

Best Practices Inquiry Responses



**Equal Employment
Advisory Council**

1/9/2015

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ACCOMMODATIONS BUDGETS INQUIRY – 2/17/2011

We have a member seeking information about what other companies do with regard to accommodations (disability, ergonomic, safety equipment, etc.) budgets. Specifically:

- 1) Has your company consolidated its accommodations budgets?*
 - 2) If so, what dollar amount do you allot each year?*
 - a) How was that amount initially determined?*
 - b) Do you still use that amount as your base each year?*
 - 3) What do you do if you run over or do not spend all of the budgeted money?*
 - 4) What is included in your budgets? (Environmental Safety and Health, Health and Wellness or just disability accommodations)*
 - 5) What were any lessons learned when you consolidated your budget?*
-

Insurance Carrier

The individual business unit pays for the majority of accommodation requests (i.e., speech activated software, head sets, etc). There is also budgeted amounts from Security for safety equipment and Facility's budget for work station modifications. In addition, I/T pays for monitors and other medically advised software. Health Services (in HR) uses a capital budget request each year for big ticket ergonomic equipment such as chairs.

Electric, Gas & Sanitary Service

Each department has their own operating budget. For example, our Safety department has a large amount set aside for ongoing training around all safety-related matters. In terms of actual equipment, hard or soft, they are budgeted based on the operational structure. They include the whole spectrum - ergonomic, disability, safety, etc.

Food and Kindred Products

We have centralized governance over accommodation requests, but accommodation costs come out of the individual managers' budgets where the requesting employee resides.

ACCOMMODATIONS BUDGETS INQUIRY – 2/17/2011

Service Station

We do not have one consolidated budget.

Industrial Machinery & Equipment

For sickness and accident (bargaining unit), short term disability for classic Company locations, and all salaried employees accommodations - we are self-insured and fund the claims from company general assets as the claims are incurred. For the traditional Torrington and TASP hourly associates, (Company) administers the STD claims, but we are also self-insured and fund also from company assets. For all long-term disability (excluding a small number of very old grandfathered claims), we have an insured product with (Company) and so we fund with insurance premiums.

I do not believe there is any set budget amount approved each year

The budget for ergonomic improvements and safety equipment is the responsibility of each individual plant.

From the corporate side, we do work with operations to ensure they budget for new safety improvement strategies such as arc flash assessment, behavior based safety initiatives, etc. However, the budget belongs to the plant/facility.

In regards to wellness, we do have a set budget that is used to fund corporate initiatives. The plants are responsible for funding any plant specific initiatives.

Heavy Construction, Ex. Building

Strictly speaking for ergonomics, currently the costs are split between our Corporate Facilities group and the individual GBU's (four). Corporate Facilities covers costs for a standardized workspace in terms of furniture, a universal ergonomically adjustable chair, and keyboard tray, task light, monitor arm if needed. GBU's are asked to pick up costs for alternate items like other than standard chairs, input devices for the computer, foot and back rests, and other small misc. items.

As far as the Corporate budgets go, each of the regional managers oversees their budget for their region, we have three of them. Exact \$ amounts isn't available at this time. (request has been made, and I'll let you know if I get responses).

As far as ADA accommodations each of the GBU's handle their own expenses. However, since we do monitor this for internal purposes I can report very little expenditures have

ACCOMMODATIONS BUDGETS INQUIRY – 2/17/2011

occurred. Most our requests have been revised/reduced work schedules or a minor change in duties.

ACCOMMODATION REQUESTS INQUIRY – 7/21/2010

Who in your organization handles disability accommodation requests?

Food and Kindred Products

Managers may get the request and then consult with HR or the employee may go straight to HR with their request. Ultimately the manager and HR collaborate. If it is a disability accommodation due to work comp it is a collaboration between HR, the Supervisor of Disability Compensation and the employee's manager.

Insurance Carrier

We have HR staff dedicated to ADA/FMLA administration, etc.

Non-depository Institution

HR generalist, typically, receives the request and consults with Legal. Sometimes the lawyer will consult with medical (company doctor) if we need to better understand the request, the condition and possible alternatives. The manager is also consulted, of course, if info is needed about the job requirements.

Industrial Machinery & Equipment

Combination of Medical personnel, human resources, and the manager at the site where the employee will need to be accommodated.

Petroleum and Coal Products

Accommodation requests are evaluated by site HR. If site HR needs assistance in evaluating the reasonableness of the request, they consult with the corporate EEO Group, Employment Law and sometimes the Medical Department. Before a request can be denied by site HR, they are required to consult with the EEO and Employment Law Groups.

ACCOMMODATION REQUESTS INQUIRY – 7/21/2010

Health Industry

We have an Occupational Medicine department that manages the requests.

Depository Institution

At (Company) disability accommodation requests are reviewed and determined by a "committee" consisting of representatives from Corporate Medical department, Employee Relations and the in-house Legal group.

Sanitary Services

A request is received by either a frontline manager or a local Rep. They are, then, supposed to channel all requests to their appropriate Employment Counsel.

Insurance Carrier

Our occupational health and employee relations area are the first point of contact. We have a separate accommodation team.

Service Station

Coordination between HR rep and EEO and Labor Legal Department.

Paper and Allied Products

We have this function partnered with our Leave of Absence process in the benefit eligibility area of HR. She also works very closely with Corporate Counsel on all requests.

Anonymous

At our company, Human Resources oversees the accommodation process in consultation with Occupational Health and Line Management.

ACCOMMODATION REQUESTS INQUIRY – 7/21/2010

Food and Kindred Products

We have a centralized, on-line process that one HR person manages company--wide.

ADA REASONABLE ACCOMMODATIONS OUTSOURCING – 10/11/12

Do any of you use outside vendors to manage your ADA reasonable accommodation process, and if you do, what vendor do you use?

Non-Depository Institution

We handle reasonable accommodations in-house.

Wholesale Trade-Nondurable Goods

We handle ADA reasonable accommodations in-house.

Food and Kindred Products

We do not. We do however outsource the medical management of our short term disability plan to Medcor, but that's it.

Insurance Carrier

We do not use a vendor. Rather, I developed and implemented a core team of internal consultants dedicated to handling accommodation requests.

Sanitary Services

We are managing it internally.

Industrial Machinery & equipment

We do not. We utilize the Job Accommodation Network (JAN) in West Virginia for ideas.

Gas Stations

We handle ours in-house.

ADA REASONABLE ACCOMMODATIONS OUTSOURCING – 10/11/12

Paper and Allied Products

We keep it in house.

Insurance Carrier

We do not outsource.

AIR TRAVEL POLICIES INQUIRY – 4/14/10

Does your company have a policy either allowing or prohibiting employee travel by private airplane while conducting company business?

(EXAMPLE: The usage of non-commercial aircraft, e.g. private, chartered, leased or rented aircraft is strictly prohibited, unless approval is granted by the CEO. There are no exceptions to this policy.)

Paper and Allied Products

Our Travel policy includes the following prohibition on use of private aircraft:

Private Aircraft: (Company) employees are not permitted to travel on, or pilot, private, non-Company, aircraft for business purposes without specific, advance approval of the appropriate VP

Insurance Carriers

We currently have no formal policy on this topic, but we allow it to occur.

ARREST POLICIES INQUIRY – 12/28/09

Does anyone have a company policy they would be willing to share that requires employees to advise HR (or someone else within the company) if they are arrested and charged with a crime?

Insurance Carrier

Here is what we have in our employee handbook:

"Federal law prohibits the Company from employing persons who have been convicted of any crime involving dishonesty or a breach of trust or money laundering or who have agreed to enter into a pretrial diversion program in relation to such an offense, unless consent is received from the appropriate regulatory authority.

You must notify the Law Department (by contacting) immediately if any of these situations apply to you. Failure to report felony convictions may result in termination of your employment."

Depository Institution

As part of our Code of Ethics, employees are required to report charges and convictions. As a bank, we need to evaluate whether the charge/conviction would prohibit the individual from being employed under the FDIC. Below is the language in the Code.

"An employee who is convicted of a crime (other than a minor traffic offense) or found liable for an offense that subjects the employee to a disciplinary or licensure order by a regulatory agency or self-regulatory organization, must promptly report the event to the Employee Relations Solutions Team (ERST). In addition, an employee who is charged with (but not convicted) of a crime involving a breach of trust, dishonesty, substance abuse, money laundering, or a felony, or is charged with (but not found liable) of an offense by a regulatory agency or self-regulatory organization that may result in a disciplinary or licensure order must promptly report the event to the ERST. Failure to report the above is a violation of the Code."

AUDIO/VIDEO RECORDING POLICIES INQUIRY – 1/22/13

Ball and Roller Bearings

1) *Does your company have a formal policy regarding the video and/or audio recording of telephone calls?* Not specifically. The policy on the use of company information technology provides that the company has a right to preserve records.

2) *If so, does it apply to all calls, conference calls, meetings, and/or webinars?* Any use of company information technology. So cell phones, office phones, conference calls, etc.

Electronic Computer Manufacturing

1) *Does your company have a formal policy regarding the video and/or audio recording of telephone calls?* Yes. Our Business Conduct Guidelines prohibit the use of recording devices (web and cell phone cameras) unless authorized by management and (Company) counsel.

2) *If so, does it apply to all calls, conference calls, meetings, and/or webinars?* The policy applies to all video and recordings. However, we do post webinars and allow teleconferences to be recorded if the participants agree and have appropriate approval.

CALL CENTER EMPLOYEE HOURS INQUIRY – 8/19/2010

What types of technical solutions do you use to prohibit or detect call center employees from working off the clock? Examples: 1) Not allowing badges to work outside of scheduled hours; 2) Automation comparing timekeeping records to computer logon records or other business system records; 3) Others? Any information or direction to other sources would be appreciated.

Industrial Machinery & Equipment

Currently we limit remote access to only exempt associates and educate pay managers and associates on FLSA laws.

Insurance Carriers

We utilize Workforce Management software (Genesys Workforce Manager) for shift/break scheduling and to track each individual's adherence to those scheduled hours, by tracking the log in and out times of each individual's phone. Historical and real-time reporting is available to both the supervisors and business analysts in the call center. They utilize these reports throughout the day to ensure each individual adheres to their schedule. In the event individuals are not working when they are scheduled, or working when they are not scheduled, this is found on the reporting. Additionally, the call center employees are expected to report any exceptions to management if their worked hours need to be adjusted on their timekeeping reporting for payroll.

COMMUNITY SERVICE POLICIES INQUIRY – 4/12/2010

Does anyone have a company community service policy they would be willing to share?

Holding and Other Investment Offices

EXAMPLE #1:

Community Involvement

We encourage all employees to be active in community organizations and service groups. Although individual employees and departments support many organizations and community services, programs that are promoted across the Organization, must be approved by the Division Head.

The **Code of Business Conduct** requires you to report acceptance of board memberships for non-profit organizations to Human Resources. Likewise, accepting a directorship of a for-profit corporation requires prior approval from the Executive Committee.

EXAMPLE #2:

Community Affairs

The management of the Company is expected to provide leadership and participate in the charitable, social, and civic affairs of the communities that they serve.

The Company fully supports encouraging all officers and managers and staff to become actively involved in community affairs.

Special emphasis is placed upon community service of a charitable nature as opposed to "sociable" activities.

Political involvement should be approached with some caution and officers should be asked to obtain counsel from their President & Chief Executive Officer before a commitment is made. See Code of Ethics.

Community involvement should be a factor considered in appraising the overall performance of each officer; but the factor should be weighted by the position the officer holds.

Applicable Excerpts from Code of Business Conduct/Ethics:

Outside Employment

COMMUNITY SERVICE POLICIES INQUIRY – 4/12/2010

The Organization does not object to an employee accepting off-duty employment or self-employment for salary or commission, provided that: (1) there is not a conflict of interest with the Organization; (2) the off-duty employment does not interfere with the satisfactory performance of the employee's duties; and (3) the occupation is of the type that would not bring discredit upon the employee or the Organization. Employees are required to discuss any outside employment with their immediate supervisor and have his/her approval prior to accepting an outside position or job.

Generally, an employee (and his/her family members) should not be a supplier of goods or services to the Organization, represent a supplier to the Organization, or work for a supplier to the Organization, while employed at the Organization. In the event that such an employment situation arises, it is the responsibility of the employee to inform his manager in writing of the fact.

An employee of the Organization may not perform outside work for another business or solicit business for another entity on the Organization's premises or while conducting Organization work without the approval of the employee's immediate supervisor.

Outside Boards of Directors

Acceptance of membership on outside boards of for-profit corporations may also involve the possibility of a conflict of interest. No employee should accept a directorship in any profit-making corporation without prior approval from their Affiliate President or delegate or designated individual.

Employees are encouraged to serve in civic, charitable, or religious organizations. However, they are required to report in writing, any outside not-for-profit board on which they serve to their Director of Human Resources.

Political Activity

The Organization encourages employees to take an active interest in political affairs. All employees engaging in political activities must make it clear to all concerned that they are acting as private individuals and not as representatives of the Organization. Use of the Organization's facilities, real or personal property (including letterhead and use of the Organization's e-mail system), or personnel for political purposes is not permitted without prior approval of Executive Management. There are federal and state laws strictly limiting the political activities of corporations. Questions about the permissibility of an activity should be referred to the Legal Department.

Use of Corporate Resources

Employees shall not use corporate facilities, real or personal property, or personnel for purposes unrelated to the Organization's business without authorization from management or in accordance with a policy established and approved by management. Further, usage of the Organization's computers will adhere to the Organization's end user computing requirements. Usage of electronic mail systems also will adhere to the Organization's electronic mail system requirements. For further information, Employees should contact their immediate supervisors.

CONFIDENTIAL SEPARATION AGREEMENTS INQUIRY – 5/3/13

Who signs your confidential separation agreements on behalf of the company -- HR, legal, or someone else?

Drugs and Druggists' Sundries Merchant Wholesalers

Human Resources usually signs these.

Tire Manufacturing (except Retreading)

Typically the HR Representative.

Medical Laboratories

HR signs, and in the recent case of a “Voluntary Separation Program” that we had, we also had our Retirement Services group sign off on them.

Line-Haul Railroads

Legal.

Offices of Bank Holding Companies

The employee's manager or HR signs the agreement as a representative for Key.

Engineering Services

We typically have an officer of the company sign who is somehow connected to the employee receiving the agreement.

Anonymous

Legal.

Ball and Roller Bearing Manufacturing

Human Resources would sign this agreement.

DOMESTIC VIOLENCE POLICIES INQUIRY – 4/14/10

Does your company have a separate policy to address domestic violence in the workplace issues – or is it incorporated into your general Workplace Violence Policy?

Paper and Allied Products

We do not have a separate policy on domestic violence, it is included in our Workplace Violence Policy.

Trucking and Warehousing

We address it in the Workplace Violence Policy.

Insurance Carrier

We have no separate policy for domestic violence. It is incorporated into our Workplace Violence policy.

Wholesale Trade-Nondurable Goods

We do not have a separate policy nor do we have any language in our Violence in the Workplace Policy specific to domestic/intimate partner violence. We do, however, call it out in our supervisor training to raise awareness of possible indicators and resources to assist individuals.

DOMESTIC VIOLENCE POLICIES INQUIRY – 4/14/10

Anonymous

Domestic Violence in the Workplace Policy

PURPOSE

_____ is committed to the health and safety of our employees.

Domestic Violence is a leading cause of injury to women in this country. The purpose of our Domestic Violence Workplace policy is to raise awareness of domestic violence; provide support, when appropriate, to employees experiencing domestic violence; give guidance to management on addressing the occurrence of domestic violence and its affects on the workplace; and create a safer work environment.

DEFINITIONS

Domestic violence is defined by as abusive behavior in an intimate relationship. Intimate partners are defined as individuals who are married, living together, have a child or children in common, dating, in a heterosexual or same sex relationship, are divorced or separated. Domestic violence may include emotional/psychological abuse, sexual abuse, economic coercion/control, destruction of property, stalking and physical violence. A perpetrator is defined as an individual who commits acts of violence as stated above toward a current or former intimate partner. A victim is defined as an individual who is subjected to abusive and violent behavior by a current or former intimate partner.

The batterer, perpetrator, or "abuser" is the individual who commits an act of domestic violence as defined above.

The survivor or "victim" is the individual who is the subject of an act of domestic violence.

OUR POLICY

_____ strives to maintain a safe, violence-free workplace and recognizes the impact of domestic violence in the workplace. Every individual, every employee has the right to live and work free of violence and abuse.

_____ is committed to addressing domestic violence in the workplace by creating a heightened awareness that domestic violence in the workplace is unacceptable behavior. _____ will address the risk of violence through effective assessment, planning, organization and implementation. _____ will provide guidance to all employees and management in addressing the occurrence and affects of domestic violence in the workplace. Domestic violence compromises the wellbeing of a workplace by adversely affecting productivity, health cost, safety and security. It can negatively impact company morale through extended time off work, increased absences and turn over.

DOMESTIC VIOLENCE POLICIES INQUIRY – 4/14/10

Employee Assistance Program

We have an Employee Assistance Program that has professionals trained to handle domestic violence cases. These professionals provide counseling, support, and referrals. In addition, our Employee Assistance Program is a resource for employees wanting to learn more about domestic violence or find out how to help a friend, family or coworker. To contact these resources call the following numbers:

- Employee Assistance Program: 1-800-

Human Resources and Company Security

_____ Human Resources and company security are also a resource for employees. When appropriate, available, and permissible, personnel in these departments can assist victims in a number of ways, including but not limited to:

- Developing a safety plan for the workplace
- Assigning special parking spots
- Escorting people to and from their cars or other points of transportation
- Screening telephone calls and removing an employee's name from automated telephone directories
- Working with local law enforcement to enforce restraining orders on company property
- Relocating an employee's workspace to a more secure area
- Having paychecks delivered to another location
- Changing benefits to the victim's own name
- Saving any threatening emails
- Allowing time off so that employee's can seek safety and protection, attend court appearances, arrange for new housing, attend counseling, receive medical care or take care of other appropriate matters
- Arranging for flexible hours and short-term leaves of absence with the guarantee in most cases of a position upon return
- _____ is available twenty-four (24) hours a day and seven (7) days a week. Any communication with Human Resources and security will be kept confidential to the fullest extent possible. Others will be informed only on a need to know basis for the security of the victim, other employees, and the workplace.

To contact these resources call the following numbers:

- Security :
- Human Resources: Your Local HR Contact

Community Agencies

DOMESTIC VIOLENCE POLICIES INQUIRY – 4/14/10

_____ encourages victims and other employees to contact community agencies for resources and referrals. Many provide free services for safety planning, counseling, support groups, shelter, and legal assistance. To contact these resources and receive referrals call the following numbers, which are available twenty-four (24) hours a day and seven (7) days a week:

- National Domestic Violence Hotline 1-800-799-SAFE (7233)
- **RESEARCH REQUIRED FOR LOCAL AND STATE NUMBERS**

_____ will not discriminate against domestic violence victims or employees perceived as domestic violence victims in hiring, firing, staffing, or other terms, conditions, or privileges of employment.

_____ is aware that domestic violence victims may have performance problems such as chronic absenteeism, tardiness or lower productivity as a result of domestic violence. When addressing performance and safety issues, _____ will make reasonable efforts to consider all aspects of the employee's situation and, to the extent possible, utilize reasonable options to help resolve the performance and/or safety problems. If reasonable attempts to resolve the performance and/or safety problems are unsuccessful, _____ may have to take appropriate action.

Temporary or Permanent Protective/Restraining Orders

Any employee who obtains a temporary or permanent order of protection from a court, which lists company locations as protected areas, must provide security with a copy of the petition and court order. In addition, the employee must provide security with the following information on the abuser: a photograph picture or physical description, description of automobile and license plate number, and any other information the security department needs for the security of the workplace.

Employees who Commit Acts or Threats of Domestic Violence

Any employee who commits acts/threats of domestic violence at the workplace or while using workplace resources, will be subject to disciplinary action, which may include but is not limited to dismissal. If appropriate, law enforcement will be contacted, which may result in arrest, criminal charges, and/or prosecution. Workplace resources include, but are not limited to, company vehicles, phones, fax machines, e-mail, mail, cellular phones, pagers, office supplies, and photocopy machines.

Some job positions may give an employee access to certain types of information or resources. If that employee intentionally uses this access to enable an abuser to harm/contact a victim, that employee and abuser, if an employee, will be subject to disciplinary action, which may include but is not limited to dismissal. If appropriate, law enforcement will be contacted, which may result in arrest, criminal charges, and/or prosecution.

DOMESTIC VIOLENCE POLICIES INQUIRY – 4/14/10

_____ recognizes that abusers also need assistance and resources. We will provide, when appropriate, referrals to our Employee Assistance Program and/or Batterers' Intervention Programs, defined as programs designed to eliminate violence in intimate relationships, stop other forms of abusive behavior and increase victim safety.

Law Enforcement and Legislation

_____ will cooperate to the fullest extent legally possible with law enforcement and other appropriate government agencies. In addition, this policy shall be interpreted and applied in accordance with all applicable local, state or federal laws.

EMPLOYMENT-AT-WILL POLICIES INQUIRY – 1/5/2011

Does your company have a standalone policy on employment-at-will or is it just referred to in other company policies?

Depository Institution

We have a stand-alone Employment at Will policy.

Anonymous

Referred to in other policies, as needed.

Paper and Allied Products

We do not have a separate policy on employment-at-will; it is spelled out on the application for employment and in the employee handbook.

Non-Depository Institution

Nothing separate. Just referred to in many other places/documents.

Wholesale Trade-Nondurable Goods

We have an “Introduction” at the front of our Handbook with some general statements, which include statements about the handbook not being an employment contract and that they employee’s employment is at-will.

EMPLOYMENT-AT-WILL POLICIES INQUIRY – 1/5/2011

Railroad

Ours is a "page" in our electronic HR policies manual, so it could be considered a stand alone policy:

At Will Employment

Employment with (Company) is voluntary and "at will." Nothing contained in the **HR Policy Manual**, express or implied, is intended to create a contract or assurance of continued employment. Just as the employee is free to leave the employment of the Company at any time and for any reason, the Company has the right to terminate employment any time, with or without notice, for any reason or no reason.

