



AFFIRMATIVE ACTION PLAN

for

**CASTLE SENIOR LIVING, INC.
Grand Hills Castle**

AAP Year: January 1, 2024 to December 31, 2024

Part 1: AAP for Minorities and Women

**Part 2: AAP for Protected Veterans
And Individuals with Disabilities**

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BACKGROUND

CASTLE SENIOR LIVING, INC. (hereinafter referred to as the "Company") is a federal government supply and service contractor subject to the affirmative action requirements of Executive Order 11246 as amended, the Rehabilitation Act of 1973 as amended, and the Vietnam Veterans' Readjustment Assistance Act of 1974 as amended.

Because the Company has \$50,000 or more in annual contracts with the federal government and has 50 or more employees, we are required to prepare annual written Affirmative Action Plans (AAPs) for minorities and women and for individuals with disabilities for our organization. In addition, because the Company has \$150,000 or more in annual contracts with the federal government and has 50 or more employees, we are also required to prepare annual written AAPs for protected veterans.

Affirmative action is a term that encompasses any measure adopted by an employer to correct or to compensate for past or present discrimination or to prevent discrimination from occurring in the future. Affirmative action goes beyond the simple termination of a discriminatory practice.

As stipulated in federal regulations, a prerequisite to the development of a satisfactory affirmative action plan is the evaluation of opportunities for protected group members, as well as an identification and analysis of problem areas inherent in their employment. Also, where an analysis reveals a statistically significant disparity between incumbency and availability, an AAP details specific affirmative action steps to guarantee equal employment opportunity. These steps are keyed to the problems and needs of protected group members. For minorities and women, such steps include the development of hiring and promotion goals to rectify the disparity between incumbency and availability. For protected veterans and individuals with disabilities, such steps will include a thorough review of the Company's outreach efforts to determine the effectiveness of such efforts in closing the hiring and/or utilization gaps. It is toward this end that the following AAP of the Company was developed.

The Company is committed to the concept and practice of equal opportunity and affirmative action in all aspects of employment. This Affirmative Action Plan ("AAP" or "Plan") is designed to satisfy the Company's Equal Employment Opportunity/Affirmative Action responsibilities under Executive Order 11246, as amended, Section 503 of the Rehabilitation Act of 1973, Section 4212 of the Vietnam Veterans Readjustment Assistance Act of 1974 and the various implementing rules and regulations. Nothing contained in this AAP or its supporting data should be construed as an admission by the Company, in whole or in part, that it has contravened any federal, state, or local employment practice laws.

In developing and implementing this Plan, the Company has undertaken an analysis of its policies and practices with a view toward enhancing equal employment opportunity without regard to sex, race, national origin, religion, color, disability or special disabled veteran, Vietnam era or other covered veteran status. This Plan is adopted in reliance on the Equal Employment Opportunity Commission's Affirmative Action Guidelines as well as those of the Office of Federal Contract and Compliance Programs. This AAP does not create any rights for any person or entity and is not developed nor intended to be used as a vehicle to sanction the unlawful discriminatory treatment of any group or individual.

COVERED GROUPS UNDER AFFIRMATIVE ACTION LAWS AND REGULATIONS

Coverage under affirmative action laws and regulations applies to:

- Women and minorities who are recognized as belonging to or identifying with the following race or ethnic groups: Blacks/African Americans, Hispanics/Latinos, Asians/Pacific Islanders, and American Indians/Alaskan Natives.
- Any veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or who was discharged or released from active duty because of a service-connected disability.
- Recently separated veterans: any veteran currently within three-years of discharge or release from active duty.
- Veterans who served on active duty in the U.S. military during a war or campaign or expedition for which a campaign badge is awarded.
- Veterans who, while serving on active duty in the Armed Forces, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.
- An individual with a disability is a person who: (1) has a physical or mental impairment that substantially limits one or more of his/her major life activities; (2) has a record of such impairment, or (3) is regarded as having such an impairment.

CONFIDENTIALITY STATEMENT

While the Company firmly believes in dissemination of its affirmative action policies and equal employment opportunity practices and makes the non-data components of this AAP available for review to employees and applicants upon request, the AAP remains a proprietary document of the Company. Moreover, the data on which the Company has relied in preparing this AAP are confidential and sensitive, and the Company believes release of the data would subject the Company to commercial harm.

This AAP contains confidential information which is subject to the provisions of 18 U.S.C., Section 1905. *Chrysler Corporation v. Brown*, 441 U.S. 281, 99 S.Ct. 1705 (1979). Copies of this Plan and all related appendices, documents and supporting data are made available on loan to the United States Government upon the request of the Government on the condition that the Government hold them completely confidential and not release copies to any persons whatsoever.

The Plan and its appendices and other supporting documents contain confidential information that may reveal directly or indirectly the Company's plans for business and geographical expansion and contraction. The Company considers this Plan to be exempt from disclosure, reproduction and distribution under the Freedom of Information Act upon the grounds that such material constitutes:

1. Personnel files, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, and/or exempt from disclosure under 5 U.S.C., Section 552(b)(6);
2. Confidential, commercial or financial information which is exempt from disclosure under 5 U.S.C., Section 552(b);
3. Investigatory records compiled for law enforcement purposes, the production of which would constitute an unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C., Section 552(b)(7)(C); and
4. Matters specifically exempted from disclosure by statute, which are exempt from disclosure under 5 U.S.C., Section 552(b)(3).

**NOTICE IS HEREBY GIVEN OF A REQUEST PURSUANT TO
41 C.F.R. §§ 60-40.1 et. seq. THAT THIS PLAN BE KEPT CONFIDENTIAL.**

The Company makes it clear that it does not consent to the release of any information contained in this Plan under the Freedom of Information Act or otherwise. If the United States Government, or any agency or subdivision thereof, or any State Agency or subdivision thereof (collectively the "Government") is considering a request for release of this plan under the Freedom of Information Act or under corresponding state law, **a request is hereby made that the Government immediately notify the Chief Executive Officer or EEO Coordinator of this Company of any and all Freedom of Information Act requests received by the Government or any contemplated release of this plan by the Government which relates to information obtained by the Government from this Company.** Furthermore, the following is requested:

- If this AAP or any supporting data or documentation are submitted to Office of Federal Contract Compliance Programs (OFCCP) pursuant to the Executive Order, the Rehabilitation Act, The Vietnam Era Veterans' Readjustment Assistance Act and/or any implementing regulations (as any or all have been or may be amended), those documents and the information they contain are to be considered confidential and not subject to disclosure without notifying the Company of the agency's decision to disclose and providing the Company with ample time to contest the disclosure. Advance notice of disclosure should be sent to Janell Breitzman or designated successor. The Company requests this information be treated as exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. § 552.
- If this AAP or any supporting data or documentation is supplied by the Company to another government contractor, EEOC or fair employment practices agency representatives, or any other person, it is not to be copied, reproduced, or disclosed by such persons without prior notification to the Company.
- No information contained in the AAP or any supporting data or documentation is to be copied, removed from the premises, or released to other individuals without a prior notification to and permission from the Company.
- Reports that require specific data, such as names of employees and salary information, are not an official part of this AAP. This information is on file at the Company as

Documentation and Supporting Data for AAP Reports and is available for review only as required by law.

This AAP does not constitute an express or implied contract between the Company and its employees, job applicants, or other persons, nor does it change in any way the basic at will employment relationship all Company employees have with the Company. Nothing in this AAP creates a private right of action on behalf of any individual or group against the Company.

The Company further requests that anyone who reviews this Plan, its supporting appendices, documents or other data, treats such information as confidential and that such information not be released to any person. Retention or disclosure of information relating to identifiable individuals may also violate the Privacy Act of 1974.

PLAN TERMINOLOGY

The terms "utilization analysis", "underutilization", "problem area" and "deficiency" and other similar terms appearing in this AAP are terms the Company is required to use by government regulation. The use of these terms is specified and defined by the government regulation.

Although the terms are used in good faith in connection with the Plan, these terms have no independent legal or factual significance whatsoever. The usage of these terms does not constitute an admission by the Company that it agrees these terms were properly applied to any particular factual situation, nor does it constitute an admission by the Company that it has engaged in any prohibited conduct or practice with regard to employment.

Whenever the term "goal" is used, the term is expressly intended not to be used to discriminate against any applicant or employee because of race, color, religion, sex or national origin as stated in 41 C.F.R., Section 60-2.16. Goals are not intended as rigid, inflexible quotas, but rather as targets that the Company intends to make good faith efforts to attain.

DEFINITIONS

"Disability" means, generally, (i) a physical or mental impairment that substantially limits one or more of an individual's major life activities, (ii) a record of such impairment, or (iii) being regarded as having such impairment.

For the purposes of this Plan, a disability is substantially limiting if it substantially impairs the ability of an individual to perform a major life activity as compared to most people in the general population. An impairment need not prevent, or significantly or severely restrict the individual from performing a major life activity to be considered substantially limiting.

For the purposes of this Plan, major life activities include but are not limited to the operation of a major bodily function, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, interacting with others, and working.

A “qualified individual” means an individual who satisfies the requisite skill, experience, education, and other job-related requirements for the particular position he/she holds or desires and who is capable of performing the essential functions of that position, with or without reasonable accommodation for any disability.

A “disabled veteran” is (1) A veteran of the U.S. military, ground, naval, or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or (2) A person who was discharged or released from active duty because of a service-connected disability.

A “qualified disabled veteran” means a disabled veteran as defined above who has the ability to perform the essential functions of the employment position at issue with or without reasonable accommodation.

A “recently separated veteran” means any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval or air service.

An “armed forces service medal veteran” is any veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

An “active-duty wartime or campaign badge veteran” means a veteran who served on active duty in the U.S. military, ground, naval or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the Department of Defense.

“Protected veterans” means Disabled Veterans, Recently Separated Veterans, Armed Forces Service Medal Veterans, and Active-Duty Wartime or Campaign Badge Veterans.

RELIANCE ON EEOC’S GUIDELINES

Although the Company does not believe any violation of Title VII of the Civil Rights Act exists, it has developed this AAP in accordance with and in reliance upon the EEOC’s Guidelines on Affirmative Action, Title 29 Code of Federal Regulations, Part 1608.

REPORTING PERIOD

This AAP is designed to cover the following reporting period:

- AAP implementation period: January 1, 2024 – December 31, 2024



CASTLE SENIOR LIVING POLICY STATEMENTS

A. Equal Employment Opportunity and Affirmative Action Policy 41 C.F.R. 60.741.44(a)

It is the policy of Castle Senior Living, Inc. (the "Company") not to discriminate or allow the harassment of employees or applicants on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law with regard to any employment practices, including recruitment, advertising, job application procedures, hiring, training, promotion, transfer, compensation, job assignments, benefits and/or other terms, conditions, or privileges of employment, provided the individual is qualified, with or without reasonable accommodations, to perform the essential functions of the job.

This policy applies to all jobs at the Company. The Company will continue to take affirmative action to ensure that individuals are employed, and that employees are treated during employment, without regard to their gender, gender identity, sexual orientation, race, color, creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law in all employment practices.

