



TO ALL EMPLOYEES OF SEC-OPS, INC.:

Building and maintaining a diverse workforce and an equitable work environment is essential to my vision of an all-inclusive corporation. I am proud to affirm the Sec-Ops long-standing commitment to the principles of employment equity, affirmative action and workforce diversity. Sec-Ops will actively strive in recruiting a qualified and diverse workforce of professionals necessary for success while making every effort to provide a work environment that is free of illegal discrimination and harassment. These essential steps will guide us toward fulfilling our moral and ethical obligations.

It is my commitment as a premier facility services contractor that Sec-Ops must be the leader and set the standards that our clients, other company's and competitors want to follow. We will remain a competitive employment leader and fulfill our mission by pioneering ways to ensure we provide a positive and welcoming work force environment. We must continue to make use of the tools available to us, such as ensuring non-discrimination in all employment practices and making good faith efforts toward meeting our affirmative action goals.

As the CEO and senior leader of the Sec-Ops organization, it is my responsibility to assure equity and diversity at all levels of the corporation and to promote the goal that "Sec-Ops remains an inclusive and diverse facility services provider". We provide employment equity, a corporation free of discrimination, and affirmative action commitments are maintained by Sec-Ops policies pursuant to federal rules and regulations, but the realization of these goals depends on each of us. I strongly urge you to incorporate the ideals of equity and diversity in every aspect of work, from long-range planning to day-to-day decisions and job activities. Our commitment to our employees is based on maximizing each person's talents without regard to race, religion, disability, or gender. Thank you for your continual efforts in meeting our corporate goals.

The 2022 Corporate Affirmative Action Plan is available at the corporate office and posted on the website for review. If you have any questions, please contact the office at 361-299-6767.

Yours sincerely,

Mr. Robert D. Lott
President and CEO of Sec-Ops, Inc.



Sec-Ops AFFIRMATIVE ACTION PLAN January 1, 2022 - December 31, 2022

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Purpose of the Affirmative Action Plan ¶141 CFR 60-2.10

The Sec-Ops Affirmative Action Plan serves as a working document for reporting on company personnel actions and informing the management and clients of programs and procedures undertaken by Sec-Ops to ensure equal employment opportunity and to implement our commitment to affirmative action in accordance with corporate policy and applicable Federal and State laws and regulations. For example, the Plan describes the following: the delegation of responsibilities to various employees for the implementation of affirmative action and equal employment opportunity, job groups, availability data, utilization analysis, annual placement goals, and action-oriented programs. The Affirmative Action Program for Individuals with Disabilities and Covered Veterans is also included.

Federal affirmative action regulations and company policy stipulates that the Affirmative Action Plan be evaluated, monitored, and updated annually. Progress is to be assessed, deficiencies to be identified, and corrective changes that will better accomplish the Plan's goals and objectives are to be outlined.

Internal Audit and Reporting Systems ¶141 CFR 60-2.17(d)

A major component of the Affirmative Action Plan is an assessment of the effectiveness of efforts undertaken to achieve company goals and objectives. This assessment requires record-keeping processes for collecting information about applicants and about the numerous personnel transactions affecting company employees. Maintenance of the information is in accordance with company policy. The information provides the basis for analyzing personnel transactions for a one-year period and for an annual update of the Affirmative Action Plan. The update includes the predetermination of annual placement goals as well as an assessment of the previous year's annual placement goals and progress made. Senior management is advised of the assessments of program effectiveness, and any recommendations deemed necessary to improve performance or correct identified problem areas.

Applicant Information: Information about the gender and ethnicity of each applicant is collected and maintained for affirmative action reporting purposes. Applicants who wish to benefit under the Affirmative Action Program for Individuals with Disabilities and Covered Veterans are also invited to self-identify their status after an offer of employment has been made and before employment begins. This information is requested on a voluntary basis and is used only for affirmative action purposes. Information regarding the disposition of each application for each opening is also maintained.

Employee Information: Information is collected and maintained for the following personnel transactions: placements (new hires, promotions, and transfers); appointment step of new hires; merit increases; separations (resignation, death, retirement, and medical); involuntary separations (layoffs and dismissals); and training programs. The information is compiled by job group, by gender, and by ethnicity.



The 2022 Affirmative Action Plan

This Plan sets annual placement goals by job group for underutilized women and ethnic minorities, as appropriate, for the period January 1, 2023 – December 31, 2023. This Plan presents analyses of personnel transactions for the period January 1, 2022 - December 31, 2022.

