

# Another

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Supply Company, LLC

**ANOTHER SUPPLY COMPANY, LLC  
(ASCLLC) AFFIRMATIVE ACTION  
PROGRAM (AAP) FOR QUALIFIED  
MINORITIES, WOMEN, VETERANS, AND  
INDIVIDUALS WITH DISABILITIES  
[EO 11246, 41 CFR 60-741, 41 CFR 60-300]**

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## Policy Statement on Equal Employment Opportunity

As the Chief Executives of ASCLLC, I am committed to the principles of affirmative action and equal employment opportunity for qualified minorities and women and veterans and persons with disabilities. Therefore, it is the policy of ASCLLC 1) not to discriminate because of a disability, a sincerely held religious belief, a person's national origin, or a person's status as a qualified minority and/or woman and/or veteran, and 2) to take affirmative action to employ and advance in employment qualified minorities and/or women and/or veterans and/or persons with disabilities at all levels within the company. ASCLLC will ensure that all employment actions, including but not limited to recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, are administered without regard to a disability, a person's religious beliefs, or a person's status as a qualified minority and/or woman and/or veteran. ASCLLC will provide qualified applicants and employees who are disabled with needed reasonable accommodations, as required by law, and will ensure that all employment decisions are based only on valid job requirements.

ASCLLC prohibits harassment of any employee and/or applicant because of a disability or religious belief or because of their status as a qualified minority and/or woman and/or veteran and conducts training to try to prevent any harassment or discrimination before it occurs. ASCLLC prohibits retaliation against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for qualified minorities and/or women and/or veterans and/or persons with disabilities. Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

In furtherance of ASCLLC's policy regarding affirmative action and equal employment opportunity, ASCLLC has developed a written Affirmative Action Program (AAP) that sets forth the policies, practices and procedures that ASCLLC is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified minorities and/or women and/or veterans and/or persons with disabilities is accomplished. This AAP is available for inspection by any employee or applicant for employment upon request, during normal business hours, in ASCLLC's Administrative Department office located at 1004 Cumberland Street, Clearfield, PA 16830. Interested persons should contact the Human Resources Office at 814-962-6260 or [kali@anothersupplycompany.co](mailto:kali@anothersupplycompany.co) for assistance.

In order to ensure employment opportunity and affirmative action throughout all levels of ASCLLC, I have designated ASCLLC's Director of Human Resources as the Equal Employment Opportunity (EEO) Officer for ASCLLC. The EEO Officer will establish and maintain an internal audit and reporting system that will track and measure the effectiveness of ASCLLC's AAP and show where additional action is needed to meet ASCLLC's objectives.

## Designation of Responsibility for Implementation of AAP

### Responsibilities of The Director of Human Resources

The Director of Human Resources has been designated to direct the activities of the affirmative action program. The Director has the full support of the Chief Executive Officer and has the responsibility for designing and ensuring the effective implementation of ASCLLC's AAP. These responsibilities include, but are not limited to:

1. The development of the AAP for qualified minorities and women and veterans and persons with disabilities, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
2. Reviewing all personnel actions, policies, and procedures to ensure compliance with ASCLLC's affirmative action obligations;
3. Reviewing the qualifications of all applicants and employees considered/eligible for hiring promotion, transfer, or layoff/reduction in force to ensure qualified minorities and women and veterans and persons with disabilities are treated in a nondiscriminatory manner when hiring, promotion, transfer, or layoff/reduction in force occur;
4. Developing solutions for any identified problem areas;
5. Assisting management in arriving at effective solutions to AAP/EEO problems;
6. Designing and implementing an internal audit and reporting system that:
  - a. Measures the effectiveness of ASCLLC's program;
  - b. Determines the degree to which AAP goals and objectives are met; and
  - c. Identifies the need for remedial action;
7. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit and reporting system that measures the effectiveness of the program;
8. Keeping the CEO informed of equal opportunity progress and problems within the company through quarterly reports;
9. Providing department-level managers with copies of the Affirmative Action Program (minus the items withheld from dissemination for confidentiality reasons) and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
10. Reviewing the company's AAP for qualified minorities and women and veterans and persons with disabilities with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
11. Assisting in ensuring that career development of employees who are qualified minorities and/or women and/or veterans and/or persons with disabilities is equal to that of other employees;
12. Auditing the contents of company bulletin boards to ensure that required information is posted and up-to-date;