Employment decisions at the Company are based on legitimate job-related criteria. All personnel actions or programs that affect qualified individuals, such as employment, demotion, transfer, recruitment, advertising, termination, rate of pay or other forms of compensation, and selection for training, are made without discrimination because of any basis protected by law. Employees may choose to voluntarily disclose their sex, race, national origin, disability and protected veteran status at any time by contacting Human Resources. Such information will be maintained in a confidential manner and will not be used against an individual when making any employment decisions. Employees and applicants with disabilities and disabled veterans are encouraged to inform Human Resources if they need a reasonable accommodation to perform a job for which they are otherwise qualified. The Company makes, and will continue to make, reasonable accommodations to the known physical or mental limitations of an otherwise qualified applicant or employee and to promote the employment of qualified individuals with disabilities and disabled veterans, unless such accommodations would impose an undue hardship on the operations of the Company's business.

The Company is fully committed to principles of equal employment opportunity and affirmative action. As President, I support the successful implementation of the Company's Affirmative Action Programs. I have appointed Janell Breitzman or designated successor as the Affirmative Action Officer/EEO Coordinator for the Company, with responsibility for implementation of the Company's affirmative action activities. The Affirmative Action Officer has the full support of top management and the staff necessary to fully implement this Plan. All managers and supervisors will take an active part in the Company's AAP to ensure all qualified employees and prospective employees are treated in a non-discriminatory manner with respect to all employment decisions. Furthermore, the Company will solicit the cooperation and support of all employees for the Company's Equal Employment Opportunity and Affirmative Action Policy.

Our Affirmative Action Programs include an audit and reporting system, which, among other things, uses metrics and other information to measure the effectiveness of our Plan. The Affirmative Action Officer has been assigned responsibility for periodically reviewing progress in the compliance and implementation of our policy of affirmative action. In accordance with applicable law, the Company's program of affirmative action for qualified individuals with disabilities and the program of affirmative action for protected veterans are available for inspection in the Human Resources Department, Monday through Friday, from 9:00 a.m. to 4:00 p.m. (except for holidays) upon request.

In addition, employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in, or may have engaged in, filing a complaint, assisting or participating in an investigation, compliance review hearing, or other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, Executive Order 11246, and/or any other federal, state or local law or regulation regarding Equal Employment Opportunity, opposing any act or practice made unlawful, or exercising any other right protected by such laws or regulations or exercising any other right protected by such laws or regulations. The Company 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. However, employees who have access to the compensation information of other employees or applicants as part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the individual's legal duty to furnish information.

B. Religious and National Origin Discrimination Policy

41 C.F.R. 60-50.1 – 60.50.5

Pursuant to the Company's equal employment opportunity and affirmative action policy, we have adopted a policy prohibiting religious and national discrimination and harassment in the workplace. This policy applies to all terms and conditions of employment, including but not limited to, recruitment, hiring, promotion, transfer, demotion, layoff or recall from layoff, termination, wage and benefit administration, and selection for training or other employment opportunities. In furtherance of our commitment to ensuring equal employment opportunity regardless of national origin or religious beliefs, we will take the following steps, as appropriate:

- Recruit individuals for all positions without regard to their national origin or religious beliefs.
- Review employment practices and personnel policies to ensure that applicants and employees are not discriminated against or harassed on the basis of religion or national origin.
- Provide qualified employees with an equal opportunity to any available job without regard to their religion or national origin.
- Administer employment opportunities, wages, hours, conditions of employment, retirement programs, and other employee benefits regardless of religion or national origin.

- Develop written policies which prohibit unwelcome verbal or physical conduct based on religion or national origin and take reasonable steps to prevent such harassment occurring.
- Explain the Company's commitment to equal employment opportunity to supervisors and employees and request their support.
- Develop reasonable internal procedures to monitor our implementation of our equal employment opportunity and affirmative action policy.
- Inform all recruitment sources of our commitment to equal employment opportunity and seek their assistance and support of our commitment to providing equal employment opportunity without regard to national origin or religion.
- Endeavor to make reasonable accommodations to religious observations and practices of an employee or prospective employee unless doing so would pose an undue hardship on the Company's business.

Kevin Kiefer, President

PART 1: AFFIRMATIVE ACTION PLAN FOR MINORITIES AND WOMEN

1.1 RESPONSIBILITIES FOR IMPLEMENTATION – 41 C.F.R. 60-2.17(a)

A. EEO Coordinator

Janell Breitzman or her designated successor, the Company's EEO Coordinator, has overall responsibility for implementation of this Affirmative Action Plan. She has been given top management support and staffing to execute this assignment and her responsibilities include, but are not limited to:

1. Developing, maintaining and modifying, where appropriate, policy statements, affirmative action plans and programs.
2. Developing and modifying, where appropriate, procedures for effectively communicating the AAP and its elements both internally and externally.
3. Advising management on EEO/AA progress, identifying and reporting on potential problem areas, and assisting management in arriving at equitable solutions, where feasible, to identifiable problems.
4. Evaluating the effectiveness of the AAP on a regular basis and reporting to management.
5. Designing, implementing and managing audit systems that periodically measure effectiveness of the Plan, identifying the need for remedial action, and measuring the degree to which goals and objectives are being achieved.
5. Serving as the Company representative and liaison between the Company and enforcement agencies.
6. Serving as liaison between the Company and community organizations concerned with employment of protected class members.
7. Monitoring Company policies and procedures with regard to terms and conditions of employment to attempt to ensure compliance with affirmative action obligations.
8. Auditing the content of the Company's bulletin board and electronic policies, as appropriate, to ensure compliance information is posted and up-to-date.
9. Keeping management informed of the latest developments in equal opportunity and affirmative action areas.
10. As necessary, serving as a liaison between the Company and organizations, such as minority organizations and women's organizations.

11. When necessary, monitoring and implementing training programs to increase protected-group participation.
12. Assisting in the investigation, handling and disposition of employee harassment and discrimination complaints.
13. Discussing EEO/AA policies with all personnel, including management, to ensure the Company's policies and the need for their support are understood at all levels.
14. Reviewing the Company's AAP for qualified women and minorities with all managers and supervisors to ensure the policy is understood and followed in all personnel actions.
15. Conducting periodic reviews of offices to ensure compliance in the areas of proper display of posters and notices, comparable facilities for both sexes, and opportunity for participation in Company-sponsored recreational, educational, and social activities.
16. Auditing training programs, hiring, and promotion patterns.

B. Management Responsibilities

Line and upper management share responsibility for the AAP, including, but not limited to the following:

1. Assisting the EEO Coordinator in identifying problem areas, formulating solutions, establishing goals and objectives to correct their problem areas.
2. Assisting the EEO Coordinator, as appropriate, in being actively involved with community organizations concerned with employment of protected class members.
3. Periodically assisting the EEO Coordinator in auditing training programs and hiring and promotion patterns to remove impediments to the attainment of goals and objectives.
4. Assisting the EEO Coordinator in holding regular discussions with appropriate managers, supervisors and employees to be certain Equal Opportunity/Affirmative Action policies are being followed.
5. Reviewing the qualifications of employees and applicants to ensure that qualified individuals are treated in a nondiscriminatory manner in connection with hiring, promotion, transfer and termination decisions.
6. Arranging career counseling for employees who request assistance or are identified as in need of assistance.
7. Periodically auditing facilities to ensure posters are properly displayed and

physical facilities other than those requiring segregation to achieve personal privacy are desegregated. In addition, periodic audits are made to assure facilities such as locker rooms and rest rooms are comparable for both sexes and that minorities and women are given full opportunity to participate in all Company sponsored educational, training and social programs.

8. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee and his or her duties.
9. Reviewing position descriptions of the jobs in the manager's area or department to see that they adequately reflect the job to be performed.
10. Assisting subordinates and upper management in the prevention of harassment.
11. Ensuring that supervisors understand that their job duties include cooperating in efforts to comply with the EEO laws and the Affirmative Action Plan.
12. In coordination with others in management, to fully implement this plan.

1.2 REVIEW OF PERSONNEL PROCESSES – DISSEMINATION OF THE POLICY

A. Internal Dissemination of EEO Policy – 41 C.F.R. 60-741.44(g)(3)

1. Internal employee handbooks contain the policy statement.
2. The policy is permanently posted in conspicuous places (including where applicable, electronic websites) available to employees and applicants for employment.
2. Periodically, the policy is communicated to executive, managerial and supervisory personnel along with instruction on the laws and regulations concerning equal employment opportunity and affirmative action.
3. New employees are informed of the policy as part of our orientation program.
4. The following Equal Opportunity posters are permanently and prominently displayed:
 - a. Equal Employment Opportunity Poster; and
 - b. Wisconsin Equal Rights Division
5. If and when employees are featured in product or consumer advertising, handbooks or similar publications, an effort is made to depict individuals of

diverse gender, race and national origin.

B. External Dissemination of EEO Policy – 41 C.F.R. 60-300.44(f)

1. In solicitations or advertisements for employees placed by or on its behalf, the Company complies with at least one of the following methods regarding the dissemination of its equal employment opportunity clause:
 - a. Solicitations or advertising will expressly state that all qualified applicants will receive consideration for employment without regard to race, color, religion, gender, sexual orientation, gender identity or national origin.
 - b. The Company will use a single advertisement in which appears in clearly-distinguishable type the phrase “an equal employment opportunity employer.”
 - c. The Company uses a single advertisement, and the advertisement is grouped with other advertisements under a caption which clearly states that all employers in the group assure all qualified applicants equal consideration for employment without regard to race, color, religion, gender, sexual orientation, gender identity, or national origin.
 - d. Our employment application notes our commitment to equal opportunity principles.
2. The following exemplify the methods and locations the Company may use in its ongoing efforts to ensure continuing dissemination of its policy and AAP, although we may not always use all of the below methods, and it may use other methods not listed below:
 - a. Annually, all recruiting sources will be informed verbally that they should actively recruit minorities and women for all positions.
 - b. Other potential recruiting sources such as minority and women's organizations, community agencies, community leaders, secondary schools and colleges, are or will be notified in writing of our policy when they are used.
 - c. When employees are pictured in consumer advertising, help-wanted advertising or Company publications, reasonable steps will be taken to depict individuals of diverse gender, race and national origin.
3. The Equal Opportunity and affirmative action clauses will be incorporated by reference in all purchase orders, leases and contracts covered by Executive Order 11246 and in accordance with 41 C.F.R. § 60-1.4 (a) – (c) (unless exempted under 41 C.F.R. § 60-1.5). In addition, written notification of our policy will be sent to subcontractors, vendors and suppliers requesting appropriate action on their part as applicable.

1.3 ORGANIZATIONAL PROFILE – 41 C.F.R. 60-2.11

The Company conducted a workforce analysis by grouping employees by organizational unit, job title, race/ethnicity and sex. Job titles are arranged from lowest to highest paid. The organizational profile is an overview of staffing patterns at the Company, and is used to determine whether there are areas in the workforce where individuals are underrepresented or concentrated by gender or race. In addition to the organizational profile, we are supplying our current organizational chart. These documents are contained in the Appendix.