The Sec-Ops Community

The Work Force 41 CFR 60-2.11(c)

As of **December 31, 2022**, the total workforce of personnel employed by Sec-Ops was **219**. Female employee representation was **19** percent; total minority representation was **56** percent. As a part of its total workforce, the company employs 39 part time personnel with limited hours (employed less than 50 percent time). Staff employees are addressed in the Affirmative Action Plan because those permanent positions are considered the most effective way to achieve lasting work force diversification.

Staff employees of Sec-Ops serve in a variety of capacities supporting the objectives of corporate services leading to the corporate mission of the company.

The Company's Commitment to Equal Employment Opportunity and Affirmative Action

Sec-Ops commitment to equal employment opportunity and affirmative action is reflected by the following statement:

It is the policy of Sec-Ops not to engage in discrimination or harassment of any person employed or seeking employment with the company on the basis of race, color, national origin, religion, sex, gender identity, pregnancy, physical or mental disability, medical condition (cancer-related or genetic characteristics), ancestry, marital status, age, sexual orientation, citizenship, or status as a covered veteran. This policy applies to all practices, including recruitment, selection, promotion, transfer, merit increase, salary, training and development, demotion, and separation. This policy is intended to be consistent with the provisions of applicable State and Federal laws and corporate policies. In addition, it is the policy of Sec-Ops to undertake affirmative action, consistent with its obligations as a Federal contractor, for minorities and women, for persons with disabilities, and for covered veterans. Sec-Ops commits itself to apply every good faith effort to achieve prompt and full utilization of minorities and women in all segments of its workforce where deficiencies exist. These efforts conform to all current legal and regulatory requirements and are consistent with corporate standards of quality and excellence.

In conformance with Federal regulations, written affirmative action plans shall be prepared and maintained by the corporate office for the company as a whole. Such plan shall be reviewed by the Director of Administrative and approved by the President.



The personnel program for employees contains written provisions that address nondiscrimination in employment and affirmative action. If we enter into labor agreements Sec-Ops will ensure documentation contains an article on affirmative action, this Affirmative Action Plan and the corporation's commitment to equal employment opportunity and affirmative action apply equally to represented and non-represented career employees.

Dissemination of Equal Employment Opportunity and Affirmative Action Policies and Information

Sec-Ops commitment to equal employment opportunity and affirmative action is communicated in the following ways:

Internal Dissemination

1. Statements on nondiscrimination in employment and affirmative action are contained in the company personnel policies. A nondiscrimination statement is contained in all employee agreements. Copies of the appropriate policies or agreements are sent to all sites/departments employing personnel and are accessible at the Corporate Office.
2. Company managers are briefed about Sec-Ops commitment to equal employment opportunity and affirmative action, the status of the staff affirmative action program, and affirmative action progress.
3. The Corporate Office Manager (Admin Director) provides ordering information to managers who require copies of "Equal Employment Opportunity is the Law" posters.
4. Information regarding Sec-Ops job openings is posted on the Website and each main site where Sec-Ops is represented including local newspapers in the area where job openings are present.
5. Nondiscrimination and affirmative action posters, along with required Federal or State equal employment opportunity notices, are posted in Sec-Ops site/departamental offices.
6. The procedures for implementing the new personnel policies for personnel state that employees having the responsibility for meeting established commitments in equal employment opportunity and affirmative action shall be evaluated on their good faith efforts in these areas.
8. The President annually issues a statement reaffirming the company's commitment to affirmative action and equal employment opportunity.

External Dissemination

1. Our recruiting sources which include community and governmental organizations, colleges, tech schools and organizations representing minorities, women, veterans, and individuals with disabilities are informed via correspondence that the corporation is an affirmative action/equal employment opportunity employer. Recruiting sources are asked to seek and refer all potentially qualified applicants, including minorities, women, individuals with disabilities, and covered veterans, for all positions listed.



2. Recruitment materials and employment advertising specify that Sec-Ops is an equal opportunity/affirmative action employer.
3. Pictures of and articles about employees in company publications include minorities, women, individuals with disabilities, and veterans.
4. Employment application forms notify applicants that Sec-Ops is in compliance with applicable equal employment opportunity and affirmative action statutes. In addition to external dissemination by Sec-Ops of its commitment to equal employment opportunity and affirmative action, Sec-Ops incorporates the equal opportunity clause required by the Federal affirmative action regulations in subcontracts covered by Executive Order 11246.