Industrial Machinery & Equipment

It is in the employee handbook. For some executive hires there are separate non-competes and additional forms.

Holding and Other Investment Offices

Please find below Our Employment At Will Statement. It is a stand-alone statement represented at the front of the employee handbook. All employees sign to acknowledge this statement at new-hire orientation and then periodically thereafter with receipt of the employee handbook (when it's revised, updated, republished).

EMPLOYMENT AT WILL

Your employment with (Company) is considered 'at will', which means that you may terminate your employment and your employment may be terminated at any time without restriction.

Service Station

Ours is referred to in our policies.

ERISA SEVERANCE PLANS AND DISCHARGED EMPLOYEES INQUIRY – 5/23/14

1. *Does your company have an ERISA Severance Plan that covers people discharged for poor performance (not down-sized)?*
2. *If so, what formula do you use for calculating payout?*

All Other Miscellaneous Electrical Equipment and Component Manufacturing

No.

Construction Machinery Manufacturing

1. We do not offer severance for poor performance, just job elimination.
2. If so, what formula do you use for calculating payout?

Engineering Services

No.

Engineering Services

We amended our plan earlier this year to provide severance eligibility to include skills incompatibility and poor performance in lieu of a PIP. We did not develop a different calculation for this category.

Ball and Roller Bearing Manufacturing

No.

Sanitary Paper Product Manufacturing

1. Yes, it's a subpart of our broader US Severance Pay Plan.

ERISA SEVERANCE PLANS AND DISCHARGED EMPLOYEES INQUIRY – 5/23/14

2. Flat rate per level in the organization (i.e., nonexempt, exempt, executive); varies based upon level.
-

FLEXIBLE WORK ARRANGEMENTS INQUIRY – 3/6/13

If your company offers flexible work arrangements, what types do you offer and how has it worked out? Are they offered to non-exempt employees such as admin support?

Other Gasoline Stations

Sunoco did have a 9/80 work schedule for *all employees* (80 hours in 9 days with every other Friday off) that worked well. However, as of the first of the year, the new owners, ETP, have done away with it. We are left with core hours 7-3:30. We can come in as early as 7 and leave at 3:30 or as late as 9 and work till 5:30. This is for all employees.

Line-Haul Railroads

Working from home and flexible hours; working from home is allowed for some non-exempt employees but is very limited.

Softwood Veneer and Plywood Manufacturing

We don't "officially" offer flexible work arrangements; however there are case-by-case situations where it's granted to a limited extent in some settings, i.e., some employees at corporate headquarters work from home 1 day a week. I doubt if this is offered at our plant locations for office personnel, however I don't know.

Petroleum Refineries

We offer a variety of flexible work arrangement programs that allow time off from work or adjust an employee's work schedule or location. Key considerations:

- Flexible Work Arrangements apply in situations where the Company can meet the needs of the business and provide flexibility.
- Supervisors are encouraged to foster an environment in which work gets done and reasonable flexibility is provided.
- In approving Flexible Work Arrangements, supervisors should weigh operating requirements, employees' needs and employees' ability to perform their jobs.
- There will be some times and some jobs for which Flexible Work Arrangements are not possible.

Examples of flexible work arrangements:

Adaptable Work Place - work from home up to three days per week on a temporary basis for personal reasons or needs, with prior supervisory approval and where compatible with the business.

Modified Work Week - work a modified schedule (other than eight hours per day, five days per week) on a temporary basis for personal reasons, with prior supervisory approval and where compatible with the business.

Part-Time Regular Work Arrangements – work a reduced schedule of 20 to 32 hours per week with benefits, to meet a pressing, family-related reason, for up to 2 years maximum.

Personal Time - time off to attend to personal emergencies or other brief and pressing personal matters that cannot be arranged at other times. May be paid or unpaid depending on the situation.

These programs have generally worked out very well and they are offered to non-exempt employees such as admin support.

Engineering Services

Yes, we offer telecommuting and 9/80 schedules. The telecommuters have agreements with stipulations and expectations.

Non-exempt aren't eligible for telecommuting. 9/80 is done in many of the groups within most of our Global Business Units. It is for both EX and NX within those groups. Some projects do not offer 9/80 due to client schedules. Most senior management although eligible do not use the 9/80 even if their groups partake.

Ball and Roller Bearing Manufacturing

The company does not offer flexible work arrangements.

General Line Grocery Merchant Wholesalers

We do offer flexible work arrangements on a case by case basis. Full-time work-at-home situations, with a home office instead of a site office, apply primarily for salaried exempt employees whose jobs require substantial travel regardless of where they would be stationed. Examples include regional sales personnel or account managers and persons like myself with US oversight. These arrangements must be approved by the immediate manager and there are guidelines for managers to follow.

Occasional work-at-home arrangements may be made for a salaried exempt employee whose work does not require them to be in office for the entire week. The employee

may work one or two days a week at home but not routinely. Rarely would these arrangements extend to salaried non-exempt employees but their status doesn't rule this out. These situations are approved by the immediate manager and typically do not involve a home office arrangement.

Sometimes arrangements are made for a short-term accommodation to a health or personal condition.

FRAGRANCE FREE WORKPLACE POLICIES INQUIRY – 7/21/11

Does anyone have a fragrance free company policy they would be willing to share?

Industrial Machinery & Equipment

Ours is not fragrance free, it is a part of our dress code policy and basically says be cognizant of the fact that some employees may have sensitivity, and we should be cognizant of those concerns and sensitivities.

Food and Kindred Products

We do not have a “fragrance free” company policy. However, as a food manufacturer, limiting the use of fragrance is included in the personal hygiene portion of our “Good Manufacturing Practices” that are implemented for employees that work in and around our operational areas.

Insurance Carrier

We don't have a "fragrance free policy.” However, if there is an instance where an associate indicates that s/he has allergies or is otherwise impacted by fragrances, we will work with the local management to advise associates in the area that they should refrain from wearing fragrances to work. So, it is a case-by-case situation for us.

Transportation Equipment

We do not have such a policy, but we would consider requests for an accommodation based on sensitivity to fragrances under our reasonable accommodations policy.

Heavy Construction

Included in our dress code and grooming policy is the following sentence:

Excessive use of cologne and perfume is unacceptable, and employees may be requested to discontinue wearing perfumes and colognes if co-workers experience breathing or allergy problems.

FRAGRANCE FREE WORKPLACE POLICIES INQUIRY – 7/21/11

Engineering and Management Services

We do not have a fragrance free work policy. Instead, we address the issue on a case-by-case basis and match solutions to needs.

INCLEMENT WEATHER INQUIRY – 7/18/12

What is your company's compensation policy during significant inclement weather situations, such as hurricanes, tornadoes, floods, blizzards, etc., where operations have to be shut down for at least a full day or more? For example, do you pay employees for up to a certain number of days and after that it is unpaid? Do you not pay employees, but instead allow them to use PTO or vacation days? Is it possible for other facilities to take in the affected employees?

Food and Kindred Products

Here is what we send out from HR, typically in winter, however it applies to any weather emergency.

To all Corporate Office managers:

As we head into another Minnesota winter, we want to remind you of our Severe Weather Policy (below). Please monitor weather conditions; when treacherous weather occurs, notify your employees that they can go home if they feel the conditions warrant it. Managers are encouraged to work with hourly employees to allow missed time to be made up. Employees may also substitute vacation or floating holidays for unpaid time off.

(Company) will make every effort to maintain normal business hours during all weather conditions. On days when severe weather prevents employees from making it into work, causes them to arrive late, or leave early, employees must notify their supervisor as soon as they have determined they will need to alter their work schedule. Office hourly employees may then choose to substitute a vacation day or floating holiday or take the day/time as an emergency excused day which will be unpaid.

On the rare occasion when (Company) or other property management representatives decide to close an office or facility for any reason, office hourly employees may also choose to substitute vacation or floating holiday or take the day/time as emergency excused time which will be unpaid. Employees can call the (Company) Facility Status Number (1-xxx-xxx-xxx) to find out if an office or facility is closed or will have a late start.

Anonymous

When the employees work location is closed

If your work location is closed for a full or partial work day, you will be paid for the time you were scheduled to work on that day. Leaders have discretion to adjust work

INCLEMENT WEATHER INQUIRY – 7/18/12

schedules based on business need and variables related to the office closure, regardless of its duration.

For home-based employees whose home is disrupted (impacting ability to work), you will only be paid, unless you use PTO or other paid benefits, if there are local offices which are also closed, subject to leader evaluation.

When your work location is functional

Absent employees will not be paid unless they use accrued PTO or other paid benefits. Requests for approved absences will be evaluated by leaders considering business need and specific circumstances.

Instruments and Related Products

Our employees have the following options depending on the situation with the inclement weather:

1. Use a Charge Number provided by HR
2. Use PTO
3. Unpaid Absences

Sanitary Services

We utilize a combination of all you mentioned. The decision is made based on each situation. For example, if the affected location houses a workforce that has different options to work remotely, they will be told to do so. If the affected area is broadly defined, or houses various functions like HQ, they will be paid while the office is closed. At the same time, the employees are asked to monitor and communicate urgent matters. If the affected location houses a function that cannot be shut down (customer call centers, hauling operations, etc.,) we will relocate employees elsewhere and continue the operations.

Depository Institution

(Company) has an Inclement Weather and Emergency policy under which employees would be paid without using PTO time. The length of time will vary based on the circumstances.

INCLEMENT WEATHER INQUIRY – 7/18/12

Heavy Construction

Should an office be closed by Government agencies (State or FEMA etc.), an emergency job number will be provided for employees to charge their time.

If there are no office closings, employees may still encounter dangerous commuting conditions. In all cases common sense and safety are paramount at all times and especially during the period of the weather emergency. Any employees who feel that commuting conditions are dangerous or who are uncomfortable coming to the office can take PTO or with their manager's approval take their computers home and work from home. Employees can also make up lost time during the balance of the week with their manager's approval.

LACTATION POLICIES INQUIRY – 10/23/13

1. *Do you have a lactation policy or policies with regard to female employees pumping at work?*
 2. *If so, do you have separate policies for exempt and nonexempt employees?*
 3. *How are you handling employees who work out in remote locations or are on the road most of the time? For example, sales people, truck drivers, small retail outlets, etc.*
-

Wireless Telecommunications Carriers (except Satellite)

Nursing Mothers

For a period of up to one year after birth (unless applicable state law provides for a longer time period), employees who are nursing mothers may use reasonable excused, unpaid time each day as necessary to express breast milk.

Many locations have either New Mom's rooms (search using criteria "New Mom's Room") or small conference rooms that may be reserved through the Microsoft Outlook. If rooms are not available through the system at your location, you should discuss a suitable location with your manager. If you and your manager determine that no suitable location exists on-site, you may use an off-site location. In any event, you are not required to use restroom facilities.

Poultry Processing

1. Do you have a lactation policy or policies with regard to female employees pumping at work? Yes, it basically mirrors the requirements under ACA
2. If so, do you have separate policies for exempt and nonexempt employees? No, although the policy says that a nonexempt employee can choose to pump during her normal paid break. If she pumps at a different time than the normal break or the pumping is longer than a normal paid break time, then it will be unpaid. (Paid break is 15 minutes. If pumping takes 30 minutes then 15 minutes will be paid, 15 minutes will be unpaid.)
3. How are you handling employees who work out in remote locations or are on the road most of the time? For example, sales people, truck drivers, small retail outlets, etc. We are recommending that the employee contact HR to discuss their needs and we will work out an individual solution. We are handling like an

accommodation interactive process. In smaller locations we are getting the manager to leave his/her office for the lactation breaks (approx. 30 minutes 2-3 times per day).

Other Engine Equipment Manufacturing

1. Do you have a lactation policy or policies with regard to female employees pumping at work? Yes. We have a global nursing mother policy.
 2. If so, do you have separate policies for exempt and nonexempt employees? No. We have 1 policy that covers all employees. It allows mothers a reasonable amount of time to express milk.
 3. How are you handling employees who work out in remote locations or are on the road most of the time? For example, sales people, truck drivers, small retail outlets, etc. This is not a big issue for us due to the make up of our workforce. We have a loner pump program in place in some of our locations and others have pumps available on site. We do also make provisions for the use of ice for storage of milk, but the employee must provide their own cooler.
-

Construction Machinery Manufacturing

1. Do you have a lactation policy or policies with regard to female employees pumping at work? Yes, we have a policy
 2. If so, do you have separate policies for exempt and nonexempt employees? The policy covers everyone working in the US
 3. How are you handling employees who work out in remote locations or are on the road most of the time? For example, sales people, truck drivers, small retail outlets, etc. This is not something addressed in the policy. If they are traveling, they would be allowed time to take breaks to express milk
-

Direct Health and Medical Insurance Carriers

1. Do you have a lactation policy or policies with regard to female employees pumping at work? Yes, our policy follows ACA regulations and we provide a private, comfortable lactation room (non-bathroom) for mothers wanting to breast feed. These moms are allowed reasonable break time to express milk. We

support and encourage breast feeding and allow these breaks well beyond the child's first year of life, if that is the mother's wishes.

2. If so, do you have separate policies for exempt and nonexempt employees? No separate policies, but non-exempt employees are asked to work with their department manager if necessary, to make up any break time not covered by the paid 30 minute break time allowed each day.
3. How are you handling employees who work out in remote locations or are on the road most of the time? For example, sales people, truck drivers, small retail outlets, etc. We work with each employee in a remote location on a case by case basis, and have been able to meet the needs of all mothers requesting lactation services.

Ball and Roller Bearing Manufacturing

1. Do you have a lactation policy or policies with regard to female employees pumping at work? Yes
2. If so, do you have separate policies for exempt and nonexempt employees? No
3. How are you handling employees who work out in remote locations or are on the road most of the time? For example, sales people, truck drivers, small retail outlets, etc. The company would provide a private area for employees in remote company owned locations to use for lactation.

Engineering Services

1. Do you have a lactation policy or policies with regard to female employees pumping at work?

Yes, a guideline developed in conjunction with our Facilities folks, General Services and Talent Management since 2011. This memo was sent out from Corporate Talent Management:

To: Managers (insert manager name)
From: Talent Management Director (or Manager)
Subject: New Law Regarding Nursing Mothers

The purpose of this email is to provide you with general information concerning break time and other legal requirements for employees who are nursing mothers.

On March 23, 2010, the Patient Protection and Affordable Care Act (“PPACA”) was signed into law. This new law requires employers to provide reasonable break time for an employee to express breast milk for her nursing child for 1 year after the child’s birth each time such employee has the need to express the milk. Employers also are required to provide “a place, other than a bathroom, that is shielded from view and free from intrusion from coworkers and the public, which may be used by an employee to express breast milk.”

While an immediate need to accommodate an employee who is a nursing mother many not currently exist in your office, a proactive approach (*to ensure compliance*) is best. Therefore, please ensure there is private space available in your office facility in advance of any requests. “Wellness rooms” already have been established in several offices for such purposes. You may contact your local facilities representative for further information or assistance regarding space availability. If you reside in an office not owned or leased by us, you should speak with the landlord or owner to determine what space is or can be made available. Be advised that under no circumstances should a request from a nursing mother for private space be denied.

For further information regarding the requirements of this Act, please feel free to contact me (*your Talent Management Representative*).

2. If so, do you have separate policies for exempt and nonexempt employees? No
3. How are you handling employees who work out in remote locations or are on the road most of the time? For example, sales people, truck drivers, small retail outlets, etc.

The items described haven’t affected our ability to accommodate. Rather, the same offices as you mention have presented some challenges. However, we continue to advise supervisors and land lords of various leased properties, it isn’t optional.

LAPTOP & TABLETS POLICIES INQUIRY – 1/8/13

- 1) *Does your company issue laptops and/or tablets to employees?*
- 2) *If so, what policies, if any, do you have with regard to material downloaded and data retention?*

Railroads, Line-haul Operating

We issue laptops to employees. We are allowed to only download business related data. For data we have a retention schedule that all employees must adhere to.

Commercial Physical and Biological Research

We issue laptops for company use only and have security safeguards to prevent/block certain downloads and site access. The users are required to complete and pass security classes regarding the use of the laptops.

Petroleum Refining

We have an elaborate “IT Standards” policy regarding usage of our computers (including laptops):

Index for IT Standards policy

Page 1 Overview

Purpose

Standard

Use of Computer systems

: Desktop administrative access

: Proper use of Disk Space

Page 2 Password Construction

: Strong Passwords

: Poor, weak Passwords

Password Protection

Page 3 Password Standards for Applications Development

Application Security Levels

Application Security Authentication

Page 4 Remote Access

Page 5 Review and Monitor user authorities to Sunoco Computer Information

We also have an “e-mail usage policy” that outlines authorized and prohibited usage as well as email ownership, monitoring and disclosure.

For “retention” of work related data, all data is to follow our “record retention policy” which is huge. All computers regardless of type laptop or desktop, follow the same retention policy.

We also have an huge “Process Control Cyber Security” policy.

Ball and Roller Bearings

Yes, we issue laptops to some employees. The company does not have a separate retention schedule for laptop users. The same retention schedule and rules apply whether the material is downloaded/created in the office on a desktop or out of the office on a laptop or tablet. The retention schedule sets forth the rules for when a document is created, how long it should be retained and how it is properly disposed of. The retention policies also contain some FAQs and contact information for resources at the company who can answer questions for employees on document retention.

Other Heavy and Civil Engineering Construction

Yes, in most cases employees are issued laptops. Some have tablets as well and iPhones or Blackberry.

Numerous Electronic Communication Policies are in place written by Legal, Talent Management and I/S. They cover the topics of electronic communications, prohibited software and internet services, software management, software use and licensing.

LEGALIZATION OF MARIJUANA INQUIRY – 1/3/13

For those of you with operations in Colorado and Washington where recreational marijuana has been legalized is your company taking any affirmative steps to reaffirm your drug-free workplace policy? If so, what steps are you taking?

Line-Haul Railroads

Thus far we are not taking any additional efforts to communicate our drug-free policy.

Ball and Roller Bearings

We have not had any discussions on this at the present time. However, we probably will take the changes in legislation as an opportunity to discuss the company policies on drug use.

Anonymous

We did issue a reminder notice on our weekly bulletin site:

Notice Regarding New State Laws Legalizing Recreational Marijuana Use:

Marijuana remains an illegal substance under federal law. We will continue to enforce its Substance Abuse and Substance Free Workplace Policies in accordance with federal law.

Anonymous

The company issued a reminder in December 2012, to all employees about the company's policy with respect to use of controlled substances and the use, possession of, or being under the influence of alcohol in the workplace.

This reminder was given in light of the applicability of federal Department of Transportation and Mine Safety and Health Administration regulations requiring such policies to be in place and enforced for covered positions.

The reminder was prompted by the notice by the Department of Transportation reiterating its position regarding drug and alcohol testing for safety-sensitive transportation and pipeline employees.

The reminder issued by the company stated the company's expectation that all employees are to report to work capable of performing assigned duties safely, efficiently and free from the presence or effects of drug or alcohol use.

Air Water & Waste Program Administration

We are not doing anything differently and continue to enforce our drug-free policy. No special reaffirmation.

Drugs and Druggists' Sundries Merchant Wholesalers

As of right now, we've just been reaffirming the policy as one-off questions have arisen. However, we are contemplating taking more affirmative steps in these locations to reaffirm that we will continue to enforce our Drug Free Workplace Policy as it is currently drafted.

Hotels and Motels

There will be no changes to our existing, zero-tolerance policy as marijuana is still classified as a Schedule I illegal substance by the federal government. We have provided guidance to the properties on how they should handle situations of employees and guests attempting to smoke marijuana in designated smoking areas of the hotel. The day after the election, HR also communicated (via email) to the GMs at each location in those states clarifying that the current policy remains in effect because marijuana is still banned by federal law and the properties should not deviate from current policy and practice.

Commercial Banking

We are not taking any special action in WA or CO. We are answering questions as they come up but have chosen not to bring special attention to the matter.

Commercial Banking

We do not have plans at this point to re-affirm our drug-free workplace policy/procedure in Colorado due to Amendment 64, or at any of our other locations.

MILITARY PAY POLICIES INQUIRY – 2/12/13

Does your company provide supplemental pay for employees on active military duty, (for example, the difference between their military base pay and regular Company wages)?

Lassoers of Other Real Estate Property

(Company) pay the difference between military pay and Company pay for up to 24 months.

All Other Nondepository Credit Intermediation

Yes. Up to three years of military differential pay.

Anonymous

Yes, if their military wages are less than their company wages and only up to a period of 18 months. Must provide proof of military wages.

Ball and Roller Bearing Manufacturing

Yes – difference between military base pay and regular company wages

Other Nonhazardous Waste Treatment and Disposal

We pay the difference.

Engineering Services

Yes, for six months per event.

Meat and Meat Product Merchant Wholesalers

Yes, our military leave law is just as you described; the difference in military pay and co. wages for up to two weeks per year. We also have a military “bonus” program where we will pay one week’s base salary per month an employee is gone. This “bonus” is only paid to those called up on active duty in support of the Middle East crisis. This is paid quarterly.

Drugs and Druggists' Sundries Merchant Wholesalers

Yes, for up to 10 days.

Line-Haul Railroads

Yes.

Computer Systems Design Services

This depends on the length of absence and type of service: for up to 15 days of military training, regular employees receive a payment equal to the difference between the employee's (Company) base pay and the military pay; for emergency call-up, employees receive the greater of the IBM base salary and the military base salary; and, for extended military leave, employees go on an unpaid leave from (Company), don't accrue holiday or vacation time, but retain most other benefits.

Direct Health and Medical Insurance Carriers

In a call-up or mobilization to active duty (includes active duty for training), there will be up to a 3-month salary differential (between military or service pay and civilian pay) paid for employees with less than 1 year of service and up to a 6-month salary differential paid for employees with more than 1 year of service with the Company. After these salary differentials are paid, the remainder of the military duty will be unpaid.

Construction Machinery Manufacturing

(Company) provides differential pay (the difference between (Company) base pay and military base pay) if the employee makes more at (Company) than in the military. This differential pay is provided for employees who are involuntarily called up to active duty for the duration of the deployment.