1.4 JOB GROUP ANALYSIS – 41 C.F.R. 60-2.12

As an additional diagnostic component of our AAP, we have conducted a job group analysis. The job group analysis is a method of comparing the representation of minorities and women in the workforce covered by this AAP with the estimate of the available qualified minorities and women who could be employed by the Company in positions covered by this AAP. The job group analysis is located in the Appendix.

In designing our job groups, we considered similarities of duties and opportunities. Although not a determinative factor in designing job groups, we also attempted to create job groups large enough to conduct appropriate analysis. The job group analysis identifies the job groups created for this AAP, the job titles that comprise each job group, and the percentage of minority incumbents and the percentage of female incumbents in each job group.

1.5 PLACEMENT OF INCUMBENTS IN JOB GROUPS – 41 C.F.R. 60-2.13

Each job group appears on a Job Group Analysis report with a job group name. The report lists each job title in the job group. For each job title, the worksheet provides the following information: EEO reporting category, job title, employee headcounts for each job title, and overall percentages by sex and race/ethnicity. See the Job Group Analysis in the Appendix for the listing of the job titles and the associated race and sex headcounts per job group.

1.6 AVAILABILITY ANALYSIS – 41 C.F.R. 60-2.14

After aggregating individual jobs into job groups, federal contractors are then required to determine the availability of women and minorities for those job groups.

“Availability” is a percentage estimate of the number of qualified women and minorities who have the skills required to perform the jobs within the job groups could reasonably be expected to be represented in a job group if employment decisions are being made without regard to gender, race or ethnic origin. The purpose of the availability determination is to establish a benchmark against which the demographic composition of the Company’s incumbent workforce can be compared in order to determine whether barriers to equal employment opportunity may exist within particular job groups.

Availability estimates, therefore, are a way of translating equal employment opportunity into concrete numerical terms. Correct comparisons of incumbency to availability, worthwhile and attainable goals, and real increases in employment for problem area groups depend on competent and accurate availability analyses. With valid availability data, we can compare the percentages of those who could reasonably be expected to be employed versus our current employment (from the workforce analysis), identify problem areas, and establish percentage goals to correct the problems.

To determine the availability percentages, contractors are required to consider the following factors:

1. The percentage of minorities or women with requisite skills in the reasonable recruitment area. The reasonable recruitment area is defined as the geographic area from which the Company usually seeks or reasonably could seek workers to fill the positions in question.
2. The percentage of minorities or women among those promotable, transferable, and trainable within the organization who could, with appropriate training which the Company is reasonably able to provide, become promotable or transferable during the AAP year.

The Company is required to use the most current and discrete statistical information available to derive availability figures. Examples of such information include census data, data from local job service offices, and data from colleges or other training institutions.

The Company may not draw its reasonable recruitment area in such a way as to have the effect of excluding minorities or women. For each job group, the reasonable recruitment area must be identified, with a brief explanation of the rationale for selection of that recruitment area.

The Company may not define the pool of promotable, transferable, and trainable employees in such a way as to have the effect of excluding minorities or women. For each job group, the pool of promotable, transferable, and trainable employees must be identified with a brief explanation of the rationale for the selection of that pool.

Where a job group is composed of job titles with different availability rates, a composite availability figure for the job group must be calculated. The Company must separately determine the availability for each job title within the job group and must determine the proportion of job group incumbents employed in each job title. The Company must weight the availability for each job title by the proportion of job group incumbents employed in that job group. The sum of the weighted availability estimates for all job titles in the job group must be the composite availability for the job group.

The Availability Analysis is in the Appendix.

1.7 COMPARING INCUMBENCY TO AVAILABILITY AND PLACEMENT GOAL – 41 C.F.R. 60-2.15

We have compared incumbency to availability in each job group. The 80% rule was followed in declaring underutilization and establishing goals when the actual employment of minorities or females is less than 80% of their availability. If the female/minority incumbency percent (%) is less than the female/minority availability percent (%) and the ratio of incumbency to availability is less than 80%, a placement goal should be included in the appropriate column.

As required by applicable regulations, the Company has established placement goals where the actual representation of women or minorities in a job group is less than would be reasonably expected based on calculated availability. In establishing placement goals, we applied the following principles:

- When the percentage of minorities or women employed in a particular job group is less than would reasonably be expected, given their availability percentage in that job group, the Company established a percentage annual placement goal at least equal to the availability figure derived for women or minorities, as appropriate, for that job group.
- Placement goals are not quotas that must be met, nor are they to be considered as either a ceiling or a floor for the employment of particular groups. Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
- In all employment decisions, the Company makes selections in a nondiscriminatory manner. Placement goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or other characteristic protected by law.
- Placement goals are not used to supersede merit selection principles, nor do these placement goals require the Company to hire a person who lacks qualifications to perform the job successfully or hire a less qualified person in preference to a more qualified one.

As is described in more detail in the Action Oriented Program section of this AAP, where a placement goal is set, the Company will develop action-oriented steps to increase the recruitment and training of minorities or women, or both. Current placement goals are contained in the Appendix.

1.8 IDENTIFICATION OF AREAS FOR DISCUSSION – 41 C.F.R. 60-2.17(b)

The Company's commitment to fully implement this policy and AAP includes periodic reviews of its total employment process to determine whether and where impediments to equal employment opportunity exist. These reviews include:

1. The workforce by organizational unit and job group of minority or female utilization (i.e., employment in the unit or group) and distribution (i.e., placement in the different jobs within the unit or group);
2. Personnel activity (applicant flows, hires, terminations, promotions, and other personnel actions)¹ to determine whether there are selection disparities;
3. Compensation systems to determine if there are gender-, race-, or ethnicity-based disparities;
4. Selection, recruitment, referral, and other personnel procedures to determine whether they result in employment or placement disparities of minorities or women; and,
5. Any other areas that might impact the success of the affirmative action program, including, for example, our review of:
 - a. The workforce composition by race and sex to compare it to the availability of these groups;
 - b. The Company's applicant flow compared to the availability for the protected groups;
 - c. A comparison of hires to applicants pertaining to minorities and women;
 - d. Selection forms, such as applications for employment, to ensure they comply with federal and state employment laws;
 - e. Processes to ensure there are no artificially-created barriers or restrictive seniority provisions; and,
 - f. Training opportunities to ensure they are available to minorities and women.

1.9 DEVELOPMENT AND EXECUTION OF ACTION PROGRAMS – 41 C.F.R. 60-2.17(c)

A. Management Responsibility

We realize that the ultimate success of affirmative action efforts will depend upon the degree of commitment of management at all levels to achieving objectives in this area. Managers at all levels should be aware their job duties include cooperating in efforts to comply with the EEO laws and the Affirmative Action Plan. Supervisory practices such as employee evaluations, counseling and discipline will be reviewed periodically to assure the practices are being administered properly and on a non-discriminatory basis. Supervisors are encouraged to seek the input of the EEO Coordinator with any questions regarding job-related personnel practices. The Company's rules and policies will be reviewed to ensure that they do not inadvertently discriminate

¹ These logs are contained in the Appendix.

against qualified persons on any prohibited basis.

B. Employment Procedures Analysis

We will continue to review our employment process to ensure that any one, or combination of more than one policy, practice or procedure does not have a disparate impact upon minority or female candidates, or even given the absence of a disparate impact, might individually and negatively influence an individual minority's or woman's opportunity for employment as compared to a non-minority's or male's opportunity. This review is the responsibility of Janell Breitzman or her designated successor. It will include but not be limited to the following:

1. Analysis of all requirements for all positions to ensure their job relatedness.
2. Analysis of recruitment and selection procedures.
3. Auditing of the hires and promotions of minorities and women to determine compliance with the objective of the Affirmative Action Plan.

C. Recruiting

Human Resources develops all procedures and all hiring at the Company is conducted on the basis of nondiscriminatory criteria. Specifically, one or more of the following criteria and procedures may be used to ensure that hiring decisions that are free of discrimination:

1. Job descriptions have been reviewed and revised to make sure duties are accurately described, that the experience and education requirements are job related, and that all incumbents meet minimum job requirements. Job titles have and will continue to be written without regard to sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law.
2. Application forms have been reviewed to ensure all requested information is job-related, and the forms comply with all applicable laws. In addition, all forms state the Company is an Equal Opportunity/Affirmative Action Employer.
3. Company representatives who are involved in the selection process have been briefed on the Company's obligations.
4. We will work with hiring managers to determine appropriate outreach to generate greater minority and female referrals. The outreach may include, but not be limited to area universities and two- and four-year local colleges, vocational technical schools, high schools, local business schools, and state and community organizations which attract qualified minority and female students.
5. All employees are encouraged to refer qualified applicants to the Company for employment. In addition, referral sources used will receive the Equal Employment Opportunity Policy and a letter encouraging their adherence to

this policy in their referrals.

6. The Company will identify local organizations and/or community agencies known to specialize placing and/or developing training programs for protected individuals and send them notices of vacant positions. When appropriate, the Company will invite community service and other outreach partners to tour the office and discuss the Company, job recruitment needs, selection process, and other details related to recruitment and placement. In the event a partner is unable to schedule an on-site meeting, the Company will suggest a telephone meeting so they can better identify qualified individuals for our positions.
7. When the Company recruits at colleges and universities, it will incorporate efforts to reach students who are covered by this AAP.
8. The Company will seek to include individuals covered by this AAP when employees are pictured in consumer and personnel recruitment advertising.
9. The Company will communicate to employees its obligation to take affirmative action to employ protected individuals and will encourage employee referral of covered applicants.
10. An invitation to participate in the Company's policy of affirmative action is disseminated to all applicants, as well as to all employees once the Company has extended a job offer, but before beginning employment duties.
11. All personnel and employment records made or kept by the Company are retained for the required period as mandated by OFCCP regulations.
12. The Company files annual EEO-1 and veteran employment reports with the appropriate agencies.
13. We will consider conducting an in-house seminar for all management personnel to further acquaint them with equal opportunity and affirmative action laws and regulations. Emphasis will be placed on understanding how these laws and regulations relate to recruitment, hire, promotion, etc.

D. Job Specification/Selection Process

As noted in the previous section, Human Resources develops all procedures and all hiring at the Company is conducted on the basis of nondiscriminatory criteria. The following criteria and procedures will be used to ensure that the selection process is free of discrimination:

1. The Company has developed position descriptions that accurately reflect position functions and are consistent for the same position from one location to another.

2. The Company has developed job or worker specifications that contain academic, experience, and skill requirements that do not constitute inadvertent discrimination. Develop specifications that are free from bias with regard to sex, age, race, color, religion, national origin, disability, veteran status, sexual orientation, or gender identity.
3. Approved position specifications and worker specifications will be made available to all members of management involved in the recruiting, screening, selection, and promotion process.
4. The Company will continue to use only worker specifications that include job-related criteria.
5. The Company will continue to carefully select and counsel all personnel involved in the recruiting, screening, selection, promotion, disciplinary, and related processes to eliminate bias in all personnel actions.

The Company will consider minorities and females not currently in the workforce who have the requisite skills for the job opening. The following are some methods by which the Company will recruit these individuals:

1. Through its relationship with job service, the Company may request job service to seek out and refer qualified minority and female applicants.
2. Employees currently in the workforce may be asked to refer qualified minorities and females and encourage them to apply for job openings.
3. Vocational schools and organizations promoting the interests of minorities and females may be notified in seeking applicants for employment opportunities.

