

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-4

Effective Date: 08-28-00

SUBJECT: Affirmative Action

Revision Date: 07-09-09

LOYOLA firmly supports the concept of equal opportunity for all and takes active steps to promote employment and advancement of the disabled. This philosophy is a reflection of the personal convictions of LOYOLA's executive management and has been given full expression in the Company's Affirmative Action Plans (AAP) throughout the Company's history. The AAP's express affirmative action in employing, training, developing, and promoting employees of "protected classes" for all people who have in the past suffered from the intentional or unintentional imposition of constraints against their employment and advancement in American business and industry.

The following are brief definitions of the legally accepted protected classes.

Minorities - Specific minority groups are designated by statute as those deserving of special protection under the law. Persons generally considered to be, or who identify themselves to be, parts of a given minority community are considered to fall within that particular protected class. The racial/ethnic protected groups are (USGPO 1980-326-321):

- Black or African American (not of Hispanic origin) - All persons having origins in any of the black racial groups of Africa.
- Hispanic or Latino - All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- Asian - All persons having origins in any of the original Peoples of the Far East, Southeast Asia, and the Indian Subcontinent.
- Native Hawaiian or other Pacific Islander – All person having origins in any of the Peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- American Indian or Alaskan Native - All persons having origins in any of the original Peoples of North and South America, and who maintain cultural identification through tribal affiliations or community attachment.

Women - All women are included as a protected class by virtue of the socially imposed positions or salaries in the business and professional world.

Disabled Veterans and Vietnam Era Veterans

- Disabled veterans are those entitled to disability compensation, under laws administered by the Veterans Administration, by the virtue of a disability established as 30% or more or because of discharge or release from active duty for a disability incurred or aggravated in the line of duty.
- Vietnam era veterans are those who served on active duty for a period of more than 180 days, any part of which occurred between August 5, 1964 and May 7, 1975, and who were discharged or released from active duty with other than a dishonorable discharge.

Protected Classes

Certain minority groups have historically been victims of discrimination in employment and in other basic aspects of their relationships with American society. In order to put an end to the effects of this historic discrimination and to rectify wrongs inflicted over the centuries, the U.S. Government has required establishment of the Affirmative Action Program Plans within American businesses. These plans, which map out positive actions and set goals for employment and promotion of the affected minority groups, have the full support of LOYOLA management. It is the conviction of all the officials of the Company that everyone is unique, that people cannot and should not be judged and characterized in broad racial and ethnic groupings, but only individually. This recognition of the individual character and worth of each person is a moral and ethical obligation of everyone who represents the Company.

The same philosophy as that expressed above, applies equally to women in the workplace. Not only should women be employed on the basis of individual capability, but their status and salary should reflect their contributions to the Company at the same rate that those contributions would be rewarded if the employees were men.

The Americans with Disabilities Act (ADA), although not strictly an Affirmative Action Program, makes discrimination against disabled persons illegal. The ADA requires employers to "level the playing field" for disabled persons.

The men and women who have served in our armed forces have contributed significantly to the preservation of our nation. In order to minimize the injurious impact of wartime military service on these men and women, the Government enacted the Vietnam Era Veterans Readjustment Assistance Act of 1974. The purpose of the act is to ensure that Government contractors take affirmative action to employ and advance in employment qualified disabled veterans and veterans of the Vietnam era. It is essential that all managers and supervisors be aware of LOYOLA's commitment to affirmative action for qualified disabled veterans and veterans of the Vietnam era in their personnel actions. Full cooperation from each employee in implementing this program is expected.

Responsibility

The Human Resource Manager serves as the Director of Equal Employment Opportunity and is responsible for formulating, implementing, coordinating, and monitoring all efforts. The Human Resource Manager reports directly to the President and has complete support in implementing and monitoring the corporate-wide Affirmative Action Program.

It is the responsibility of each supervisor, manager, and executive to support and, if necessary, to enforce the provisions of this policy. All company officials are encouraged to suggest ways to improve the Company's performance in Equal Opportunity and Affirmative Action.

All employees are expected to support and comply with the Company's Equal Opportunity Affirmative Action Policy.