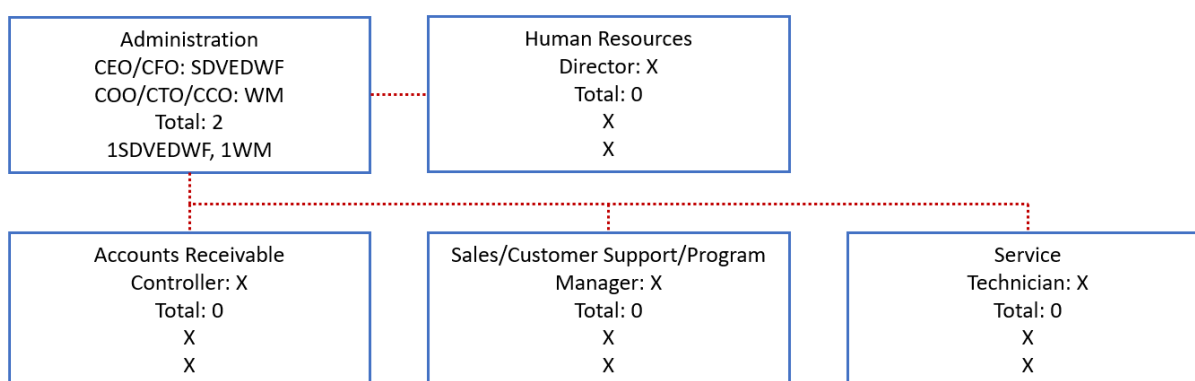
13. Serving as a liaison between ASCLLC and enforcement agencies; and
14. Serving as a liaison between ASCLLC and outreach and recruitment sources for qualified minorities and women and veterans and persons with disabilities.

#### Responsibilities of Managers and Supervisors:

It is the responsibility of all managerial and supervisory staff to implement ASCLLC's AAP. These responsibilities include, but are not limited to:

1. Assisting in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when necessary;
2. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur; and
3. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities.

### Organizational Display



### Workforce Analysis

PENDING – Ref. Attachment: *ASCLLC\_Analysis-Workforce.pdf*

### Job Group Analysis

PENDING – Ref. Attachment: *ASCLLC\_Analysis-JobGroup.pdf*

### Utilization Analysis

PENDING – Ref. Attachment: *ASCLLC\_Analysis-Utilization.pdf*

### Placement Goals

PENDING – Ref. Attachment: *ASCLLC\_PlacementGoals.pdf*

## Review of Personnel Processes

To comply with the requirement to “periodically review” its personnel processes, ASCLLC reviews its personnel processes annually to determine whether its present procedures assure careful thorough and systematic consideration of the qualifications of known qualified minorities and women and veterans and persons with disabilities. As part of this review, ASCLLC also ensures that its personnel processes do not stereotype individuals with disabilities in a manner which limits their access to all jobs for which they are qualified. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as to all training opportunities offered or made available to employees. In conducting this review, ASCLLC uses the procedures suggested in Appendix C to 41 C.F.R. § 60-300.

Based upon ASCLLC’s most recent review of its personnel processes, ASCLLC has implemented the following modifications to its personnel processes to come into compliance:

### Ensure accessibility of personnel processes

ASCLLC will ensure that applicants and employees who are qualified minorities and/or women and/or veterans and/or persons with disabilities have equal access to all of its personnel processes. Although it is not required to do so, as a best practice in furtherance of that commitment, ASCLLC is in the process of developing its job application, time and attendance worksheet format, and employee benefits electronic systems to conform to the Web Content Accessibility Guidelines (WCAG 2.0) promulgated by the World Wide Web Consortium Web Accessibility Initiative and will complete these upgrades by December 31, 2026. ASCLLC believes that taking these steps now will help minimize the need for future reasonable accommodations and facilitate ready access to key systems for many applicants and employees with disabilities. Also, as part of the upgrading of our job application system, ASCLLC will ensure that human resources office contact information is prominently displayed to facilitate requests for reasonable accommodation from applicants with disabilities.