MOBILE DEVICES INQUIRY – 4/16/13

- 1) Do you allow employees to use personal mobile devices for work purposes during regular work hours? During nonwork hours?*
 - 2) If so, are they able to link their personal mobile devices to the company's network server?*
 - 3) If applicable, how do you track compensable time employees spend during nonwork hours conducting work on their personal mobile devices?*
 - 4) What systems and/or safeguards does your company use to prohibit the theft of company confidential and/or proprietary information through the use of personal mobile devices not linked to the company's network server?*
-

Ball and Roller Bearing Manufacturing

- 1) Do you allow employees to use personal mobile devices for work purposes during regular work hours? Yes During nonwork hours? Yes
 - 2) If so, are they able to link their personal mobile devices to the company's network server? Yes, they are.
 - 3) If applicable, how do you track compensable time employees spend during nonwork hours conducting work on their personal mobile devices? The individual employee is responsible for tracking this. However, our company policy requires that company approval be given to anyone who is not a salaried exempt employee for any type of remote access.
 - 4) What systems and/or safeguards does your company use to prohibit the theft of company confidential and/or proprietary information through the use of personal mobile devices not linked to the company's network server? The company program restricts personal device access to only company email, calendar and contacts.
-

Engineering Services

(Company) Corporate Network Access Policy expressly prohibits employees or contractors from connecting personal devices to the (Company) network without written authorization. The policy is in place to minimize risks to (Company), including the introduction of malicious software to the corporate network. In addition to the potential for viruses, such incidents can lead to unauthorized information disclosure or contract violations.

Engineering Services

To my knowledge we do not allow/permit employees to use personal mobile devices for work. We are issued company devices.

NONDISCLOSURE/CONFIDENTIALITY AGREEMENT REMINDER INQUIRY
– 7/9/13

What process does your company use to remind employees leaving the company of their responsibilities under the nondisclosure or confidentiality agreement they signed?

Other Nonhazardous Waste Treatment and Disposal

Part of the exit interview checklist.

Engineering Services

As part of the exit interview process, employees are given another short, agreement to sign reminding them that they did previously sign a confidentiality agreement and that even though they are leaving the company, they are still bound by that agreement.

Sanitary Paper Product Manufacturing

We have an exit interview checklist. The departing employee is given a copy of their confidentiality and nondisclosure agreement and reminded that the terms survive the end of the employment relationship. In a severance situation, the confidentiality and nondisclosure agreement is an exhibit and part of the terms of separation contract.

Anonymous

We have several sites that have a form the employee will sign upon exiting reminding them of their responsibilities in this area.

Petroleum Refineries

Provide written reminder upon termination of responsibilities under agreement (including copy of signed agreement).

Meat and Meat Product Merchant Wholesalers

Upon notice of resignation, HR sends a letter to the employee with a copy of their confidentiality agreement and requests they sign a copy of the letter and send back. The letter reminds them they signed the agreement and terms of it, we expect them to not violate it, etc.

Industrial Gas Manufacturing

We have a standard reminder letter that goes out under the HR person's signature reminding the departing employee, in brief terms, of their obligations under the NDA they signed with the Company.

All Other Miscellaneous Electrical Equipment and Component Manufacturing

We have a systematized exit process now. Prior to departure, the employee is alerted to enter an internal website in which they are reminded of these confidentiality obligations and are asked to reaffirm them (among other things...).

Industrial and Personal Service Paper Merchant Wholesalers

We provide the employee a copy of the signed nondisclosure/confidentiality agreement at the time of termination or during the exit interview and remind them that it applies even after the employment relationship ends.

All Other Miscellaneous Food Manufacturing

It is our policy to notify all employees of their continuing obligations of confidentiality and nondisclosure. We provide a notice at termination or send a reminder letter in the event of job abandonment.

Drugs and Druggists' Sundries Merchant Wholesalers

We usually cover this in an exit meeting/interview. If no exit meeting/interview takes place and we have concerns about where the former employee is going to work, we will send them a certified letter reminding them of their obligations.

OFFICIAL COMPANY HOLIDAY POLICIES INQUIRY – 5/12/2010

Wholesale Trade-Nondurable Goods

New Year's Day
Memorial Day
July 4th
Labor Day
Thanksgiving Day
Christmas Day

Plus 4 personal/floating holidays

Food and Kindred Products

Our holidays vary by company location; however, the standard holidays are:

New Year's Day
Independence Day
Thanksgiving Day
Memorial Day
Labor Day
Christmas Day

Some locations add a floating holiday, but most do not.

Depository Institution

(Company) officially observes New Year's Day, Martin Luther King Day, Memorial Day, July 4th, Labor Day, Thanksgiving Day and Christmas Day and provides 3 floating holidays. Certain lines of business may observe other holidays (i.e., Presidents Day, Columbus Day and Veterans Day in the branches because the Federal Reserve is closed) and if so, employees are required to use the floating holiday for them.

Industrial Machinery and Equipment

New Year's Day
Good Friday
Memorial Day
Independence Day
Labor Day

OFFICIAL COMPANY HOLIDAY POLICIES INQUIRY – 5/12/2010

Thanksgiving Day
Day after Thanksgiving Day
Day before Christmas
Christmas
One added day designated by Co.(usually a day right before or after the other Christmas holidays)

Chemicals and Allied Products

New Year's
Martin Luther King
Presidents Birthday
Memorial Day
July 4th
Labor Day
Thanksgiving
Day after Thanksgiving
Christmas

4 optional holidays to use at employees discretion

Total of 13

Chemicals and Allies Products

For 2010:

January 1 - New Year's Day
April 2 - Spring Holiday
May 31 - Memorial Day
July 5 - Independence Day
September 6 - Labor Day
November 25 - Thanksgiving
November 26 - Day after Thanksgiving
December 24 - Day before Winter Holiday
December 27 - Winter Holiday

OFFICIAL COMPANY HOLIDAY POLICIES INQUIRY – 5/12/2010

Petroleum and Coal Products

We have 10 Holidays per year in the U.S. The Holiday schedule varies across the world. Two of the 10 U.S. Holidays are "Personal" designation holidays and can be used for any workday during the year.

(Company) 2010 U.S. Standard Holiday Schedule:

Offices located in the U.S. will be closed in observance of the following holidays in 2010:

- Friday, January 1 - New Year's Day
- Monday, May 31 - Memorial Day
- Monday, July 5 - Independence Day Holiday Observed
- Monday, September 6 - Labor Day
- Thursday, November 25 - Thanksgiving Day
- Friday, November 26 - Thanksgiving Friday Holiday
- Thursday, December 23 - Christmas Floating Holiday
- Friday, December 24 - Christmas Day Holiday Observed
- Friday, December 31* - New Year's Day 2011 Holiday Observed

*This is a 2011 holiday that will be observed in 2010. Because New Year's Day 2011 falls on Saturday, January 1, 2011, the holiday will be observed on Friday, December 31, 2010.

In addition to the above Company-designated holidays, each employee on the payroll on or before July 1, 2010 may schedule two personal holidays, subject to supervisory approval. Employees added to the payroll after July 1, 2010 may schedule one personal holiday. No payment will be made in lieu of a personal holiday not taken.

The offices will remain open until closing time on the last working day preceding each holiday.

Railroad

- New Year's Day
- President's Day
- Good Friday
- Memorial Day
- Fourth of July
- Labor Day
- Thanksgiving

OFFICIAL COMPANY HOLIDAY POLICIES INQUIRY – 5/12/2010

Day after Thanksgiving

Christmas Eve (only if it falls on a day employee is scheduled to work, i.e. if it falls on Saturday, we don't get the day before off as salaried employees)

Christmas Day

New Year's Eve (only if it falls on a day employee is scheduled to work)

Transportation Equipment

2010 Holiday Schedule

Holiday Date	Day of Week	Description
1/1/2010	Friday	New Years Day
4/02/2010	Friday	Good Friday
5/31/2010	Monday	Memorial Day
7/5/2010	Monday	Independence Day (observed)
9/6/2010	Monday	Labor Day
11/25/2010	Thursday	Thanksgiving Day
11/26/2010	Friday	Friday after Thanksgiving
12/24/2010	Friday	Christmas
12/27/2010	Monday	Winter Holiday
12/28/2010	Tuesday	Winter Holiday
12/29/2010	Wednesday	Winter Holiday
12/30/2010	Thursday	Winter Holiday
12/31/2010	Friday	Winter Holiday

OFFICIAL COMPANY HOLIDAY POLICIES INQUIRY – 5/12/2010

Wholesale Trade-Nondurable Goods (Food)

(Company's) regular full-time associates are eligible for 72 hours or 9 days of holiday pay. There are six company-recognized holidays:

- New Year's Day
 - Memorial Day
 - Independence Day
 - Labor Day
 - Thanksgiving Day
 - Christmas Day
-

Paper and Allied Products

Our corporate office closes for:

New Year's Day -- January 1

Memorial Day -- Last Monday in May

Independence Day -- July 4

Labor Day -- First Monday in September

Thanksgiving Day -- Fourth Thursday in November

Christmas Day -- December 25

Two Floating Days -- Designated by Vice President of Administration

One floating day is typically used for the Friday after Thanksgiving, and another is typically used for extending either the Fourth of July holiday or Christmas holiday depending on where in the week those holidays fall.

Our production facilities close for:

New Year's Day -- January 1

Memorial Day -- Last Monday in May

Independence Day -- July 4

Labor Day -- First Monday in September

Thanksgiving Day -- Fourth Thursday in November

Christmas Day -- December 25

Three Floating Days -- Designated by Vice President of Manufacturing

One floating day is typically used for Easter (we are, generally, 24/7 operations), and the other two are generally used plant by plant (either birthday, MLK day, Company picnic day, etc.).

OFFICIAL COMPANY HOLIDAY POLICIES INQUIRY – 5/12/2010

Chemical and Allied Products

From our US policy

- 3.1 The Company observes 10 holidays (totaling 80 hours, prorated for part-time employees) per year.
- 3.2 Establishing the Holiday Schedule: Each year, the Company establishes seven fixed holidays. Site management has the flexibility to designate the mix of fixed and floating holidays as long as there is a minimum of two floating holidays and the amount of days/hours does not exceed that provided under the policy. For cases where a company designated fixed holiday falls on a scheduled day off, the site has the flexibility to determine an alternate day. For a sample holiday schedule see *policy website*.
- 3.3 Fixed Holidays: Any of the following holidays can be designated as Company fixed holidays:

New Years Day	Thanksgiving Day
Memorial Day	Day after Thanksgiving
Independence Day	Christmas Day
Labor Day	

Holidays are observed on the actual day they occur. However, for day employees, a holiday that falls on a Saturday is observed on the preceding Friday and a holiday that falls on a Sunday is observed on the following Monday.

Insurance Carriers

(Company's) practice is to give all associates a total of 12 paid holidays annually. Generally, there are about 7 holiday schedules which are based on the line of business, location, state or regulatory agency requirements. Each schedule designates a set number of office closings and the remaining days (difference between 12 and office closings) are converted into PTO days. Below are core holidays that all locations and businesses are expected to observe:

New Year's Day
Martin Luther King Jr.'s Birthday

OFFICIAL COMPANY HOLIDAY POLICIES INQUIRY – 5/12/2010

President's Day
Memorial Day
Independence Day
Labor Day
Thanksgiving Day
Christmas Day

In addition, some holiday schedules may include the following days:

Good Friday
Victory Day
Veterans' Day
Day after Thanksgiving
Christmas Eve
New Year's Eve

Wholesale Trade-Nondurable Goods

(Company) designates the following holidays:

- New Year's Day
- President's Day
- Good Friday
- Memorial Day
- Independence Day (July 4)
- Labor Day
- Thanksgiving Day
- Thanksgiving Friday
- Christmas Eve
- Christmas Day
- One personal holiday at the employee's choice

Instruments and Related Products

The 2010 Holiday Schedule for (Company) Corporate Headquarters is as follows:

New Years Day
Memorial Day
(Day after) Independence Day
Labor Day
Thanksgiving Day
Day after Thanksgiving

OFFICIAL COMPANY HOLIDAY POLICIES INQUIRY – 5/12/2010

Holiday Shutdown: December 24-31

Insurance Carrier

Scheduled Holidays:

New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, Friday after Thanksgiving, and Christmas Day

Generally, there are nine paid Holidays a year: seven scheduled and two floating Holidays, which may change from year to year. The Holiday schedule will be published in December of each year for the following year. Where requirements dictate, the floating Holidays may be adjusted to meet operational needs.

Holding and Other Investments Offices

HOLIDAYS

(Company) provides a generous holiday schedule of nine regularly scheduled holidays. When one of the holidays listed below falls on a Saturday or Sunday and the employee is not scheduled to work, a floater holiday is normally taken on or after the actual holiday date.

Business needs or facility openings may result in staffing being required on certain holidays in some departments. Employees who are required to work a holiday will receive a floater holiday. Use of floater holidays must be coordinated with your business unit's needs and are to be approved by your manager.

Full-time employees will receive eight hours of holiday time on the actual holiday. Part-time employees will receive holiday hours on the actual holiday based on the number of hours paid over the previous four weeks:

- .01-80 hours paid (average 20 hours per week) will receive four holiday hours
- 80.01-119.99 hours paid (average 20.01-29.99 hours per week) will receive six holiday hours
- 120+ hours paid (average 30+ hours per week) will receive eight holiday hours

Management reserves the right to change holidays depending upon business needs. Holiday hours can only be used on or after the actual holiday date.

- New Year's Day
- Martin Luther King Day
- Presidents' Day

OFFICIAL COMPANY HOLIDAY POLICIES INQUIRY – 5/12/2010

- Memorial Day
- Independence Day
- Labor Day
- Veterans Day
- Thanksgiving
- Christmas

Some facilities will be open to the public on these days. Those employees who are required to work will receive a floating holiday.

Holiday time cannot be used to create overtime. At the end of the year, unused holiday hours will roll into supplemental hours for both full time and part time employees. Employees who leave the Organization will be paid for unused Holiday time that has been earned for the current year.

Insurance Carriers

2010 holiday schedule.

New Year's Day 01/01/2010
Martin Luther King Jr. Day 01/18/2010
Presidents Day 02/15/2010
Friday Before Memorial Day 05/28/2010 - 1/2 day
Memorial Day 05/31/2010
Day After Independence Day 07/05/2010
Friday Before Labor Day 09/03/2010 - 1/2 day
Labor Day 09/06/2010
Day Before Thanksgiving 11/24/2010 - 1/2 day
Thanksgiving Day 11/25/2010
Day After Thanksgiving 11/26/2010
Christmas Eve 12/24/2010
New Year's Eve 12/31/2010

Electric and Gas Services

Friday	January 1, 2010	New Year's Day
Monday	January 18, 2010	Martin Luther King Day
Monday	May 31, 2010	Memorial Day
Monday	July 5, 2010	Independence Day

OFFICIAL COMPANY HOLIDAY POLICIES INQUIRY – 5/12/2010

Monday	September 6, 2010	Labor Day
Thursday	November 25, 2010	Thanksgiving Day
Friday	November 26, 2010	designated Holiday
Friday	December 24, 2010	designated Holiday
Friday	December 31, 2010	designated Holiday
**One Discretionary Holiday		

Anonymous

Our holiday schedule can vary by business and location.

At Corporate Headquarters (and many of our locations) our holidays are:

New Years
Martin Luther King, Jr. Day
President's Day
Good Friday
Memorial Day
Independence Day
Labor Day
Veterans Day
Thanksgiving Day
Day after Thanksgiving
Christmas Eve day
Christmas Day

Responses to Inquiry re Off-the-Clock Policies – February 2010

This member is looking for samples of company policies that address "off-the-clock" work (i.e., work performed outside of designated working hours that is not captured).

Chemical and Allied Products

If the position is non-exempt, the time would be captured, as our overtime must be approved and reported. Our IT organization tracks exempt hours as they relate to reporting on IT projects. In Legal they track hours for billing purposes...with that said we do not have a policy on Off-the Clock work.

Holding and Other Investment Offices

ATTENDANCE POLICY

Regular and predictable attendance is expected of all employees. A dependable work force is an essential element in providing high-quality service to our customers.

Employees are expected to be conscientious about punctuality and attendance. If you are going to be late to work or absent due to any reason, **you must contact** your manager prior to the start of your workday.

Each division or affiliate may have their own specific attendance policy or requirement. Please contact your manager or Human Resources Representative for more information.

WORKING HOURS

All XXX employees are required to work hours as assigned, including, where necessary, hours in addition to the employee's normal or regularly scheduled hours. Failure to work hours as assigned or excessive tardiness will be grounds for disciplinary action up to and including termination.

Each manager must establish all work hours to meet the variety of work performed and the needs of the Organization's customers. Because of these demands and workloads, each department may have completely different working hours, breaks and lunch schedules. Each business unit may have their own working hours policy. Please contact your manager or Human Resources Representative for more information.

TIME WORKED

Time worked is defined as any time you are performing duties or work for the employer but may also include other circumstances which are defined below.

Responses to Inquiry re Off-the-Clock Policies – February 2010

Time worked includes such activities as reviewing e-mails, completing paperwork, or other activities necessary to complete your job.

- **Break and meal time -**

Rest breaks of 20 minutes or less will be considered time worked and you will be paid for this time. Break frequency and duration will vary by business unit. In some circumstances, due to customer service needs or staffing requirements, breaks may not be possible each day or they may vary in duration. Rest breaks are meant to be short refreshment periods and break time is not to be accumulated and used from one day to the next.

Meal periods where you are not performing work is not considered time worked and you will not be compensated for this time. Meal period frequency and duration will vary by business unit. In some circumstances, due to customer service needs or coverage requirements, meal times and duration may vary. If you are non-exempt and your manager requires you to work, or you do work through a meal period, you must record this as time worked and you will be paid for this time.

- **Meetings and Training Programs -**

If you are required to attend meetings, training programs and similar activities you must record this as hours worked and you will be paid for this time even if the event is outside normal working hours. If you voluntarily attend training programs outside of normal working hours for your own personal development, you will not be paid for this time.

- **Other (Company) sponsored events -**

If you are required to attend any employer sponsored event, you must record this as hours worked and you will be paid for this time even if the event is outside normal working hours. Attending holiday parties, picnics, athletic or social events and other similar functions is voluntary and you will not be paid for this time.

- **On-call time -**

If you are required to remain on call on our premises you must record this as hours worked and you will be paid for this time even if you aren't performing work duties. An employee who is required to remain on call away from our premises (such as carrying a pager or cell phone) is not working while on call and will usually not be paid for that time. An employee who is called into work or required to perform duties remotely must record these as hours worked and will be paid for this time. This may include simply responding to pages or phone calls. Because these situations may vary greatly, please contact your Human Resources Representative for further guidance.

- **Working remotely or from home -**

Working remotely or from home is a privilege that requires approval by your manager. It is reviewed on a case by case basis, and every position is different.

Responses to Inquiry re Off-the-Clock Policies – February 2010

The needs of the organization and the position are taken into consideration. If you are working remotely or from your home (meaning at a place other than our premises), you must record the time you are working as hours worked and you will be paid for this time. This includes time spent working via e-mail, computer, telephone or any other remote technology. Because work of this nature may involve limited supervision, it is important that you accurately record your time worked.

- **Travel Time -**

Whether travel time is considered time worked depends on the nature of the travel.

- **Home To Work Travel:** An employee who travels from home before the regular workday and returns to his/her home at the end of the workday is engaged in ordinary home to work travel, which is not time worked.
- **Home to Work on a Special One Day Assignment in Another City:** This is an employee who regularly works in one city and who is given a special one day assignment in another city and returns home the same day. The time spent in traveling to and returning from the other city is work time, except we will deduct that time the employee would normally spend commuting to the regular work site.
- **Travel That is All in a Day's Work:** Time spent by an employee in travel as part of his/her principal activity, such as travel from job site to job site during the workday, is time worked and you will be paid for it.
- **Travel Away from Home Community:** Travel time that keeps an employee away from home overnight is travel away from home. Travel time will be considered time worked when the travel time is within the employee's normal work hours on regular working days and during corresponding hours on nonworking days. Travel time that is outside your normal work hour schedule is not considered time worked.

- **Recording Your Time Worked**

You are required to record your time worked accurately and completely on your weekly timecard. Failure to do so may result in disciplinary action up to and including termination.

"Banking" time (i.e. "comp time") from one week to the next is not permissible. You must record all hours worked each week and there is no carry over allowed in order to avoid overtime or build up time-off into a future week.

- **Working Outside of Your Normal Shift**

You may not perform work outside the hours of your scheduled shift unless you have approval by your manager. All time worked must be entered on your timecard.

You may request permission to work hours other than your scheduled shift in order to review work emails, account information, complete paperwork, and other

Responses to Inquiry re Off-the-Clock Policies – February 2010

matters necessary for your job and you will be paid for this time. You may not engage in such activities without recording it as time worked. Employees who do so will be subject to discipline up to and including termination.

- **Logging in Time**

You may not log into your PC until the start of your shift. Employees that log into multiple systems at the start of their shift should seek management's recommendation on procedures to ensure work efficiency.

- **Non-Business Related Activities**

Some business units may allow you to perform personal activities before, during or after the course of your regularly scheduled shift. Examples may include using the phone or computer, studying for a class, or various other activities which are not related to your job. Unless these activities take place during a paid break or meal time (see above), you will not be paid for this time. You should check with your manager to determine your business unit's policy.