Designation of Responsibility for Implementation of Equal Employment Opportunity and Affirmative Action §141 CFR 60-2.17(a)

As part of Sec-Ops efforts to ensure equal employment opportunity and implement affirmative action for employees and applicants, specific responsibilities have been delegated. The President, Chief Operating Officer, the Corporate Office Manager, the Human Resources Officer, and managers and supervisors have the responsibilities described below.

President

The ultimate responsibility for equal employment opportunity and affirmative action rests with President, Mr. Robert D. Lott. His responsibilities include, but are not limited to, the following:

1. Delegating the responsibility for overseeing, administering, implementing, and monitoring the Staff Affirmative Action Plan to appropriate personnel.
2. Ensuring that those designated personnel responsible for components of the Staff Affirmative Action Plan are, to the greatest extent possible, given the staffing necessary to implement successfully their assigned responsibilities.
3. Imparting personal direction that assures total involvement and commitment to equal employment opportunity and affirmative action.

Human Resources Manager

Reporting directly to the President, HR Manager– Rose Herrera has line responsibility for equal employment opportunity and affirmative action in the corporate organization, which includes the policy enforcement and review of all EEO cases. In addition, she has responsibility for monitoring the implementation of the affirmative action goals and objectives. Additional responsibilities include planning, organizing, and directing the activities of Human Resources to ensure equal employment opportunity for all human resource processes and to ensure affirmative action implementation for women, minorities, individuals with disabilities, and covered veterans. Such responsibilities



include the implementation of personnel policies and the final review of personnel actions to identify possible problem areas.

Director of Administration (Corporate Office Manager)

The Corporate Director of Administration – Ms. Priscilla Robles, who reports to the President, is responsible for reporting progress to senior management on affirmative action/equal employment opportunity matters and oversees the development of the affirmative action program. She has line responsibility for equal employment opportunity and affirmative action in the Human Resource Services organization. In addition, she has responsibility for ensuring effective company implementation of equal employment opportunity and the affirmative action goals and objectives. Her duties include, but are not limited to, the following:

1. Publishing corporate policies, guidelines, and programs relating to equal employment opportunity.
2. Facilitating internal and external communications to ensure the Affirmative Action Plan and affirmative action policies are made known to company employees and clients by:

- (1) designating a liaison between the company and minority and female organizations and community action groups concerned with employment opportunities for minorities and women, and
- (2) authorizing use of various communication devices for disseminating staff affirmative action information.

3. Engaging in periodic discussions with managers, supervisors, and other personnel to ensure that they are aware of their responsibilities with regard to equal employment opportunity and affirmative action.
4. Advising management in the modification and development of company policies to ensure the enhancement of equal employment opportunity for all employees and applicants within existing equal employment opportunity guidelines.
5. Ensuring that managers and supervisors are aware that their work performance is being evaluated on the basis of their good faith efforts in meeting established commitments in equal employment opportunity and affirmative action.
6. Reviewing, updating, and implementing the Staff Affirmative Action Plan on an annual basis.
7. Designing and implementing an audit and reporting system that will:
 - (1) measure the effectiveness of the Staff Affirmative Action Plan,
 - (2) indicate the need for remedial action, if any, and
 - (3) assess attainment of goals and objectives.
8. Conducting periodic audits of
 - (1) training programs and hiring and promotion patterns to confirm that they are consistent with the attainment of affirmative action goals and objectives, and
 - (2) company-sponsored educational and training activities to ensure that all employees are encouraged to participate in accordance with policies on nondiscrimination.



9. Assisting in the review and revision of applicable company policies and procedures to ensure they are in compliance with company policy and Federal and State laws and regulations governing equal employment opportunity and affirmative action.
10. Assisting in the identification of problem areas and establishing procedures, goals, and objectives, and assisting line managers in arriving at solutions to problems.
11. Developing educational programs to assist managers and supervisors in ensuring equal opportunity, providing a work environment that is free of illegal discrimination and harassment, and achieving further diversity in the workplace.

