

Home at Heart Care, Inc.

**AFFIRMATIVE ACTION PLAN (“AAP”)
For People of Color, Women, and Disabled Individuals**

June 20, 2018 - June 19, 2019



TABLE OF CONTENTS OF AFFIRMATIVE ACTION PLAN

SECTION NAME	Page Number
DESCRIPTION OF ORGANIZATION.....	2
DEFINITIONS USED IN THIS AAP AND JOB GROUPS.....	3
EQUAL EMPLOYMENT OPPORTUNITY (EEO) POLICY	5
ASSIGNMENT OF RESPONSIBILITY FOR AFFIRMATIVE ACTION PROGRAM	6
DISSEMINATION OF AFFIRMATIVE ACTION POLICY AND PLAN.....	7
INTERNAL AUDIT AND REPORTING SYSTEMS.....	7
WORKFORCE ANALYSIS.....	7
GOALS AND TIMETABLES.....	8
PROBLEM AREA IDENTIFICATION.....	8
ACTION-ORIENTED PROGRAMS	9
ANTI-HARASSMENT POLICY.....	12
PROBLEM RESOLUTION POLICY	13
WORKFORCE ANALYSIS 2018	Attachment
AVAILABILITY AND UTILIZATION/UNDERUTILIZATION ANALYSIS 2018 ..	Attachment
CENSUS 2010 EEO DATA PACKET; GREATER MINNESOTA	Attachment

DESCRIPTION OF ORGANIZATION

Home at Heart Care, Inc.
Personal Care Assistant Services
221 3rd Ave SW
PO Box 183
Clearbrook MN 56634

Minnesota’s Personal Care Assistance (PCA) program, referred to as Personal Assistant Services (PAS) in many other states, is designed to support people of all ages with disabilities to live independently in the community. Personal Care Assistants (PCAs) provide services to people who need help with activities of daily living, instrumental activities of daily living and health-related functions. PCA services are services and supports provided to an individual, as needed, to assist in accomplishing activities of daily living; instrumental activities of daily living; health-related functions through hands-on assistance, supervision, and cuing; and redirection and intervention for behavior including observation and monitoring.

The PCA program provides support to:

- People with disabilities of all ages
- The elderly (over 65)

Home at Heart Care, Inc. (hereinafter “Home at Heart Care”, “we”, “our” or “us”) also utilizes its Personal Care Assistants (PCAs) to provide Homemaking, Housekeeping and In-Home Respite Services.

DEFINITIONS OF TERMS USED IN THIS AAP

Individual with a Disability: any person who has a physical, sensory, or mental impairment which “materially” (Minnesota) or “substantially” (Federal) limits one or more major life activities or has a record of or is regarded as having such an impairment. "Individual with a Disability" does not include an alcohol or drug abuser whose current use of alcohol or drugs renders that individual a direct threat to property or to the safety of others.

American Indian or Alaska Native: a person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.

Asian: A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

Black or African American: A person having origins in any of the black racial groups of Africa.

Hispanic or Latino: A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

Native Hawaiian or Other Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

White: A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Minority: Any person who identifies as being American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islander, or in any combination of these identifiers, or someone who identifies as White and as any of the other identifiers.

Job Groups:

Managers and Administrators: Administrative personnel set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special phases of an organization's operations. This category includes: officials, executives, middle management, plant managers, department managers, and superintendents, salaried supervisors who are members of management, purchasing agents, and buyers. Unless specifically listed under officials and managers or craft (skilled), first line supervisors, who engage in the same activities as the employees they supervise, should not be reported under this category.

Professionals and Technicians: Professionals are considered to be persons working in occupations requiring either college graduation or comparable work experience. Technicians are those whose work requires a combination of basic scientific knowledge and manual skills such as can be attained through two-year technical or community college degrees or equivalent on-the-job training.