ON-SITE SECURITY INQUIRY – 2/24/12

Industrial Machinery & Equipment

- 1) Does your company use on-site security? *Yes*
- 2) If so, are they directly employed or independent contractors?
We have both. Corporate security is directly employed. Some of the plants/locations use independent contractors
- 3) Do your on-site security personnel carry weapons? *No*

Transportation Equipment

- 1) Does your company use on-site security? *Yes*
- 2) If so, are they directly employed or independent contractors? *Contractor*
- 3) Do your on-site security personnel carry weapons? *In some locations*
- 4) If so, do you have a specific policy regarding the carrying of firearms by on-site security? For example, what qualifications, certification, training, etc. do you require? Are there areas of your facilities where the firearms are not permitted, etc.?
Not sure, probably

Insurance Carrier

- 1) Does your company use on-site security? *Yes*
- 2) If so, are they directly employed or independent contractors? *Both*
- 3) Do your on-site security personnel carry weapons? *No*

Anonymous

- 1) Does your company use on-site security? *Yes (people, gates and video cameras)*
- 2) If so, are they directly employed or independent contractors? *Both*
- 3) Do your on-site security personnel carry weapons? *No*

ON-SITE SECURITY INQUIRY – 2/24/12

Anonymous

- 1) Does your company use on-site security? *Yes*
 - 2) If so, are they directly employed or independent contractors? *Both*
 - 3) Do your on-site security personnel carry weapons? *No*
-

Anonymous

- 1) Does your company use on-site security? *Yes*
 - 2) If so, are they directly employed or independent contractors?
We have a small contingent of security personnel who are FTEs and a larger group of contract personnel to assist with the physical security function.
 - 3) Do your on-site security personnel carry weapons? *No*
-

Depository Institution

- 1) Does your company use on-site security? *Yes, at some facilities, but not all.*
 - 2) If so, are they directly employed or independent contractors?
Both direct employees and leased employees.
 - 3) Do your on-site security personnel carry weapons? *Yes.*
 - 4) If so, do you have a specific policy regarding the carrying of firearms by on-site security? For example, what qualifications, certification, training, etc. do you require? Are there areas of your facilities where the firearms are not permitted, etc.?
Yes, must complete annual certification and training.
-

Sanitary Services

- 1) Does your company use on-site security? *Yes*
- 2) If so, are they directly employed or independent contractors?
Both, however the majority are directly employed

ON-SITE SECURITY INQUIRY – 2/24/12

- 3) Do your on-site security personnel carry weapons?
No. Exceptions pertain to temporary contracting with law enforcement and must be approved by the Chief Security officer. We do not use armed guard staff that are not current law enforcement officers.
 - 4) If so, do you have a specific policy regarding the carrying of firearms by on-site security? For example, what qualifications, certification, training, etc. do you require? Are there areas of your facilities where the firearms are not permitted, etc.
See above. Firearms are only permitted with the specific approval of the CSO or where allowed without exclusion by state law.
-

Anonymous

- 1) Does your company use on-site security? *Yes*
 - 2) If so, are they directly employed or independent contractors?
Both. There are corporate security positions that are exempt level and are directly employed. They oversee issues as well as the security personnel who are contracted through a 3rd party.
 - 3) Do your on-site security personnel carry weapons? *No*
-

Insurance Carrier

- 1) Does your company use on-site security? *Yes*
 - 2) If so, are they directly employed or independent contractors? *Employees*
 - 3) Do your on-site security personnel carry weapons? *No*
-

Communications

At Corporate Headquarters and other locations, we have a contractor, Securitas, provide those services. They do not carry weapons, and are instructed to call local law enforcement if there is a confrontation or a crime.

ON-SITE SECURITY INQUIRY – 2/24/12

Food and Kindred Products

- 1) Does your company use on-site security? *Yes*
- 2) If so, are they directly employed or independent contractors? *Independent contractors*
- 3) Do your on-site security personnel carry weapons? *No*

Anonymous

- 1) Does your company use on-site security?
Yes, we have an onsite security desk at all our locations.
- 2) If so, are they directly employed or independent contractors?
We use a security firm called Securitas.
- 3) Do your on-site security personnel carry weapons?
Some of the staff, but not all.
- 4) If so, do you have a specific policy regarding the carrying of firearms by on-site security? For example, what qualifications, certification, training, etc. do you require? Are there areas of your facilities where the firearms are not permitted, etc.? *Not sure.*

Heavy Construction

- 1) Does your company use on-site security?
Yes, at our corporate headquarters in CA. In Washington, DC office and a few other places we rent space in buildings that also are manned by the building security.
- 2) If so, are they directly employed or independent contractors?
Contractors, Tower Security.
- 3) Do your on-site security personnel carry weapons? *No*

**PEER REVIEW PROCESS FOR TERMINATIONS AND FINAL WARNINGS
INQUIRY – 4/15/2014**

1. *Does your company utilize a Peer Review process when employees have been put on a Final Warning or Terminated?*
 2. *If so, do you do the Peer Review process virtually or in person?*
-

Companies in the following industries indicated that they do not:

Pharmaceutical Preparation Manufacturing
Electromedical and Electrotherapeutic Apparatus Manufacturing
Ship Building and Repairing
Tire Manufacturing (except Retreading)
Electric Power Distribution
Research and Development in the Physical, Engineering, and Life Sciences (except Biotechnology)
Ball and Roller Bearing Manufacturing
Engineering Services

Poultry Processing

We do peer review for termination, in person only.

COMPANY POLICIES INQUIRY – 7/24/13

1. *Does your company have a centralized policy group that handles all company policies regardless of functions (e.g. HR, Finance, Safety, Travel, Ethics and Compliance)? Or does each function own their own policy series?*
2. *Do you distinguish between policies and practices? If so, what is the distinction? Who administers each?*
3. *Do you require legal approval of all policies before they are posted? Or does the policy owner make the decision on a case by case basis depending on the nature of the policy, the extent of the revisions, etc.?*
4. *What is the highest level of approval needed before you can post a policy and communicate it (new policy or revisions to existing policies)? (I realize that some policies require the CEO and other officials signatures. Don't worry about those. I am asking about run of the mill policies that don't have a regulatory requirement for the signature.)*
5. *Can you provide a screen shot or a list of your policies series?*
6. *How do you communicate your new policies or revisions to existing policies? Do you use any kind of a system that audits and records who has read and signed off on the policy? Do you have different procedures for policies that are required by legal or regulatory statutes?*
7. *Is the member willing to exchange emails and speak with me directly?*

Ball and Roller Bearing Manufacturing

1. Does your company have a centralized policy group that handles all company policies regardless of functions (e.g. HR, Finance, Safety, Travel, Ethics and Compliance)? – No Or does each function own their own policy series? Each function can create their own policies.
2. Do you distinguish between policies and practices? Yes If so, what is the distinction? Policies are formally written up. Who administers each? This depends on how far reaching the policy is. Generally, employee relations would interpret the policy and it is enforced by the management/leadership team.
3. Do you require legal approval of all policies before they are posted? No Or does the policy owner make the decision on a case by case basis depending on the nature of the policy, the extent of the revisions, etc.? Yes

4. What is the highest level of approval needed before you can post a policy and communicate it (new policy or revisions to existing policies)? (I realize that some policies require the CEO and other officials signatures. Don't worry about those. I am asking about run of the mill policies that don't have a regulatory requirement for the signature.) We would look to get “buy in” from the other organizational leaders that the policy would impact.
 5. Can you provide a screen shot or a list of your policies series? We do not have a comprehensive list of the policies
 6. How do you communicate your new policies or revisions to existing policies? Depends on the type of policy. Generally the policies are rolled out during a meeting/teleconference. Do you use any kind of a system that audits and records who has read and signed off on the policy? No. Do you have different procedures for policies that are required by legal or regulatory statutes? Different people will need to approve the policy but the process is basically the same.
 7. Is the member willing to exchange emails and speak with me directly? Yes
-

Meat and Meat Product Merchant Wholesalers

1. Does your company have a centralized policy group that handles all company policies regardless of functions (e.g. HR, Finance, Safety, Travel, Ethics and Compliance)? Or does each function own their own policy series?
No central policy group. Each function handles their own.
2. Do you distinguish between policies and practices? No. If so, what is the distinction? Who administers each? Typically HR administers HR related policies. Each function takes care of their practices.
3. Do you require legal approval of all policies before they are posted?
No. Or does the policy owner make the decision on a case by case basis depending on the nature of the policy, the extent of the revisions, etc.?
Policy owners make the decision based on the nature of the policy. For example, food safety policies are administered by quality control, there's really nothing illegal about requiring hand washing, hair nets, etc. Of course if a question came up about accommodations then they'd involve HR or Legal.
4. What is the highest level of approval needed before you can post a policy and communicate it (new policy or revisions to existing policies)?
(I realize that some policies require the CEO and other officials signatures. Don't worry about those. I am asking about run of the mill policies that don't have a regulatory requirement for the signature.) Most are just through the VP of HR if

they are HR related. If they are division specific it's through the VP of the division.

5. Can you provide a screen shot or a list of your policies series? Too many, sorry.
6. How do you communicate your new policies or revisions to existing policies? Our internal policies library shows a snapshot of the 5 most recently updated policies. Do you use any kind of a system that audits and records who has read and signed off on the policy? Only on our Code of Ethical Business Conduct Policy. We can send out an alert via our internal website if we want to notify people of updates. We can track who read the alert, but that's about it. Do you have different procedures for policies that are required by legal or regulatory statutes? Yes, the Code of Ethical Business Conduct Policy is tracked on who read and responded to it. I'm not sure how it works though.
7. Is the member willing to exchange emails and speak with me directly? I can try and answer questions.

Anonymous

1. Does your company have a centralized policy group that handles all company policies regardless of functions (e.g. HR, Finance, Safety, Travel, Ethics and Compliance)? Or does each function own their own policy series? Each function owns its own policies; however, all policies are subject to a central approval mechanism.
2. Do you distinguish between policies and practices? Yes If so, what is the distinction? Policies are most often embodied in formal documents, while practices are not necessarily written down. Who administers each? The owners and their delegates.
3. Do you require legal approval of all policies before they are posted? Yes Or does the policy owner make the decision on a case by case basis depending on the nature of the policy, the extent of the revisions, etc.? All must ultimately be reviewed by Legal, if they contain provisions that could raise the possibility of legal compliance requirements or legal liability
4. What is the highest level of approval needed before you can post a policy and communicate it (new policy or revisions to existing policies)? Owner of the policy (I realize that some policies require the CEO and other officials signatures. Don't worry about those. I am asking about run of the mill policies that don't have a regulatory requirement for the signature.)

5. Can you provide a screen shot or a list of your policies series?
 6. How do you communicate your new policies or revisions to existing policies? Communicated through company internal website, and also through notes sent by the owner of the policy or the business lead whose team would be affected. Do you use any kind of a system that audits and records who has read and signed off on the policy? Depends on the policy; for instance, all employees must read and certify to the company Business Conduct Guidelines. Do you have different procedures for policies that are required by legal or regulatory statutes? Yes.
-

Insurance Agencies and Brokerages

1. Does your company have a centralized policy group that handles all company policies regardless of functions (e.g. HR, Finance, Safety, Travel, Ethics and Compliance)? Or does each function own their own policy series? Each area generally functions on its own, but we often collaborate depending on the policy at hand.
2. Do you distinguish between policies and practices? If so, what is the distinction? Who administers each? Some practices/procedures could be included in a policy where it makes sense to do so (such as how to enter time into our time sheets could be in the time entry policy). If it is something that is very specific to a particular business unit, then that area would have “standard operating procedures” or practices that they maintain locally. On a higher level, a policy is one that is generally more subject to legal/regulatory compliance and is the “corporate approved” foundation that all practices should be built upon.
3. Do you require legal approval of all policies before they are posted? Or does the policy owner make the decision on a case by case basis depending on the nature of the policy, the extent of the revisions, etc.? The HR process is to secure legal approval for any significant policy change. If it is a procedural change or a minor modification, the policy owner or subject matter expert may make the change. All policy changes must be channeled through the HR Policy Coordinator before being posted. The Policy Coordinator engages legal as needed.
4. What is the highest level of approval needed before you can post a policy and communicate it (new policy or revisions to existing policies)? (I realize that some policies require the CEO and other officials signatures. Don't worry about those. I am asking about run of the mill policies that don't have a regulatory requirement for the signature.) It depends on the policy. If it is something that has a significant impact on business (be it cost or culture impact) it may need input from the EVP of HR and/or the CEO. But that is rare given that most of our policies are well established.

5. Can you provide a screen shot or a list of your policies series? I'm not sure I understand this question. I can give a screen shot of where our HR policies are posted if that's what you need. It will have the names of policies we have posted there.
 6. How do you communicate your new policies or revisions to existing policies? Do you use any kind of a system that audits and records who has read and signed off on the policy? Do you have different procedures for policies that are required by legal or regulatory statutes? We have a weekly email for HR to communicate policy changes and provide education as needed. If necessary, we have online channels to notify/educate managers and associates. For new hires, they must sign off on having received the policies and every year through ethics & compliance training, key HR policies are reviewed and online signature that associates know and abide by all HR policies is obtained.
 7. Is the member willing to exchange emails and speak with me directly? I'll be happy to assist as needed. Email is probably the best vehicle.
-

Direct Health and Medical Insurance Carriers

1. Does your company have a centralized policy group that handles all company policies regardless of functions (e.g. HR, Finance, Safety, Travel, Ethics and Compliance)? Or does each function own their own policy series? No we do not and yes, each function owns their own policy series. We are, however, currently looking into a centralized governance process and a workgroup has been established to develop that framework.
2. Do you distinguish between policies and practices? If so, what is the distinction? Who administers each? We do in the sense that what we call policies are typically published, communicated, sometimes trained, etc., whereas practices are usually more at the local business area level and are not formally published, communicated, etc. We do not currently have a common definition of policy, standards, procedures, controls, etc. That is the one of the deliverables of the current workgroup.
3. Do you require legal approval of all policies before they are posted? Or does the policy owner make the decision on a case by case basis depending on the nature of the policy, the extent of the revisions, etc.? For HR Policies, our Employment attorney is involved in the review, but there is not a formal approval process. For other policies, the policy owner makes the decision based on the type of policy, the risks associated with the reason for the policy, etc.

4. What is the highest level of approval needed before you can post a policy and communicate it (new policy or revisions to existing policies)? (I realize that some policies require the CEO and other officials signatures. Don't worry about those. I am asking about run of the mill policies that don't have a regulatory requirement for the signature.) It varies, but for the more routine policies, those are typically approved within that subject matter expertise area at either a professional or middle management level. There are only a few policies that require our Corporate Operating Group (executive team) and/or Board approval (i.e. Code of Ethics, Investment Policy, etc.). It is very limited.
5. Can you provide a screen shot or a list of your policies series? N/A
6. How do you communicate your new policies or revisions to existing policies? Do you use any kind of a system that audits and records who has read and signed off on the policy? Do you have different procedures for policies that are required by legal or regulatory statutes? Again, it varies by area. In HR, if it is a brand new policy or one that has had significant change, it is communicated either to all management or all employees through an e-mail or posted on our intranet or both.

Sometimes, depending on the complexity or nature of the policy, we might also communicate FAQ's and/or have an e-learning associated with the communication. This is true of finance policies, Code of Ethics, etc. We do have individuals acknowledge the HR policies and the Code of Ethics Annually, and we track that through our Learning Management System. The sign off is for the entire HR Policy Series and the entire Code of Ethics - not individual sections or policies. No, we do not have different procedures for legal or regulatory statutes, but we may have mandatory compliance training for those items depending on the situation.

7. Is the member willing to exchange emails and speak with me directly? Yes

Engineering Services

1. Does your company have a centralized policy group that handles all company policies regardless of functions (e.g. HR, Finance, Safety, Travel, Ethics and Compliance)? Or does each function own their own policy series? We do have what's referred to as a CPC, Corporate Policy center. It is "managed" or overseen by one individual appointed a couple of years ago as a result of an internal audit. The audit determined there were redundancies, inaccuracies, and various other unneeded info. Each function you list is responsible for their own policies, but within the work flow process once drafted, reviewed, and approved, it is then put through for publishing to the individual mentioned above. He basically is the gate keeper who follows clear instruction laid out after the audit. If a user has "violated" such then it's kicked back to the functional owner for improvement.

2. Do you distinguish between policies and practices? Not really in a written official approach. No doubt field TM reps are administering a policy within the structure spelled out. How they've handled certain matter in the past maybe used as their guide or practice in handling similar matters. If so, what is the distinction? Who administers each?
 3. Do you require legal approval of all policies before they are posted? We don't require legal approval however, depending on the policy, we may have our in-house legal counsel review and give input. Or does the policy owner make the decision on a case by case basis depending on the nature of the policy, the extent of the revisions, etc.? Policy owner
 4. What is the highest level of approval needed before you can post a policy and communicate it (new policy or revisions to existing policies)? Much of what is said in #1 response. Using TM as an example, as the TM designate responsible for policy update and oversee, annually my team will review current policies and suggest new policies if applicable. The other TM Directors of the various business units are given an opportunity to review and comment on the product. Upon completion of that step in the work flow the product then goes to Corporate VP of TM with recommendations and comments. He will then approve. It is returned to me in workflow and I put through the request to publish. Each policy has at the end of it a revision history so we are able to capture what if anything has changed. (I realize that some policies require the CEO and other officials signatures. Don't worry about those. I am asking about run of the mill policies that don't have a regulatory requirement for the signature.)
 5. Can you provide a screen shot or a list of your policies series? Probably not
 6. How do you communicate your new policies or revisions to existing policies?
We do try to inform our own Talent Management Community of changes although I will admit there are times we've been known to miss one. Do you use any kind of a system that audits and records who has read and signed off on the policy? Yes, I think this would be what we've mentioned above about the work flow and steps associated with a policy update or creation. Do you have different procedures for policies that are required by legal or regulatory statutes? No, as a TM community we have seen value in certain policies having procedures crafted to assist in the implementation of such. Recently we have taken a new approach addressing this issue. Much of what is purely TM only info is retained on a separate site viewed only by TM. Employees in general do have access to the afore mentioned CPC, but it is noted that if more info is required there are TM reps from our Service center available to provide further detail or assistance. An example might be the completion of a form for jury duty.
 7. Is the member willing to exchange emails and speak with me directly? Sure
-

Line-Haul Railroads

1. Does your company have a centralized policy group that handles all company policies regardless of functions (e.g. HR, Finance, Safety, Travel, Ethics and Compliance)? Or does each function own their own policy series? Each department “owns” their own corporate policies and procedures (P&Ps), and the Ethics and Compliance group manages the P&Ps in terms of making sure that the departments annually review and update their policies, posting the policies, etc.
2. Do you distinguish between policies and practices? If so, what is the distinction? Who administers each? Corporate procedures are designed as the action steps that implement the corporate policies. The individual departments are responsible for interpretation and administration of their P&Ps.
3. Do you require legal approval of all policies before they are posted? Or does the policy owner make the decision on a case by case basis depending on the nature of the policy, the extent of the revisions, etc.? Yes, the Law Department reviews all policies and procedures unless the revision is merely technical/clerical in nature.
4. What is the highest level of approval needed before you can post a policy and communicate it (new policy or revisions to existing policies)? (I realize that some policies require the CEO and other officials signatures. Don't worry about those. I am asking about run of the mill policies that don't have a regulatory requirement for the signature.) All Corporate P&Ps are reviewed by our CEO; Every Corp Policy is approved by our CEO, and Corporate Procedures are also authorized by our Corporate Secretary.
5. Can you provide a screen shot or a list of your policies series?
6. How do you communicate your new policies or revisions to existing policies? Do you use any kind of a system that audits and records who has read and signed off on the policy? Do you have different procedures for policies that are required by legal or regulatory statutes? Each department has a P&P representative who is responsible for coordinating reviews and revisions of P&Ps and relaying general information to the department. So when a policy is created or revised, the Ethics and Compliance department will advise the representatives from the various departments, and those departments have an opportunity to review and comment on the policy before it is finalized. The reps are advised again when the authorized, finalized policies are posted. We do not currently have a system that audits and records when a policy has been read, etc.
7. Is the member willing to exchange emails and speak with me directly? Yes

PREGNANCY PARKING POLICIES INQUIRY – 11/15/10

1. *Does your company have a policy with regard to special parking for pregnant employees? (For example, closer to the building or office entryway).*
 2. *If so, do you allocate a limited number of spaces for this purpose?*
 3. *If you allocate a limited number of spaces for this purpose, how do you determine who gets the special parking privileges? Is it first-come, first-serve, or does it depend on what trimester the employee is in?*
 4. *Do you handle this issue in some other way and if so, how?*
-

Companies w/o policies: Paper and Allied Products, Depository Institution, Printing and Postage, Sanitary Service, Service Station, Instruments and related Products

Foods and Kindred Products

The corporate office provides a pregnancy Q&A for employees - salaried and office hourly. One particular question is parking. We offer parking near the office building(s) during winter months. Employees need to contact our facilities management area and provide make/model and license plate information. HR notifies facilities management when the employee goes out on leave. We make spaces as necessary.

Plant hourly employees make requests known through medical departments or the safety manager.

Petroleum and Coal Products

We have handicapped parking spaces at each U.S. facility. If someone qualifies on a permanent or temporary basis for a "handicapped" parking space, then one is provided. Pregnancy is not handled differently from other medical conditions.

Insurance Carrier

1. Does your company have a policy with regard to special parking for pregnant employees? (For example, closer to the building or office entryway).
At large locations, we have designated for them the closest spots (along with those for disabled) to building entrances...

PREGNANCY PARKING POLICIES INQUIRY – 11/15/10

2. If so, do you allocate a limited number of spaces for this purpose?
Yes – they are sign posted and the number of designated spots varies by location.
 3. If you allocate a limited number of spaces for this purpose, how do you determine who gets the special parking privileges? Is it first-come, first-serve, or does it depend on what trimester the employee is in?
For larger locations, starting in 3rd trimester. At that point, its first come, first serve. For smaller locations, spaces aren't designated for expectant mothers because parking in a particular spot wouldn't provide a significant difference in the distance that must be traveled to get to company buildings.
-

Insurance Carrier

1. Does your company have a policy with regard to special parking for pregnant employees? (For example, closer to the building or office entryway).
We do not offer special parking privileges to pregnant associates. We do offer near parking to associates who have a need due to a walking limitation.
 2. If so, do you allocate a limited number of spaces for this purpose? *Parking spaces are not allocated unless the associate has state issued handicap tag. All other near parking is on a first come/serve basis and, a temporary parking permit is required to park in the lot nearest to the building entrance.*
 3. If you allocate a limited number of spaces for this purpose, how do you determine who gets the special parking privileges? Is it first-come, first-serve, or does it depend on what trimester the employee is in?
N/A
 4. Do you handle this issue in some other way and if so, how?
Associates who request near parking (including pregnant employees) must provide medical information that supports there is a need in addition to providing the duration near parking will be needed. An assessment is made to determine whether temporary parking permit will be granted. If approved the associate is informed in writing and instructed to provide details of their vehicle to the building's Security personnel. A reminder notice is sent to associates when the permit expires. If an extension is needed the associate may be asked to provide new medical information to be considered for an extension.
-

Anonymous

I am unaware of any specific company-wide policy regarding parking for pregnant women. At our site, if there was such a request for a parking space, Security would issue

PREGNANCY PARKING POLICIES INQUIRY – 11/15/10

a temporary visitor parking permit. This would not grant them access to a "handicapped" space. The visitor parking is much closer to the entrance, similar to handicapped spaces.