Managers and Supervisors

Line managers, in day-to-day contact with staff, are assigned certain responsibilities to ensure compliance with equal employment opportunity policies and to implement affirmative action. Such responsibilities are recognized by the administration and are subject to performance appraisal goals. The responsibilities include adhering to the campus nondiscrimination policy and assisting in the implementation of the Affirmative Action Plan by exercising good faith efforts for meeting established commitments to equal employment opportunity and affirmative action goals. In addition, the responsibilities of supervisors include, but are not limited to, the following:

1. Evaluating the performance of subordinate supervisors, taking into consideration their good faith efforts for meeting established commitments in equal employment opportunity and affirmative action.
2. Advising employees, upon request, about individual career development plans.
3. Implementing the decentralized career hiring process which consists of:
 -)] Completing a job posting.
 -)] Advertising in publications or websites.
 -)] Reviewing applications, conducting interviews, and selecting the individual to be hired in accordance with company policy.

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Work Force

Job Groups ¶141 CFR 60-2.12

Job groups are the basic units for developing availability proportions, conducting the utilization analysis, and analyzing personnel transactions. In accordance with Federal affirmative action regulations, our job titles held by Sec-Ops employees have been combined to form the 4 job groups we currently employ. A list of job titles by job group is listed within this plan.

Methodology

Federal affirmative action regulations specify that job groups have similar content, wage rates, and opportunities. Accordingly, in developing the job groups, the following guidelines were taken into consideration:



))The content of the jobs included in a job group should be similar in job responsibilities, requisite skills, and wage rates.

))The opportunities for advancement should be similar for all jobs in a job group.

))A given job group should not include job classifications with clearly different utilization patterns. For example, job classifications predominantly filled with males should not be combined in the same job group with job classifications predominantly filled with women.

))Job groups, in general, should be composed of a minimum of fifty employees to allow meaningful utilization analysis and the establishment of goals. In most cases, our job groups employ less than fifty employees because of the size of our company, unique job content, requirements, and skills.

))Job groups should illuminate, rather than mask, problem areas.

))Jobs in a job group should have the same labor market.

))For the purpose of determining underutilization, the President is not counted in the work force Senior Management Group.

Sec-Ops Work Force: **December 31, 2022** ¶41 CFR 60-2.13

Gender and ethnic distributions of the 219 Sec-Ops employees by job group are presented in the tables immediately following. The chart below contains a summary of the percentages of minorities and women employed within each job group.

Sec-Ops Work Force: Ethnicity and Gender

November 3, 2022

Job Group	Non-Minority	Minority	Total	Men	Women
1 – Administrative Support	0	2	2	0	2
2 – First/Mid Level	4	8	12	7	5
3 – Officials and Managers	3	0	3	3	0
4 – Service Worker	90	112	202	171	31
TOTAL	97	122	219	181	38

Sec-Ops Work Force: Ethnic Minority Category

December 31, 2022

Male/Female	181/38	81% / 19%	White	97	44%
FT Personnel	180		Black African American	15	7%
PT Personnel	39		Hispanic Latino	101	46%
Total Personnel	219		Asian/ pacific islander	6	3%
Texas	169		Native American	0	0%
Wyoming	32		Two or More Races	0	0%
Florida	1		Total	219	100%
Arizona	17		Veterans	55	25%
Hub Cert	86	39%	Sample Date 11/03/22		



Availability Proportions ¶141 CFR 60-2.14

In accordance with Federal affirmative action regulations, a utilization analysis of the employment of women and ethnic minorities by job group is conducted. The utilization analysis requires estimating the number of qualified minorities and women available for employment in each job group, expressed as the percentage of all qualified persons available for employment in the job group.

Methodology

As specified in Federal affirmative action regulations, the two factors that must be considered in determining the availability of women and ethnic minorities for each job group are set forth below. The data must be based on current and discrete statistical data.

1. The percent of minorities or women with requisite skills in the reasonable recruitment area. The reasonable recruitment area is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question. The rationale for the area must be provided and may not have the effect of excluding women and minorities.
2. The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees with the contractor's organization who could, with appropriate training that the contractor is reasonably able to provide, become promotable or transferable during the affirmative action plan year. The pool of internal employees may not have the effect of excluding women and minorities.

Underutilization: December 31, 2021

Job groups in which there are fewer women and minorities employed than would be expected based upon the recruiting area and internal pool of candidates were identified. The declaration of underutilization, and the resultant establishment of a placement goal, does not amount to an admission of impermissible conduct. It is neither a finding of discrimination nor a finding of a lack of good faith affirmative action efforts. Rather, "underutilization" is a technical term used by affirmative action planners who seek to assess good faith efforts in order to ensure equal opportunity for qualified women and minorities in the work force.