E. Promotion Practices

In order to increase the opportunities of minorities and females for promotion and transfer, we will encourage supervisors and managers to consider minority and female employees for promotional opportunities prior to making every selection decision for their consideration.

To ensure that such decisions are being made in a nondiscriminatory manner, the following equal employment opportunity practices are in place:

1. The Company provides every reasonable opportunity for employees to advance. In this regard, training and other developmental opportunities are offered.
2. Employees are encouraged to contact their supervisor and/or the Human Resources Department, at any time, should they desire information relative to another position within the Company.
3. Management initiated promotions are based on performance and other job-related criteria without discrimination on account of sex, gender identity, sexual

orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law.

4. Most promotional opportunities are posted, providing all interested employees with an opportunity to apply and call their special skills to the attention of the manager.

F. Use of Local Training Programs and Training Institutions

We will support local training programs and institutions as a resource for employee education through our tuition reimbursement program that is open to all employees for their use in self-advancement.

G. Compensation Systems

As part of its affirmative action obligations, the Company has reviewed its compensation systems to determine whether those systems are being administered without regard to an individual's sex, race, ethnicity, or other characteristic protected by law. Our analysis did not identify any significant problem areas. If the Company discovers significant compensation system differences between individuals who are similarly situated, it will determine whether they are the result of legitimate, nondiscriminatory factors.

H. Terminations

The Company has evaluated its termination practices to determine whether there are disparities on the basis of sex, race or ethnicity. When terminations or reductions in force are necessary, the Company makes its decisions without regard to sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law.

We will develop any additional action-oriented programs as these may be necessary to correct any problems that arise which deter the attainment of our goals and objectives. We plan to make every good faith effort to make the Affirmative Action Plan successful.

1.10 INTERNAL AUDIT AND REPORTING SYSTEMS – 41 C.F.R. 60-2.17(d)

Inherent in the AAP is the need for periodic self-assessment of challenges encountered, corrective action taken, and progress made. Self-evaluation requires complex record keeping systems on applicants, employees, and components of the AAP itself.

The Company maintains a personnel audit and reporting system to measure the effectiveness of the plan. The Company's audit and reporting system is designed and implemented to:

1. Measure the effectiveness of the AAP
2. Identify any need for remedial action
3. Determine the degree to which the Company's objectives are being attained

4. Determine whether protected individuals have had the full opportunity to equal employment and to participate in all Company sponsored educational, training, recreational, and social activities
5. Measure the Company's compliance with the AAP's specific obligations
6. Document the actions taken to monitor the Company's compliance with the AAP's specific obligations.

To achieve this goal, the following records are maintained:

1. Applicant Flow Logs
2. Hire Logs
3. Promotion and Transfer Logs
4. Layoff Logs
5. Recall Logs
6. Termination Logs

These records are summarized and reviewed on a quarterly and annual basis by the EEO Coordinator to evaluate the degree to which equal employment opportunity and organizational objectives are being obtained. If problems are identified, corrective actions are recommended. The EEO Coordinator will discuss any problems with managers and supervisors and outline suggestions for solutions. Any managers or supervisors identifying any problem areas will report them to the EEO Coordinator immediately.

In order to measure the effectiveness of the AAP, Company may also take the following actions:

1. Audit its voluntary self-identification process to monitor the number of individuals who choose to self-identify and evaluate whether changes could be made to Company's self-identification process to encourage greater voluntary self-identification.
2. Report on the organization's progress towards equal employment opportunity, and any identified areas for concern, to top management and those involved in the selection process, so that immediate and appropriate steps can be taken to resolve any issues.
3. Examine available utilization and benchmark data regarding protected individuals and develop action-oriented programs to address any areas of underutilization.
4. Review available data computations and analyses regarding applicants and hires.
5. Review the effectiveness of its recruitment and outreach activities.
6. Audit its communications with vendors and subcontractors to ensure that such communications reflect the Company's commitment to equal employment opportunity and affirmative action.

7. Audit its communications with applicants and employees to ensure that such communications reflect the Company's commitment to equal employment opportunity and affirmative action.
8. Audit its job listings to ensure that the postings reflect the Company's commitment to equal employment opportunity and affirmative action, and that such postings are timely listed with the appropriate state employment delivery system.
9. Audit its personnel policies to ensure that such policies reflect the Company's commitment to equal employment opportunity and affirmative action.
10. Audit its personnel processes to ensure that individuals have equal opportunity in employment without regard to sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law.
11. Audit any mental and physical qualifications to ensure that they are job-related and consistent with business necessity.

Where the affirmative action program is found to be deficient, Company shall endeavor to undertake necessary action to bring the program into compliance.

The Company will monitor its success in meeting its affirmative action goals annually and note such progress in its future year's plan. Impact ratios on various personnel activities may be used to determine if any personnel practices are having adverse impact on minorities or women.

PART 2: AFFIRMATIVE ACTION PLAN FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES

2.1 POLICY STATEMENT – 41 C.F.R. 60-300.44(a) and 41 C.F.R. 60-741.44(a)

It is the policy of the Company and my personal commitment that equal opportunity be provided in the employment and advancement of all persons regardless of race, religion, color, national origin, sex, age, disability, veteran status, sexual orientation and gender identity, including at the executive level. The Company does not and will not discriminate against any applicant or employee on the basis of race, religion, color, national origin, sex, age, disability, veteran status, sexual orientation, and gender identity for any position for which the applicant or employee is qualified.

In addition, the Company is committed to taking affirmative action to employ and advance in employment qualified protected veteran employees and individuals with disabilities. Such affirmative action will apply to all employment practices, including, but not limited to, hiring, upgrading, demotion, transfer, recruitment, recruitment advertising, layoff, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship and on-the-job training. Decisions related to personnel policies and practices will be made on the basis of an individual's capacity to perform a particular job and the feasibility of any reasonable job accommodation.

The Company will make every effort to provide reasonable accommodations for any physical and mental limitations of individuals with disabilities and disabled veterans. Employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any activity protected by state, federal, or local anti-discrimination laws, including the following activities:

1. Filing a complaint;
2. Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA), or any other federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans; Section 503 of the Rehabilitation Act of 1973, as amended (Section 503); or any other federal, state or local law requiring equal opportunity for individuals with disabilities;
3. Opposing any act or practice made unlawful by VEVRAA or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans; Section 503 or its implementing regulations; or any other federal, state or local law requiring equal opportunity for disabled persons; or
4. Exercising any other right protected by VEVRAA or Section 503 or their implementing regulations.

The Company's obligations in this area stem from not only adherence to various state and federal regulations, but also from our commitment as an employer in this community to provide job opportunities to all persons regardless of race, religion, color, national origin, sex, age, disability, veteran status, sexual orientation or gender identity. The Company's EEO and affirmative action obligations are fully supported by the Company's President.

The Company will also continually implement and update audit and reporting systems that measure the effectiveness of the AAP, identify the need for remedial actions, determine if objectives were attained, and determine if opportunities to participate in employer-sponsored activities were extended to all employees and applicants. We are also committed to abiding by the Pay Transparency Nondiscrimination Provision and, therefore, will not discharge or in any other manner discriminate or retaliate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant.

Company employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained not to disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or other action, including an investigation conducted by the employer, or (c) consistent with the Company's legal duty to furnish the information.

If you have any questions regarding our equal employment opportunity or harassment policies or complaint procedures, you may contact the EEO Coordinator. Parts of the Affirmative Action Plan may be reviewed, as appropriate, by making an appointment with this office.

Janell Breitzman, EEO Coordinator

2.2 REQUEST FOR SELF-IDENTIFICATION – 41 C.F.R. 60-300.42; 41 C.F.R. 60-741.42

In order to notify applicants and employees of the existence of and the opportunity to participate in this affirmative action program and to provide sufficient data to allow the Company to measure and improve, if necessary, the effectiveness of the Company's affirmative action efforts, the Company invites applicants and employees to complete an invitation to self-identify status as a person with a disability or as a protected veteran as follows:

1. When an applicant applies or is considered for employment, the Company provides the applicant with a copy of the form attached at Appendix 14, at the same time the Company invites the applicant to self-identify race, ethnicity, sex, and disability status.
2. Following an offer of employment but before the individual begins his/her job duties, the Company provides an additional copy of the form attached at Appendix 14.

3. Recognizing an individual's status regarding disability may change over time and/or an employee may feel more comfortable disclosing an existing disability after being employed for a period of time, the Company also sends a copy of the form attached as Appendix 14 to all employees at least once every five years. In addition, the Company will post a copy of the Invitation to Self-Identify and at least once during the five-year intervals between workplace surveys, sends a written reminder to employees that they may voluntarily update their disability status.

The Company keeps all self-identification information confidential and maintains it in a data analysis file rather than in individual employee personnel or medical files.

2.3 REVIEW OF PERSONNEL PROCESSES – 41 C.F.R. 60-300.44(b); 60-741.44(b)

To ensure that all personnel activities are conducted in a job-related manner which provides and promotes equal employment opportunity for all known protected veterans and employees and individuals with disabilities, reviews are periodically made of our examination and selection methods to identify barriers to employment, training, and promotion, including the following:

1. The Company periodically conducts a review of its employment processes to ensure the thorough and systematic consideration of the job qualifications of (a) known protected veteran applicants and employees, and (b) applicants and employees with disabilities, for job vacancies filled either by external hiring or internal promotions/transfers, as well as for all training opportunities available. In order to determine whether an individual is qualified for a particular job, the content of the job is closely examined, as well as the job qualifications of known protected veterans and individuals with disabilities, both applicants and employees. In determining the qualifications of a protected veteran, consideration is given only to that portion of the military record, including discharge papers, relevant to the job qualifications for which the veteran is being considered.
2. The Company ensures that its personnel processes do not stereotype individuals with disabilities or protected veterans in a manner which limits their access to jobs for which they are qualified.
3. The Company ensures that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies.
4. The Company provides reasonable accommodations for applicants and employees with disabilities, unless such accommodations will cause undue hardship, to ensure that equal employment opportunity is extended in the operation of its personnel processes.
5. The Company ensures that its information and communications systems are accessible to all employees and applicants with disabilities, even in the absence of a specific request for accommodation.

2.4 PHYSICAL AND MENTAL QUALIFICATIONS – 41 C.F.R. 60-300.44(c); 60-741.44(c)

The Company will ensure that all physical and mental qualifications and requirements are job-related, and will periodically review these qualifications and requirements as they relate to employment, training, and promotion.

The physical and mental job requirements are reviewed periodically to determine whether or not they are job-related and consistent with business necessity and safe performance on the job. The Company will also schedule for review any previously reviewed classification will be reviewed again if there is a change in working conditions that affects the job's physical or mental requirements (e.g., new requirements, new equipment).

If the Company requires a determination of an applicant's (post job offer) or employee's disability, it may require the applicant or employee to provide medical documentation relating to the impairment, or, in the alternative, may require the applicant or employee to undergo a medical examination at the Company's expense.