Industrial Machinery & Equipment

We use the same procedure for pregnancy as with disability – if there is a medical need a restriction would be written for close parking. Security would issue a close parking permit.

It has been our experience, that most pregnancies do not require close parking.

PTO POLICIES INQUIRY – 4/29/13

1. *Does your company have a Paid Time Off Policy?*
 2. *If so, does your PTO policy differentiate sick time from vacation/personal time off or compile all paid leave (vacation, sick and personal, other) into one bank? In particular, how is this handled in those states that have paid sick time laws?*
 3. *Do employees accrue PTO days over the course of a year, or receive a lump sum of days at the start of each calendar year?*
 4. *How does accrual and annual carryover of days work for your PTO policy?*
 5. *How many days of PTO does an employee receive per year?*
 6. *Does your company pay out the entire bank of accrued PTO upon separation from employment in all states, or is payout only done in those states that mandate that accrued vacation be paid out upon separation?*
-

Softwood Veneer and Plywood Manufacturing

1. Does your company have a Paid Time Off Policy? Yes, only it's called YTO, You Time Off
2. If so, does your PTO policy differentiate sick time from vacation/personal time off or compile all paid leave (vacation, sick and personal, other) into one bank? In particular, how is this handled in those states that have paid sick time laws? No, our policy combines all paid time off, except for our 8 paid holidays per year.
3. Do employees accrue PTO days over the course of a year, or receive a lump sum of days at the start of each calendar year? It's accrued at a rate per work hour over the course of the year.
4. How does accrual and annual carryover of days work for your PTO policy? Employees with less than 12 years of service can carry over up to 40 hours unused time; 12 or more years, 80 hours.
5. How many days of PTO does an employee receive per year? 0-4 years = 16 days (up to 168 hrs. for CA, IL, & MT) ; 5-11 years = 21 days (up to 208 hrs. for CA, IL, & MT); 12-19 years = 26 days (up to 288 hrs. for CA, IL, & MT); 20 or more years = 31 days (up to 328 hrs. for CA, IL, & MT)
6. Does your company pay out the entire bank of accrued PTO upon separation from employment in all states, or is payout only done in those states that mandate that

accrued vacation be paid out upon separation? Employees who terminate for any reason (whether voluntary or involuntary) other than death or total disability will receive payment for YTO accrued and unused as of the date of the termination

7. Would you be willing to share a copy of your PTO policy? Unable to.
8. What industry are you in? Manufacturing – Paper and Wood Products

Poultry Processing

1. Does your company have a Paid Time Off Policy? Yes
2. If so, does your PTO policy differentiate sick time from vacation/personal time off or compile all paid leave (vacation, sick and personal, other) into one bank? In particular, how is this handled in those states that have paid sick time laws? One back, no difference between sick and vacation
3. Do employees accrue PTO days over the course of a year, or receive a lump sum of days at the start of each calendar year? Lump sum on anniversary date.
4. How does accrual and annual carryover of days work for your PTO policy? No accrual and no carryover
5. How many days of PTO does an employee receive per year? Depends on level 17 – 35 days.
6. Does your company pay out the entire bank of accrued PTO upon separation from employment in all states, or is payout only done in those states that mandate that accrued vacation be paid out upon separation? Pay out entire unused back if employee gives two weeks notice.
7. Would you be willing to share a copy of your PTO policy? Unable to
8. What industry are you in? Food/ commodities

Medical Laboratories

1. Does your company have a Paid Time Off Policy? Yes, we call it Time Off with Pay (TOP)
2. If so, does your PTO policy differentiate sick time from vacation/personal time off or compile all paid leave (vacation, sick and personal, other) into one bank?

In particular, how is this handled in those states that have paid sick time laws?
Compiled together – see attached policies for specifics

3. Do employees accrue PTO days over the course of a year, or receive a lump sum of days at the start of each calendar year? Accrue as they go
4. How does accrual and annual carryover of days work for your PTO policy?
Depends on FLSA status – non-exempt is a combination of carry-over and payout of up to 30% of un-used time accrued in that year, exempt is only carry-over of up to 15% of un-used time accrued in that year
5. How many days of PTO does an employee receive per year? See above answer
6. Does your company pay out the entire bank of accrued PTO upon separation from employment in all states, or is payout only done in those states that mandate that accrued vacation be paid out upon separation? Payout is for all unused time in all states
7. Would you be willing to share a copy of your PTO policy? See attached – two policies as CA, OR and PR have a separate policy due to state regulations
8. What industry are you in? Healthcare

Engineering Services

1. Does your company have a Paid Time Off Policy? Yes
2. If so, does your PTO policy differentiate sick time from vacation/personal time off or compile all paid leave (vacation, sick and personal, other) into one bank?
In particular, how is this handled in those states that have paid sick time laws? No differentiation
3. Do employees accrue PTO days over the course of a year, or receive a lump sum of days at the start of each calendar year? Accrued
4. How does accrual and annual carryover of days work for your PTO policy? See #5
5. How many days of PTO does an employee receive per year? Depending on length of service, less than 5 years 120 hours, less than 20 years, 160 hours and 20 or more years, 200 hours. Max accrual 480 ours, 640 hours and 800 hours

6. Does your company pay out the entire bank of accrued PTO upon separation from employment in all states, or is payout only done in those states that mandate that accrued vacation be paid out upon separation? Paid out at termination.
 7. Would you be willing to share a copy of your PTO policy? Sure, to some level. For example we allow employees to donate PTO to a fellow employees account for a qualifying absence.
 8. What industry are you in? Professional (other)
-

Engineering Services

1. Does your company have a Paid Time Off Policy? Yes
 2. If so, does your PTO policy differentiate sick time from vacation/personal time off or compile all paid leave (vacation, sick and personal, other) into one bank? In particular, how is this handled in those states that have paid sick time laws? Compile all paid leave.
 3. Do employees accrue PTO days over the course of a year, or receive a lump sum of days at the start of each calendar year? Lump sum at the beginning of the year.
 4. How does accrual and annual carryover of days work for your PTO policy? There is a limit on the number of days you can carry over.
 5. How many days of PTO does an employee receive per year? It is based on the number of service years.
 6. Does your company pay out the entire bank of accrued PTO upon separation from employment in all states, or is payout only done in those states that mandate that accrued vacation be paid out upon separation? I am not aware of any payouts.
 7. Would you be willing to share a copy of your PTO policy? The request would have to go through our legal department.
 8. What industry are you in? Manufacturing
-

Meat and Meat Product Merchant Wholesalers

We do not have PTO.

General Medical and Surgical Hospitals

1. Does your company have a Paid Time Off Policy? Yes
 2. If so, does your PTO policy differentiate sick time from vacation/personal time off or compile all paid leave (vacation, sick and personal, other) into one bank? In particular, how is this handled in those states that have paid sick time laws? All Paid Time Off is lumped together in one bank.
 3. Do employees accrue PTO days over the course of a year, or receive a lump sum of days at the start of each calendar year? Employees accrue PTO over the course of a year, beginning with the first day of employment.
 4. How does accrual and annual carryover of days work for your PTO policy? PTO can be carried over to the following year. PTO continues to accrue until the employee reaches an amount equal to 1.5 times his annual accrual. When the maximum is reached, PTO accrual stops until PTO is taken by the employee, thereby lowering the time accrued in his bank.
 5. How many days of PTO does an employee receive per year? Nonexempt staff receive 17.625 days/year. Exempt staff receive 22.625 days/year. Directors and above receive 27.625 days/year. After 5 years and 15 years of service, staff move up to the next higher accrual rate. The maximum accrual rate is 27.625 days/year. These totals are for full-time employees working 40 hours per week. Part-time staff accrue PTO at a slightly lower rate. Staff members may buy up to 40 hours of PTO each year or sell up to 40 hours of PTO each year; they may not do both in the same year.
 6. Does your company pay out the entire bank of accrued PTO upon separation from employment in all states, or is payout only done in those states that mandate that accrued vacation be paid out upon separation? PTO is currently paid out upon termination, although this is changing. In the future, staff members with limited service time will not receive any PTO pay out.
 7. Would you be willing to share a copy of your PTO policy? N/A
 8. What industry are you in? Healthcare
-

All Other Miscellaneous Electrical Equipment and Component Manufacturing

We don't have a PTO policy. All of our paid days off are paid out of separate buckets....one for illness, one for vacation, one for personal business, etc.

INQUIRY RE REFERENCES POLICIES – 5/26/2010

Who in your company is permitted to provide professional references for former employees? What, if any, restrictions do you have in place regarding providing references?

Sanitary Services

The policy is to refer any such requests to the HOUR service center for only past employment and duration verification. General guideline is not to provide personal references.

Wholesale Trade-Nondurable Goods

Our general policy is that no one is permitted to give references. All requests for references are supposed to be referred to Human Resources, who will only provide the dates of employment and positions held.

Depository Institutions

We do not allow professional references by anyone for anyone.

Paper and Allied Products

We allow only the HR professionals within any given location to provide professional references. We generally provide only dates of employment and position held.

Printing and Postage

We encourage all reference calls be funneled through the HR department at each location who verifies dates of employment, job title, and rate of pay. However, we have no way of monitoring if other individuals are getting these requests and providing information.

INQUIRY RE REFERENCES POLICIES – 5/26/2010

Chemical and Allied Products

Practice is not to give personal references. Basic data is provided via 3rd party vendor. Any exceptions are through HR VP and/or legal.

Holding and Other Investment Offices

Only Human Resources is authorized to process and provide employee information requests that are received by fax, mail, or email. An authorization for release of information must be signed by the current or former employee.

HR processes the request within 3 to 5 business days. Forms with legal impacts must be completed by due date on form.

General Types of Verifications:

- Employee record
- Social services
- Accident insurance claim
- Benefit/Insurance
- Mortgage

ONLY job title and dates of employment will be provided.

Exceptions / Scenarios:

- Requests to validate any information other than job title or dates of employment, such as in relation to a mortgage verification, must be submitted in writing and will be escalated to management for approval.
 - If no authorization release form is signed by the current/former employee, a standard letter will be sent to the requestor asking for release.
 - If current employee is requesting information an email giving (Company) permission to disclose information is adequate as a signed release.
 - If previous employee is requesting information, fax or letter of signed release is required. A letter is typed on letter head and sent to requestor or company.
-

INQUIRY RE REFERENCES POLICIES – 5/26/2010

Business Services

Personal and business references

- **Personal reference**
A personal reference is information released by one individual about another relating only to their personal relationship. An (company) employee may give a personal reference provided it is made clear the reference is not an official (company) statement. Personal references may not be provided on (company) stationery.
- **Business reference**
A business reference is the release of information concerning the business relationship that exists or existed between an employee and the company. All requests for a business reference from an outside organization or individual, regardless of the manner in which the request is addressed, must be referred to the Employee Services Center (ESC) for reply.
- **Information to be released**
Written or telephone requests for reference information from known or verifiable sources may be answered either in writing or by telephone. Unless otherwise approved in writing by the employee, only the following information may be provided: date(s) of employment, last work location and last position title. With the written approval of the former or current employee, current or final base pay and the last five (5) year job chronology may also be released. No other information may be released without the approval of the employee.

Terminating employees should be informed of (company) release of information policy in their exit interview and be given an opportunity to sign a release if they want (company) to release or verify information other than date(s) of employment, last work location and last position held.

Trucking and Warehousing

We don't have a written policy, but we have outsourced our employment verification/references. In management training, we discuss our vendor and that they are not to put any personal references on company letterhead.

WORKPLACE RELATIONSHIP POLICIES INQUIRY – 5/26/2010

Does your company have a written policy on workplace relationships (dating)? Is it included in your employee handbook? Do you require individuals to disclose workplace relationships?

Sanitary Services

There is a section in the Code of Conduct, generally prohibiting a personal relationship conflict: "In order to prevent a conflict of interest, you must avoid putting yourself in a position where you could influence employment matters, including hiring, promotion, performance evaluation, termination, work assignment, or the general work environment, involving a relative or someone with whom you have a close personal relationship."

Each regional HOUR manual may have more specific language as well. We ask any personal conflicts to be reported on an ongoing basis, as well as in the annual Conflict of Interest questionnaire. Each reported incident gets investigated and a course of action determined.

Wholesale Trade-Nondurable Goods

We have a "Consensual Relationship" policy that requires associates who are in supervisory positions to disclose relationships if those relationships are with non-supervisory associates. It also advises the associates that if any time the relationship is no longer "consensual" the associate should advise HR if they are uncomfortable. The policy does not require the reporting of any relationship that is between two associates where it's not a supervisor/subordinate situation. The Policy is in our Associate Handbook. There is also a form required for the reporting purpose.

Depository Institution

(Company) has an Employment of Relatives policy that includes individuals who are dating. The policy prohibits related individuals from being in roles that would have supervisory relationships or other relationships where one individual could have influence over the other. Relationships would have to be disclosed if it would result in the issues stated. The policy is published with all other HR policies.

WORKPLACE RELATIONSHIP POLICIES INQUIRY – 5/26/2010

Anonymous

Company recognizes that personal relationships may develop between employees. However, in order to promote the efficient operation of the business and to avoid misunderstandings, complaints or the appearance of favoritism, potential conflicts of interest, or possible claims of sexual harassment, supervisors are not permitted to date or pursue or engage in sexual, intimate, or romantic relationships with employees whom they supervise.

In the event that a supervisor wishes to pursue a personal relationship with an individual that he or she directly supervises, he or she must immediately notify his or her manager to arrange for a transfer and/or any other appropriate action to ensure that there is no potential conflict of interest. Individuals who violate this policy will be subject to discipline, up to and including termination of employment.

Chemical and Allied Products

POLICY

Relatives of current employees, employees in a dating/romantic relationship or other close relationship shall not be employed into or assigned to jobs in which they have direct supervisory or other close working relationships (e.g., relatives or spouses working for the same supervisor).

GUIDELINES

An employee must advise his or her supervisor of existing or changes in reporting relationships that are contrary to the intent of this policy.

The Human Resources Business Partner is responsible for the administration of this policy and will evaluate each situation.

Holding and Other Investment Offices

EMPLOYMENT OF MEMBERS OF THE SAME FAMILY/HOUSEHOLD

The employment of relatives and members of the same household can create conflicts of interest and/or improper influence or favor, either real or perceived. To avoid such situations, (Company) and its subsidiary companies permit the employment (including hire, promotion, transfer, demotion, or reassignment) of qualified relatives and members of the same household (including contract and temporary employees) within the same

WORKPLACE RELATIONSHIP POLICIES INQUIRY – 5/26/2010

Company, Division or Business Unit provided such employment does not create either a Prohibited Employment Relationship or Conflict of Interest as defined below:

Prohibited Employment Relationships:

- A manager/subordinate relationship between relatives or members of the same household
- Any relationship where a relative or member of the same household has or can exert influence over actions that could result in a change affecting employment, i.e. performance appraisal, discipline, promotion, pay change, hours of work, benefits, etc.

Conflict of Interest:

- The work of the relatives or members of the same household is related and/or dependent upon each other
- A Human Resources Representative is assigned to an area where a relative or member of his/her household is employed
- An Internal Auditor is assigned to audit an area that employs his/her relative or member of his/her household

Change in Status

If a Prohibited Employment Relationship or Conflict of Interest is created when employees marry or become part of the same household, the employees must inform their Human Resource Representative, in writing, no later than 30 days after the change in status. A reasonable period of time will be allowed for either one or both of the employees to obtain other positions within the organization. In the event that neither employee is able to secure another position, it will be up to the employees to decide who will leave the organization. If the employees cannot agree, appropriate action, such as the transfer or termination of one or both of the parties, will, if possible, be taken. Failure to report a Prohibited Employment Relationship or Conflict of Interest will be considered a violation of this policy.

Definitions

Relative: Spouse, child, parent, sibling, grandparent, grandchild, aunt, uncle, niece, nephew, mother or father-in-law, sister or brother-in-law, step-parent, step-child or step-sibling.

SOCIAL RELATIONSHIPS

Romantic and close personal relationships between managers and subordinates create the potential for real or perceived favoritism, disruption of work, and complaints of sexual harassment. Such relationships present both a potential for employee relations problems and risks of legal liability for the individual manager and the Organization. Although we recognize that romantic and other close personal relationships develop in the workplace, we feel it is necessary to establish this policy to address issues that may potentially develop as a result of these types of relationships.

WORKPLACE RELATIONSHIP POLICIES INQUIRY – 5/26/2010

Managers at all levels should refrain from developing romantic and close personal relationships with employees who report to them whether directly or indirectly. This applies not only to managers in a direct chain of command, but also to senior officers and managers who may exercise real or apparent authority with respect to such matters as an employee's placement and opportunities. Similarly, it is not permissible for a manager/supervisor to share a residence with anyone in their chain of command for the same reasons. In the event such a relationship does develop, it must be immediately reported by the manager to his or her superior or to their HR Representative. Based upon the nature of the relationship, and the potential for work-related problems and risks, appropriate action, such as the transfer or termination of one or both of the parties, will, if possible, be taken.

Failure to report such relationship on a timely basis will be considered a violation of this policy and the employee may be subject to disciplinary actions up to and including termination.

Business Services

Included in our on-line policies is the requirement that dating another employee must be disclosed.

Trucking and Warehousing

We don't have a written policy, but it is addressed in our Respect Training. We do have a policy regarding supervising immediate family members which is covered in our Nepotism policy.

Nepotism. In general, immediate family members may not work for the Company if a conflict of interest (such as another employee having the ability to approve an immediate family member's compensation) arises. An employee may not directly supervise an immediate family member. Refer to the Policy on Employment of Relatives for more details.

SEVERANCE CALCULATIONS INQUIRY – 2/1/13

What calculation do you use to determine the amount of severance an employee gets upon leaving? For example, one week of severance for every year worked for the company.

Meat and Meat Product Merchant Wholesalers

We provide one week for every year worked for the company.

Other Building Equipment Contractors

That is our standard severance calc (1 week/year of service). Plus benefit continuation for the same number of weeks, plus a one-time kicker between 2-6 thousand (based on years of service) for transition pay.

Line-Haul Railroads

The amount of severance depends on the level of the employee and the number of years of service with the company.

Anonymous

An Eligible Employee qualified for Severance Pay will receive in one lump sum (minus lawful deductions) the greater of:

- one week of Weekly Pay for each Service Year; or
- two weeks of Weekly Pay for each \$10,000 of an Eligible Employee's annual base compensation (rounded to the nearest \$10,000).

A 26 week Severance Pay maximum will apply to non-exempt Eligible Employees, and a 52 week maximum will apply to exempt Eligible Employees. A six week Severance Pay minimum will apply to all Eligible Employees.

Ball and Roller Bearing Manufacturing

One week of your base pay multiplied by your years of service. Minimum severance benefit is 4 weeks. Max is 30.

Drugs and Druggists' Sundries Merchant Wholesalers

Our formula is:

One week of pay for each year of service up to 10 years of service.

For each year over 10 years of service, we pay 1.5 weeks of pay.

Softwood Veneer and Plywood Manufacturing

The severance schedule from our corporate policy is attached. This of course is just the schedule and not all of the exceptions addressed in the policy.

Annual Salary	Years of Service			
	1-4	5-14	15-24	25 and Over
Up to \$40,000	0-3 mos.	1-4 mos.	3-6 mos.	5-7 mos.
\$40,001 to \$65,000	1-4 mos.	2-5 mos.	4-7 mos.	6-8 mos.
\$65,001 to \$100,000	2-5 mos.	3-6 mos.	5-8 mos.	7-9 mos.
\$100,001 and above	3-6 mos.	4-7 mos.	6-9 mos.	8-10 mos.

The amount of severance paid under the schedule above will not exceed two times the maximum compensation limit under Internal Revenue Code Section 401(a)(17).

Anonymous

We do not have a severance plan.

Other Gasoline Stations

We get 2 weeks for every year worked up to one yrs pay.

The minimum severance is 12 weeks.

General Line Grocery Merchant Wholesalers

Below is our standard package but this may vary depending on the size of the restructure.

Here are the basics:

- 2 weeks of salary continuation for every completed year of service
- 2 weeks of subsidy to cover health benefits for every completed year of service based on COBRA rates
- Separation bonus based on years of service
- Outplacement services. Length of service provided is based on Professional, Manager, Executive level

Direct Health and Medical Insurance Carriers

(Comany's) general severance calculation is 1 week per year of service for non-exempt and 2 weeks per year of service for exempt employees up to a maximum of 6 months severance.

Anonymous

In general, we use two weeks per year of service.

Anonymous

Length of Service	Weeks of Severance Pay only with an executed release agreement.
Up to 1 year	4 weeks
Additional years of service beyond 1 year.	Add 1 week for each six month period of service to a maximum of 52 weeks

SMOKELESS CIGARETTES POLICIES INQUIRY – 3/2/2011

Has the issue of smokeless electronic cigarettes come up at your company and do you have a policy regarding smokeless electronic cigarettes?

Industrial Machinery & Equipment

Smoke-Free Workplace

To provide a healthy work environment, (Company) restricts smoking at all facilities. Smoking is permitted only in designated areas and at a reasonable distance outside of entrances. Do not smoke in bathrooms, enclosed entranceways, stairwells, warehouses, on loading docks, or in areas where non-smokers may be subject to second-hand smoke. This policy applies to all employees, clients, contractors, and visitors.

An employee found smoking in an unauthorized area will be subject to disciplinary action.

Designated areas are supplied with a receptacle for ash and other tobacco residual disposal. Smokers and users of any tobacco products must dispose of the remains in the proper containers. This helps to keep a neat and clean environment for all employees and our visiting customers.

For employees who wish to quit smoking, there are several resources that provide smoking cessation services programs and other assistance. Contact your Human Resources Representative for more information.