### Invite all applicants to voluntarily self-identify as a member of a protected group and/or veteran before an offer of employment is made

On 04/20/2023, ASCLLC began inviting all applicants to voluntarily inform ASCLLC that they are veterans or members of a protected group before an offer of employment is made, following guidance published by the OFCCP, the DoL, and the State of Pennsylvania. ASCLLC will continue to invite applicants to self-identify as veterans or members of a protected group post-offer. ASCLLC provides the self-id form it created using the model in Appendix B of 41 CFR 60-300 to all applicants along with ASCLLC’s required paper application forms. Additionally, ASCLLC has modified its electronic application system and created a fillable copy of the self-id form. ASCLLC also created a separate electronic file where it stores all self-id information separate from employment applications, personnel records, and employee medical files.

### Applicant flow logs

ASCLLC collects applicant and hiring data to comply with the requirements of 41 CFR 60. In order to facilitate the accurate tracking of applicant and hiring data for qualified minorities, women, veterans, and persons with disabilities ASCLLC maintains confidential applicant flow logs.

### Documentation and Assessment of Outreach and Recruitment Activities

ASCLLC has always engaged in positive outreach and recruitment for qualified minorities, women, veterans, and persons with disabilities as required by OFCCP regulations. ASCLLC documents each outreach and recruitment activity to comply with the requirements of 41 CFR 60 and will conduct an annual assessment to evaluate the effectiveness of the totality of our outreach and recruitment efforts, as required by 41 CFR 60-300.44(f)(3). ASCLLC will institute procedures to comply with the requirements of this part and will conduct its first annual assessment with data collected during the 2025 AAP year, starting in January 2025.

ASCLLC will evaluate the results of each outreach and recruitment activity using the following criteria, which includes data collected under 41 CFR 60, to see if it is producing measurable results:

1. To what extent did the activity attract qualified minorities, women, qualified veterans, and persons with disabilities?
2. To what extent did the activity result in the hiring of qualified minorities, women, qualified veterans, and persons with disabilities?
3. To what extent did the activity expand ASCLLC's outreach to minorities, women, veterans, and persons with disabilities in the community?
4. To what extent did the activity increase ASCLLC's capacity/capability to include minorities, women, veterans, and persons with disabilities in its workforce?

ASCLLC will utilize the same criteria to conduct its annual assessment of the totality of its outreach and recruitment efforts. If ASCLLC concludes that the totality of its efforts are not effective in identifying and recruiting qualified minorities, women, veterans, and persons with disabilities ASCLLC will explore and implement alternative outreach and recruitment methods. ASCLLC will document its outreach and recruitment activities and its assessments of these activities and retain these documents for three years.

### Review of Physical and Mental Job Qualification Standards

To comply with the requirement to "periodically review" its physical and mental job qualification standards, ASCLLC reviews the physical and mental job qualifications of each job opening before it is publicly posted to ensure that, to the extent that such qualification requirements tend to screen out qualified minorities, women, veterans, or persons with disabilities they are related to the job(s) in question and consistent with business necessity and the safe performance of the job. ASCLLC also conducts a periodic review of all job qualification standards every three years (except for those job qualification standards that

ASCLLC has reviewed within the previous twelve months) to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities, they are job-related and consistent with business necessity. The last review was completed on April 26, 2023.

Appropriately trained personnel conducted the review and identified no physical or mental job qualification requirements that are likely to screen out qualified minorities, women, veterans, or persons with disabilities. Nevertheless, to ensure our compliance, ASCLLC strives to use only job qualification standards that are job-related and consistent with business necessity. The review found all job qualification requirements to be job-related and consistent with business necessity and safety.

ASCLLC will continue to review physical and mental job qualification requirements whenever a job vacancy is to be filled through either hiring or promotion and will conduct a qualification review whenever job duties change.

No pre-employment physical examinations or medical questionnaires are used in ASCLLC's hiring process.

If at any time in the future, ASCLLC should inquire into an applicant's physical or mental condition or should conduct a medical examination, ASCLLC affirms that such inquiries or exams will be conducted in accordance with 41 CFR 60 and VEVRAA regulations and that information obtained as a result of the inquiry or exam will be kept confidential, except as otherwise provided for in 41 CFR 60 and VEVRAA regulations. The results of the examination or inquiry will only be used in accordance with 41 CFR 60 and VEVRAA regulations.