Whenever the Company inquiries into an applicant's (post job offer) or employee's physical or mental condition or conducts a medical examination post offer or change in employment status, information obtained in response to such inquiries or examination is kept confidential except that: (a) supervisors and managers may be informed regarding restrictions on the work or duties of disabled individuals and regarding accommodations and (b) others may be informed as is permitted under applicable law.

2.5 REASONABLE ACCOMMODATIONS – 41 C.F.R. 60-300.44(d); 60-741.44(d)

The Company will make every effort to provide reasonable accommodations for the known physical and mental limitations of applicants and employees with disabilities unless it can demonstrate that the accommodations would impose an undue hardship on the operation of business. The Company ensures that qualified applicants and employees with disabilities who are unable to fully utilize the system are provided equal opportunities to apply and be considered for all jobs.

The Company will also confidentially review performance issues involving employees with known disabilities to determine whether a reasonable accommodation is needed when: 1) the employee is having significant difficulty with job performance, and 2) it is reasonable to conclude that the problem is related to the known disability.

In addition, if an employee who is known to be a disabled veteran is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the Company will confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability; if the employee responds affirmatively, the Company will confidentially inquire whether the employee is in need of a reasonable accommodation.

Employees may also contact the following at any time to formally request an accommodation:

Name: Janell Breitzman
Title: Director of Human Resources
Phone: 262-330-8225 (direct)
Email: janell@castlewi.com

The Company has developed and implemented a set of procedures to ensure that its employees with disabilities and protected veterans are not harassed due to those conditions. A copy of the discrimination, sexual harassment, and related retaliation policy, which includes the prohibition of harassment of individuals with disabilities and protected veterans, is available for distribution to new as well as to existing employees.

The Company will also take all necessary steps to ensure that no person intimidates, threatens, coerces or discriminates against any individual for the purpose of interfering with the filing of a complaint, furnishing information or assisting or participating in any manner in an investigation, compliance review, hearing or any other activity related to the administration of the Acts.

2.6 OUTREACH, POSITIVE RECRUITMENT AND EXTERNAL DISSEMINATION OF POLICY – 41 C.F.R. 60-300.44(f); 60-741.44(f)

The EEO Coordinator periodically reviews employment practices to determine whether affirmative action for qualified disabled and covered veterans is being practiced. To practice the required affirmative action, the Company will or has undertaken the following outreach and positive recruitment activities:

1. Initiate and maintain communication with organizations having special interests in the recruitment of and job accommodations for protected veterans and individuals with disabilities.
2. The Company will disseminate information concerning employment opportunities to outlets that primarily reach protected veterans and individuals with disabilities.
3. The Company will inform all recruiting sources of its affirmative action policy for protected veterans and individuals with disabilities.
4. The Company will enlist the assistance and support of recruiting sources to aid in providing meaningful employment opportunities to qualified disabled and covered veteran workers.
5. Where feasible, the Company may enlist the assistance and support of organizations to aid in developing on-the-job training opportunities for veterans and individuals with disabilities to provide meaning employment opportunities for such individuals.

2.7 INTERNAL DISSEMINATION OF THE POLICY – 41 C.F.R. 60-300.44(g); 60-741.44(g)

In order to gain positive support and understanding for the affirmative action program for protected veterans and individuals with disabilities, the Company will implement or continue to implement the following internal dissemination procedures, all of which are the responsibility of the EEO Coordinator. The following procedures are designed to foster support and understanding by our executive staff, management, supervisors, and other employees in an effort to encourage all employees to take the necessary actions to aid us in meeting our obligations.

1. The Company's Equal Employment Opportunity/Affirmative Action Policy and the existence of this Affirmative Action Plan is communicated to all employees. These policies are explained in the Company's Employee Handbook, and will otherwise be made available to employees upon request.
2. The Company may conduct special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation.
3. The Company will ensure the policy is discussed as part of employee orientation and appropriate management training programs.
4. When employees are featured in employee handbooks or similar publications for employees, the Company will strive to include employees with disabilities and veterans.
5. The EEO Coordinator and other staff monitor all employment functions and processes, placements, transfers, promotions and terminations at all levels to ensure that the Company's obligation to engage in affirmative action to employ and promote qualified disabled and covered veteran workers is being fully implemented.
3. The Company periodically informs all employees and prospective employees of its commitment to engage in affirmative action to increase employment opportunities for qualified disabled and covered veteran workers. The following means are used to accomplish this objective:
 - a. Our EEO/AA Policy, which references the disabled and covered veterans, is posted in all Company locations.
 - b. The official equal opportunity posters, which reference the disabled and covered veterans, are appropriately displayed.
 - c. Recruiting sources, agencies and schools are made aware of our EEO/AA Policy and will be requested to refer qualified disabled and covered veteran applicants.
 - d. Prospective employees can see our EEO/AA Policy when they apply for employment.

2.8 AUDIT AND REPORTING SYSTEM – 41 C.F.R. 60-300.44(h); 41 C.F.R. 60-741.44(h)

The Company has developed and will implement an audit and reporting system that addresses the following:

1. Measures the effectiveness of the Company's overall affirmative action program and whether the Company is in compliance with specific obligations.
2. Indicates the need for remedial action. Any corrective actions will be the responsibility of the EEO Coordinator.
3. Measures the degree to which our affirmative action objectives are being met.
4. Identifies any undue hurdles for individuals with disabilities and protected veterans with regard to employer sponsored educational, training, recreational, and social activities. This will also include, but is not limited to, reviewing the on-line and electronic application system to determine its accessibility and ensuring that procedures to request accommodations are prominently displayed and that individuals with disabilities can readily obtain the needed reasonable accommodation.

2.9 RESPONSIBILITY FOR IMPLEMENTATION – 41 C.F.R. 60-300.44(i); 41 C.F.R. 60-741.44(i)

A. EEO Coordinator

The EEO Coordinator is responsible for overseeing and ensuring all Company affirmative action activities for the disabled and covered veterans. Her identity appears on all internal and external communications regarding the Company's affirmative action plans. This executive has the support of top management to carry out this plan. She is responsible for:

1. Monitoring the application of equal employment opportunity policies.
2. Ensuring that the AAP is reviewed and updated annually in accordance with the Company's stated policy.
3. Participating in periodic discussions with management, supervisors, and all other appropriate personnel to ensure AAP and equal employment opportunity policies are being followed.
4. Reviewing the qualifications of all employees to ensure that equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.
5. Conducting periodic audits of training programs and hiring and promotion patterns to remove impediments to the attainment of AAP goals and objectives.

6. Periodically reviewing policies and practices in an effort to identify areas to develop solutions.
7. Ensuring that the Company's equal opportunity and affirmative action policy is posted internally.
8. Providing direction to employees, as necessary, to carry out all actions required to meet the Company's equal employment opportunity and affirmative action commitments.
9. Review, report on, and update the Company's AAP at least on an annual basis in accordance with stated policy.
10. Periodically review job descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensure that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.
11. Advise management in the modification and development of policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.
12. Conduct periodic audits to ensure all required posters and those advertising the Company's equal employment opportunity policies and AAP are displayed and that the Company's equal employment opportunity and AAP policies are being communicated.
13. Assist in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations.

B. Managers and Supervisors

In their direct day-to-day contact with employees, managers and supervisors have assumed certain responsibilities to help the Company ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to the following:

1. Adhering to the equal employment opportunity policy.
2. Supporting and assisting the EEO Coordinator in maintaining and successfully implementing the AAP.
3. Taking action to prevent harassment of employees who are protected veterans or who have disabilities.
4. Ensuring that all interviews, offers of employment, and/or wage commitments are consistent with the AAP.

5. Implementing the internal promotion and transfer of all employees under their supervision consistent with AAP goals and objectives.
6. Assisting in identifying problem areas and providing needed information for establishing and meeting department affirmative action goals and objectives.
7. Seeking and sharing information on reasonable accommodations which have been or could be made for known disabilities.

2.10 TRAINING – 41 C.F.R. 60-300.44(j); 60-741.44(j)

The Company trains all employees involved with the recruitment, selection, promotion, discipline, training, and related personnel processes of individuals with disabilities or protected veterans to ensure compliance with affirmative action goals.

2.11 DATA COLLECTION ANALYSIS – 41 C.F.R. 60-300.44(k); 60-741.44(k)

The Company has adopted the current national percentage of veterans in the civilian labor force of 5.4% as its hiring benchmark for protected veterans. The Company will update its hiring benchmark as new data is published and/or updated by the Office of Federal Contract Compliance Programs (OFCCP), U.S. Department of Labor. This hiring benchmark is applied to each job group within the Company.

The Company has also adopted the current national utilization goal of 7.0% for qualified individuals with disabilities. The Company will update its utilization goal as new data is published and/or updated by OFCCP. The 7.0% utilization goal is applied to each job group within the Company.

Goals and/or benchmarks do not require that the Company hire, promote, train, and/or retain a specified number of individuals with disabilities and/or protected veterans. These goals/benchmarks are not rigid and inflexible quotas which must be met, but are instead targets that are reasonably attainable by means of applying good faith efforts to make all aspects of the AAP work. A goal is a guidepost against which the Company or a compliance agency can measure progress in meeting affirmative action goals and benchmarks.

2.12 COMPENSATION – 41 C.F.R. 60-300.21(i); 60-741.21(i)

It is the Company's policy that when offering employment or promotion to protected veterans or individuals with disabilities, the amount of compensation offered will not be reduced because of any disability income, pension, or other benefit the applicant or employee receives from another source.