Sales Workers: Occupations engaged wholly or primarily in direct selling. This includes: advertising agents and sales agents, insurance agents and brokers, real estate agents and brokers, sales agents and sales clerks, grocery clerks, cashiers/checkers.

Office and Clerical: All clerical work regardless of the level of difficulty in which activities are predominantly non-manual (though some manual work not directly involved with altering or transporting the products is included). This includes: bookkeepers, collectors, messengers, and office helpers, office machine operators, shipping and receiving clerks, stenographers, typists, secretaries, and telephone operators.

Skilled Crafts: Manual workers of a relatively high skill level who have a thorough and comprehensive knowledge of the process involved in their work. They exercise considerable independent judgment and usually receive an extensive period of training. This includes: building trades, hourly paid foremen and lead-workers who are not members of management, mechanics and repairmen, skilled machinery occupations, electricians. Exclude learners and helpers of craft workers (apprentices).

Operatives: (Semi-skilled): Workers who operate machines or processing equipment or perform other factory-type duties of an intermediate skill level which can be mastered in a few weeks and requires only limited training. This includes: apprentices, operatives, attendants, delivery and route drivers, truck and tractor drivers, dressmakers, weavers, welders. Include craft apprentices in such fields as auto mechanics, printing, metalwork, carpentry, plumbing and other building trades.

Laborers: (Unskilled): Workers in manual occupations which generally require no special training. They perform elementary duties which may be learned in a few days and which require the application of little or no independent judgment. This includes: garage laborers, car washers, gardeners, and lumber workers, laborers performing lifting, digging, mixing and loading.

Service Workers: Workers in both protective and no protective service occupations. This includes: attendants, clean-up workers, janitors, guards, police, fire fighters, waiters and waitresses.

Underutilization: The Minnesota Department of Human Rights defines underutilization in a job group if the number of women or people of color in a job group are less than is expected based on the availability percentage adopted for the analysis. Any fractional underutilization is rounded down to the nearest whole number.

The Department uses the "WHOLE-PERSON RULE" in determining underutilization.

Declaration of underutilization does not indicate that discrimination has occurred in Home at Heart Care; rather it is an opportunity to enable Home at Heart Care to apply good faith efforts to ensure equal employment opportunities continually occur in the business.

EQUAL EMPLOYMENT OPPORTUNITY POLICY

This is to affirm Home at Heart Care's policy of providing equal employment opportunities to all employees and applicants for employment in accordance with all applicable laws, directives and regulations of federal, state and local governing bodies or agencies.

Our organization will not discriminate against or harass any employee or applicant for employment because of race, color, creed, religion, national origin, sex, sexual orientation, disability, age, marital status, familial status, membership or activity in a local human rights commission, or status with regard to public assistance.

We will take affirmative steps to ensure that all of our company's employment practices are free of discrimination. Such employment practices include, but are not limited to, the following: hiring, upgrading, demotion, transfer, recruitment or recruitment advertising, selection, layoff, disciplinary action, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship. We will provide reasonable accommodation to applicants and employees with disabilities whenever possible.

Home at Heart Care, Inc. will evaluate the performance of its management and supervisory personnel on the basis of their involvement in achieving these affirmative action objectives as well as other established criteria. In addition, all employees are expected to perform their job responsibilities in a manner that supports equal employment opportunities.

I have appointed Linda Engen, Human Resources Director, to manage the company's Equal Employment Opportunity Program as "EEO/AA Coordinator". This person's responsibilities include monitoring all EEO activities and reporting the effectiveness of the company's Affirmative Action program as required by law. I will receive and review reports on the progress of the program. Any employee or applicant may inspect our Affirmative Action Plan and information related to our EEO program during normal business hours. Please contact the EEO/AA Coordinator listed above for further information.

Any employee or applicant for employment who believes s/he has been treated in a way that violates this policy should contact either Linda Engen at 221 3rd Ave SW, Clearbrook MN 56634 / (218) 776-3508 or any other management representative, including me. The company will take immediate action to investigate and address allegations of discrimination or harassment confidentially and promptly.