## Reasonable Accommodation

ASCLLC is committed to making reasonable accommodation to the known physical or mental limitations of qualified disabled veterans and/or persons with disabilities unless such accommodation would impose an undue hardship on the conduct of its business. ASCLLC commits to engaging in an interactive process with the person requesting the accommodation (or their representative), as needed, to determine an appropriate accommodation. Undue hardship will be determined by assessing whether the requested accommodation, and any other potential accommodations, would cause significant difficulty or expense, as provided for in 41 CFR 60 and VEVRAA regulations.

When an employee with a known disability has significant difficulty performing their job and it is reasonable to conclude that the performance problem may be related to the known disability, the employee is confidentially notified of the performance problem and asked if the problem is related to the disability. If the employee indicates that the performance problems are related to their disability, the employee is asked if reasonable accommodation is needed.



ASCLLC will also ensure that all requests for reasonable accommodation and any medical or disability-related information provided to ASCLLC will be treated as confidential medical records and maintained in a separate medical file.

Because ASCLLC strives to be a model employer, it is currently drafting reasonable accommodations procedures using the guidance in Appendix B of the Section 503 disability regulations at 41 CFR Part 60-741.

## Anti-Harassment Procedures

Employees and applicants of ASCLLC will not be subject to harassment because of qualified minority, woman, veteran, or disability status. Any employee or applicant who believes that they have been subject to harassment because of their status as a qualified minority, woman, veteran, or person with a disability should promptly contact a manager in their chain of command, or the Director of Human Resources at 814-962-9260 or [kali@anothersupplycompany.co](mailto:kali@anothersupplycompany.co) for assistance. Employees or applicants may also file a written complaint with the office of the Director of Human Resources, 1004 Cumberland Street, Clearfield, PA 16830.

Retaliation, including intimidation, threat, coercion, or discrimination, against an employee or applicant because they have objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing or have otherwise sought to obtain their legal rights under any Federal, State, or local EEO law regarding minorities, women, veterans, or persons with disabilities is prohibited. Any employee or applicant who believes that they have been subject to retaliation should contact the Director of Human Resources at 814-962-9260 or [kali@anothersupplycompany.co](mailto:kali@anothersupplycompany.co) for assistance.

This anti-harassment policy is communicated to all employees and managers annually via e-mail, most recently on December 1, 2014, and a notice is posted in the personnel office.

Additionally, training is provided annually on the identification and prevention of harassment based on minority, woman, veteran, or disability status to all of ASCLLC's employees. Furthermore, ASCLLC monitors its environment for the presence of any forms of harassment, intimidation, or coercion and, where warranted, takes corrective action.

## External Dissemination of Policy

ASCLLC provided written notification of ASCLLC's Equal Employment Opportunity and Affirmative Action policy regarding the employment of minorities, women, veterans, and persons with disabilities to all current subcontractors, vendors, and suppliers on MM DD, 202Y and will continue to do so on an annual basis. ASCLLC will also provide such written notification to new subcontractors, vendors, and suppliers upon entering into a relationship with them.

ASCLLC has informed its recruiting sources, including State employment agencies, local employment service delivery systems, educational institutions and social service agencies, of the company's policy

concerning the employment of qualified minorities, women, veterans, and persons with disabilities and will notify them of employment opportunities as they become available. ASCLLC requested all recruiting sources to actively recruit and refer qualified persons for job opportunities.

A copy of ASCLLC's Affirmative Action Policy for qualified minorities, women, veterans, and persons with disabilities is provided to the State Employment Service annually.

ASCLLC will include the equal opportunity clause concerning the employment of qualified minorities, women, veterans, and persons with disabilities in all non-exempt subcontracts and purchase orders.

