

	<b>Equal Employment Opportunity</b>
	<b>Policy &amp; Procedure #: 420</b>
<b>Effective Date: 01/01/18</b>	<b>Date Replaced: 09/01/15</b>
<b>Approved By: Sr. Management</b>	<b>Functional Area/Owner: Corporate</b>

**Objective:**

The Company is committed to prohibiting discrimination in employment on the basis of race, color, creed, sex, pregnancy, age, religion, ancestry, national origin, marital status, familial status, sexual orientation, gender identity, disability including those related to pregnancy or childbirth, medical condition including genetic characteristics, AIDS/HIV, Sickle Cell or Hemoglobin C Trait, Hepatitis C, status with regard to public assistance, local human rights commission activity, member of a state militia, citizenship status, height or weight, misdemeanor arrest record, the lawful use of lawful products when not at work, use of tobacco, domestic violence victim status, use of a service animal, pre-existing injury or any other protected class as established by law. This Equal Employment Opportunity policy is designed to ensure equal treatment for all employees, including in hiring or any decision affecting job status or pay. All employees, including supervisors and managers, are responsible for adhering to this policy.

**Process or Guidelines:**

- 1) The recruitment, testing and hiring of all personnel will be without discrimination of any protected class. Attempts will be made to contact known sources of minority and women potential applicants so as to maximize the participation of such applicants.
- 2) Individuals will be promoted on the basis of their abilities, skills and experience. Minority and women employees who are qualified, as well as those who are qualifiable through training, will be considered for promotion. Promotions will be based on valid occupational qualifications.
- 3) Personnel decisions affecting employees in areas such as compensation, benefits, transfers, layoffs, returns from layoff, Company-sponsored training, education, tuition assistance and social and recreational programs will be made and implemented without regard to any protected class.
- 4) The EEO policy will be included in the Employee Handbook. Copies of the Employee Handbook will be distributed to all current employees and to new employees when they are hired.

- 5)
- 6) Employees are encouraged to bring questions, comments or complaints with respect to Bell Lumber & Pole policy, or the implementation and administration of that policy, to Human Resources.
- 7) If you become aware of a complaint or incident of possible discrimination, or if you believe you have been subjected to discrimination, you should immediately contact Human Resources or an officer of the Company.
- 8) Sr. Management has communicated and will continue to publicize that it does not tolerate or permit harassment of any employee because of race, color, religion, sex, national origin or any other protected class as established by law.

**Unless specified within the policy, the policies and procedures issued by Bell Lumber & Pole will cover the following entities:**

- 1) Bell Lumber & Pole Company
- 2) Bell Timber Inc.
- 3) Alamco Wood Products LLC

**Exceptions & Approvals:**

- 1) Any decision made regarding reasonable accommodation(s) will be reviewed with the President, CFO and Human Resources.
  - a) Reasonable accommodation means making existing facilities readily accessible to and usable by individuals with disabilities, job restructuring, part-time or modified work schedules, reassignment to a vacant position, acquisition or modification of equipment or devices, adjustment or modification of examinations, adjustment or modification of training materials, adjustment or modification of policies, and similar activities.
- 2) Any decision made regarding an undue hardship for the accommodation(s) of a disability covered under the American with Disabilities Act (ADA) will be reviewed by the President, CFO and Human Resources.
  - a) Undue hardship means an action requiring significant difficulty or expense by the employer. The factors to be considered in determining an undue hardship include: (1) the nature and cost of the accommodation; (2) the overall financial resources of the facility at which the reasonable accommodation is to be made; (3) the number of persons employed at that facility; (4) the effect on expenses and resources or other impact upon that facility; (5) the overall financial resources of Bell Lumber & Pole ; (6) the overall number of employees and facilities; (7) the operations of the particular facility as well as the entire Company; and (8) the relationship of the particular facility to Bell Lumber and Pole. These are not all of the factors but merely examples.

**Related Documentation:**

- 1) New Hire Orientation
- 2) EEO Statement

<b>Policy &amp; Procedure Name</b>	<b>Policy &amp; Procedure #</b>
<b>Americans with Disabilities Act</b>	<b>405</b>
<b>Corrective Action</b>	<b>310</b>
<b>Termination of Employment</b>	<b>705</b>