NOTE: This provision applies to the use of any tobacco products including but not limited to cigarettes, cigars, chewing tobacco and e-cigarettes.

Instruments and Related Products

We did have a discussion around this recently and the interim decision was to include the e-cigarettes as part of our No-Smoking policy. As this is a new product, untested, and no FDA approval, we decided that we do not have enough information at this time - therefore not allowed. As we work with many chemicals, our No Smoking policy falls under our strict safety requirements.

SMOKING POLICIES INQUIRY – 4/29/2010

Chemical & Allied Products

1. Does your company conduct business in any states where smoking is a barrier to hire?
Not that I am aware of.
 2. If so, which states, and what are your policies and disclosures around the issue?
None
 3. Does your company offer protection to employees or applicants that smoke?
Not that I am aware of
 4. Are smokers penalized in any way?
No
 5. If you have a policy on smoking in your employee handbook, would you be willing to share it?
We don't have a policy on smoking in our handbook
-

Holding and Other Investment Offices

This is (Company's) policy, which is published in the employee handbook, which complies with Nebraska's Clean Indoor Air Act:

TOBACCO USE

(Company) is committed to providing a safe and healthy environment for our employees and customers. The Organization maintains a tobacco-free work environment. Smoking and/or use of tobacco products is prohibited while on any (Company) premises, including but not limited to all interior and exterior properties, parking facilities, parks, and (Company) vehicles. Failure to comply with this policy may lead to disciplinary action up to, and including termination.

(Company) also has a wellness program where employees can sign up for health screens (height, weight, blood pressure, blood test, etc.) on an annual basis. Participation in the wellness program is entirely voluntary. Employees who score at a certain level on these different test factors are eligible for a discount on their health insurance premium. Included in the health screen is a test for smokers, and smokers get points deducted from their wellness score.

SMOKING POLICIES INQUIRY – 4/29/2010

Railroad

1. Does your company conduct business in any states where smoking is a barrier to hire?
Yes
2. If so, which states, and what are your policies and disclosures around the issue?
Arkansas, Idaho, Washington, Tennessee, Texas, Kansas, Arizona
3. Does your company offer protection to employees or applicants that smoke?
?
4. Are smokers penalized in any way?
*Current Employees - Failure to comply may result in the assessment of discipline.
Candidates for Employment - In the states identified above are not considered for employment.*
5. If you have a policy on smoking in your employee handbook, would you be willing to share it?

Smoking Policy

Purpose

The purpose of this policy is to provide employees of (Company) with a work environment free from the potentially harmful effects of tobacco use.

(Company) intends to provide employees with a smoke-free work environment. This policy has been implemented because of the potentially harmful effects of tobacco use in response to employee health concerns and at the direction of Senior Management.

General Provisions

Smoking is prohibited at the following locations and activities:

All Company property, whether owned or leased, including mechanical facilities, along the right of way, in office buildings, and all service unit facilities and yards.

In or near building entrances and contiguous sidewalks.

In locomotive cabs, cabooses, bunk cars, Company vehicles, and similar equipment.

Meetings held at off-site locations.

Cessation Programs

Programs are available for employees who desire to quit smoking. Interested employees should contact the Health Promotion staff .

Noncompliance

Failure to comply may result in the assessment of discipline.

For Further Information

Answers to Frequently Asked Questions.

Questions concerning compliance with the Smoking Policy should be referred to your immediate supervisor.

SOCIAL MEDIA AND EMPLOYEE PRODUCTIVITY INQUIRY – 10/31/12

If you allow employees to access social media (Facebook, etc.) at work using company systems and during company-paid time, what have been the impacts to:

- *Employee productivity?*
- *Number of harassment/discrimination/retaliation complaints?*
- *Number of privacy issues?*
- *Company brand?*
- *Anything else you'd care to share?*

Transportation Equipment

Generally speaking, we don't allow access to Facebook, etc. at work using company systems/during company-paid time. Access to social media requires 'special permission'.

Food and Kindred Products

We allow employees access to social media sites, however, we tell employees they are only allowed to access it during break times. We also have a social media policy that addresses discussing the company on social media sites. As of right now I am not aware of any issues. Our Corporate Communications department has staff time devoted to monitoring postings about the company.

Insurance Carrier

We do not allow access YET but it is being contemplated.

Electric and Gas Services

Our company blocks out social media such as Facebook.

SOCIAL MEDIA AND EMPLOYEE PRODUCTIVITY INQUIRY – 10/31/12

Instruments and Related Products

- Employee productivity? We have not had any issues thus far and we also have not had any issues with our internal social media.
 - Number of harassment/discrimination/retaliation complaints? We have not had any related to work usage.
 - Number of privacy issues? None
 - Company brand? We have not had any impact to our Company Brand that I am aware of, but we do find that there is a lot of positive discussions about the Company
 - Anything else you'd care to share? We encourage cross business discussions and group discussions as long as the discussions do not involve confidential or proprietary information.
-

Sanitary Services

Our internet policy allows them to access it, but only on their own time such as breaks. So far we haven't had any productivity or other issues.

Petroleum and Coal Products

We block social media access to numerous sites such as Facebook, MySpace, Pinterest, dating sites, etc. Access via company computers is permitted to selective sites such as LinkedIn and Twitter.

- Employee productivity? Little to no impact.
 - Number of harassment/discrimination/retaliation complaints? Very low activity, 2-3 cases, from employees making threats or inappropriate comments on personal accounts outside of work.
 - Number of privacy issues? None
 - Company brand? None
-

SOCIAL MEDIA POLICY OWNERSHIP INQUIRY – 4/29/2014

For companies that have a Social Media Policy, who “owns” the policy and enforces compliance with it?

Anonymous

Owens: Legal
Enforces: HR

Meat and Meat Product Merchant Wholesalers

HR and Communications

Anonymous

We don't have a Social Media policy, but the topic is being discussed by Legal and Labor Relations. If we did have one, it would reside with HR.

All Other Miscellaneous Food Manufacturing

HR owns and is responsible for enforcement but Communications monitors.

Pharmaceutical Preparation Manufacturing

Public Relations and Human Resources

Electric Power Distribution

Our Communications team within Corporate Affairs owns our policy

SOCIAL MEDIA POLICY OWNERSHIP INQUIRY – 4/29/2014

Ball and Roller Bearing Manufacturing

Office of Ethics and Compliance owns this policy and enforces the compliance with it.

Engineering Services

Issued by Corporate Relations dept. Responsibilities are in conjunction with Talent Management and Ethics.

Savings Institutions

Our Legal Officer owns the organization's social media policy. It's not a standalone policy – it's a provision of our Code of Business Conduct. We also have a Social Media Committee, which is comprised of interested stakeholders in our company – Legal, HR, Retail, Marketing, etc. who meet periodically to discuss the bank's strategy on social media and our social media projects.

SUSPENSIONS FOR MISCONDUCT INQUIRY – 2/6/14

1. *Does your company place employees who are suspected of misconduct on paid, unpaid, or no suspension pending discharge (while you complete your investigation and reach a final decision)?*
 2. *Does this differ depending upon whether the employee is hourly or salaried? If so, how?*
-

Waste Management

1. Does your company place employees who are suspected of misconduct on paid, unpaid, or no suspension pending discharge (while you complete your investigation and reach a final decision)? Employees are put on leave (paid, if an exempt, and undecided about the pay if non-exempt.) At the end of the investigation, the pay is decided on a non-exempt.
 2. Does this differ depending upon whether the employee is hourly or salaried? If so, how? If the allegation is not substantiated, the employee is brought back and paid for the time they were on leave.
-

Norfolk Southern

We generally place management employees on paid leave while we investigate, however union employees are placed on unpaid leave.

Prudential

It depends on the gravity and nature of the allegation. Most of the time, an employee under investigation does not get suspended while review is pending. When a suspension is necessary, the person is paid.

Timken

1. Does your company place employees who are suspected of misconduct on paid, unpaid, or no suspension pending discharge (while you complete your investigation and reach a final decision)? This is not a standard practice, but we will use this when the company feels it is appropriate.
2. Does this differ depending upon whether the employee is hourly or salaried? If so, how? No. Both hourly and salary employees can be put on leave while an investigation is being conducted.

SUSPENSIONS FOR MISCONDUCT INQUIRY – 2/6/14

Mutual of Omaha

1. Does your company place employees who are suspected of misconduct on paid, unpaid, or no suspension pending discharge (while you complete your investigation and reach a final decision)? We do reserve the right to suspend employees, pending investigation, of a situation. This is a pretty rare occurrence and only utilized if we have a safety situation or an investigation would be compromised if the employee/employees were on the premises. Generally our practice has been to suspend with pay.

The specific language from our policy (Conduct Jeopardizing the Safety and Rights of Others) is:

The employee may be sent home pending further investigation. The VP, Human Resources (or designee) may authorize suspension of the employee, with or without pay, pending the completion of the investigation.

2. Does this differ depending upon whether the employee is hourly or salaried? If so, how? We have not, to my knowledge, differentiated between salary and hourly in making a decision on whether to suspend with pay.
-

UNLIMITED VACATION TIME POLICIES INQUIRY – 2/12/13

Does your company provide unlimited vacation time?

If so, are all employees eligible?

If so, would you be willing to chat about your policy with the EEAC member asking the question?

Companies responding “No”:

Lassoers of Other Real Estate Property
All Other Nondepository Credit Intermediation
Anonymous
Ball and Roller Bearing Manufacturing
Other Nonhazardous Waste Treatment and Disposal
Engineering Services
Meat and Meat Product Merchant Wholesalers
Drugs and Druggists' Sundries Merchant Wholesalers
Line-Haul Railroads
Computer Systems Design Services
Direct Health and Medical Insurance Carriers

VACATION CARRY-OVER INQUIRY – 1/21/2014

1. Does your company allow employees to carry over accrued vacation time from one year to the next?
2. If so, what is your policy?

Anonymous

No we do not allow carryover of vacation time from one year to the next.

Meat and Meat Product Merchant Wholesalers

1. Does your company allow employees to carry over accrued vacation time from one year to the next? Yes
2. If so, what is your policy? Employees may carry over up to five (5) days of vacation into the next fiscal year. Employees on an alternate work schedule may carry over up to one typical work week, as defined by their alternate work schedule, into the next fiscal year.

All Other Miscellaneous Chemical Product and Preparation Manufacturing

No, we do not allow carryover vacation time.

Wireless Telecommunications Carriers (except Satellite)

Yes, our company does have a vacation carry over policy.

Employees are encouraged to use all PTO hours during the calendar year in which they were accrued. However, Sprint recognizes that, due to departmental demands or other considerations, employees may not be able to use their full allotment of accrued PTO hours each calendar year. Thus, employees will be permitted to carry over 40 accrued PTO hours from one year to the next. Specifically, all accrued PTO hours in excess of 40 that are not used by the end of the pay period of the first check dated in the new year will expire after that payroll period, unless otherwise required by law.

VACATION CARRY-OVER INQUIRY – 1/21/2014

Computer Systems Design Services

We do not allow vacation carryover per se; however, any accrued but unused vacation will not be lost but still available the following year but will reduce the amount of vacation entitlement in that year.

Drugs and Druggists' Sundries Merchant Wholesalers

1. Does your company allow employees to carry over accrued vacation time from one year to the next? We just converted to a PTO bank and only allow carry-over in states (CA) where the law does not allow a use it or lose it policy.
 2. If so, what is your policy? Associates are allowed to carry over time left over at the end of the year, however, hours will cap at the maximum accrual rate (according to years of service) until time is used.
-

Softwood Veneer and Plywood Manufacturing

1. Yes
 2. Employees with less than 12 years of service may carry over up to 40 hours of unused YTO (Your Time Off) to the next accrual year. Employees with 12 or more years of service may carry over up to 80 hours of unused YTO to the next accrual year. Accrued but unused YTO in excess of these limits will be forfeited, with no exceptions other than as required by state law.
-

General Medical and Surgical Hospitals

1. Does your company allow employees to carry over accrued vacation time from one year to the next? Yes
 2. If so, what is your policy? Vacation time (PTO) accrues each pay period beginning with the first day of employment. We have three accrual levels, which are based upon years of service and FLSA status. PTO continues to accrue unless the staff member's PTO bank reaches an amount equivalent to 1.5 times the annual accrual rate.
-

VACATION CARRY-OVER INQUIRY – 1/21/2014

Anonymous

Employees are encouraged to take the vacation benefits they earn. Managers are encouraged to make sure that employees take vacation, except as otherwise dictated by operational considerations. Vacation will continue to accrue until employees have earned a maximum of two times their annual accrual. If that occurs, vacation accrual is suspended until vacation is taken.

Research & Development in Biotechnology

1. Does your company allow employees to carry over accrued vacation time from one year to the next? Yes.
2. If so, what is your policy? For the first 3 years of employment, vacation accrual stops at 270 hours. After 3 years of employment, depending on hire date, vacation accumulation stops at 270 or 360 hours. For those with 5 years of employment, vacation accrual stops when an employee reaches 360 hours of vacation. However, Sr. Leadership can make exceptions for critical work required situations.

All Other Miscellaneous Food Manufacturing

1. Does your company allow employees to carry over accrued vacation time from one year to the next? Salaried employees, full and part time, yes. Hourly employees at some factories are permitted to carry forward vacation though most do not permit it.
2. If so, what is your policy? Salaried employees earn hours each pay period and are permitted to maintain a bank of hours with a maximum accrual set at slightly more than the maximum annual earned. Vacation (PTO) hours earned and maximum accruals are based on service and full-time or part-time status. Where hourly employees are permitted to carry forward vacation, the maximum carry forward is 40 hours. This was implemented in conjunction with an unpaid FMLA policy.

During any FMLA leave, wherever permitted by state law, (salaried and hourly) employees must use all but 5 days of any accrued paid time off, including vacation leave, sick leave, any other paid time off (PTO), and earned time off.

Poultry Processing

VACATION CARRY-OVER INQUIRY – 1/21/2014

Yes we allow carry over, up to 25% of your annual allocation. So if you earn 2 weeks vacation per year (80 hours) then you can carry over up to 20 hours.

You can never have more than 125% of your annual earned vacation. Once you get 125% you stop accruing until your balance drops.

Engineering Services

1. Does your company allow employees to carry over accrued vacation time from one year to the next? Yes
2. If so, what is your policy? Based on number of years of service an employee may accrue up to a maximum of 800 hours or 100 days if 20+ years of service, 640 hours or 80 days for 5-20 years of service, 480 hours or 60 days for less than 5 years of service.

Savings Institutions

1. Does your company allow employees to carry over accrued vacation time from one year to the next? We have a PTO policy (not vacation time or sick time), which allows for carry-over.
2. If so, what is your policy? At the end of each calendar year, unused PTO time of up to 40 hours will be carried over into the next calendar year's PTO time. Any unused PTO time over 40 hours will be forfeited.

Insurance Agencies and Brokerages

1. Does your company allow employees to carry over accrued vacation time from one year to the next? Yes, there is a maximum hours that can be carried over from year to year.
 2. If so, what is your policy? After a maximum number of vacation time is accrued, an associate will stop accruing additional vacation days until days are used.
-

RESPONSES TO INQUIRY RE VACATION POLICIES – 7/22/09

Wholesale Trade-Nondurable Goods

1. What is your company's schedule of vacation allowance?

In first year of employment we pro-rate vacation based on hire date as follows:

January 1-31	9 days
February 1-28	8 days
March 1-31	7 days
April 1-30	6 days
May 1-31	5 days
June 1-30	4 days
July 1-31	3 days
August 1 – 31	2 days
September 1 – 30	1 day

Then the eligibility is as follows:

<u>DURING VACATION YEAR</u>	<u>VACATION DAYS</u>
1	10
2	11
3	12
4	13
5	14
6 through 9	15
10 through 24	20
25 or more	25

2. Do you credit for previous years of experience?

No. We "grant" vacation each year based on the number of January 1sts the person has been with the company. For example, if someone starts on June 20, 2009, for 2009 they can use 4 days of vacation. Starting January 1, 2010, they are in Vacation Year 1 and get granted 10 days of vacation they can use through-out 2010. On January 1, 2011, they are in Vacation Year 2 and get 11 days, and so on. The time is "earned as you go" on a 1/12th basis for each month you work (for purposes of vacation payouts when terminating employment).

If this doesn't make sense, call me and I'll explain. It's a little confusing to our employees and we usually have to explain it a couple of times.

3. Do you payout for unused vacation? If so, how much do you allow to be paid out each calendar year?

RESPONSES TO INQUIRY RE VACATION POLICIES – 7/22/09

We do not pay out unused vacation - our policy is "use it or lose it" - except in states like CA where you can't do that - in CA we make sure that people use their vacation, but if they can't we do allow carryover to the next year.

4. Do you allow "banking" of unused vacation? If so, how many hours are allowed to be "banked"? *No banking is allowed*
 5. If you recently revised your vacation policy, did existing employees get "grandfathered" into previous policy? If not, how did you transition?
When we changed our policy back in 2003, we did not grandfather old policy. We basically told the people on the accrual policies that there would be no additional accruals in the transition year until they used up the time they had accrued in the previous year - basically, we capped future accruals at the yearly maximum days. Then in the year after the transition year, they went on to the "granting" policy.
 6. What industry are you in? *Pharmaceutical Wholesale Distribution and Services*
-

Electric and Gas Services

1. What is your company's schedule of vacation allowance?

<u>Completed Years of Service</u>	<u>Length of Vacation</u>	
Less than 5 years	6.66 hrs per month	80 hrs per year
5-9 years	10.0 hrs per month	120 hrs per year
10 - 19 years	13.33 hrs per month	160 hrs per year
20+ years	16.66 hrs per month	200 hrs per year

2. Do you credit for previous years of experience? *Yes*
3. Do you payout for unused vacation? If so, how much do you allow to be paid out each calendar year? *No pay out for unused vacation except at termination.*
4. Do you allow "banking" of unused vacation? If so, how many hours are allowed to be "banked"?
A maximum of 40 hrs can be carried over from one year to the next.
5. If you recently revised your vacation policy, did existing employees get "grandfathered" into previous policy? If not, how did you transition? *NA*

RESPONSES TO INQUIRY RE VACATION POLICIES – 7/22/09

6. What industry are you in? *Energy*

Depository Institution

1. What is your company's schedule of vacation allowance?

<u>Completed Years of Service</u> <i>(Entry Level)</i>	<u>Length of Vacation</u>
---	---------------------------

0 -4	15
5 - 9	20
10 - 14	25
15+	27

(Professional/Entry to Middle Mgmt)

0 -4	20
5 - 9	25
10 - 14	25
15+	27

(Sr. Mgmt)

0 -4	25
5 - 9	25
10 - 14	25
15+	27

2. Do you credit for previous years of experience?

Yes, if break is less than prior service.

3. Do you payout for unused vacation? If so, how much do you allow to be paid out each calendar year?

Upon termination unused accrued PTO is paid out. No pay out at year end.

4. Do you allow "banking" of unused vacation? If so, how many hours are allowed to be "banked"?

Up to 5 days may be banked at year end for a total of 10 banked days. However, banked days can be used for illness only.

5. If you recently revised your vacation policy, did existing employees get "grandfathered" into previous policy? If not, how did you transition?

We are changing 1/1/2010 with no grandfathering.

RESPONSES TO INQUIRY RE VACATION POLICIES – 7/22/09

6. What industry are you in? *Banking/Financial Services*

Health Services

1. What is your company's schedule of vacation allowance?
Accrual Levels (for 1.0 FTE)

Nonexempt Plan

Years of Service	PTO in days	PTO in hours	PTO hours accrued Per pay period
0	23	184	7.08
2	28	224	8.62
10	33	264	10.15
15	35	280	10.77
20+	38	304	11.69

Exempt Plan

Years of Service	PTO in days	PTO in hours	PTO hours accrued Per pay period
0	28	224	8.62
2	33	264	10.15
10	35	280	10.77
15+	38	304	11.69

2. Do you credit for previous years of experience? *No*
3. Do you payout for unused vacation? If so, how much do you allow to be paid out each calendar year?
Employees can sell PTO. They must leave 40 hours in their bank to cover the elimination period for STD. They must declare how much PTO they wish to sell during Open Enrollment for benefits. If they sell PTO, but did not declare it during OE, they will have a 15% penalty as required by the IRS. This penalty is in addition to normal payroll taxes.
4. Do you allow "banking" of unused vacation? If so, how many hours are allowed to be "banked"?
Staff can carry over PTO up to 2 times their annual accrual amount.

RESPONSES TO INQUIRY RE VACATION POLICIES – 7/22/09

5. If you recently revised your vacation policy, did existing employees get "grandfathered" into previous policy? If not, how did you transition?
Our policy will change next year. There will be no grandfathering. I'm not in a position to divulge the changes.
 6. What industry are you in? *Healthcare*
-

Instruments and Related Products

1. What is your company's schedule of vacation allowance?
We have "Paid Time Off" that is determined by the years of service.
 2. Do you credit for previous years of experience?
PTO is based on the number of service years with the company and is not available for carryover.
 3. Do you payout for unused vacation? If so, how much do you allow to be paid out each calendar year?
Only if the employee is terminating. Any hours that are not used by a specified cut-off date are lost.
 4. Do you allow "banking" of unused vacation? If so, how many hours are allowed to be "banked"?
No.
 5. If you recently revised your vacation policy, did existing employees get "grandfathered" into previous policy? If not, how did you transition?
Some employees that were acquired via mergers or acquisitions were "grandfathered" based on the terms of the acquisition and the previous organization's policy.
 6. What industry are you in? *Manufacturing*
-

Stone, Clay & Glass Products

1. What is your company's schedule of vacation allowance?

<u>Completed Years of Service</u>	<u>Length of Vacation</u>
After 6 months	5 days
After 1 year	10 days
After 5 years	15 days

RESPONSES TO INQUIRY RE VACATION POLICIES – 7/22/09

After 10 years	20 days
After 20 years	25 days
After 30 years	30 days

2. Do you credit for previous years of experience?
That is taken into consideration when extending offers to external new hires.
 3. Do you payout for unused vacation? If so, how much do you allow to be paid out each calendar year? *No.*
 4. Do you allow "banking" of unused vacation? If so, how many hours are allowed to be "banked"? *No.*
 5. If you recently revised your vacation policy, did existing employees get "grandfathered" into previous policy? If not, how did you transition?
No changes have been made to our vacation policy in 10+ years.
 6. What industry are you in? *Manufacturing and distribution.*
-

Petroleum and Coal Products

1. What is your company's schedule of vacation allowance?

<u>Completed Years of Service</u>	<u>Length of Vacation</u>
0 to 5	2 weeks
5-10	3
10-20	4
20-30	5
30+	6
2. Do you credit for previous years of experience?
Yes- some limited credit for relevant experience
3. Do you payout for unused vacation? If so, how much do you allow to be paid out each calendar year
No, except when employment ends or in special circumstances, like post hurricanes and then no more than 2 weeks.
4. Do you allow "banking" of unused vacation? If so, how many hours are allowed to be "banked"?
Carryover to next year of up to 2 weeks; very unusual and limited use of more than 2 weeks of carryover.