Annual Placement Goals ¶141 CFR 60-2.16

Methodology

At the beginning of a reporting period, annual goals are established for women and ethnic minority categories in job groups where underutilization is identified and is equal to or exceeds one-half person or more. For the 2022 Affirmative Action Plan, these goals are expressed as annual placement rates equal to availability proportions based upon the location of company contracts and the area's available qualified personnel.



The goal is met if the actual placement rate is equal to or exceeds the availability rate. Annual placement goals for the period January 1, 2022 - December 31, 2022 will be viewed based on the chart below.

Sec-Ops Annual Placement Goals

January 1, 2022 - December 31, 2022

The following table presents annual goals for those job groups indicating underutilization for this year's Affirmative Action Plan period based on our demographic work force.

Job Group	Women	American Indian or Alaska Native	Asian or Pacific Islander	Black	Hispanic
1 – Administrative Support	XX	XX	2%	XX	XX
2 – First/Mid Level	XX	XX	2%	5%	5%
3 – Officials and Managers	XX	XX	XX	XX	XX
4 – Service Worker	15%	6%	6%	10%	20%

(XX represents no current openings)

Personnel Transactions and Identification of Problem Areas

141 CFR 60-2.17 (b)

Methodology

Data for various personnel transactions occurring during a reporting period are analyzed by job group. In each of the analyses, the rate of the group (men, women, non-minorities, and individual ethnic minority categories) with the highest rate in the activity being analyzed is compared to the rates of the remaining groups to determine if the rates of the remaining groups are at least 80 percent of the highest rate. Personnel transactions were analyzed for the period January 1, 2022 - December 31, 2022.

Analyses of Personnel Transactions

Applied v. Selected: This analysis, conducted by job group, reviews (1) the number of selections to the number of applicants for each sex, and (2) the number of selections to the number of applicants, by ethnic category. The analysis is limited to the extent that applicants are not required to and do not always provide data about gender and ethnicity. Accordingly, conclusions drawn from this analysis are based on gender and ethnicity data actually provided by the applicants. Sec-Ops advises all applicants that it is a federal contractor and makes continuing good faith efforts to obtain gender, race, and ethnicity information from each applicant. For the period January 1, 2022- December 31, 2022, there were placements in all job groups. The review of applied v. selected data by gender and by ethnicity indicates that the selections of the following groups are of concern: Asians or Pacific Islanders in all job groups lacked representation; Blacks in job groups 2



and 4 were underrepresented; Hispanics in job group 4 were the majority; and total minority in job groups 4 for Wyoming were underrepresented.

Interviewed v. Selected. This analysis, conducted by job group, reviews (1) the number of selections to the number of interviewed for each sex and (2) the number of selections to the number of interviewed, by ethnic category. The analysis is limited to the extent that applicants are not required to and do not always provide data about gender and ethnicity. Accordingly, conclusions drawn from this analysis are based on gender and ethnicity data actually provided by the applicants. Sec-Ops advises all applicants that it is a federal contractor and makes continuing good faith efforts to obtain gender, race, and ethnicity information from each applicant. For the period January 1, 2021 - December 31, 2021, there were placements in all job groups. The review of interviewed v. selected data by gender and by ethnicity indicates that there are no areas of concern with regard to the differences in the rates of selection within each job group.

Promotions. This analysis, conducted by job group, reviews promotion rates by gender and by ethnicity. The number of employees in a job group at the beginning of the reporting period plus the number of employees moved into the job group during the period is compared to the number of employees promoted from that job group. For the period January 1, 2021 - December 31, 2021, there were promotional opportunities in job group 4. The review of promotions by gender and by ethnicity indicates that the rates of promotions of Blacks in job group 4 are of concern.

Reclassifications. This analysis, conducted by job group, reviews reclassification rates by gender and by ethnicity. There were no reclassifications conducted in any job group.

Involuntary Separations. This analysis, conducted by job group, reviews involuntary separations rates by gender and by ethnicity. For the period January 1, 2021 - December 31, 2020, involuntary separations occurred in job groups 4. The review of involuntary separations by gender and by ethnicity indicates no areas of concern with regard to the differences in the rates of involuntary separations within the job group.

