) 563-4412
<https://equalitymagazines.com>

MINORITY/WOMEN RECRUITING AND INFORMATION SOURCES
MAINE & OFCCP

Maine JobLink
47 State House Station
Augusta, ME 04333
(888)457-8883
<https://joblink.maine.gov/>

University of ME - Multicultural
Center (Employer Outreach)
5748 Memorial Union, Room 312
Orono, ME 04465
(207)581-1437
<https://umaine.edu/multicultural//>

In Her Presence
179 Mechanic Street
Westbrook, ME 04092
(207)347-9891
<https://inherpresence.org/>

Women For Hire
155 W 72nd St #403
New York, NY 10023
(212) 290-2600
<http://womenforhire.com>

Employ Diversity
1671 Alameda Ave
San Jose CA 95126
(408)293-1299
<https://employdiversity.com>

MilitaryVetJobs.com
26 Eastmans Rd
Parsippany, NJ 07054
(973) 992-7311
<https://militaryvetjobs.com>

EqualityMagazines.com
5301 Camino del Rancho
Las Vegas, Nevada 89130
(702) 563-4412
<https://equalitymagazines.com>

MINORITY/WOMEN RECRUITING AND INFORMATION SOURCES
VERMONT & OFCCP

Vermont DOL – Workforce
Development Division
63 Pearl Street
Burlington, Vermont 05401
(802) 863-7676
<https://www.vermontjoblink.com/>

Vermont Commission on Women
126 State Street, 2nd Floor
Montpelier, VT 05633
802-828-2851
<https://women.vermont.gov/>

Northland Job Corps Center
100A Macdonough Drive
Vergennes, VT 05491
(802) 877-2922
<https://northlands.jobcorps.gov/>

Women For Hire
155 W 72nd St #403
New York, NY 10023
(212) 290-2600
<http://womenforhire.com>

Employ Diversity
1671 Alameda Ave
San Jose CA 95126
(408)293-1299
<https://employdiversity.com>

MilitaryVetJobs.com
26 Eastmans Rd
Parsippany, NJ 07054
(973) 992-7311
<https://militaryvetjobs.com>

EqualityMagazines.com
5301 Camino del Rancho
Las Vegas, Nevada 89130
(702) 563-4412
<https://equalitymagazines.com>

EXHIBIT I-b

SEXUAL HARASSMENT POLICY

HOYLE, TANNER & ASSOCIATES, INC.



SEXUAL HARASSMENT POLICY

1. **PURPOSE:** Hoyle, Tanner & Associates, Inc. (Hoyle Tanner) is committed to preserving a working environment free from sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by this organization. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is similarly unlawful and will not be tolerated. To achieve our goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees.

Because Hoyle Tanner takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate. If you have witnessed sexual harassment, you are urged to report the incident so that prompt action may be taken.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

2. **ELIGIBILITY:** This policy covers sexual harassment of or by Hoyle Tanner employees, clients, vendors or any other person dealing with the Company.

3. **BENEFIT/POLICY GUIDELINES:**

Definition Of Sexual Harassment:

Sexual harassment consists of unwelcome sexual advances, requests for sexual favors or unwanted sexual attention by anyone associated with the company, whether male or female. Harassment may include references to employment status or conditions or may serve to create a hostile, intimidating or uncomfortable work environment. Harassment includes, but is not limited to, obscene jokes, lewd comments, sexual depictions, repeated requests for dates, touching, staring or other sexual conduct committed either on or off company premises.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.



SEXUAL HARASSMENT POLICY

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances - whether they involve physical touching or not
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess
- Displaying sexually suggestive objects, pictures, cartoons
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments
- Inquiries into one's sexual experiences
- Discussion of one's sexual activities

A victim of sexual harassment can be a man or a woman. The victim can be of the same sex as the harasser. The harasser can be a supervisor, co-worker, other Company employee, or a non-employee who has a business relationship with the Company.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this organization.

Complaints Of Sexual Harassment:

If any of our employees believes that he or she has been subjected to sexual harassment, the employee has the right to file a complaint with our organization. This may be done in writing or orally.

If you would like to file a complaint, you may do so by contacting the appropriate manager within your division or Judith Donovan Hann, the Equal Employment Opportunity Officer at Hoyle, Tanner & Associates, 150 Dow Street, Manchester, NH 03101, telephone number 603-669-5555. This person is also available to discuss any concerns you may have and to provide information to you about our policy on sexual harassment and our complaint process.

Sexual Harassment Investigation:

When we receive the complaint, we will promptly investigate the allegation in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation will include a private interview with the person filing the complaint and with witnesses. When we have completed our investigation, we will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where appropriate will also impose disciplinary action.



HOYLE TANNER

EFFECTIVE DATE: JANUARY 1, 2017

POLICY TITLE: SEXUAL HARASSMENT POLICY

SUPERSEDES: MAY 22, 1997

SEXUAL HARASSMENT POLICY

Disciplinary Action:

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment and may include such other forms of disciplinary action as deemed appropriate under the circumstances.

State and Federal Remedies:

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either the nearest federal or appropriate state agency set forth below, or both. Using our complaint process does not prohibit you from filing a complaint with these agencies.