RESPONSES TO INQUIRY RE VACATION POLICIES – 7/22/09

5. If you recently revised your vacation policy, did existing employees get "grandfathered" into previous policy? If not, how did you transition? *N/A*
 6. What industry are you in? *Energy/Petrochemical*
-

Wholesale Trade-Nondurable Goods

1. If you are a global company, do you have a global vacation policy?
We do not have a global vacation policy. Our Canadian and UK operations have their own policies, and even within our US operations there are variations among subsidiaries on the vacation policy. For example a few of our subsidiaries use an all PTO policy while other still have separate banks for vacation, sick and personal holiday time.
 2. Do you pay employees that leave the company any of their unused vacation?
We try to follow the state's law where the employee is located on payment of earned but unused vacation time.
 3. Is this unused vacation based on an accrual process? If so, then do they only get vacation that has been earned?
The vacation time is "front loaded" at the beginning of the year and then "earned as you go" – so the payouts are based only on what is earned as of the date of termination. If the employee has taken more time than was technically earned – we do not require any payback.
 4. Do you track all employees' vacation time? Hourly, SNE, Exempt?
This depends on the business unit. All business units track vacation time for non-exempt, but it varies from business unit to business unit how vacation gets tracked for non-exempt.
-

Industrial Machinery & Equipment

1. If you are a global company, do you have a global vacation policy?
No.
 2. Do you pay employees that leave the company any of their unused vacation?
Yes.
 3. Is this unused vacation based on an accrual process? If so, then do they only get vacation that has been earned?
Yes/Yes
 1. Do you track all employees' vacation time? Hourly, SNE, Exempt?
Hourly yes, SNE, yes, Exempt - not so much. Depends on the manager.
-

VACATION POLICIES INQUIRY – 8/24/2011

Hotel

1. If you are a global company, do you have a global vacation policy? *No.*
 2. Do you pay employees that leave the company any of their unused vacation?
We pay vested leave to U.S. workers up to a max.
 3. Is this unused vacation based on an accrual process? If so, then do they only get vacation that has been earned?
Yes, vacation is based on time worked. Yes, they only get time that has been earned.
 4. Do you track all employees' vacation time? Hourly, SNE, Exempt?
Vacation time taken is submitted via payroll and is reflected on the pay check stub for all associates.
-

Electric and Gas Services

1. If you are a global company, do you have a global vacation policy?
We have a domestic policy; our Canadian office has its own vacation policy.
 2. Do you pay employees that leave the company any of their unused vacation?
-At termination, employees are paid for their accrued but unused vacation.
 3. Is this unused vacation based on an accrual process? If so, then do they only get vacation that has been earned?
Yes, they are only paid for accrued but unused vacation.
 4. Do you track all employees' vacation time? Hourly, SNE, Exempt?
All employees are required to complete their timesheets noting vacation hrs taken.
-

Insurance Carrier

1. If you are a global company, do you have a global vacation policy?
We are not a global company.
2. Do you pay employees that leave the company any of their unused vacation?
We pay out all accrued but not used vacation. We do not pay out unused Personal Time.

VACATION POLICIES INQUIRY – 8/24/2011

3. Is this unused vacation based on an accrual process? If so, then do they only get vacation that has been earned?

Vacation is earned every pay period based on hours worked for non-exempt employees and hours scheduled for exempt employees. "Hours worked" does include vacation, personal time, bereavement, holidays and workers' compensation time off. "Hours worked" does not include short term disability time off.

4. Do you track all employees' vacation time? Hourly, SNE, Exempt?

Yes for all employees and all categories of pay.

Heavy Construction

1. If you are a global company, do you have a global vacation policy?
(Company) does not have a global vacation policy. The company offers Paid Time Off (PTO)/vacation to employees as a company benefit. The guidelines regarding its paid time off benefit are included in the company's Benefits Highlights brochure that is distributed to employees annually. Both domestic and international employees are provided with a paid time off benefit.

2. Do you pay employees that leave the company any of their unused vacation?
Employees are paid for accrued and unused PTO upon termination of employment. However, in cases of termination and rehire by another U.S. affiliate, the employee may elect either to be paid all or part of accrued PTO, or have the accrued PTO hours transferred to the new Company.

3. Is this unused vacation based on an accrual process? If so, then do they only get vacation that has been earned?

Yes, the unused vacation is based on an accrual process. As noted in #3 above, employees only get paid out for accrued and unused vacation.

4. Do you track all employees' vacation time? Hourly, SNE, Exempt?
Yes, vacation for all employees, exempt and nonexempt, is tracked. All employees, regardless of their FLSA status, must record their time and attendance on a daily basis, including vacation time off.
-

WORKPLACE WEAPONS POLICIES INQUIRY – 7/12/2011

We have a member who is in the process of drafting a policy regarding weapons in the workplace. She was wondering if anyone would be willing to share their policy, especially any members we have in Arizona or Texas. Also, what if anything are you posting with regard to the policy?

Sanitary Services

Following is our policy that has been in place for several years. We do recommend that each site post a generic message that reads “firearms are prohibited at the location” sign, but do not enforce it. This is a company-wide policy with consideration for variations in state level requirements. Even with the new law in Texas, we will still prohibit possessing a firearm in a company vehicle.

Purpose:

To communicate Management objectives to conduct inspections and searches, in order to safeguard the property of Company employees, our customers, and the Company, and to provide a safe work environment and prevent the possession of weapons on Company premises. Searches and inspections may also be conducted to prevent the possession, use, or sale of illegal drugs on Company premises. This policy will be enforced in compliance with applicable federal, state, local, and provincial laws and regulations.

Policy:

The Company provides desks, storage areas, work areas, lockers, file cabinets, credenzas, computer systems, offices, telephones, modems, facsimile machines, duplicating machines, vehicles, food service areas, utility areas, and other areas, and other equipment to employees to use for work purposes; however, these remain the property of the Company. The Company reserves the right, at all times, and without prior notice, to inspect and search any and all Company properties for the purpose of protecting Company assets, safeguarding employees and customers, and determining whether any Company policy has been violated. Such inspections and searches may be conducted during or after business hours and in the presence or absence of the employee, at the discretion of the Company.

The Company also reserves the right to inspect all vehicles on Company property, and any packages, parcels, purses, handbags, briefcases, lunchboxes, or other possessions or articles carried to and from the Company’s premises. Inspections and searches may include requesting employees to empty his or her pockets and remove property from one’s clothing.

Persons entering the Company’s premises, who refuse to cooperate in an inspection conducted pursuant to this policy, will not be permitted to enter the premises. Employees, who refuse to cooperate in the enforcement of this policy, may be subject to disciplinary action, up to and including discharge.

Weapons of any kind are not permitted on Company property at any time, except where specifically authorized by the Vice President, Chief Security Officer (or his designee). Consequently, and for the protection of our employees and visitors, the Company reserves the

WORKPLACE WEAPONS POLICIES INQUIRY – 7/12/2011

right to conduct reasonable searches for weapons of all persons on Company property where such search is based on reasonable suspicion and/or in exigent circumstances.

Approval Requirements:

N/A

Policy Owner/Contact:

The policy owner is the Sr. Vice President, General Counsel and Chief Compliance Officer. Questions regarding this policy should be directed to the Vice President, Chief Security Officer, or the Vice President, Recruiting and Retention, or the Policy Owner.

Variance Approvals:

Policy variances must be obtained from the Policy Owner. Variances must be requested using the Variance Approval Form.

Chemicals and Allied Products

Following is our current policy but do note that we may revise it (we believe minimum revisions needed) with the new regulations and once we do our site assessments of what sites may need to comply. We have several plants in Texas.

PURPOSE

All applicants, prospective employees, employees, contractors, subcontractors, vendors and other persons are prohibited from using, possessing and/or displaying any weapons, concealed or otherwise, while on Company property, including personal vehicles, or while engaged in the business of the Company. The Company also prohibits the use or possession of any weapon, concealed or otherwise, at Company-related activities.

ELIGIBILITY

This policy applies to all U.S. employees, contractors, vendors and/or visitors to a U.S. Company property.

DEFINITIONS

Company – The legal entity by which the employee is employed.

Weapon – The Company defines “weapon” as any device that can cause injury or death when used in an aggressive, threatening, or careless manner against an individual. These “weapons” include, but are not limited to, firearms (loaded or unloaded), bladed instruments, explosive or incendiary devices, weapons of the martial arts, axes, clubs, etc. Replicas of weapons are included within the intent of this policy.

GUIDELINES

WORKPLACE WEAPONS POLICIES INQUIRY – 7/12/2011

The Company has zero tolerance regarding the possession, use or threatened use of weapons at our facilities or at Company events (The possession of pocket knives will not be subject to disciplinary action unless used in an aggressive, threatening or careless manner.) Violations of this policy will subject the offending employee to immediate disciplinary action up to and including termination. Employees found to have violated this policy may also be subject to criminal proceedings and/or prosecution.

All weapons as defined above may not be brought on to plant/facility/office grounds at any time. In the rare circumstance wherein state law specifically allows weapons to remain locked and concealed in autos located in parking lots outside of fenced or controlled areas, state law will govern (control). If you see anyone with a weapon, do not attempt to disarm that individual. Notify Security or Management immediately and/or the local Law Enforcement Agency if necessary.

Employees may be required to submit to a search of their personal vehicles, personal effects, and work areas under their individual control while on Company property or Company business.

Vendors, contractors and visitors found in violation of this policy are subject to permanent removal from Company property and where applicable, are subject to loss of their business relationship with the Company and criminal proceedings and/or prosecution.

Exceptions will be made for police officers, sheriffs, or federal agents when they are:

- on duty in uniform,
 - on duty in suits where the weapon is exposed,
 - and on official business.
-

WEAPONS POLICIES INQUIRY – 2/11/2010

We have a member inquiry regarding what other EEAC member companies are doing with respect to state laws that permit employees to keep firearms locked in their vehicles on company premises, I.e. "parking lot gun laws." For those of you affected by such laws, have you had to modify your company policies regarding weapons in the workplace and on company premises, and if so, how?

Trucking and Warehousing

Scope:

(Company) recognizes that in order to create a safe work environment for employees, vendors, contractors, customers and visitors, a clearly defined policy prohibiting weapons on company property be established.

Policy:

In furtherance of maintaining an environment that is safe for (Company) employees, vendors, contractors, customers and visitors, (Company) prohibits the wearing, transporting, storage, presence or use of dangerous weapons on company property or in company vehicles, regardless of whether the person is legally licensed to carry a weapon. Within certain areas of the country, concealment of a firearm in personal vehicles while on company property may be further prohibited.

This policy shall not apply to law enforcement personnel acting in an official capacity, under color of law or (Company) Security Department personnel, with specific written approval of the Vice President of Security.

Prohibited weapons include any form of weapon or explosive restricted under local, state or federal regulation including, but not limited to, firearms, ammunition, illegal knives, chemical sprays or other weapons covered by the law.

Any (Company) employee, vendor, contractor, customer or visitor violating this policy will be removed from company property and reported to the appropriate law enforcement authority. Further, (Company) employees are subject to disciplinary action up to and including dismissal.

This policy shall not be construed to create any duty or obligation on the part of the company to take any actions beyond those required of an employer by existing law.

Implementation:

(Company) management will insure that all employees are aware of the (Company) No Weapons policy. (Company) Facilities will predominantly display No Weapons warning signs, posted in clearly observable locations at points of entry to those facilities.

WEAPONS POLICIES INQUIRY – 2/11/2010

Chemicals and Allied Products

For now what we have done is revise the language in our policy “Prohibition against Weapons in the Workplace” to allow for complying with any state law that may allow for weapons in the auto/parking lot. As we see more of these and they become law, we may do more to the policy to be more detailed.

Depository Institution

(Company)’s policy prohibits weapons on (Company) property. To comply with the state laws we simply added "as state law allows".

Wholesale Trade-Nondurable Goods

(Company) has modified our policy to read: “All weapons and firearms are PROHIBITED from all areas of (Company) property, including plants, offices, work sites and parking lots, except as otherwise authorized under applicable state law. Law enforcement personnel and security officers who are on special assignment are exempt.”

ANONYMOUS

The following was sent out in a memo to Plant Managers and HR personnel in those states that had applicable laws:

In the past year, statutes known as “Parking Lot Gun Laws” have been enacted in a handful of states, including Kentucky and Mississippi. These laws essentially inhibit an employer’s ability to enforce workplace violence policies by permitting employees to carry guns in their vehicles on company property. Kentucky’s Parking Lot Gun Law states in pertinent part:

“No person, including but not limited to an employer, who is the owner, lessee, or occupant of real property shall prohibit any person who is legally entitled to possess a firearm from possessing a firearm, part of a firearm, ammunition, or ammunition component in a personal vehicle on the property.

An employer that fires, disciplines, demotes, or otherwise punishes an employee who is lawfully exercising a right guaranteed by this section and who is engaging in conduct in compliance with this statute shall be liable in civil damages.”

(Kentucky Revised Statutes § 237.106)

The Mississippi law similarly states:

WEAPONS POLICIES INQUIRY – 2/11/2010

“[A] public or private employer may not establish, maintain, or enforce any policy or rule that has the effect of prohibiting a person from transporting or storing a firearm in a locked vehicle in any parking lot, parking garage, or other designated area.”

(Mississippi Code § 45-9-55)

Due to these laws, {company} cannot legally enforce the portion of the existing Violence in the Workplace Policy that prohibits firearms or ammunition in personal vehicles at our Kentucky and Mississippi facilities. The statutes create a new cause of action against an employer if an employee is fired, demoted or otherwise disciplined for keeping a firearm (or ammunition) in a personal vehicle on company property. {Company} may, however, prohibit employees from keeping guns in company-owned vehicles.

In order to keep our Violence in the Workplace Policy in compliance with the law, as applied in Kentucky and Mississippi, the word “property” in the policy shall NOT refer to an employee’s personal vehicle. Consequently, a policy or sign posted at the plant stating firearms are prohibited will NOT apply to personal vehicles parked on company property at those particular facilities. With respect to {Company’s} facilities outside of the affected states, firearms and ammunition are still banned on {Company’s} property, including in employees’ personal vehicles.

Due to {Company’s} commitment to maintain a safe workplace, the above-referenced change in laws will not be advertised to our Kentucky and Mississippi employees. Thus, existing policies, postings and signage will not be revised in any manner. Instead, the company will refrain from disciplining employees found to be carrying firearms in personal vehicles in Kentucky and Mississippi. Please attach this memo to your existing Violence in the Workplace Policy to note the change in enforcement.

Wholesale Trade-Nondurable Goods (Pharmaceutical)

In those states, we have posted signs on all of the entrances that state that no one can bring firearms into the facility. Our generally applicable policies still state that we do not permit firearms on company property, in company vehicles or in personal vehicles on company property. I think the advice we got was that it was worth the risk in those states that have “parking lot gun laws” – i.e., we would just deal with it if there ever was an issue.

Inquiry re Workplace Recording Policies1 sent

To: Associates in the affected area
From: Employee Relations

In order to ensure that Company is providing exceptional quality service to our customers, as a matter of practice in certain areas of our business Company randomly monitors incoming and/or outgoing telephone calls on special phone lines that may be recorded.

All associates working in business areas that may currently, or in the future, monitor business telephone calls are required to sign a Taping and Monitoring Acknowledgement and Consent Form. The form is attached below for your review and signature. Please submit the signed form to your supervisor no later than DATE (3 weeks from date of memo).

Associates that may have signed earlier versions of this form in the past are required to sign and complete this updated version.

Thank you in advance for your cooperation. If you have any questions about this notice, please reach out to your supervisor or the Employee Relations mailbox.

DRIVERS' CHECKS INQUIRY – 6/15/2011

Wholesale Trade-Nondurable Goods

1. Does your company have individuals that drive as a regular part of their job?
Yes.
 - a. If so, how do you differentiate those whose ability to drive is an actual requirement of the job?
They are the individuals who are registered with the Company Vehicle Program – mostly Sales Associates.
 2. Do you run checks on the driving histories of those individuals in driving jobs at the time of hire?
Yes, when they are assigned the Company vehicle.
 3. Do you run periodic checks on those same employees post-hire?
Yes.
 - a. If so, how often?
Annually
-

Anonymous

We have positions in the mailroom that require employees to drive box trucks. When they interview, they actually drive the truck with the hiring manager in the passenger seat for observation. They are required to have a license, and typically the applicants have driving experience in past positions, which is listed as a preferred qualification. However, there are no driving record checks, or follow-up checks in regard to their license being validated.

Paper and Allied Products

1. Does your company have individuals that drive as a regular part of their job?
Yes.
 - a. If so, how do you differentiate those whose ability to drive is an actual requirement of the job?
We look to the essential functions of the job. If the incumbent must drive to perform an essential function of the job we would consider a valid driver's license and good driving record a position requirement.
2. Do you run checks on the driving histories of those individuals in driving jobs at the time of hire?
Yes.

DRIVERS' CHECKS INQUIRY – 6/15/2011

3. Do you run periodic checks on those same employees post-hire?
No, but we've been discussing this, and need to implement a periodic post-hire check. We're not yet sure what the right timeline will be.

Chemicals and Allied Products

1. Does your company have individuals that drive as a regular part of their job?
There are some that will drive as part of their job.
 - a. If so, how do you differentiate those whose ability to drive is an actual requirement of the job?
We don't at this time.
2. Do you run checks on the driving histories of those individuals in driving jobs at the time of hire?
We do not run specific checks but if something comes up in the background check that says an individual may have a suspended license then we check to see if job requires driving.
3. Do you run periodic checks on those same employees post-hire?
No

Electric, Gas and Sanitary Services

1. Does your company have individuals that drive as a regular part of their job?
Yes
 - a. If so, how do you differentiate those whose ability to drive is an actual requirement of the job?
It is noted on the job description.
2. Do you run checks on the driving histories of those individuals in driving jobs at the time of hire?
Yes, it is part of the background check for drivers.
3. Do you run periodic checks on those same employees post-hire? If so, how often?
Yes, annually to ensure that the employee continues to meet requirements.

Service Station

DRIVERS' CHECKS INQUIRY – 6/15/2011

1. Does your company have individuals that drive as a regular part of their job?
Yes - AOM/DOM, Transpiration Drivers, Maintenance Techs and others supporting departments (engineering, safety, environmental, training, etc.) AMM, DMM.
 - a. If so, how do you differentiate those whose ability to drive is an actual requirement of the job?
Job posting.
 2. Do you run checks on the driving histories of those individuals in driving jobs at the time of hire?
Annual checks are made for drivers permitted to use company vehicles
 3. Do you run periodic checks on those same employees post-hire?
Yes.
 - a. If so, how often?
Annually and as part of background check upon new hire
-

Tobacco Products

1. Does your company have individuals that drive as a regular part of their job?
We do. We have Trade and skill positions that require employees to operate company provided vehicles
 - a. If so, how do you differentiate those whose ability to drive is an actual requirement of the job?
 - *Sales are assigned vehicles for both work and personal use.*
 - *Skill positions use vehicles (operations) equipped with tools, capable of hauling cargo or designated for between facility transportation.*
 2. Do you run checks on the driving histories of those individuals in driving jobs at the time of hire?
Yes. We have set criteria a candidate must meet to be considered for employment. We review their Motor Vehicle Records and take convictions for driving offenses into consideration.
 3. Do you run periodic checks on those same employees post-hire? If so, how often?
We perform annual MVR's in the first qtr. annually and a second MVR on drivers we identify as high risk in the third qtr.
-

DUI POLICIES INQUIRY – 6/17/2010

If your company has positions that require a regular driver's license or a commercial driver's license to perform the functions of the job, what is your policy for such an employee if he or she gets a DUI?

Engineering and Management Services

An individual arrested or charged with a crime must notify the supervisor within five days or before returning to work, whichever comes first. The consequences of a DUI depends on the employee's position in the organization. Certain licensed positions (i.e. RN's) require that they notify their licensing board of a DUI or other arrests. If their license incurs restrictions (i.e. can't distribute meds) it could impact their employment. If it's an admin assistant with a DUI, the review may result in no action being taken. However, if that admin is charged with a felony or a violent assault, it may impact their employment. Particularly if they're supporting an area where we provide patient care. In all cases, HR is to be involved.

Service Station

We do not have a formal policy.

Electric, Gas and Sanitary Services

We have somewhat different policies in each regional operation and currently working on a standardized, company-wide policy. For now, when an employee is arrested for a DUI, he/she is placed in a non-driving/non-safety sensitive position until the trial date. Once convicted, the employee is terminated. On the other hand, if an employee receives a DUI while on the job, that results in immediate termination. This is pretty much what we are pushing for as a company-wide policy.

Anonymous

For certain safety sensitive positions and all Security Drivers (chauffeurs of senior executives), a DUI at any time prior to or during employment normally will result in that person being ineligible for that position.

DRUG/ALCOHOL TESTING INQUIRY – 7/9/13

Does your company terminate an employee upon failing a drug and/or alcohol test on the first offense, or are rehab and a second chance offered?

Other Nonhazardous Waste Treatment and Disposal

Depending on their job responsibilities, but mostly the first offense is a basis for an automatic termination.

Ball and Roller Bearing Manufacturing

Rehab and a second chance are offered.

Engineering Services

If a drug and/or alcohol test is given post accident or as part of a random DOT test requirement or as a result of reasonable suspicion, the employee would be terminated immediately.