## Outreach and Positive Recruitment

### ASCLLC's Outreach and Positive Recruitment Activities

*Ref. Attachment: ASCLLC Recruitment Activities Matrix.xlsx*

### Future Assessment of External Outreach and Recruitment Efforts

ASCLLC will begin assessing its outreach and recruitment efforts annually starting in 2024 and will document such assessment for inclusion in ASCLLC's 2025 AAP. This will include an assessment of the effectiveness of each individual effort, as an assessment of the effectiveness of the totality of our efforts for the year. Because ASCLLC currently has no applicant and hiring data for minorities, women, veterans, or persons with disabilities, which it has yet to begin collecting, we cannot perform an assessment of the effectiveness of our outreach and recruitment efforts at this time. Starting in 2025, ASCLLC will have more complete data from which to perform a comprehensive assessment of whether our efforts are effective in recruiting veterans into our workforce. ASCLLC documents all of its outreach and recruitment efforts and maintains these documents, including the written assessments of the effectiveness of these efforts, for three years, in accordance with 41 CFR 60-300.44(f)(4).

### Future Outreach and Positive Recruitment Activities

ASCLLC plans to expand its outreach and positive recruitment efforts in 2024. ASCLLC will routinely post its job vacancy announcements to veteran job boards hosted by the Departments of Veterans Affairs and Defense (the Veterans Employment Center), the Paralyzed Veterans of America (Paving Access to Veterans' Employment), and other similar public and private veteran-focused job banks. ASCLLC will also reach out to the Disabled Veterans' Outreach Program Specialists (DVOPS) & Local Veterans' Employment Representatives (LVERs) in our area to explore the creation of an on-the-job training and mentorship program for veterans. ASCLLC will also begin hosting briefing sessions and facility tours for representatives of local organizations that provide employment services to veterans.

## Internal Dissemination of Policy

ASCLLC has developed internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified veterans. ASCLLC's procedures are designed to foster understanding, acceptance, and support among all employees and to encourage them to help ASCLLC meet this obligation.

ASCLLC makes copies of its AAP available for inspection to any employee or applicant upon request. ASCLLC also incorporates the company's affirmative action and equal employment opportunity policies into the ASCLLC Human Resources Manual and updates this manual as needed. The policies are emailed to all employees annually and discussed in employee orientation programs, such as ASCLLC's New Employee Orientation seminar. Additionally, ASCLLC's affirmative action policy and EEO poster are placed on bulletin boards located throughout ASCLLC's facilities and office work areas, and electronic versions of these notices are posted and clearly labeled on ASCLLC's company-wide intranet. A clearly labeled link to an electronic version of the EEO poster is also included in ASCLLC's electronic job application system.

ASCLLC managers and supervisors are provided with affirmative action and EEO training upon taking their management roles and are briefed annually of these policies. The last such management briefing was held on June 1, 2014. ASCLLC also notified union officials and employee representatives of these policies on June 1, 2014 and will send them reminders on an annual basis.

## Audit and Reporting System

The ASCLLC Director of Human Resources has the responsibility for developing and preparing the formal documents of the AAP. The Director of Human Resources is responsible for the effective implementation of the AAP; however, responsibility is likewise vested with each department manager and supervisor. ASCLLC's audit and reporting system is designed to:

- Measure the effectiveness of the AAP/EEO program;
- Document personnel activities;
- Identify problem areas where remedial action is needed; and
- Determine the degree to which FCI's AAP goals and objectives have been obtained.

The following personnel activities are reviewed to ensure nondiscrimination and equal employment opportunity for all individuals without regard to their race, color, sex, sexual orientation, gender identity, religion, or national origin:

- Recruitment, advertising, and job application procedures;
- Hiring, promotion, upgrading, award of tenure, layoff, recall from layoff;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications, job descriptions, and seniority lists;
- Sick leave, leaves or absence, or any other leave;
- Training, apprenticeships, attendance at professional meetings and conferences; and

- Any other term, condition, or privilege of employment.

ASCLLC shall conduct an annual audit of personnel activities to ensure such activities are free from discrimination against, or stereotyping of, veterans in any manner. The results of ASCLLC's most recent self-audit are available by request via email to [info@anothersupplycompany.co](mailto:info@anothersupplycompany.co). During the self-audit, the following activities are reviewed:

- Recruitment, advertising, and job application procedures;
- Implementation of hiring, promotion, upgrading, award of tenure, layoff, and recall from layoff practices;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications, job descriptions, and seniority lists;
- Implementation of reasonable accommodation policies and procedures;
- Awarding of sick leave, leaves or absence, or implementation of any other leave policies;
- Participation in training, mentoring, or apprenticeship programs, and attendance at professional meetings and conferences; and
- Application of any other term, condition, or privilege of employment, including participation in company-sponsored educational, training, recreational, and social activities.