U.S. Equal Employment Opportunity Commission (EEOC)
131 M Street, NE
Washington, DC 20507
Phone: 202-663-4900

Maine Human Rights Commission (FEPA)
51 State House Station
Augusta, ME 04330
Phone: 207-624-6062

U.S. Equal Employment Opportunity Commission (EEOC)
Miami Tower
100 SE 2nd Street, Suite 1500
Miami FL 33131
Phone: 1-800-669-4000

Florida Commission on Human Relations (FEPA)
4075 Esplanade Way, Room 110
Tallahassee, FL 32399
Phone: 850-488-7082

U.S. Equal Employment Opportunity Commission
John F. Kennedy Federal Building
475 Government Center
Boston, MA 02203
Phone: 617-565-3200

The Massachusetts Commission Against Discrimination ("MCAD")
One Ashburton Place - Room 601
Boston, MA 02108
Phone: 617-727-3990

New Hampshire Commission for Human Rights (FEPA)
2 Chenell Drive
Concord, NH 03301-8501
Phone: 603-271-2767

Vermont Attorney General's Office - Public Protection Division Civil Rights Unit (FEPA)
109 State Street
Montpelier, VT 05609-1001
Phone: 802-828-5511

The Company reserves the right to add to, delete from, terminate or modify any provision of this policy, either on an individual or company-wide basis. Such additions, deletions, terminations or modifications shall be effective when approved by the Company. This policy is not intended to and does not create contractual obligations for the Company.

EXHIBIT I-c

DISCRIMINATION COMPLAINT PROCEDURE

HOYLE, TANNER & ASSOCIATES, INC.

DISCRIMINATION COMPLAINT PROCEDURE

The Hoyle, Tanner & Associates, Inc. (Hoyle Tanner) Complaint Procedure addresses discrimination complaints, including those regarding race, color, religion, age, sex, marital status, physical disability (including, but not limited to blindness), criminal record, national origin or ancestry, or mental disorder (or history thereof), from both current and prospective employees. These individuals have the right to make full utilization of this Complaint Procedure without in any way jeopardizing their current or prospective employment status. See COMPLAINT RESOLUTION PROCESS - MA

The components of the Hoyle Tanner Complaint Procedure are the following:

The Equal Employment Opportunity Officer will receive all written complaints of discrimination. These may be direct from the employee or upon referral from a supervisor who has received a complaint from an employee.

All discrimination complaints filed under this procedure will be accepted for investigation up to, and including, thirty (30) days after the date of the alleged discriminatory act.

All complaints will be recorded on Hoyle Tanner "Notice of Discrimination Complaint" form and signed by the complainant. At this time, the complainant will be counseled as to the other avenues of redress open to him or her; e.g., the complaint procedure of the State Commission on Human Rights and Opportunities.

The Bureau of Administration and the Transportation Commissioner will be notified simultaneously of all complaints and of the complaint's ultimate resolution.

All complaints will be investigated and processed by the Equal Employment Opportunity Officer within thirty (30) days of receipt.

The complainant will be notified, in writing, by the Equal Employment Opportunity Officer regarding the results of the investigation and the final disposition of the complaint, including any proposed remedial action.

Should the complainant disagree with the Equal Employment Opportunity Officer's decision, he or she can still avail himself or herself of any, or all, of the other avenues of redress previously explained (see third paragraph).

In the event of a complaint against the Equal Employment Opportunity Officer, complainants will be advised to utilize the procedures of the State Commission on Human Rights and Opportunities.

The Equal Employment Opportunity Officer will take the necessary steps to ensure the confidentiality of all Title VII complaint records and of any counseling done in the course of the complaint procedure.

COMPLAINT RESOLUTION PROCESS - MA

Hoyle, Tanner & Associates, Inc. (Hoyle Tanner) is committed to providing the opportunity for any protected group member to voice and resolve any alleged infringement of Equal Opportunity or Affirmative Action rights that are assured through state or federal laws, executive orders and/or guidelines. Accordingly, Hoyle Tanner has established a uniform grievance procedure that is known as the Resolution Process.

The Resolution Process may be used for allegations of adverse impact, maltreatment or harassment based on race, color, national origin, ancestry, sex, sexual orientation, disability or status as a Vietnam Era Veteran; allegations of failure to make reasonable accommodation for a person's disability; and/or any and all other issues arising from relevant laws and related to this Plan. The Resolution Process may be used by employees and applicants for employment.

A person who chooses to use the Resolution Process is not precluded from filing a complaint or grievance with any other appropriate agencies or authorities. Anyone using the Resolution Process shall be informed that any discovered information that could constitute a violation of anti-discrimination laws should be referred to the Massachusetts Commission Against Discrimination ("MCAD"), the Equal Employment Opportunity Commission ("EEOC") and/or other appropriate state or federal authority.

A complaint must be filed at the MCAD within 300 days of an alleged violation. For more information contact the MCAD at <http://www.mass.gov/mcad>. The MCAD is a fair employment practices agency recognized by the EEOC.