Bruce Emmel, President, CEO
Home at Heart Care, Inc.

Effective Date: June 20, 2018

ASSIGNMENT OF RESPONSIBILITY FOR AFFIRMATIVE ACTION PROGRAM

Linda Engen, Human Resources Director, is designated as EEO/AA coordinator and is tasked with monitoring all employment activity to ensure that our EEO/AA policies are being carried out. The EEO/AA coordinator has been given the necessary staffing and support from senior management to fulfill the duties of the position. These duties include, but are not limited to, the following:

1. Develop an EEO policy statement and Affirmative Action Plan (“AAP”) that are consistent with the company’s EEO policies and establish our affirmative action goals and objectives.
2. Develop and implement internal and external strategies for disseminating the company’s AAP and EEO policies.
3. Conduct and/or coordinate EEO/AA training and orientation.
4. Ensure that our managers and supervisors understand it is their responsibility to take action to prevent the harassment of employees and applicants for employment.
5. Ensure that all minority, female, and disabled employees are provided equal opportunity as it relates to organization-sponsored training programs, recreational/social activities, benefit plans, pay and other working conditions.
6. Implement and maintain EEO audit, reporting, and record-keeping systems in order to measure the effectiveness of our Affirmative Action Plan/Program and to determine whether our goals and objectives have been attained.
7. Coordinate the implementation of necessary affirmative action to meet compliance requirements and goals.
8. Serve as liaison between our organization and relevant governmental enforcement agencies.
9. Coordinate the recruitment and employment of women, people of color, and individuals with disabilities, and coordinate the recruitment and utilization of businesses owned by women, people of color, and individuals with disabilities.
10. Coordinate employee and company support of community action programs that may lead to the full employment of women, people of color, and individuals with disabilities.
11. Keep management informed of the latest developments in the area of EEO.

INTERNAL AND EXTERNAL DISSEMINATION OF AFFIRMATIVE ACTION POLICY AND PLAN

A. Internal Dissemination

1. Our EEO policy statement is included in our employee handbooks.
2. We will publicize our EEO policy in any newsletters, magazines, annual reports, or other media the company utilizes.
3. We will schedule special meetings all other employees to discuss the policy and explain individual employee responsibilities;
4. We will discuss the policy thoroughly during both employee orientation and management training programs;
5. If applicable we will meet with union officials to provide notice of our EEO policy and ask for their cooperation in implementing the policy.
6. If applicable we will include non-discrimination clauses in all of our union agreements and review all contractual provisions to ensure they are non-discriminatory.
7. We will publish articles in any company publications covering our EEO programs, progress reports, and the accomplishments of disabled and female employees and employees of color.
8. Our EEO policy statement and non-discrimination posters will be permanently posted and conspicuously displayed in areas available to employees and applicants for employment.
9. When employees are featured in product or consumer advertising, employee handbooks, or similar publications, we will include images of male and female employees, employees of color, and disabled employees.
10. Communicate at least annually to employees the existence of our affirmative action program and make available the elements of its program as well as enable prospective employees to know and avail themselves of all of our program's benefits.
11. All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes are carefully selected and trained to ensure that the goals and commitments in the company's affirmative action program are implemented.

B. External Dissemination

1. We will notify all recruiting sources of the company's EEO policy, stipulating that these sources actively recruit and refer women and people of color for all positions listed.
2. We will hold formal briefing sessions with representatives from recruiting sources. As an integral part of these briefings, we will include facility tours; clear and concise explanations of current and future job openings; position descriptions; worker specifications; explanations of

the company's selection process; and, recruiting literature. We will make formal arrangements regarding applicant referrals, and follow-up with referral sources regarding the disposition of applicants.

