

**SYCAMORE SERVICES, INC. DBA LINK HENDRICKS COUNTY
EQUAL EMPLOYMENT OPPORTUNITY POLICY**

Objective

Sycamore Services, Inc. dba LINK Hendricks County is an equal opportunity employer. In accordance with anti-discrimination law, it is the purpose of this policy to effectuate these principles and mandates. Sycamore Services, Inc. dba LINK Hendricks County prohibits discrimination and harassment of any type and affords equal employment opportunities to employees and applicants without regard to race, color, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, protected veteran status, or any other characteristic protected by law. Sycamore Services, Inc. dba LINK Hendricks County conforms to the spirit as well as to the letter of all applicable laws and regulations.

Scope

The policy of equal employment opportunity (EEO) and anti-discrimination applies to all aspects of the relationship between Sycamore Services, Inc. dba LINK Hendricks County and its employees, including:

- Recruitment.
- Employment.
- Promotion.
- Transfer.
- Training.
- Working conditions.
- Wages and salary administration.
- Employee benefits and application of policies.

The policies and principles of EEO also apply to the selection and treatment of independent contractors, personnel working on our premises who are employed by temporary agencies and any other persons or firms doing business for or with Sycamore Services, Inc. dba LINK Hendricks County.

Dissemination and Implementation of Policy

The HR/QA Department of Sycamore Services, Inc. dba LINK Hendricks County will be responsible for the dissemination of this policy. Officers, directors, managers and supervisors are responsible for implementing equal employment practices within each department. The HR/QA department is responsible for overall compliance and will maintain personnel records in compliance with applicable laws and regulations.

Procedures

Sycamore Services, Inc. dba LINK Hendricks County administers our EEO policy fairly and consistently by:

- Posting all required notices regarding employee rights under EEO laws in areas highly visible to employees.
- Advertising for job openings with the statement "EEO"
- Posting all required job openings with the appropriate state agencies.
- Forbidding retaliation against any individual who files a charge of discrimination, opposes a practice believed to be unlawful discrimination, reports harassment, or assists, testifies or participates in an EEO agency proceeding.
- Requires employees to report to a member of management, an HR/QA representative or the general counsel any apparent discrimination or harassment. The report should be made within 48 hours of the incident.
- Promptly notifies the general counsel of all incidents or reports of discrimination or harassment and takes other appropriate measures to resolve the situation.

Harassment

Harassment is a form of unlawful discrimination and violates Sycamore Services, Inc. dba LINK Hendricks County policy. Prohibited sexual harassment, for example, is defined as unwelcome sexual advances, request for sexual favors and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individuals.
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Harassment also includes unwelcome conduct that is based on race, color, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, protected veteran status, or any other characteristic protected by law. Harassment becomes unlawful where:

- Enduring the offensive conduct becomes a condition of continued employment, or
- The conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

Sycamore Services, Inc. dba LINK Hendricks County encourages employees to report all incidents of harassment to a member of management or the HR/QA department. Sycamore Services, Inc. dba LINK Hendricks County conducts harassment prevention training for all employees and maintains and enforces a separate policy on harassment prevention, complaint procedures and penalties for violations. Sycamore Services, Inc. dba LINK Hendricks County investigates all complaints of harassment promptly and fairly,

and, when appropriate, takes immediate corrective action to stop the harassment and prevent it from recurring.

Filing Complaints

Any person who believes she or he has been discriminated against on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, protected veteran status, or any other characteristic protected by law status by the Sycamore Services Inc. dba LINK Hendricks County may file a complaint by completing and submitting the agency's Title VI or Consolidated Civil Rights Complaint Form to the agencies Director of HR/QA. The Sycamore Services Inc. dba LINK Hendricks County investigates complaints received no more than 180 days after the alleged incident.

Sycamore Services Inc. dba LINK Hendricks County will process complaints that are complete. Once the complaint is received, Sycamore Services Inc. dba LINK Hendricks County will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

Sycamore Services Inc. dba LINK Hendricks County has five (5) days to investigate the complaint. If more information is needed to resolve the case, Sycamore Services Inc. dba LINK Hendricks County may contact the complainant. The complainant has five (5) business days from the date of the acknowledgement letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within five (5) business days, Sycamore Services Inc. dba LINK Hendricks County can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue his or her case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant:

- A closure letter or a letter of finding (LOF).
- A closure letter summarizes the allegations and states that there was not a violation and that the case will be closed.
- An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.

If the complainant wishes to appeal the decision, she/he has fifteen (15) days after the date of the letter or the LOF to do so.

Sycamore Services Inc. dba LINK Hendricks County shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, national origin, sex, age, disability or low income status, which shall include data on the following: Any known active investigations conducted by Federal Transit Administration (FTA) and entities other than FTA; Lawsuits; and

Complaints naming Sycamore Services Inc. dba LINK Hendricks County the Rural Transit System and/or Section 5311 Sub-Recipient, Sycamore Services Inc. dba LINK Hendricks County.

A person may file a complaint directly with:

- Sycamore Services Inc. dba LINK Hendricks County to Sycamore Services, Inc. HR/QA Director, LaDonna Everroad, at Sycamore Services, Inc. Corporate office, 1001 Sycamore Lane, Danville Indiana 46122. Contact number: 1-866-573-0817 Email: lrbrinkman@sycamoreservices.com
- Federal Transit Administration (FTA), at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.
- If information is needed in another language or mode of communication, then contact: **1-866-573-0817. For Hearing Impaired or Spanish, call Relay Indiana: Dial 711**
- **Si se necesita información en otro idioma o modo de comunicación, a continuación, póngase en contacto con: 1-866-573-0817. Para personas con problemas auditivos o español, llamada de retransmisión Relay Indiana: Marque 711**

Remedies

Violations of this policy, regardless of whether an actual law has been violated, will not be tolerated. Sycamore Services, Inc. dba LINK Hendricks County will promptly, thoroughly and fairly investigate every issue that is brought to its attention in this area and will take disciplinary action, when appropriate, up to and including termination of employment.



10/2/2020

Approved

Date