In addition, the Company is also committed to abiding by the Pay Transparency Nondiscrimination Provision. Employees or applicants who have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant will not be discharged or in



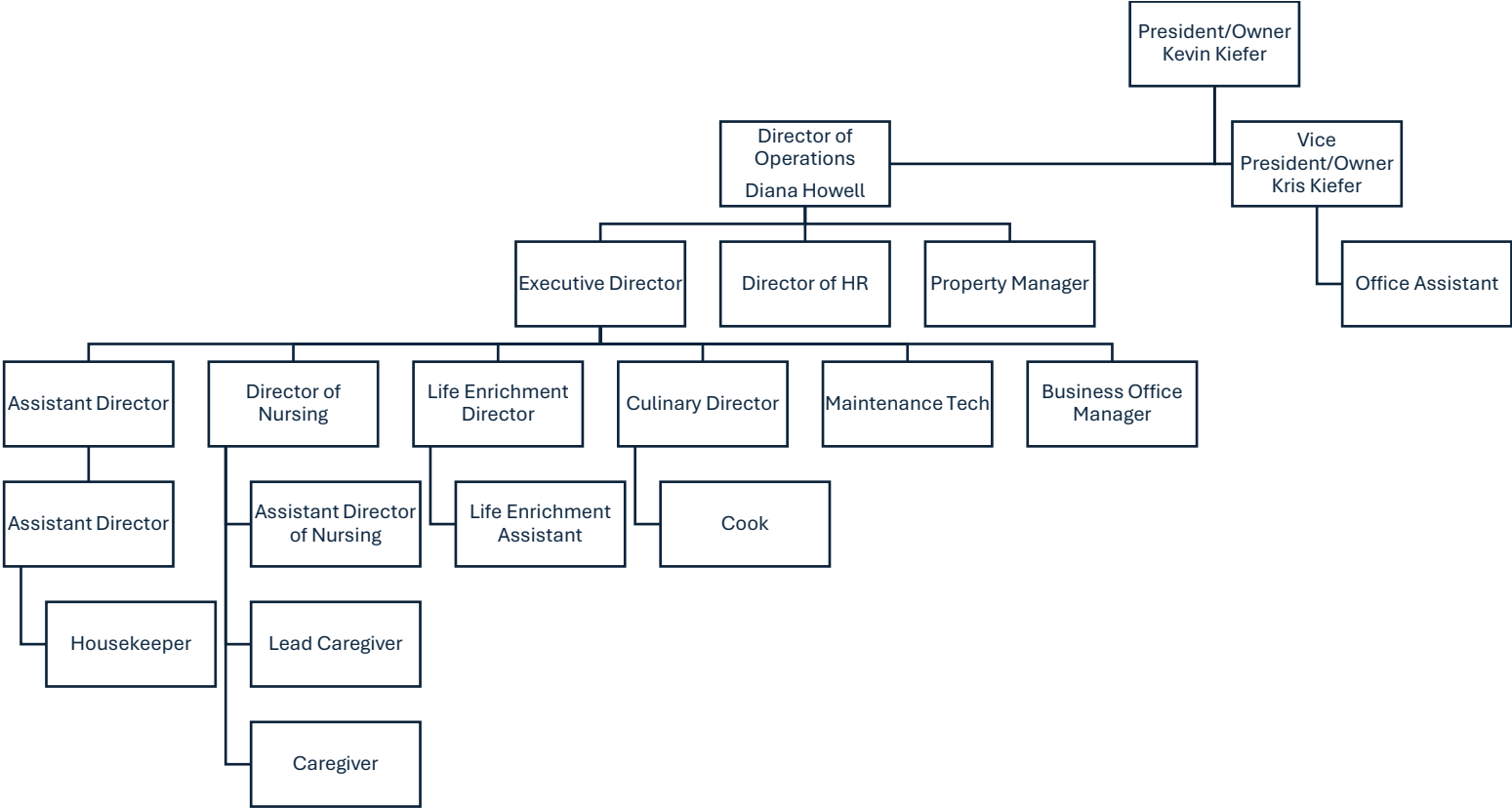
any other manner be discriminated or retaliated against. Employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, or (c) consistent with the Company's legal duty to furnish the information.

APPENDIX

<u>Appendix No.</u>	<u>Description</u>
1	Organizational Chart
2	Organizational Profile
3	Job Group Analysis
4	Availability Analysis
5	Utilization Analysis
6	Applicant Flow Logs
7	Hire Logs
8	Promotion Logs
9	Layoff Logs
10	Recall Logs
11	Termination Logs
12	Invitation to Self-Identify – Disability
13	Invitation to Self-Identify - Veteran
14	Current Placement Goals

Castle Senior Living, Inc. – 2024 Organizational Chart

The Grand Hills Castle:



CASTLE SENIOR LIVING, INC.

ORGANIZATIONAL PROFILE - THE GRAND HILLS CASTLE

2024

<u>Last Name</u>	<u>First Name</u>	<u>Ethnicity</u>	<u>Gender</u>	<u>EEO ID</u>	<u>Job Title</u>	<u>EEO Description</u>	<u>AAP Salary Code</u>	<u>Work Location</u>
Francher	Kathryn	White	Female	5	Receptionist	Administrative Support Workers	A	The Grand Hills Castle
Vetter	Aidan	White	Male	9	Certified Caregiver	Service Worker	A	The Grand Hills Castle
Kiefer	Stella	White	Female	5	Office Assistant	Administrative Support Workers	B	Castle - Corporate Office
Kiefer	Leslie	White	Female	5	Office Assistant	Administrative Support Workers	B	Castle - Corporate Office
Grube	Leanne	White	Female	9	Certified Caregiver	Service Worker	B	The Grand Hills Castle
Kiefer	Scarlett	White	Female	5	Office Assistant	Administrative Support Workers	C	Castle - Corporate Office
Semrad	Mary	White	Female	5	Receptionist	Administrative Support Workers	C	The Grand Hills Castle
Heisel	Adreanna	Amer. Ind or AK Native	Female	9	Housekeeper	Service Worker	C	The Grand Hills Castle
Enderby	Julie	White	Female	9	Life Enrichment Assistant	Service Worker	C	The Grand Hills Castle
Kelnhofner	Maija	White	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Alexander	Wallett	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Alexander	Chyanne	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Coleman	Aiyana	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Fischer	Ember	White	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Foti	Liz	White	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Frohna	Mark	Two or more Races	Male	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Gaston	Lashonia	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Jones	Deloris	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Lee	Markeisha	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Lewis	Sky	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Payne	Kacee	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Perkins	Lameisha	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Robinson	Brittney	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Thomas	Debra	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Wofford	Camilliana	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Kizaric	Susan	White	Female	9	Life Enrichment Assistant	Service Worker	C	The Grand Hills Castle
Hamilton	Camara	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Chada Hadnot	Theresa	Two or more Races	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Humphrey	Nyla	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Zhong	Valerie	Asian	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Grube	Kaylee	White	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Grube	Jayna	White	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Savage	Ladonna	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Wolff	Joshua	White	Male	9	Cook	Service Worker	C	The Grand Hills Castle
Wynn	Destini	Black or African American	Female	9	Cook	Service Worker	C	The Grand Hills Castle
Thomas	Shavanna	Black or African American	Female	9	Lead Certified Caregiver	Service Worker	C	The Grand Hills Castle
JONES HENNING	SHANTICE	Black or African American	Female	9	Cook	Service Worker	C	The Grand Hills Castle
Pacheco	Raul	Hispanic or Latino	Male	9	Cook	Service Worker	C	The Grand Hills Castle
Collins	Calnisha	Black or African American	Female	9	Lead Certified Caregiver	Service Worker	C	The Grand Hills Castle
Harrington	Colleen	White	Female	9	Life Enrichment Assistant	Service Worker	C	The Grand Hills Castle
Stewart-Veasley	Candis	Black or African American	Female	9	Certified Caregiver	Service Worker	C	The Grand Hills Castle
Sexton	Nicole	White	Female	5	Office Assistant	Administrative Support Workers	C	The Grand Hills Castle
Whitefeather	Michelle	Nat HI or Oth Pac Island	Female	9	Lead Certified Caregiver	Service Worker	D	The Grand Hills Castle
Badzinski	Debra	White	Female	9	Certified Caregiver	Service Worker	D	The Grand Hills Castle
Triplett	Angela	Black or African American	Female	9	Lead Certified Caregiver	Service Worker	D	The Grand Hills Castle
Hawver	Rachel	White	Female	5	Culinary Director	Administrative Support Workers	D	The Grand Hills Castle
Manke	Laurayn	White	Female	1.2	Assistant Director (AD)	First / Mid-Level Officials and Managers	D	The Grand Hills Castle
Richer	Renee	White	Female	5	Life Enrichment Director	Administrative Support Workers	E	The Grand Hills Castle
Kiefer	Jennifer	White	Female	5	AP & AR Specialist	Administrative Support Workers	E	Castle - Corporate Office
Weiland	Jeannie	White	Female	5	Receptionist	Administrative Support Workers	E	The Grand Hills Castle
Wade	Robin	White	Female	1.2	Assistant Director (AD)	First / Mid-Level Officials and Managers	E	The Grand Hills Castle
Coons	Bill	White	Male	9	Maintenance Technician	Service Worker	G	Castle - Corporate Office
McCoy	Jonathan	White	Male	9	LPN Supervisor	Service Worker	G	The Grand Hills Castle
Reuter	Mitchell	White	Male	1.2	Executive Director (ED)	First / Mid-Level Officials and Managers	I	The Grand Hills Castle
Kitzke	Jolie	White	Female	2	Dir of Nursing (DON)	Professionals	J	The Grand Hills Castle
Kiefer	Kevin	White	Male	1.1	President	Executive / Senior Level Officials and Managers	J	Castle - Corporate Office
Kiefer	Kristopher	White	Male	1.1	Vice President	Executive / Senior Level Officials and Managers	J	Castle - Corporate Office
Breitzman	Janell	White	Female	1.2	Dir of Human Resource	First / Mid-Level Officials and Managers	K	Castle - Corporate Office
Howell	Diana	Hispanic or Latino	Female	1.1	Dir of Operations	Executive / Senior Level Officials and Managers	L	Castle - Corporate Office

APPENDIX 2

ORGANIZATIONAL PROFILE	Castle Senior Living, Inc. -- Grand Hills Castle															
COMPANY NAME:																
DEPARTMENT:	Senior Leadership															
PERIOD COVERED:	January 1, 2024 - December 31, 2024															
							FEMALE						MALE			
Job Title	Job Group	Salary Code	Total Employees	Total Minorities	Total Females	W	B	H	AP	AI	Total Males	W	B	H	AP	AI
President	1.1	J	1	0	0	0	0	0	0	0	1	1	0	0	0	0
Vice President	1.1	J	1	0	0	0	0	0	0	0	1	1	0	0	0	0
Director of Operations	1.1	L	1	1	1	0	0	1	0	0	0	0	0	0	0	0
TOTAL			3	1	1	0	0	1	0	0	2	2	0	0	0	0
			100.0%	33.3%	33.3%	0.0%	0.0%	33.3%	0.0%	0.0%	66.7%	66.7%	0.0%	0.0%	0.0%	0.0%

[illegible]

[illegible]

ORGANIZATIONAL PROFILE	Castle Senior Living, Inc. - Grand Hills Castle															
COMPANY NAME:																
DEPARTMENT:	Operations															
PERIOD COVERED:	January 1, 2024 - December 31, 2024															
							FEMALE						MALE			
Job Title	Job Group	Salary Code	Total Employees	Total Minorities	Total Females	W	B	H	AP	AI	Total Males	W	B	H	AP	AI
Executive Director	1.2	I	1	0	0	0	0	0	0	0	1	1	0	0	0	0
Assistant Director	1.2	D	1	0	1	1	0	0	0	0	0	0	0	0	0	0
Assistant Director	1.2	E	1	0	1	1	0	0	0	0	0	0	0	0	0	0
Culinary Director	5	D	1	0	1	1	0	0	0	0	0	0	0	0	0	0
Maintenance Technician	9	G	1	0	0	0	0	0	0	0	1	1	0	0	0	0
Housekeeper	9	C	1	1	1	0	0	0	0	1	0	0	0	0	0	0
Cook	9	C	4	3	2	0	2	0	0	0	2	1	0	1	0	0
TOTAL			10	4	6	3	2	0	0	1	4	3	0	1	0	0
			100.0%	40.0%	60.0%	30.0%	20.0%	0.0%	0.0%	10.0%	40.0%	30.0%	0.0%	10.0%	0.0%	0.0%

[illegible]

[illegible]