3. Any disabled employees who wish to participate in career days, youth motivation programs, and related community activities will be given opportunity to do so.
4. Any recruiting efforts at schools will include specific outreach to disabled students.
5. We will make an effort to participate in work study programs with rehabilitation facilities and schools that specialize in the training or educating disabled individuals.
6. We will use all available resources to continue or establish on-the-job training programs.
7. We will incorporate the equal opportunity clause into all purchase orders, leases, and contracts.
8. We will send written notification of the company's EEO policy to all sub-contractors, vendors, and suppliers, and request cooperative action from them.
9. We will notify community agencies, community leaders, secondary schools, colleges, and organizations that promote women, people of color, and disabled individuals regarding the company's EEO policy.
10. When employees are featured in consumer or help wanted advertising, we will include images of male and female employees, employees of color, and disabled employees.
11. We will communicate the existence of our EEO policy to prospective employees and provide sufficient information to enable prospective employees to avail themselves of the policy's benefits.

INTERNAL AUDIT AND REPORTING SYSTEMS

Our EEO Coordinator has responsibility for implementing and monitoring our affirmative action programs. Department heads, managers, and supervisors are responsible for providing the EEO Coordinator with information and/or statistical data as necessary to measure our good faith efforts to implement our programs. In addition, they are also responsible for submitting formal reports to the EEO Coordinator on a scheduled basis regarding the degree to which corporate or unit goals are attained and timetables are met.

At least annually, internal audit reports will be prepared in table format and dated. Data collected for these reports will include applicant flow, new hires, promotions, transfers, and terminations (voluntary and involuntary) by job group. Figures for each personnel process must show a breakdown by sex, minority classification, and disability status. Reports will be disseminated to appropriate levels of management, and any problem areas will be addressed as promptly as possible.

We will preserve all audit data and other applicable documentation and information available as required by law to the Minnesota Department of Human Rights and other government agencies.

Also, once a year we will submit to the Minnesota Department of Human Rights, on or before, the anniversary date of our Workforce Certificate of Compliance, our **Annual Compliance Report** as required under Minnesota Administrative Rule 5000.3580 for the company's regular workforce.

WORKFORCE ANALYSIS

Attached:

1. Home at Heart Care Workforce Analysis 2018
2. Home at Heart Care Job Group Availability/Utilization/Underutilization Analysis & Annual Goals 2018
3. Census 2010 EEO Packet w/ pages that include Medical and Health Services Managers, Human Resource Assistants, Registered Nurse (Professionals) and Personal Care Aide data.

GOALS AND TIMETABLES

During this plan year, it is our goal to make a good faith effort to meet or exceed the availability percentage for women or people of color in all job groups, within availability/utilization/ underutilization analysis. We will continue good faith efforts to recruit and retain individuals with disabilities in all levels of our workforce.

PROBLEM AREA IDENTIFICATION

Home at Heart Care, Inc. periodically conducts an in-depth analysis of its total employment process to determine whether and where impediments to equal employment opportunity may exist. We evaluated:

1. Workforce composition by job group:

We have identified no underutilization of women or minorities in our current workforce. We will continue to monitor our workforce composition to ensure that no problems arise.

2. Personnel activity: We will routinely conduct adverse impact analyses using the "Eighty Percent Test" or other statistical methods to analyze our personnel activities, including applicant flow, hires, promotions, terminations and other personnel actions, to determine if there are selection disparities between men and women, people of color, nonminority (and within specific racial groups, if appropriate), or disabled and nondisabled applicants or employees. For tests used as a part of our selection process, we confirm these tests are job-related and are validated. We have taken

corrective action to remove any barriers to hiring or retaining women, people of color, or individuals with disabilities.

