

<b>Policy Name:</b>	<b>Equal Employment Opportunity (EEO)</b>
<b>Policy Number:</b>	<b>3.01</b>
<b>Date:</b>	<b>February 2023</b>

## **POLICY STATEMENT:**

JC Steele is an equal opportunity employer that also embraces diversity. In accordance with all federal, state and local laws, we will recruit, hire, remunerate, train and develop, evaluate, discipline, place, promote and terminate the employment of employees equally and fairly.

Furthermore, it is the policy of JC Steele to be impartial in all of its relations with its employees and applicants for employment, without regard to race and colour, national origin, religion, sex, sexual orientation or gender identification or expression, intersex status, pregnancy or breastfeeding, age, marital status, physical disability or medical condition, except when such a characteristic is an appropriate and bona fide occupational qualification.

JC Steele is establishing this policy because it recognises the need to initiate, uphold and preserve all affirmative measures to safeguard the success of equal employment opportunities in all aspects of our work environment. All employees of JC Steele are expected to carry out the primary aim of JC Steele's equal employment commitment.

## **PROCEDURES:**

It is the policy of JC Steele to offer equal employment opportunities to all qualified individuals without regard to race and colour, national origin, religion, sex, sexual orientation or gender identification or expression, intersex status, pregnancy or breastfeeding, age, marital status, physical disability or medical condition, except where such a characteristic is an appropriate and bona fide occupational qualification.

This policy applies to, but is not limited to, the following aspects of the JC Steele employment process:

- a. Recruitment will be merit based; based solely on the qualifications needed to perform the job
- b. All employee relations and decisions concerning interviewing, selection, job placement, promotions, terminations, remuneration, benefits, training and development, performance evaluations, or disciplinary actions will be without regard to race and colour, national origin, religion, sex, sexual orientation or gender identification or expression, intersex status, pregnancy or breastfeeding, age, marital status, physical disability or medical condition except where such a characteristic is an appropriate and bona fide occupational qualification.

Employment opportunities will always be open to all qualified people on the basis of their experience and competencies.

- c. Advancement/promotion within JC Steele, if & when available, will be based solely on each individual's achievement, performance, ability and attitude.

- d. If at any time, there are two candidates with identical qualifications being considered for a promotion, consideration will be given to the person who has demonstrated the strongest performance as measured in their most recent performance review and who has demonstrated the strongest commitment to the core values of JC Steele.
- e. Any employees who feel they have been discriminated against solely on the basis of their race and colour, national origin, religion, sex, sexual orientation or gender identification or expression, intersex status, pregnancy or breastfeeding, age, marital status, physical disability or medical condition are requested to report the incident or complaint directly to the/a Managing Director or HR Administrator, who will investigate and attempt to resolve the matter.
- f. Any employee with JC Steele who is determined to have violated this EEO Policy will be subject to disciplinary action which may also result in termination of employment.