

EQUAL EMPLOYMENT OPPORTUNITY & REASONABLE ACCOMMODATION

August, 2010 (Revised: July, 2013; January 2015; October, 2017; March, 2020)

POLICY:

It is the policy of NOWCAP of Wyoming, Inc. and its subsidiary NOWCAP Services, hence referred to as “NOWCAP,” that it will not discriminate against any employee or applicant for employment because of: race, color, religion, disability, age, sex, sexual orientation, gender identity, national origin or status as a veteran. Further, NOWCAP Services will not tolerate retaliation against any individual who has complained about discrimination or has participated in an investigation of any allegation of discrimination.

NOWCAP Services will act affirmatively to ensure employees are treated fairly without regard to their race, color, religion, sex, sexual orientation, gender identity, disability, age, national origin or status as a veteran. This policy applies to all activities, including, but not limited to the following; employment promotions, demotions, transfers, recruitment including recruitment advertising, layoffs or terminations, rates of pay or other forms of compensation, benefits selections or training and/or on-the-job training, reasonable accommodations for medical conditions or physical limitations.

NOWCAP Services respects the rights of its employees to work in an environment that is free from discrimination or harassment based on race, color, religion, sex, sexual orientation, gender identity, disability, age, national origin or status as a veteran. In compliance with the federal law, no official at NOWCAP Services will retaliate against an employee who complains about discrimination or who participates in a discrimination investigation either: 1) through the internal complaint procedure described below; or 2) through any municipal, state, or federal equal employment opportunity agency investigation. It is the policy of NOWCAP Services to follow this and all laws relating to its overall operation and practices.

Because NOWCAP Services is an equal opportunity employer it is required by the federal government to gather statistical data on an employees’ race and ethnicity, veteran status and disability status. The data gathered is purely voluntary and the employee can refuse to provide the information without adverse treatment or denial of employment. The data is compiled to complete the agency’s Affirmative Action Plan (AAP).

If there are any questions concerning the Equal Employment Opportunity & Reasonable Accommodation Policy & Procedures of NOWCAP of Wyoming, Inc, and NOWCAP Services, please contact E.J. Stolns (307-347-6185) or Renate Pullen (307-237-9146) with any concerns.

PROCEDURES:

Federal law obligates the organization to provide reasonable accommodation to the disclosed disabilities of applicants and employees, as employers are only required to accommodate disabilities of which they are aware, unless to do so would pose an undue hardship. The organization will engage the applicant or employee in the interactive process so an effective solution may be agreed upon. If an applicant or employee has any questions as to this process or needs a reasonable accommodation, they may contact NOWCAP Services Corporate Compliance Officer at {307} 237-9146 extension 404, or their direct supervisor or a member of management, and it may be requested verbally, through written

communication via email or Therap S-Comm, or using the organization's Reasonable Accommodation Request Form available from the Corporate Compliance Officer or on the NOWCAP Services website: www.nowcapservices.org

Requests for reasonable accommodation will be documented on the Reasonable Accommodation Request Form, and all requests will be reviewed by the applicant's or employee's direct supervisor, the Corporate Compliance Officer and the Executive Director and/or designee. All efforts will be made to provide the necessary reasonable accommodation unless to do so would pose an undue hardship for the organization. If it is determined that the reasonable accommodation cannot be provided due to the undue hardship posed on the organization, the applicant or employee will be referred to outside resources if applicable or feasible, dependent upon the individual's need or situation. All reasonable accommodation requests including supporting documentation will be maintained confidentially by the Corporate Compliance Officer.

Employees who believe that they have been subjected to or have witnessed job-related discrimination, are encouraged to report any alleged discrimination to any supervisor or manager, or to E.J. Stolns, President & C.E.O. at 307-347-6185 or Renate Pullen, Executive Director of NOWCAP Services, at 307-237-9146. Within ten (10) calendar days of complaint, management officials will conduct a full investigation, which will include a thorough interview with the complaining employee, the person or persons accused of discrimination, and any witness, as appropriate. Upon conclusion of the investigation, the investigating managerial official will report back to the complaining employee, and take appropriate action against the offending party. Employees may also complain by contacting the Equal Employment Opportunity Commission by telephone at 303-866-1300 or 800-699-4000, or by mail at 303 East 17th Avenue, Suite 410, Denver, Colorado 80203.