3. Compensation system: We will routinely review our compensation system, including rates of pay and bonuses, to determine whether there is any gender, race, ethnicity, or disability-based disparities. If any disparities are identified, we take prompt action to resolve the disparity. In offering employment to individuals with disabilities, we will not reduce the amount of compensation offered because of any disability income, pension, or other benefit the applicant or employee receives from another source.
4. Personnel procedures: We will routinely review all of our personnel procedures and processes, including selection, recruitment, referral, transfers and promotions, seniority provisions, apprenticeship programs, and company-sponsored training programs or other activities to determine if all employees or applicants are fairly considered.
5. Any other areas that might impact the success of this AAP: We continually analyze any other areas that may impact our success, such as accessibility of our facility to the available workforce, the attitude of our current workforce towards EEO, proper posting of our EEO policy and required governmental posters, proper notification of our subcontractors or vendors, and retention of records in accordance with applicable law. We take prompt action to remedy any problems in these areas through training of staff or other methods.

ACTION-ORIENTED PROGRAMS:

Measures To Facilitate Implementation of Equal Employment Opportunity Policy and Affirmative Action Programs for Women, People of color and Individuals with disabilities

Selection Process

We will evaluate our selection process using an adverse impact analysis to determine if our requirements screen out a disproportionate number of people of color, women, or individuals with disabilities. All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes will be carefully selected and trained to ensure that there is a commitment to the affirmative action program and its implementation.

Schedule for Review of Job Requirements: We will annually review all physical and mental job requirements to ensure that these requirements do not tend to screen out qualified individuals with disabilities. We will determine whether these requirements are job-related and are consistent with business necessity and the safe performance of the job, and we will remove any physical or mental requirements that do not meet these criteria. Any job descriptions or requirements changed after review will be distributed to all relevant employees, particularly those involved in the selection process and supervision of employees.

Pre-Employment Medical Examination: If we require medical examinations or inquiries as a part of our selection process, all exams or inquiries will be conducted after a conditional offer of employment. Only job-related medical examinations and inquiries will be conducted, and the results of these examinations or inquiries will not be used to screen out qualified individuals with disabilities. Information obtained in response to such inquiries or examinations will be kept confidential except that (a) supervisors and managers may be informed regarding restrictions on the work or duties of individuals with disabilities and regarding accommodations, (b) first aid and safety personnel may be informed, where and to the extent appropriate, if the condition might require emergency treatment, and (c) officials, employees, representatives, or agents of the Minnesota Department of Human Rights or local human rights agencies investigating compliance with the act or local human rights ordinances will be informed if they request such information.

Accommodations to Physical and Mental Limitations of Employees

We will make reasonable accommodations to the physical and mental limitations of an employee or applicant unless such an accommodation would impose an undue hardship on the conduct of the business.

Recruitment of Employees

1. All solicitation or advertisements for employees will state that applicants will receive consideration for employment regardless of their race, color, creed, religion, national origin, sex, sexual orientation, disability, age, marital status, or status with regard to public assistance. When needed, to help address underutilization, help wanted advertising will also be placed in news media oriented towards women or people of color. Copies of advertisements for employees will be kept on file for review by enforcement agencies.
2. When we place help-wanted advertisements, we will not indicate a preference, limitation, or specification based on sex, age, national origin, or other protected characteristic, unless that characteristic is a bona fide occupational qualification for a particular job. We will not allow any employment agency with which we work to express any such limitation on our behalf, and we will require that these agencies share our commitment to Equal Employment Opportunity.
3. All positions for which we post or advertise externally will be listed with State of Minnesota Workforce Centers, America's Job Bank, or similar governmental agencies.
4. We will request the Minnesota Department of Employment and Economic Development to refer qualified individual with disabilities for employment consideration under our affirmative action programs in accordance with Minnesota Administrative Rule 5000.3557.
5. As necessary to ensure that potential candidates are aware of job openings, we will contact community organizations focused on the employment of women, people of

color, and individuals with disabilities (including state vocational rehabilitation agencies or facilities, sheltered workshops, college placement offices, education agencies, or labor organizations).