The CEO has also directed the Director of Human Resources to submit a quarterly report documenting ASCLLC's efforts to comply with its EEO/AAP Responsibilities, discussing any identified EEO/AAP problem areas along with recommended remedial actions, and providing an update regarding the status of ASCLLC's AAP objectives. Managers and supervisors are asked to report any current or foreseeable EEO problem areas to the Director of Human Resources and are asked to outline their suggestions or recommendations for solutions.

The following documents are maintained as a component of ASCLLC's internal audit process:

1. Documentation of self-audit;
2. Summary data of personnel activity including external job offers and hires, promotions, resignations, terminations, and layoffs relating to veterans [withheld from distribution or public inspection to ensure confidentiality]; and
3. An applicant flow log showing the name, race, ethnicity, sex, veteran status, date of application, job title, interview status and the action taken for all individuals applying for job opportunities [withheld from distribution or public inspection to ensure confidentiality].
4. Maintenance of employment applications (not to exceed one year) [withheld from distribution or public inspection to ensure confidentiality]; and
5. Records pertaining to FCI's compensation system. [withheld from distribution or public inspection to ensure confidentiality]

## Supporting Data

ASCLLC Self-Audit (to be conducted 11/16/2024)

PENDING – *Ref. Attachment: ASCLLC\_SelfAuditWrkbk.xlsx*

Personnel Activity (establishment-wide)

[Withheld from distribution or public inspection to ensure confidentiality]

*Ref. Attachment: ASCLLC\_PersonnelActivityMatrix.xlsx*

Applicant flow log [Withheld from distribution or public inspection to ensure confidentiality]

[Withheld from distribution or public inspection to ensure confidentiality]

*Ref. Attachment: ASCLLC\_PersonnelActivityMatrix.xlsx*

## Identification of Problem Areas and Action-oriented Programs

Job Groups where Utilization Goal is Not Met	Identification of Problem Areas (if any)	Action-oriented Programs
1	PENDING	
2	No staff for Job Group	
	Managed by members of Job Group 1	
3	No staff for Job Group	
	Managed by members of Job Group 1	

## EEO and Affirmative Action Training

Managers, supervisors, and human resources staff involved in recruiting, screening, selection, promotion, disciplinary, and other related employment processes receive annual training regarding ASCLLC's AAP and their role in its implementation. Training sessions were most recently conducted on December 1, 2014.

During the annual training, managers and supervisors are advised of their responsibilities under ASCLLC's AAP for veterans and of their obligations to:

- Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
- Ensure qualified applicants and employees who are veterans are treated in a nondiscriminatory manner in all employment practices, including when making selection decisions, such as for hire, promotion, training, or to receive awards or bonuses;

- Provide reasonable accommodation to the known physical or mental limitations of qualified disabled veterans unless such accommodation would impose an undue hardship on the conduct of its business;
- Maintain confidentiality of any information regarding self-identification of veteran status; and
- Ensure that nondiscrimination is adhered to in all personnel activities.

## Applicant and Hiring Data

ASCLLC collects employee data pertaining to status as a veterans in order to assess the effectiveness of the company's outreach and recruitment efforts. ASCLLC invites applicants to voluntarily inform the company whether they believe they are veterans in compliance with the VEVRAA requirements.

[Withheld from distribution or public inspection to ensure confidentiality]

*Ref. Attachment: ASCLLC\_PersonnelActivityMatrix.xlsx*

## Hiring Benchmarks

ASCLLC has adopted the national percentage of veterans in the civilian labor force provided by OFCCP, currently 7.2%, as its hiring benchmark for the 2026 AAP year. In its AAP update on January 1, 2027, ASCLLC will analyze its success in hiring veterans during the course of this AAP year based on this benchmark and use that analysis as one of the criteria in its assessment of the effectiveness of its outreach and recruitment efforts.