COMPANY	CASTLE SENIOR LIVING - THE GRAND HILLS CASTLE																
JOB GROUP ANALYSIS																	
JOB GROUP NAME:	1.1 EXECUTIVES/SENIOR LEVEL MANAGERS																
PERIOD	2024																
							FEMALE								MALE		
Job		Salary	Total	Total													
Title	Department	Code	Employees	Minorities	Total	W	B	H	Asian	AIAN	NHoPI	2+	Total	W	B	H	Asian
President	Administration	J	1										1	1			
Vice President	Administration	J	1										1	1			
Director of Operations	Administration	L	1	1	1			1									
TOTAL			3	1	1			1					2	2			
			100.0%	33.3%	33.3%			33.3%					66.7%	66.7%			

COMPANY	CASTLE SENIOR LIVING - THE GRAND HILLS CASTLE																			
JOB GROUP ANALYSIS																				
JOB GROUP NAME:	1.2 FIRST/MID LEVEL MANAGERS																			
PERIOD	2024																			
							FEMALE								MALE					
Job		Salary	Total	Total																
Title	Department	Code	Employees	Minorities	Total	W	B	H	Asian	AIAN	NHoPI	2+	Total	W	B	H	Asian	AIAN	NHoPI	2+
Director of Human Resources	Administration	K	1		1	1														
Assistant Director	Management	D/E	2		2	2														
Executive Director	Management	I	1										1	1						
TOTAL			4		3	3							1	1						
			100.0%		75.0%	75.0%							25.0%	25.0%						

[illegible]

[illegible]

COMPANY	CASTLE SENIOR LIVING - THE GRAND HILLS CASTLE																			
JOB GROUP ANALYSIS																				
JOB GROUP NAME:	9. SERVICE																			
PERIOD	2024																			
							FEMALE								MALE					
Job		Salary	Total	Total																
Title	Department	Code	Employees	Minorities	Total	W	B	H	Asian	AIAN	NHoPI	2+	Total	W	B	H	Asian	AIAN	NHoPI	2+
Certified Caregiver	Caregivers	A/B/C/D	27	19	25	7	16		1			1	2	1						1
Cook	Operations	C	4	3	2		2						2	1		1				
Housekeeper	Operations	C	1	1	1															
Lead Certified Caregiver	Caregivers	C/D	4	4	4		3				1									
Life Enrichment Assistant	Caregivers	C	3		3	3														
LPN Supervisor	Caregivers	G	1										1	1						
Maintenance Technician	Operations	G	1										1	1						
TOTAL			41	27	35	10	21		1		1	1	6	4		1				1
			100.0%	65.9%	85.4%	24.4%	51.2%		2.4%		2.4%	2.4%	14.6%	9.8%		2.4%				0.02439

COMPANY	CASTLE SENIOR LIVING, INC. - BIRCHROCK CASTLE																
AVAILABILITY ANALYSIS																	
JOB GROUP:	EXECUTIVES																
PERIOD	2024																
	RAW STATISTICS								WEIGHTED STATISTICS								
FACTOR		TOTAL							VALUE		TOTAL						
	FEMALE	MIN.	B	H	Asian	AIAN	NHoPI	2+	WEIGHT	FEMALE	MIN.	B	H	Asian	AIAN	NHoPI	2+
PERCENTAGE OF MINORITIES AND WOMEN WITH REQUISITE SKILLS IN REASONABLE RECRUITMENT AREA	80.0%	10.2%	3.5%	3.6%	1.9%	0.3%	0.0%	0.8%	100.0%	80.0%	10.2%	3.5%	3.6%	1.9%	0.3%	0.0%	0.8%
PERCENTAGE OF MINORITIES AND WOMEN PROMOTABLE, TRANSFERABLE, AND TRAINABLE WITHIN FACILITY	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FINAL AVAILABILITY									100.0%	80.0%	10.2%	3.5%	3.6%	1.9%	0.3%	0.0%	0.8%

External -- Milwaukee-Waukesha-West Allis, WI Metro Area plus Racine & Walworth Counties - From: <https://www.census.gov/acs/www/data/eo-data/eo-tables-2018/>
Occupation Codes: 11-10xx / 0010 (top executives)
Internal -- none

Comments applicable to the entire workbook

Raw statistics for #1 External comes from census data. Use data for area (US, county, PMSA/MSA) from which you recruit. Milwaukee-Waukesha-West Allis Metro plus Racine & Walworth Counties are the most applicable for this facility.
Raw statistics for #2 Internal comes from the job group bottom-line totals for the job groups from which promotable candidates are found (feeder group).
Value weight represents the importance of the factor (internal/external) when filling job openings in the job group.
Highlighted cells are the ones in which you input data. Others are formulas.

If the contractor is "underutilized" the contractor must establish placement goals

COMPANY	CASTLE SENIOR LIVING, INC. - BIRCHROCK CASTLE																
AVAILABILITY ANALYSIS																	
JOB GROUP:	MANAGERS																
PERIOD	2024																
	RAW STATISTICS									WEIGHTED STATISTICS							
FACTOR		TOTAL							VALUE		TOTAL						
	FEMALE	MIN.	B	H	Asian	AIAN	NHoPI	2+	WEIGHT	FEMALE	MIN.	B	H	Asian	AIAN	NHoPI	2+
PERCENTAGE OF MINORITIES AND WOMEN WITH REQUISITE SKILLS IN REASONABLE RECRUITMENT AREA	34.3%	11.5%	4.3%	3.5%	2.4%	0.4%	0.0%	0.9%	100.0%	34.3%	11.5%	4.3%	3.5%	2.4%	0.4%	0.0%	0.9%
PERCENTAGE OF MINORITIES AND WOMEN PROMOTABLE, TRANSFERABLE, AND TRAINABLE WITHIN FACILITY	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FINAL AVAILABILITY									100.0%	34.3%	11.5%	4.3%	3.5%	2.4%	0.4%		0.9%

External -- Milwaukee-Waukesha-West Allis, WI Metro Area plus Racine & Walworth Counties - From: <https://www.census.gov/acs/www/data/eeo-data/eeo-tables-2018/>
Occupation Codes: 0136/11-3121 (human resources managers); 0010/11-1021 (top executives)
Internal -- none

Comments applicable to the entire workbook

Raw statistics for #1 External comes from census data. Use data for area (US, county, PMSA/MSA) from which you recruit. Milwaukee-Waukesha-West Allis Metro plus Racine & Walworth Counties are the most applicable for this facility
Raw statistics for #2 Internal comes from the job group bottom-line totals for the job groups from which promotable candidates are found (feeder group).
Value weight represents the importance of the factor (internal/external) when filling job openings in the job group.
Highlighted cells are the ones in which you input data. Others are formulas.

If the contractor is "underutilized" the contractor must establish placement goals

COMPANY	CASTLE SENIOR LIVING, INC. - BIRCHROCK CASTLE																
AVAILABILITY ANALYSIS																	
JOB GROUP	PROFESSIONALS																
PERIOD	2024																
	RAW STATISTICS									WEIGHTED STATISTICS							
FACTOR	TOTAL								VALUE	TOTAL							
	FEMALE	MIN.	B	H	Asian	AIAN	NHoPI	2+	WEIGHT	FEMALE	MIN.	B	H	Asian	AIAN	NHoPI	2+
PERCENTAGE OF MINORITIES AND WOMEN WITH REQUISITE SKILLS IN REASONABLE RECRUITMENT AREA	78.1%	18.8%	10.9%	3.1%	3.3%	1.0%	0.0%	0.6%	100.0%	78.1%	18.8%	10.9%	3.1%	3.3%	1.0%	0.0%	0.6%
PERCENTAGE OF MINORITIES AND WOMEN PROMOTABLE, TRANSFERABLE, AND TRAINABLE WITHIN FACILITY	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FINAL AVAILABILITY									100.0%	78.1%	18.8%	10.9%	3.1%	3.3%	1.0%	0.0%	0.6%

External -- Milwaukee-Waukesha-West Allis, WI Metro Area plus Racine & Walworth Counties - From: <https://www.census.gov/acs/www/data/eeo-data/eeo-tables-2018/>
Occupation Codes: 0350 / 11-9111 (medical & health services managers)
Internal -- from service group (formula = total female LPN divided by total employees service) (formula = total minority LPN divided by total employees service)

Comments applicable to the entire workbook

Raw statistics for #1 External comes from census data. Use data for area (US, county, PMSA/MSA) from which you recruit. Milwaukee-Waukesha-West Allis Metro plus Racine & Walworth Counties are the most applicable for this facility
Raw statistics for #2 Internal comes from the job group bottom-line totals for the job groups from which promotable candidates are found (feeder group).
Value weight represents the importance of the factor (internal/external) when filling job openings in the job group.
Highlighted cells are the ones in which you input data. Others are formulas.

If the contractor is "underutilized" the contractor must establish placement goals

COMPANY	CASTLE SENIOR LIVING, INC. - BIRCHROCK CASTLE																
AVAILABILITY ANALYSIS																	
JOB GROUP	ADMINISTRATIVE SUPPORT																
PERIOD	2024																
	RAW STATISTICS									WEIGHTED STATISTICS							
FACTOR	TOTAL								VALUE	TOTAL							
	FEMALE	MIN.	B	H	Asian	AIAN	NHoPI	2+	WEIGHT	FEMALE	MIN.	B	H	Asian	AIAN	NHoPI	2+
PERCENTAGE OF MINORITIES AND WOMEN WITH REQUISITE SKILLS IN REASONABLE RECRUITMENT AREA	59.7%	19.0%	7.7%	6.9%	2.7%	0.3%	0.0%	1.4%	100.0%	59.7%	19.0%	7.7%	6.9%	2.7%	0.3%	0.0%	1.4%
PERCENTAGE OF MINORITIES AND WOMEN PROMOTABLE, TRANSFERABLE, AND TRAINABLE WITHIN FACILITY	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FINAL AVAILABILITY									100.0%	59.7%	19.0%	7.7%	6.9%	2.7%	0.3%	0.0%	1.4%

External -- Milwaukee-Waukesha-West Allis, WI Metro Area plus Racine & Walworth Counties - From: <https://www.census.gov/acs/www/data/eeo-data/eeo-tables-2018/>
Occupation Codes: 0310/11-9051 (food service manager); 0410 / 11-9141 (property, RE & assoc managers); 0440 / 11-91xx (other managers); 5120/43-3031 (bookkeeping, accounting & auditing clerk); 5810/43-9000 (other office & admin support workers)
Internal -- none

Comments applicable to the entire workbook

Raw statistics for #1 External comes from census data. Use data for area (US, county, PMSA/MSA) from which you recruit. Milwaukee-Waukesha-West Allis Metro plus Racine & Walworth Counties are the most applicable for this facility

Raw statistics for #2 Internal comes from the job group bottom-line totals for the job groups from which promotable candidates are found (feeder group).

Value weight represents the importance of the factor (internal/external) when filling job openings in the job group.

Highlighted cells are the ones in which you input data. Others are formulas.