A charge must be filed with EEOC within 180 days from the date of the alleged violation in order to protect the charging party's rights. The 180-day filing deadline may be extended to 300 days if the charge is also covered by a state or local antidiscrimination law. For more information contact the EEOC at http://www.eeoc.gov/charge/overview_charge_filing.html.

Title VII is an anti-discrimination law based on the Civil Rights Act of 1964, as amended, that prohibits discrimination in employment on the basis of race, color, sex/gender, age, religion, creed, disability, Vietnam era veteran's status and disabled veterans, and national origin. Title VII was designed as a broad remedial measure, rather than a punitive statute, to seek to remedy discrimination through conciliation and cooperation. For more information about discriminatory practices under Title VII refer to http://www.eeoc.gov/abouteeo/overview_practices.html.

Procedure

The Civil Rights/ Equal Employment Opportunity Officer (Civil Rights Officer) is responsible for implementing and monitoring Hoyle Tanner's Resolution Process. While doing so, s/he makes and preserves records of complaints, and ensures that applicable laws, regulations and rules concerning confidentiality and privacy are respected. The Resolution Process shall be made available to all employees on the company website.

The Resolution Process

Hoyle Tanner has informal and formal procedures for employees who believe they have experienced or are experiencing unlawful discrimination or harassment. Hoyle Tanner takes all allegations of unlawful discrimination and harassment seriously and will move swiftly to respond to them. A complaint should be filed within 180 calendar days of the incident(s) giving rise to the complaint.

The Informal Process

Hoyle Tanner's informal process is one option available to employees to resolve complaints. The initial step in the process is reporting the behavior as soon as possible. While some situations may be appropriately resolved through informal means, others may require immediate action and will be resolved only through the formal process.

Step 1: Employees should speak to the civil rights officer located at Hoyle Tanner's Corporate Headquarters, 150 Dow Street, Manchester, NH 03101. Should they prefer to do so employees may also talk with the president of Hoyle Tanner located in the main office.

Step 2: The civil rights officer shall make every effort to resolve the matter informally. For example, informal resolution may take the form of meetings with the employee bringing the complaint, with the person against whom the complaint is brought; and with other parties, as appropriate, or some other mutually agreeable course of action to resolve the complaint.

Step 3: Should the matter not be resolved to the satisfaction of the employee bringing the complaint within sixty days, the employee may request that a formal investigation be initiated. If more time for discovery is needed Hoyle Tanner may extend the time provided.

The Formal Process

Hoyle Tanner's formal process is another option available to employees to resolve complaints.

Step I - Complaint Intake- ONE WEEK

The Complainant contacts the Civil Rights Officer that s/he has a grievance. The Civil Rights Officer conducts an intake interview. The Complainant is informed s/he may wish to pursue other avenues of recourse (e.g. MCAD, OER). Complainant and Civil Rights Officer agree to try to achieve a resolution within four weeks. At the end of the interview the Civil Rights Officer assists the Complainant in submitting a written summary of the complaint, including a statement of desired relief. The Civil Rights Officer then logs the complaint.

Step II – Investigation- FOUR WEEKS

The Civil Rights Officer conducts an informal investigation and negotiates with the Complainant and other relevant parties in an attempt to achieve resolution. The Civil Rights Officer develops resolution options. Within four weeks the Civil Rights Officer and Complainant meet to discuss the status of the complaint.

Phase III - Resolution- SIX WEEKS

The Civil Rights Officer may devise resolution options to present to the Complainant. At the end of six weeks (or sooner) the Civil Rights Officer and the Complainant meet to present the recommended actions. The final decision shall be in writing and include a statement of reasons for the decision, including a determination of each issue of fact of law necessary to the decision.

EXHIBIT I-d

MATERNITY GUIDELINES

HOYLE, TANNER & ASSOCIATES, INC.

MATERNITY GUIDELINES

It is the policy of the firm to consider maternity as any other non-work-related disability, such policy extending to sick pay, disability income benefits, FMLA leave, job protection, accumulation of tenure-based benefits and any and all benefits and considerations granted any employee with a medically certified disability.

Disability Income

Hoyle, Tanner & Associates, Inc. provides short-term disability (STD) income benefits are a part of each full-time (30 hrs. minimum per week) employee's benefit package with the company. There is no employee contribution through payroll deduction. STD insurance benefits pay 60% of wages (with bonus income included). The maximum benefits vary, and should be reviewed in the plan booklet and correspondence with the insurance provider. There is a waiting period of seven days (i.e., benefits are payable on the eighth day and subsequent days of disability).

Long-term disability (LTD) income benefits are a part of each full-time (30 hrs. minimum per week) employee's benefit package with the company. There is no employee contribution through payroll deduction. LTD insurance benefits pay 60% of wages (with bonus income included). The maximum benefits vary, and should be reviewed in the plan booklet, but are generally not a concern to employees on maternity disability, as there is a waiting period of 90 days (i.e., benefits are payable on the 91st and subsequent days of disability).

EXHIBIT B

RESPONSIBILITIES STATEMENT

RESPONSIBILITIES STATEMENT

Judith Donovan Hann, Senior Vice President and Director of Human Resources, serves as the Equal Employment Opportunity Officer for Hoyle, Tanner & Associates, Inc.