Identification of Problem Areas

As noted above, the following potential problem areas have been identified: the applied v. selected rate of Asians or Pacific Islanders in job groups 2 and 4, Blacks in job groups 2 and 4, and total minority in job groups 2 and 4; and the rates of promotions of Blacks in job group 4.

Further review and analysis will be continued to determine if problems actually exist. To the extent that the results of this review and analysis suggest that corrective action is warranted, Sec-Ops is committed to taking such action. Active recruiting for these areas of under representation will be a priority. In addition to the transaction review and analysis described above, the company is continually evaluating internal systems to determine whether there is gender, race, or ethnicity-based disparities in our



compensation system. If disparities arise, action-oriented programs are developed to address and remedy the problem. Similarly, there is ongoing review of processes and procedures for recruitment, selection, and other personnel procedures to determine whether and where impediments to equal employment opportunity exist, and what corrective action may be necessary.

Action-Oriented Programs ¶41 CFR 60-2.17 (c)

Sec-Ops employs action-oriented programs and specific actions have been undertaken to accomplish the company's commitment to equal employment opportunity and affirmative action. Some of those activities are ongoing; others addressed a particular concern and have been completed. The descriptions that follow include both ongoing and completed activities.

Job Specifications and the Application Process

1. Job titles do not include references to gender.
2. Job postings for new or substantially changed positions are reviewed to ensure that the appropriate level of education, experience, competencies, skills, knowledge, and abilities required for each position are directly related to the satisfactory performance of the duties and responsibilities of the position.
3. The application process does not request information regarding marital status, dates of elementary education, or number of children.
4. Sec-Ops advises all applicants that it is a federal contractor and makes continuing good faith efforts to obtain gender, race, and ethnicity information from each applicant. The self-identification form for specifying gender and ethnicity is voluntary and used only for affirmative action purposes consistent with applicable regulations. This form and guidelines for its use are presented to every applicant.
5. With reference to the revised regulations to Section 503 of the Rehabilitation Act of 1973, as amended, and the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, Sec-Ops no longer asks applicants to self-identify, even voluntarily, their status as a special disabled veteran or an individual with disabilities until after an offer of employment has been made and before the person's employment commences.
6. The application process is updated as necessary to ensure compliance with company policy that is consonant with applicable Federal and State equal employment opportunity regulations.

Inclusive Recruitment

1. Recruitment advertisements are placed in major publications, work force centers and on our website in an attempt to reach all qualified applicants, including minority and female populations. Active recruitment is conducted through Del Mar community college, military transition assistance programs, web site listings, and job fairs. Some other publications available are:

)) Craig's List

)) Indeed job listing

)) ZIP Recruiter

)) Work Force Services



||The Caller Times

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2. Meetings are held periodically with community recruitment sources to discuss job openings, Sec-Ops selection process, and company nondiscrimination and affirmative action issues.

3. Sec-Ops staff members attend applicant workshops, sponsored by Employment Services and Transition assistance workshops, discuss how the application process works, how to prepare a competitive resume packet, give tips on interviewing, and provide other job search resources. These workshops are open to the public and are usually conducted on a as available basis. Additionally, the workshops are presented at community organizations, and to female and ethnic organizations upon request.

Promotions and Transfers

1. Information about open positions is available to internal and external applicants via the Sec-Ops website or specific job posting on individual project work sites.

2. Some vacant positions are limited to internal company applicants when specific company-related experience and/or skills are required.

3. Supervisors inform their site employees via memo / message of department job vacancies.

Staff Employee Training

1. All employees are provided equal access to development and training classes sponsored by Sec-Ops.

Benefits

All employee benefits are administered in accordance with company policies that are consonant with applicable Federal and State equal employment opportunity laws and regulations.

1. Sec-Ops currently has no retirement system, but men and women could contribute at the same rate, when and if the program is implemented.

2. No distinction is made on the basis of race or gender in the administration of benefits.

3. Any Sec-Ops Benefits are available to wives and families of male employees are also available to husbands and families of female employees.

4. There is no mandatory retirement for staff and employees at a particular age.

5. Reinstatement after leave for childbearing is provided without loss of prior service credit or reduction in salary.

6. Accrued leave time can be used for disabilities related to pregnancy.

Employee Relations

1. Managers, supervisors, and other support personnel are available, upon request, to provide counseling to employees experiencing problems that affect job performance.