6. We will keep documentation of all contacts made and responses received, in connection with paragraphs 4 and 5 above, whether formal or informal. We will make every effort to give these agencies a reasonable amount of time to locate and refer applicants (at least one (1) month prior to the closing date for receipt of applicants).
7. We will carry out active recruiting programs at relevant technical schools and colleges, where applicable.
8. We will encourage existing people of color, female, and disabled employees to recruit additional candidates for employment opportunities.
9. *Consideration of people of color and women not currently in the workforce:* We will take additional steps to encourage the employment of women, people of color, and individuals with disabilities who are not currently in the workforce, such as providing part-time employment, internships, or summer employment programs.

Training Programs

People of color, female, and employees with disabilities will be afforded full opportunity and will be encouraged to participate in all organization sponsored educational and training programs.

We will seek the inclusion of qualified people of color, female, and disabled employees in any apprenticeship program in which we participate.

Promotion Process

Our promotion process has been developed and documented and only legitimate qualifications are considered in our promotion decisions. We will conduct adverse impact analyses to ensure that women, people of color, and employees with disabilities are promoted at rates substantially similar to men, non-people of color, and individuals without disabilities.

Termination Process

We use progressive discipline before terminating employees, where appropriate. All employees are made aware of our discipline process. We will conduct adverse impact analyses to ensure that women, people of color, and employees with disabilities do not leave our company at rates substantially dissimilar to those of men, non-people of color, and employees without disabilities.

Religion and National Origin Discrimination and Accommodation for Religious Observance and Practice

As a part of our commitment to Equal Employment Opportunity for all, we have made a specific effort to ensure that national origin and religion are not factors in recruitment, selection, promotion, transfer, termination, or participation in training. The following activities are undertaken to ensure religion and national origin are not used as a basis for employment decisions:

1. Recruitment resources are informed of our commitment to provide equal employment opportunity without regard to national origin or religion.
2. Our employees are informed of our policy and their duty to provide equal opportunity without regard to national origin or religion.
3. Employment practices exist and are reviewed to ensure that we implement equal employment opportunity without regard to national origin or religion.
4. The religious observances and practices of our employees are accommodated, except where the requested accommodation would cause undue hardship on the conduct of our business.
5. We do not discriminate against any qualified applicant or employee because of race, color, creed, disability, age, sex, sexual orientation, marital status, or status with regard to public assistance in implementing the policy concerning non-discrimination based on national origin or religion.

Sex Discrimination Guidelines

We incorporate the following commitments into this AAP to ensure that all laws related to the prohibition of discrimination based on sex are followed:

1. Employment opportunities and conditions of employment are not related to the sex of any applicant or employee. Salaries are not related to or based upon sex.
2. Women are encouraged to attend all training or development programs to facilitate their opportunities for promotion, and to apply for all positions for which they are qualified.
3. We do not deny employment to women or men with young children and do not penalize, in conditions of employment, women or men who require time away from work for parental leave.
4. Appropriate physical facilities are provided to both sexes.

Prevention of Harassment and Discrimination

Our company has developed policies prohibiting the harassment of or discrimination against any employee because of any characteristic protected under civil rights laws. Senior management will distribute these policies routinely to current employees and incorporate these policies as a part of new employee orientation. Employees are made aware of contact persons to report any violation of these policies.

Home at Heart Care, Inc.'s harassment policies are set forth below.

ANTI-HARASSMENT POLICY

Home at Heart intends to provide a work environment and customer service that is pleasant, healthy, comfortable and free from intimidation, hostility or other offenses which might interfere with work performance. Any employee who *engages in* harassment of other employees or Home at Heart clients on the basis of race, color, creed, religion, national origin, sex, sexual orientation, marital status, status with regard to public assistance, membership or activity in a local commission, disability or age; who *permits* employees under his/her supervision to engage in such harassment; or who retaliates or *permits* retaliation against an employee who reports any harassment has engaged in misconduct and shall be subject to remedial action as set forth within this Manual, including the imposition of discipline and/or termination of employment.