If the contractor is "underutilized" the contractor must establish placement goals

COMPANY	CASTLE SENIOR LIVING, INC. - BIRCHROCK CASTLE																
AVAILABILITY ANALYSIS																	
JOB GROUP	SERVICE																
PERIOD	2024																
	RAW STATISTICS									WEIGHTED STATISTICS							
FACTOR		TOTAL							VALUE		TOTAL						
	FEMALE	MIN.	B	H	Asian	AIAN	NHoPI	2+	WEIGHT	FEMALE	MIN.	B	H	Asian	AIAN	NHoPI	2+
PERCENTAGE OF MINORITIES AND WOMEN WITH REQUISITE SKILLS IN REASONABLE RECRUITMENT AREA	51.6%	31.8%	13.5%	13.4%	2.4%	0.3%	0.0%	2.1%	100.0%	51.6%	31.8%	13.5%	13.4%	2.4%	0.3%	0.0%	2.1%
PERCENTAGE OF MINORITIES AND WOMEN PROMOTABLE, TRANSFERABLE, AND TRAINABLE WITHIN FACILITY										0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
FINAL AVAILABILITY									100.0%	51.6%	31.8%	13.5%	13.4%	2.4%	0.3%	0.0%	2.1%

External -- Milwaukee-Waukesha-West Allis, WI Metro Area plus Racine & Walworth Counties - From: <https://www.census.gov/acs/www/data/eeo-data/eeo-tables-2018/>
Occupation Codes: 3630/31-9000 (other healthcare support); 4020/35-2000 (cooks & food prep); 5810 / 43-9000 (other office & admin support workers); 7010/49-xxxx (other maintenance & repair)
Internal -- none

Comments applicable to the entire workbook

Raw statistics for #1 External comes from census data. Use data for area (US, county, PMSA/MSA) from which you recruit. Milwaukee-Waukesha-West Allis Metro plus Racine & Walworth Counties are the most applicable for this facility
Raw statistics for #2 Internal comes from the job group bottom-line totals for the job groups from which promotable candidates are found (feeder group).
Value weight represents the importance of the factor (internal/external) when filling job openings in the job group.
Highlighted cells are the ones in which you input data. Others are formulas.

If the contractor is "underutilized" the contractor must establish placement goals

COMPANY:	CASTLE SENIOR LIVING - THE GRAND HILLS CASTLE 2024						
UTILIZATION ANALYSIS							

JOB GROUP	JOB CATEGORY	TOTAL WORKFORCE	FEMALE	MINORITY
1.1	Officials - Executives			
	Current Workforce	3	1	1
	% in Category		33.3%	33.3%
	% Availability		27.4%	10.5%
	% Utilization		5.9%	22.8%
	Expected Availability		0.822	0.315
	80% of Expected Availability		0.6576	0.252
	Under-utilized (80% Rule) (Y/N)		N	N
	# Needed to Reach Parity		0	0
1.2	First/Mid Level Managers			
	Current Workforce	4	3	0
	% in Category		75.0%	0.0%
	% Availability		53.7%	8.6%
	% Utilization		21.3%	-8.6%
	Expected Availability		2.148	0.344
	80% of Expected Availability		1.7184	0.2752
	Under-utilized (80% Rule) (Y/N)		N	Y
	# Needed to Reach Parity		0	1
2	Professionals			
	Current Workforce	1	1	0
	% in Category		100.0%	0.0%
	% Availability		71.3%	18.2%
	% Utilization		28.7%	-18.2%
	Expected Availability		0.713	0.182
	80% of Expected Availability		0.5704	0.1456
	Under-utilized (80% Rule) (Y/N)		N	Y
	# Needed to Reach Parity		0	1
5	Administrative Support			
	Current Workforce	10	10	0
	% in Category		100.0%	0.0%
	% Availability		78.5%	26.3%
	% Utilization		21.5%	-26.3%
	Expected Availability		7.85	2.63
	80% of Expected Availability		6.28	2.104
	Under-utilized (80% Rule) (Y/N)		N	Y
	# Needed to Reach Parity		0	1
9	Service			
	Current Workforce	41	35	27
	% in Category		85.4%	65.9%
	% Availability		42.7%	41.9%
	% Utilization		42.7%	24.0%
	Expected Availability		17.507	17.179
	80% of Expected Availability		14.0056	13.7432
	Under-utilized (80% Rule) (Y/N)		N	N
	# Needed to Reach Parity		0	0

NOTES:

Expected availability = total # employees in EEO Job Category x % available in Gender/Race group

80% of Expected Availability = 80% x Expected Available # in Gender/Race group

To determine Underutilization, is the number in the workforce less than 80% of the expected number? This number should be rounded to the next whole person.

COMPANY APPLICANT LOG		CASTLE SENIOR LIVING									
PERIOD		2024									
<u>Last Name</u>	<u>First Name</u>	<u>Date of Application</u>	<u>Position Sought</u>	<u>Department</u>	<u>Gender</u>	<u>Race</u>	<u>Veteran</u>	<u>Disability</u>	<u>Final Disposition</u>	<u>Date of Hire</u>	<u>Starting Salary</u>

COMPANY
HIRE LOG
PERIOD

CASTLE SENIOR LIVING

2024

LAST NAME	FIRST NAME	Date of Application	Hire Date	Job Title	Department	Job Group	Gender	Race	Ethnicity	Veteran Status	Disability	How Did You Hear About Us	Status	Rejection Reason	Hired Job Title	Starting Salary
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[illegible]

COMPANY
TERMINATION LOG
PERIOD

CASTLE SENIOR LIVING

TBD

Last Name	First Name	Hire Date	Termination Date	Job Title	Department	Job Group	Gender	Race	Veteran Status	Disability	Termination Reason
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Voluntary Self-Identification of Disability

Form CC-305
Page 1 of 1

OMB Control Number 1250-0005
Expires 04/30/2026

Name:
Employee ID:

Date:

(if applicable)

Why are you being asked to complete this form?

We are a federal contractor or subcontractor. The law requires us to provide equal employment opportunity to qualified people with disabilities. We have a goal of having at least 7% of our workers as people with disabilities. The law says we must measure our progress towards this goal. To do this, we must ask applicants and employees if they have a disability or have ever had one. People can become disabled, so we need to ask this question at least every five years.

Completing this form is voluntary, and we hope that you will choose to do so. Your answer is confidential. No one who makes hiring decisions will see it. Your decision to complete the form and your answer will not harm you in any way. If you want to learn more about the law or this form, visit the U.S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) website at www.dol.gov/ofccp.

How do you know if you have a disability?

A disability is a condition that substantially limits one or more of your "major life activities." If you have or have ever had such a condition, you are a person with a disability. **Disabilities include, but are not limited to:**

- Alcohol or other substance use disorder (not currently using drugs illegally)
- Autoimmune disorder, for example, lupus, fibromyalgia, rheumatoid arthritis, HIV/AIDS
- Blind or low vision
- Cancer (past or present)
- Cardiovascular or heart disease
- Celiac disease
- Cerebral palsy
- Deaf or serious difficulty hearing
- Diabetes
- Disfigurement, for example, disfigurement caused by burns, wounds, accidents, or congenital disorders
- Epilepsy or other seizure disorder
- Gastrointestinal disorders, for example, Crohn's Disease, irritable bowel syndrome
- Intellectual or developmental disability
- Mental health conditions, for example, depression, bipolar disorder, anxiety disorder, schizophrenia, PTSD
- Missing limbs or partially missing limbs
- Mobility impairment, benefiting from the use of a wheelchair, scooter, walker, leg brace(s) and/or other supports
- Nervous system condition, for example, migraine headaches, Parkinson's disease, multiple sclerosis (MS)
- Neurodivergence, for example, attention-deficit/hyperactivity disorder (ADHD), autism spectrum disorder, dyslexia, dyspraxia, other learning disabilities
- Partial or complete paralysis (any cause)
- Pulmonary or respiratory conditions, for example, tuberculosis, asthma, emphysema
- Short stature (dwarfism)
- Traumatic brain injury

Please check one of the boxes below:

- Yes, I have a disability, or have had one in the past
No, I do not have a disability and have not had one in the past
I do not want to answer

PUBLIC BURDEN STATEMENT: According to the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. This survey should take about 5 minutes to complete.

For Employer Use Only

Employers may modify this section of the form as needed for recordkeeping purposes.

For example:

Job Title:

Date of Hire:

APPENDIX 12

Voluntary Self-Identification of Veteran Status

Name: _____

Date: _____

Why Are You Being Asked to Complete This Form?

This employer is a Government contractor subject to the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended by the Jobs for Veterans Act of 2002, 38 U.S.C. 4212 (VEVRAA). VEVRAA requires Government contractors to take affirmative action to employ and advance in employment protected veterans. To help us measure the effectiveness of our outreach and recruitment efforts of veterans, we are asking you to tell us if you are a veteran covered by VEVRAA. Completing this form is completely voluntary, but we hope you fill it out. Any answer you give will be kept private and will not be used against you in any way.

For more information about this form or the equal employment obligations of Federal contractors, visit the U.S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) website at www.dol.gov/ofccp.

What Categories of Veterans Are "Protected" by VEVRAA?

Contrary to the name, VEVRAA does not just cover Vietnam Era veterans. It covers several categories of veterans from World War II, the Korean conflict, the Vietnam era, and the Persian Gulf War which is defined as occurring from August 2, 1990 to the present.

"Protected" veterans include the following categories: (1) disabled veterans; (2) recently separated veterans; (3) active-duty wartime or campaign badge veterans; and (4) Armed Forces service medal veterans. These categories are defined below.

A "disabled veteran" is one of the following:

- a veteran of the U.S. military, ground, naval or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or
- a person who was discharged or released from active duty because of a service-connected disability.

A "recently separated veteran" means any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval, or air service.

An "active-duty wartime or campaign badge veteran" means a veteran who served on active duty in the U.S. military, ground, naval or air service during a war, or in a campaign or expedition for which a campaign badge has been authorized under the laws administered by the Department of Defense.

An "Armed forces service medal veteran" means a veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

If you believe you belong to any of the categories of protected veterans, please indicate by checking the appropriate box below. As a government contractor subject to VEVRAA, we request this information in order to measure the effectiveness of the outreach and positive recruitment efforts we undertake pursuant to VEVRAA. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are consistent with VEVRAA.

Please check one:

- ☐ I identify as one or more of the classifications of protected veterans listed above.
- ☐ I am not a protected veteran.
- ☐ I do not wish to disclose my veteran status.

NOTE: If you are disabled veteran, please let us know if there any reasonable accommodations we could make that would enable you to be considered for a job opening or perform the essential functions of the position you hold. We consider requests for accommodation on a case-by case basis.

Castle Senior Living, Inc.
Grand Hills Castle
2024 Affirmative Action Plan Placement Goals

Job Group	Female Incumbency %	Female Availability %	Establish Goal? Yes/No	If Yes, Goal for Females	Minority Incumbency %	Minority Availability %	Establish Goal? Yes/No	If Yes, Goal for Minorities
Execs	33.3%	27.4%	N	0	33.3%	10.5%	N	0
Mgrs	75.0%	53.7%	N	0	0.0%	8.6%	Y	1
Prof	100.0%	71.3%	N	0	0.0%	18.2%	Y	1
Admin	100.0%	78.5%	N	0	0.0%	26.3%	Y	1
Service	85.4%	42.7%	N	0	65.9%	41.9%	N	0