2. Except for bona-fide gender considerations, all facilities, sponsored recreation, social events, and special programs of Sec-Ops are available to all eligible company employees without regard to non-related factors such as race or gender.

Complaint Resolution

1. The Discrimination Complaint Resolution (DCR) process, which provides an opportunity to resolve discrimination-related complaints at the lowest possible level, offering access to consultation, impartial investigations, and alternative dispute resolution options within the same process. DCR is available to applicants and employees who need assistance in resolving issues of discrimination in the workplace.

2. Employees who allege that they have been discriminated against because of their protected group status have access to redress through company grievance procedures established in accordance with company policy.

Compliance with Guidelines on Sex Discrimination and Discrimination Because of Religion or National Origin

CFR 60-20 and 60-50

Guidelines on Sex Discrimination

Sec-Ops employee policies and procedures comply with the sex discrimination guidelines as set forth in the Federal regulations. Sec-Ops does not discriminate on the basis of sex in recruitment, advertising, job policies and practices, compensation, or employment of women in non-traditional employment areas.

1. Titles are not segregated by sex. The company seeks qualified women for all staff positions, including positions for which women may not have traditionally applied.
3. All personnel policies and practices apply equally to employees of both sexes except those personnel policies or practices relating to childbearing.
4. Men and women have equal opportunity to apply for all available jobs.
5. Wages, hours, and other conditions of employment are not determined on the basis of sex. Fringe benefits are available to employees equally, based upon terms of employment, and are provided without regard to consideration of sex.
6. Wages in Sec-Ops system do not take sex into consideration as a salary variable.
7. The company provides appropriate physical facilities for both sexes.
8. There are no occupations that women are prohibited from performing.
9. Equal access is provided to all Sec-Ops-sponsored training and development programs.
10. Marital status and family status of applicants and employees do not affect participation in benefits or other aspects of employment.
11. It is company policy that sexual harassment is not tolerated and that discipline, which may include termination, may result if employees are found to have violated the policy.



Sec-Ops Policy on Sexual Harassment

The following policy statement reflects Sec-Ops commitment to creating and maintaining a harassment-free workplace. Sec-Ops intends to maintain a workplace free of sexual and other harassment and intimidation, including harassment based on race, color, sex (with or without sexual conduct), sexual orientation, genetic condition, pregnancy, religion, national origin, protected activity (i.e. opposition to prohibited discrimination or participation in the statutory complaint process), age, disability or other protected status.

It is the intent of this policy to:

- Affirmatively raise the subject of sexual harassment and other forms of harassment;
- Express strong disapproval against such actions;
- Identify a complaint procedure whereby employees can raise harassment issues;
- Establish an investigative procedure for such alleged misconduct;
- Provide for an effective and appropriate response to this type of conduct, including sanctions against anyone violating this policy.

Sec-Ops is committed to ensuring that its employees are not subjected to harassment by non-employees. Therefore, this policy applies to management, non-management employees, clients/customers, vendors, and others with whom we have a relationship.

Company Guidelines

Sexual and other harassment is a form of misconduct which undermines the integrity of the employment relationship. Harassment is not only offensive, but it may also harm morale and interfere with our effectiveness and our ability to fulfill our responsibilities to our clients/customers.

The Corporation strictly prohibits a supervisor at Sec-Ops from engaging in any type of sexual contact, interaction, or relationship with anyone in the company who they supervise or who reports to a manager, supervisor who reports to them.

If the investigation of a complaint reveals that some act of sexual harassment, or other inappropriate conduct or behavior has occurred, prompt and appropriate corrective action will be taken. The parties will be informed of the company's determination. If no determination can be made because the evidence is inconclusive, the parties will be informed of this result and the preventive measures will be undertaken, such as training or monitoring.

The person who engaged in such confirmed occurrences of such conduct or behavior will be subject to sanctions or penalties, up to and including suspension and/or immediate



termination of employment. If the offender is not an employee of the company, we will take reasonable measures to the extent we can exercise any control over the problem.

It is not the purpose of this policy to intrude upon the personal lives of our employees or to interfere in acceptable social relationships. However, sexual, and other harassment has absolutely no place at the company and will not be tolerated.

To demonstrate the company's commitment to this policy, all employees will receive a copy of it and it will be redistributed periodically. This policy will also be posted online, available at central locations at Sec-Ops job sites during hiring and trained annually. If any employee has any questions about the policy, he/she should contact their manager.