Harassment of any sort (verbal, physical or visual) will not be tolerated and is prohibited. Harassment can take many forms. It may be, but is not limited to: words, signs, jokes, pranks, intimidation, physical contact, or violence. Harassment is not necessarily sexual in nature.

Sexually harassing conduct is prohibited and may include unwelcome sexual advances; requests for sexual favors; unwelcome flirtation; leering; making sexual gestures; displaying derogatory or sexually suggestive posters, cartoons, drawings or objects; or any other verbal or physical contact of a sexual nature that prevents an individual from effectively performing his/her employment duties, creates an intimidating, hostile or offensive working or care environment or that is made a condition of employment or compensation, either implicitly or explicitly. Similarly, Home at Heart will not tolerate harassment by its employees of non-employees (including without limitation clients) with whom Home at Heart has a business, service or professional relationship.

Any other sexual harassment of fellow employees and/or Home at Heart clients, whether committed on or off the job (and/or on company property and/or Client premises), is also prohibited. Sexual harassment includes, but is not limited to:

- Repeated offensive sexual flirtations,
- Advances or propositions,
- Continual or repeated verbal abuse of a sexual nature,
- Graphic verbal commentaries about an individual's body,
- Sexually degrading words used to describe an individual,
- The display in the workplace of sexually explicit objects,
- Any indication, expressed or implied, that an employee's job security, job assignment, conditions of employment, or opportunities for advancement depend or may depend on the granting of sexual favors to any other employee, director, or manager,

- Any indication, expressed or implied, that continued services from Home at Heart depend or may depend on the granting of sexual favors, and/or

- The deliberate or careless expression of jokes or remarks of a sexual nature to or in the presence of employees who may find such jokes or remarks offensive.

All Home at Heart employees, *and particularly supervisors*, have a responsibility for keeping our work environment free of harassment. If you become aware of an incident of harassment, whether by witnessing the incident or being told of it, you should report it to the GM or your immediate supervisor. Appropriate investigation and disciplinary action will be taken.

If Home at Heart becomes aware that harassment might exist, it is obligated by law to take prompt and appropriate action, whether or not the victim wants the company to do so. **No retaliatory action will be taken against an employee filing a harassment complaint. All reports will be promptly investigated with due regard for the confidentiality and privacy of everyone involved.**

Any employee found to have harassed a fellow employee, subordinate or non-employee (including without limitation clients) with whom Home at Heart has a business, service or professional relationship will be subject to investigatory and disciplinary action up to and including termination. Home at Heart will also take any additional action necessary to appropriately remedy the situation. No adverse employment action will be taken for any employee making a good faith report of alleged harassment.

The individual who makes unwelcome advances, threatens or in any way harass another is personally liable for such actions and their consequences. Home at Heart will not provide legal, financial or any other assistance to an individual accused of harassment if a legal complaint is filed.

PROBLEM RESOLUTION POLICY

Your options in response to harassment include:

Self Help

You may:

- tell the person, or persons, in private, that their behavior is offensive and request that it stop;
- write to the person, or persons, about their behavior, sealing and marking the letter “personal and confidential”; or
- speak to the person, or persons, in private, in the presence of the GM and/or your immediate supervisor.

Since allegations of harassment are extremely serious it is important to keep any information confidential to those directly involved.

Informal Intervention

You may approach the GM or your immediate supervisor to intervene. This person must act quickly, discreetly and fairly, and ensure that all discussions and any investigations are conducted in strictest confidence and according to the procedures laid down by the company in this Manual.

Formal Complaint

If self help or informal intervention have not worked or if the allegation is, in your view, serious enough to warrant formal disciplinary action, you should submit a detailed written complaint to the GM or your immediate supervisor. Appropriate disciplinary action will be taken if investigation shows the complaint to be justified. Your complaint will be investigated promptly, with appropriate confidentiality, and a report (either oral or written) will be made to you by the investigating party or parties.