

Equal Employment Opportunity and Affirmative Action Plan



Section: Human Resources

Policy & Procedure Number: 201

Date: March 28, 1997 (Revised March 16, 2011)

Guest Services complies with nondiscrimination regulations under Title VII, Civil Rights Acts of 1964; Vietnam-Era Veterans Readjustment Assistance Act of 1974; Section 504 of the Rehabilitation Act of 1973; the Americans with Disabilities Act of 1990; Pregnancy Discrimination Act of 1978; the Age Discrimination in Employment Act of 1967; Executive Order 11141, the Equal Pay Act, the [state] Labor Code, and other applicable statutes, ordinances and regulations. The Company complies with affirmative action regulations under Executive Order 11246, the Vietnam-Era Veterans Readjustment Assistance Act, and the Federal Rehabilitation Act and all applicable laws, as they may be amended from time to time.

It is the firm policy of Guest Services, Inc. and all its subsidiaries that we will recruit, hire, train, and promote people in all job classifications without regard to race, color, religion, national origin, age, disability, or history of disability (except where physical or mental abilities are a bona fide occupational requirement and the individual is not able to perform the essential functions of the position even with reasonable accommodations), or gender (unless gender is a bona fide occupational qualification), status as a veteran or other protected characteristic.

The company will ensure that all personnel actions, including compensation, benefits, transfers, layoffs, return from layoff, company-sponsored training, education, and tuition assistance will be administered without regard to race, color, religion, national origin, age, disability, or history of disability (except where physical or mental abilities are a bona fide occupational requirement and the individual is not able to perform the essential functions of the position even with reasonable accommodations), veteran status, pregnancy, gender, (unless gender is a bona fide occupational qualification) or other protected characteristic

Managers and supervisors of the company will base employment decisions and actions solely on merit, service, and the ability to effectively perform work assignments.

As a government contractor, Guest Services is pledged to develop and support an environment of affirmative action toward this policy including affirmative action recruitment of candidates for positions at all levels. This policy applies to all employees and applicants for employment.

Disabled veterans, recently separated veterans, armed forces service medal veterans, and other protected veterans, and individuals with disabilities who wish to avail themselves of the provisions of the Company's Affirmative Action Program are invited to identify themselves to company administration for this purpose. Persons with disabilities, disabled veterans, recently separated veterans, armed forces service medal veterans, and other protected veterans choosing not to identify themselves for this purpose at the time of application or employment will not be discriminated against and will be able to identify themselves at any time.

Any employee with a disability who requires accommodation should speak with his or her Unit Manager or a member of the Human Resources department. Generally, this refers to an employee with a physical

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or mental impairment that substantially limits one or more major life activities (including major bodily functions); has a record of such an impairment; or is regarded as having such an impairment. The Company will seek to reasonably accommodate qualified individuals with a disability as defined by the Americans with Disabilities Act Amendments Act (ADAAA). The employee has the responsibility to provide adequate information to the Company as part of the accommodation process. A qualified person with a disability means an individual with a disability who, with or without reasonable accommodation, can perform the essential functions of the position. Such reasonable accommodation may take the form of making existing facilities readily accessible to or usable by individuals with a disability, restructuring jobs, modifying schedules, offering an unpaid leave of absence, acquiring or modifying equipment, adjusting training materials, adjusting employment policies, and the like. Generally, such reasonable accommodation will be made unless it creates an undue hardship for the Company.

Any person who believes he or she may have been discriminated against in violation of these principles or who observes any discrimination in violation of these principles or who needs a reasonable accommodation should discuss the matter with a human resources representative or their immediate manager. If for any reason you do not want to discuss the matter with these individuals, he or she may discuss the matter with any officer of the company. An alternate method of reporting violations of these principles is the GSI Helpline. Managed by a third-party company called [EthicsPoint](#), the GSI Helpline collects your information (anonymously, if you prefer) so we can review and respond to your report in a confidential and timely manner. The GSI Helpline is a multi-lingual service that is available 24 hours a day, 7 days a week. You may contact the GSI Helpline at 1-877-220-1672 or on the web at [EthicsPoint.com](#).

Managers or supervisors who receive any complaint or concern involving discrimination or observe any discrimination must bring the matter to the attention of the Vice President or Director of Human Resources. That individual will initiate an appropriate investigation. Employees have a responsibility to cooperate in any investigation of unlawful discrimination. All employees are to cooperate fully with the investigation and resolution of all discrimination and affirmative action complaints.

If the complaint involves someone who is not an employee of Guest Services, contact the Vice President of Human Resources immediately at (703) 849-9311.

Requests to review a copy of the company's Affirmative Action Program should be directed to the Vice President of Human Resources.