Discrimination Because of Religion or National Origin

Personnel policies and procedures for career staff employees comply with Federal regulations prohibiting discrimination because of religion or national origin.

1. In implementation of the company commitment to equal employment opportunity, the company does not discriminate on the basis of religion or national origin.
2. The company communicates its obligation to provide equal employment opportunity without regard to religion or national origin to all employees, including executives, managers, and supervisors.
3. The company strives to accommodate employee and prospective employee religious observances and practices. Such accommodation is made unless it could be demonstrated that doing so would cause undue hardship on the conduct of unit business.
4. The company notifies recruitment sources to refer all potential qualified candidates, regardless of religion or national origin.

Staff Affirmative Action Program for Individuals with Disabilities and Covered Veterans

¶141 CFR 60-741 and 60-250

Purpose of the Affirmative Action Program for Individuals with Disabilities and Covered Veterans

The Affirmative Action Program for Individuals with Disabilities and Covered Veterans serves as a working document for taking affirmative action to employ and advance in employment qualified individuals with disabilities and covered veterans. The employee and applicant information systems discussed in this plan, under the Internal Audit and Reporting Systems, include mechanisms to collect, maintain and report information required by Sections 60-250.44(h) and 60-741.44(h) of the regulations about covered veterans and individuals with disabilities.



It is Sec-Ops policy NOT to discriminate against or harass persons with disabilities or covered veterans in its employment practices including, hiring, upgrading, demotion, transfer, recruitment, recruitment advertising, layoff, termination, rates of pay or forms of compensation, and selection for training. Sec-Ops will provide reasonable accommodation to the known physical or mental limitations of an otherwise qualified special disabled veteran or individual with disability, unless it can be demonstrated that the accommodation would impose an undue hardship on the operation of business. Sec-Ops invites all employees with disabilities who wish to benefit under this affirmative action program to voluntarily identify themselves. Sec-Ops appropriately protect the confidentiality of those employees who choose to voluntarily identify their disabilities.

Employee Development

Employee training and development programs are available to all employees, including covered veterans and individuals with disabilities. Employees signing up for training and development programs should follow their department training guidelines.

Complaint Resolution

Grievance and Appeal Procedure: Employees who allege harassment or discrimination on the basis of their status as an individual with a disability or covered veteran have access to redress through company grievance procedures established. Complaint resolution meetings are held in accessible locations and, if necessary, interpreters or adaptive devices are provided. Eligible employees and applicants with complaints of harassment or discrimination relating to disability or covered veteran status can also use the Discrimination Complaint Resolution (DCR) process. This process provides an opportunity to resolve discrimination-related complaints at the lowest possible level, offering access to consultation, impartial investigations, and alternative dispute resolution options within the same process.



APPENDIX A

SEC-OPS AFFIRMATIVE ACTION PLAN ETHNIC CATEGORY DEFINITIONS

APPENDIX A

ETHNIC CATEGORY DEFINITIONS

American Indian or Alaskan Native

Persons having origins in any of the original American Indian peoples of North America, including Eskimos and Aleuts, or who maintain cultural identification through tribal affiliations or community recognition.

Asian or Pacific Islander

Chinese/Chinese-American. Persons having origins in any of the original peoples of China.
Japanese/Japanese-American. Persons having origins in any of the original peoples of Japan.
Korean/Korean-American. Persons having origins in any of the original peoples of Korea.
Filipino/Pilipino. Persons having origins in any of the original peoples of the Philippine Islands.
Pakistani/East Indian. Persons having origins in any of the original peoples of the Indian subcontinent.
Pacific Islanders (including Samoa), or other Asian persons having origins in any of the original peoples of Southeast Asia and the Far East not included in any of the Asian categories listed above.

Black (not of Hispanic origin)

Persons having origins in any of the Black racial groups of Africa.

Hispanic (including Black individuals whose origins are Hispanic)

Mexican/Mexican-American/Chicano. Persons of Mexican culture or origins, regardless of race.
Latin-American/Latino. Persons of Latin American (including persons having origins from Central America, South America, Cuba, Puerto Rico and the Dominican Republic) culture or origins, regardless of race.
Spanish/Spanish-American. Persons of Spanish culture or origin not included in any of the Hispanic categories listed above.

Caucasian (not of Hispanic origin)

Persons having origins in any of the original peoples of Europe, North Africa, or the Middle East.