Anonymous

Our policy varies according to state law. In most areas of the country, if an employee tests positive on a random or reasonable suspicion test, as long as the employee has been with the company two years, the employee is offered a last chance agreement. If the employee has not been with the company for two years his/her employment is terminated. One exception we have made is for states that have medical marijuana statutes. In those states, if an employee tests positive for marijuana and has a medical marijuana card the employee is offered a last chance agreement regardless of their length of service as a reasonable accommodation.

Sanitary Paper Product Manufacturing

Ordinarily, we would offer a Last Chance Agreement with a component for EAP/rehab requirement. Criminal activity related to drug use would be a terminable offense.

Anonymous

We will look at the situation and determine if we terminate or do rehab. But typically if drug related it is termination and alcohol may be where we offer rehab.

Petroleum Refineries

Terminate on first offense, in the absence of specific extenuating circumstances (i.e., valid prescription for semi-synthetic opiates). Rehab offered to employees who voluntarily request assistance (prior to an A&D policy violation).

Meat and Meat Product Merchant Wholesalers

We have some facilities that have random testing and some (only Minnesota) that we have to provide rehab and a second chance. If rehab and a second chance are not required by law we typically terminate.

All Other Miscellaneous Electrical Equipment and Component Manufacturing

We usually offer rehab/second chance. But regulatory requirements/safety concerns are considered, too.

Industrial and Personal Service Paper Merchant Wholesalers

We have a zero tolerance policy.

All Other Miscellaneous Food Manufacturing

It is our policy to terminate for a failed screen, essentially a no tolerance policy. We ask employees to come to us with their drug and alcohol problems, in advance, to seek assistance. Because of this position, if we should screen an employee, whether it be for a random DOT screen or a post-incident screen, and we find drugs or alcohol, then the employee is terminated.

Drugs and Druggists' Sundries Merchant Wholesalers

Our policy requires termination on a first offense, unless the employee is in a state (like Minnesota) where rehab and a second chance are required.

DRUG TESTING INQUIRY – 9/29/11

Wholesale Trade-Nondurable Goods

1. Does your organization require new hires to pass a drug test as part of your employment screening process?
Yes.
 2. If so, do you have a prescribed timeframe/window within which the drug test must be taken (e.g., within 3/5/7 days post-offer acceptance)?
Yes.
 3. If so, what is that timeframe and do you make exceptions?
We require they go within 48 hours of receiving the paperwork and we do not make exceptions (at least that I know about!)
 4. Does your organization require new hires to pass a background check as part of your employment screening process?
Yes.
 5. If so, how long are the results valid? (For example, must the background check and/or drug test results have been generated within 90/120/?? days of the new hire's start date?)
The background check and drug screen are done as a condition of initial employment – we don't require them to submit to these checks again if they move to another position within the company. If they leave and come back, they must have had a check (drug screen and background) within the previous 6 months or they have to be re-done. We also have certain positions that are considered "compliance critical" for which we run annual background checks.
-

Electric, Gas & Sanitary Services

1. Does your organization require new hires to pass a drug test as part of your employment screening process?
Yes.
2. If so, do you have a prescribed timeframe/window within which the drug test must be taken (e.g., within 3/5/7 days post-offer acceptance)?
Yes.

DRUG TESTING INQUIRY – 9/29/11

3. If so, what is that timeframe and do you make exceptions?
3 days and no exceptions
 4. Does your organization require new hires to pass a background check as part of your employment screening process?
Yes.
 5. If so, how long are the results valid? (For example, must the background check and/or drug test results have been generated within 90/120/?? days of the new hire's start date?)
That is an interesting aspect we have not dealt with. We hold off new hires from starting until both results come back clean, so mostly the results are up to date. The only scenario I can think of where this would be a concern is a rehire of an employee who might have been with us a very short time (less than a year) before resigning and now we are bringing the person back. I believe in such a situation, we will run another drug test and only verify the most recent history (since the last background check date) regarding background.
-

Insurance Carrier

1. Does your organization require new hires to pass a drug test as part of your employment screening process?
Yes
 2. If so, do you have a prescribed timeframe/window within which the drug test must be taken (e.g., within 3/5/7 days post-offer acceptance)?
Yes
 3. If so, what is that timeframe and do you make exceptions?
48 hours and yes we make exceptions as candidates may be traveling
 4. Does your organization require new hires to pass a background check as part of your employment screening process?
Yes
 5. If so, how long are the results valid? (For example, must the background check and/or drug test results have been generated within 90/120/?? days of the new hire's start date?)
6 months
-

DRUG TESTING INQUIRY – 9/29/11

Depository Institution

1. Does your organization require new hires to pass a drug test as part of your employment screening process?
Yes
 2. If so, do you have a prescribed timeframe/window within which the drug test must be taken (eg, within 3/5/7 days post-offer acceptance)?
Yes
 3. If so, what is that timeframe and do you make exceptions?
48 hours with no exceptions
 4. Does your organization require new hires to pass a background check as part of your employment screening process?
Yes
 5. If so, how long are the results valid? (For example, must the background check and/or drug test results have been generated within 90/120/?? days of the new hire's start date?)
45 days
-

Electric, Gas & Sanitary Services

1. Does your organization require new hires to pass a drug test as part of your employment screening process?
Yes
2. If so, do you have a prescribed timeframe/window within which the drug test must be taken (eg, within 3/5/7 days post-offer acceptance)?
Although we set no prescribed timeframe to take the drug test we expect this to be done within a week; if not done within a week we call and require that it happens immediately.
3. If so, what is that timeframe and do you make exceptions?
Only if there are exceptional circumstances.
4. Does your organization require new hires to pass a background check as part of your employment screening process?
Yes
5. If so, how long are the results valid? (For example, must the background check and/or drug test results have been generated within 90/120/?? days of the new hire's start date?)

DRUG TESTING INQUIRY – 9/29/11

We conduct background checks within 90 days of the start date.

Insurance Carrier

1. Does your organization require new hires to pass a drug test as part of your employment screening process?
Yes
 2. If so, do you have a prescribed timeframe/window within which the drug test must be taken (eg, within 3/5/7 days post-offer acceptance)?
Within 5 business days after offer is accepted
 3. If so, what is that timeframe and do you make exceptions?
We make exceptions in situations not the fault of the applicant- example out of country so cannot test right away or if there was an issue on the vendor side that could not be controlled such as getting appropriate remote site information to candidate.
 4. Does your organization require new hires to pass a background check as part of your employment screening process?
Yes
 5. If so, how long are the results valid? (For example, must the background check and/or drug test results have been generated within 90/120/?? days of the new hire's start date?)
90 days before hire
-

Paper and Allied Products

1. Does your organization require new hires to pass a drug test as part of your employment screening process?
Yes
2. If so, do you have a prescribed timeframe/window within which the drug test must be taken (eg, within 3/5/7 days post-offer acceptance)?
This time frame is set location by location, but cannot exceed 48 hours. Most of our locations use a 24 hour time frame
3. If so, what is that timeframe and do you make exceptions?
We do not allow exceptions. Even if the candidate wants to consider the offer, we tell him/her that the drug screen must be done based on the time of the offer, not the time of the acceptance.

DRUG TESTING INQUIRY – 9/29/11

4. Does your organization require new hires to pass a background check as part of your employment screening process?

Yes

5. If so, how long are the results valid? (For example, must the background check and/or drug test results have been generated within 90/120/?? days of the new hire's start date?)

We have not addressed this issue.

MEDICAL MARIJUANA SCREENING INQUIRY – 8/4/10

We have a member who would like to know how other companies are handling employees who come up positive in a drug screening, but it is because they are taking marijuana for medical purposes in a state where such is legal. Are you handling these differently or the same as other positive drug screens that are not because of legal medical marijuana?

Food and Kindred Products

We treat it as any other positive drug test. Particularly in our manufacturing facilities employees are around heavy equipment, forklifts, etc. We can't have the added risk.

Electric and Gas Services

Employees are terminated if there is a positive drug test result. There is no exclusion for the medical use of marijuana.

Anonymous

Like other drugs, employees cannot work under the influence of marijuana, even if for approved medical use. If the employee tests positive, he is not subject to dismissal, but will need to work with our medical dept to determine the medical reason for use, will be offered STD until the condition is treated and until the use of medical marijuana is no longer indicated. I'm not aware of a case here where the employee's STD ran out and he still needed to take it.

Depository Institutions

We handle these positive screens the same as all positive screens, regardless if the use is state approved.

Anonymous

Our position continues to be that drug tests that are positive for marijuana (or the metabolites thereof) at or above our testing levels continue to be labeled MRO (Medical

MEDICAL MARIJUANA SCREENING INQUIRY – 8/4/10

Review Officer) positive in accordance with our existing protocol and therefore continue to be classified as an A&D policy violation.

Wholesale Trade-Nondurable Goods

Because we are subject to the requirements of the federal Drug Free Workplace law, and also because we are heavily regulated by the DEA, we continue to take the position that regardless of whether the marijuana use is OK in a state because of medical marijuana laws, if an employee tests positive for marijuana, his/her employment will be terminated.

POST-ACCIDENT DRUG/ALCOHOL TESTING – 3/6/13

Does your company conduct post-accident drug and/or alcohol testing?

-- If so, is the testing required to be conducted within a certain time period after the accident?

-- What is that time period?

Drugs and Druggists' Sundries Merchant Wholesalers

Yes. If an accident occurs our policy dictates an associate must go immediately and have the testing conducted.

Other Gasoline Stations

We did conduct post-accident drug testing when we had refining but I do not know the particulars.

Line-Haul Railroads

Yes, testing is administered within 8 hours of the accident.

Softwood Veneer and Plywood Manufacturing

Yes, however it's a decision made at the location level; it's not mandated by the company. The timeframe is within 24 hrs.

Petroleum Refineries

Yes, as soon as possible within 24 hours of the incident. Testing beyond 24 hours possible, with special review.

Ball and Roller Bearing Manufacturing

Based upon the type of accident a post accident drug/alcohol test may be required. Time of the testing depends on the location and the availability of medical personnel to conduct the screening. At locations where we have medical personnel available around the clock, this test would occur within 30 minutes. In other locations where medical personnel availability is more limited, it may take several hours.

General Line Grocery Merchant Wholesalers

Yes, (Company) conducts post-accident drug screens. We use DOT guidance on BAC and controlled substance testing.

Aluminum Sheet, Plate, and Foil Manufacturing

Yes, both drug and alcohol testing. Conducted within certain period of time after the accident not specified at corporate level, just “as soon as possible”.

PRE-EMPLOYMENT DRUG TESTING INQUIRY – 8/10/2011

- 1) *Does your company currently do pre-employment drug testing?*
- 2) *If you do not, did you in the past, but decide to eliminate it for budgetary reasons?*
- 3) *If yes to #2, in retrospect was that a good decision?*

Paper and Allied Products

We continue to do pre-employment drug screening for all positions at all locations.

Printing and Postage

Yes, we do pre-employment drug testing.

Trucking and Warehousing (Agriculture)

Yes, we conduct pre-employment drug testing.

Insurance Carrier

We conduct pre-employment drug testing for all positions within the company - except our Financial Service Reps.

Wholesale Trade-Nondurable Goods

Our company does pre-employment drug testing for all positions in the company. We also conduct random testing in states where it is allowed and reasonable suspicion drug testing.

Non-Depository Institution

We do pre-employment drug testing for all in the U.S.

PRE-EMPLOYMENT DRUG TESTING INQUIRY – 8/10/2011

Sanitary Services

- 1) Does your company currently do pre-employment drug testing? *Yes*
 - 2) If you do not, did you in the past, but decide to eliminate it for budgetary reasons?
N/A
 - 3) If yes to #2, in retrospect was that a good decision?
N/A. As we have many DOT regulated drivers, it is not possible for us to operate without doing a drug test prior to employment. Even for all non-DOT regulated positions, it is an absolutely required step for employment. I don't see any changes in the company's position with this requirement in the near future.
-

Insurance Carrier

We do conduct pre-employment drug testing.

Wholesale Trade-Nondurable Goods

We conduct pre-employment drug and alcohol tests.

Industrial Machinery & Equipment

Yes, our company currently does pre-employment drug testing. The test is conducted pre-employment post offer. So we make our offers contingent upon passing a drug screen and a background check.

Food and Kindred Products

We do pre-employment drug testing on all offered candidates for all positions. I cannot imagine that we would ever make a decision to eliminate this practice. We also require temporary staffing agencies to drug screen prospective temporaries, using our provider and following our protocol (of course we pay for this screening.)

PRE-EMPLOYMENT DRUG TESTING INQUIRY – 8/10/2011

Wholesale Trade-Nondurable Goods (Food)

Yes, we do pre-employment drug testing via a third party vendor.

Food and Kindred Products

We conduct pre-employment drug testing for all positions.

Transportation Equipment

We conduct pre-employment drug testing for all positions.

Instruments and Related Products

Yes, we currently do pre-employment drug testing, especially given our industry.

Petroleum and Coal Products

We conduct pre-employment drug testing for all positions.

Rubber and Misc. Plastics Products

We also conduct pre-employment drug testing for all positions.

Instruments and Related Products

We also conduct pre-employment drug testing for all positions.

PRE-EMPLOYMENT DRUG TESTING INQUIRY – 8/10/2011

Depository Institution

We do pre-employment drug testing for all applicants where state law allows.

Transportation Equipment

We also conduct pre-employment screens for all positions.

RECREATIONAL MARIJUANA POLICIES INQUIRY – 1/27/14

1. *Has your company changed its drug-free workplace policy in light of the new recreational marijuana laws in Colorado and Washington?*
 2. *If so, in what way have you changed it?*
 3. *Have you sent any communications out to your employees regarding the changes in the law in Colorado and Washington?*
 4. *If so, what was the communication?*
-

Ball and Roller Bearing Manufacturing

1. Has your company changed its drug-free workplace policy in light of the new recreational marijuana laws in Colorado and Washington? No
 2. If so, in what way have you changed it?
 3. Have you sent any communications out to your employees regarding the changes in the law in Colorado and Washington? No
 4. If so, what was the communication?
-

Medical Laboratories

We are not changing our policy.

Drugs and Druggists' Sundries Merchant Wholesalers

1. Has your company changed its drug-free workplace policy in light of the new recreational marijuana laws in Colorado and Washington? No, we have not made any changes.
2. If so, in what way have you changed it? N/A
3. Have you sent any communications out to your employees regarding the changes in the law in Colorado and Washington? We have not sent a broad communication; we have been responding to questions one-off as they come up.

RECREATIONAL MARIJUANA POLICIES INQUIRY – 1/27/14

We would probably consider a broader communication, however, if the questions become more numerous/frequent.

4. If so, what was the communication? We have been telling associates who ask that our Federal Drug Free Workplace Policy still governs, and that any positive test for marijuana will result in discipline up to and including termination under the terms of our Policy.

Anonymous

1. Has your company changed its drug-free workplace policy in light of the new recreational marijuana laws in Colorado and Washington? No
2. If so, in what way have you changed it?
3. Have you sent any communications out to your employees regarding the changes in the law in Colorado and Washington? Yes
4. If so, what was the communication? We posted an announcement on our weekly newsletter to the entire corporation - "Notice Regarding New State Laws Legalizing Recreational Marijuana Use: Marijuana remains an illegal substance under federal law. We will continue to enforce its Substance Abuse and Substance Free Workplace Policies in accordance with federal law."

Biological Product (except Diagnostic) Manufacturing

No, we have not changed our policy yet, due to the new laws.

Savings Institutions

1. Has your company changed its drug-free workplace policy in light of the new recreational marijuana laws in Colorado and Washington? No – since marijuana is still illegal under federal law, and (Company) has chosen to operate and maintain a drug-free workplace in all of our locations, including Colorado, we have not changed our policy.
2. If so, in what way have you changed it? N/A

RECREATIONAL MARIJUANA POLICIES INQUIRY – 1/27/14

3. Have you sent any communications out to your employees regarding the changes in the law in Colorado and Washington? No – since we did not change our policy or position on this matter, we decided a communication is not necessary.
4. If so, what was the communication? N/A

Anonymous

1. Has your company changed its drug-free workplace policy in light of the new recreational marijuana laws in Colorado and Washington? No
 2. If so, in what way have you changed it?
 3. Have you sent any communications out to your employees regarding the changes in the law in Colorado and Washington?
 4. If so, what was the communication?
-

ELECTRONIC EMPLOYEE FILES INQUIRY – 12/2/14

1. *Does your company have electronic employee files?*
 - a. *If so, what vendor do you use?*
 2. *Does your HRIS system allow for electronic onboarding?*
 - a. *If so, what system do you use?*
 3. *Do you utilize electronic signatures?*
 4. *Can we contact you regarding your experience?*
-

Wholesale Trade Industry

1. Yes.
 - a. We engaged Iron Mountain to build out a digital recording center for imaging (DRCi).
 2. Yes.
 - a. Workday
 3. Yes.
 4. Yes.
-

Manufacturing Industry

1. Most files are electronic and some are still hard copy.
 - a. OnBase
 2. Yes.
 - a. SuccessFactors
 3. We will start utilizing next year.
 4. Yes.
-

Healthcare and Social Assistance Industry

1. Yes.
 - a. Oracle/People Soft

2. Yes.
 - a. Oracle/Taleo
 3. Yes.
 4. Yes.
-

Manufacturing Industry

1. No.
 2. Yes.
 - a. ADP-Salute. We will have to change to ADP-Recruiting Manager because they are no longer supporting their Salute program.
 3. Yes.
-

Riverside Research

1. Yes.
 - a. Transitioning - we use cyber Recruiter, sage/abra and teens for storage.
 2. Not 100%.
 3. No.
 4. Process is not recommended. We are converting to James next year.
-

Healthcare and Social Assistance Industry

1. Yes.
 - a. We house our associate files on WellPoint Content Framework. It is an Internal Database.
2. We do share a new hire information form through a Taleo onboarding tool, pre-hire. Associates utilize Employee Self Service through PeopleSoft to update their personal records but it is not an Onboarding Tool, it is simply our HRIS.
 - a. PeopleSoft
3. We are currently working on e-signatures for the offer confirmation letter but at this time new hires print their offer letter, sign it and bring it with them on their first day of work. On the HRIS side, for Direct Deposit, W-2s, and other Employee Self Service transactions the username serves as electronic signature.

Healthcare and Social Assistance Industry

1. Yes.
 - a. IBM FileNet
 2. No.
 - a. N/A.
 3. Yes.
 4. Yes.
-

Manufacturing Industry

1. Yes.
 - a. We develop our own HRIS systems.
 2. Yes.
 3. Yes.
-

Caterpillar

1. Yes, for U.S. based employees.
 - a. Perceptive Hardware, SW is ImageNow.
 2. No.
-

Kinder Morgan

1. Yes.
 - a. We use FileNet to house our employee files.
 2. Yes.
 - a. Lawson
 3. Yes. Our company's employment application has an electronic signature online.
 4. Yes.
-

Transportation and Warehousing Industry

1. Yes.
 - a. Iron Mountain
 2. No.
 - a. We are moving to an Oracle based product in 2015, today we use Oracle alerts to hiring managers and check lists.
 3. Yes.
 4. Yes.
-

Manufacturing Industry

1. Our personnel files are not electronic, but we do have a large amount of business documentation stored electronically.
 - a. OnBase.
 2. I believe so, yes.
 - a. SuccessFactors
 3. We have used the LMS portion of our HRIS for electronic acknowledgements (for handbooks and other policies).
 4. Sure.
-

Finance and Insurance Industry

1. Yes.
 - a. No vendor, in-house IT resources.
 2. Yes
 - a. No vendor, in-house IT resources created a HR portal for new hire onboarding.
 3. Yes.
 4. Yes.
-

Anonymous

1. Yes, hybrid of sorts.
 - a. In-house custom build.

2. Somewhat.
 - a. Now shopping for a new tool/vendor for hopefully 2016 implementation.
 3. Yes.
-

Information Industry

1. Yes.
 - a. KnowledgeLake
2. Yes.
 - a. We use RedCarpet (SilkRoad Onboarding).
3. Yes.

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 - a. We use RedCarpet (SilkRoad Onboarding).
3. Yes.

EMPLOYEE DEMOGRAPHIC STATISTICS INQUIRY – 11/18/14

1. *Do you release employee demographic statistics to the public?*
 2. *If no, are you considering doing so?*
 3. *If yes, what do you release (e.g., race, sex, age, etc.), for whom (e.g., all employees, US only, Sr. Management only, etc.), and how/where (e.g., Annual Report, press release, Sustainability Report, etc.)?*
-

Companies that do not disclose and are not considering it:

Finance and Insurance Industry
Mining Industry
Transportation and Warehousing
Manufacturing (5)
Utilities Industry
Finance and Insurance Industry
Professional and Scientific and Technical Services (2)

Manufacturing

Historically, our company has been pretty open with its demographic data and has done so publically for many years. In fact, our demographic data is currently displayed on our website and has been since at least the year 2001. [For further information/links to this information, please contact Judy Lampley directly: jlampley@eeac.org]

Wholesale Trade Industry

We release it only for surveys we complete and it's generic in nature so as not to identify anyone. For example, if we apply to Working Mother's Best Places to Work survey, they ask how many female and male X level managers, employees, etc. do you have.

Healthcare and Social Assistance Industry

Our company does not currently release these statistics but we are considering it as part of our envisioned Multicultural Competence & Inclusion (MCI) Connectivity Council practice. These councils are intended to regularly engage the communities we serve with information on 1) the things we are working on to achieve and maintain equity in outcomes for patient care and service and employee engagement and opportunity; and 2) how well we are doing in this work and how they can be a part of the process to improve. Community members would make up a small percentage of these council

members and would be encouraged to share what they learn broadly with others in the community. This concept is still in the development stage but, we hope to be fully operation in 2015.

Information Industry

We do not generally release employee demographic information to the public. We have provided consolidated EEO-1 data to Diversity Inc. Otherwise we only provide very specific diversity data for some surveys.

We don't post demographic data to our company website, annual report or otherwise make it available to the public.

Administrative/Support and Waste Management/Remediation Services Industry

Yes. We include general demographics, including race, gender, generation (veterans, X-ers, etc.) for all US employees and a high level summary of executives/board members in our Sustainability Report.

Utilities Industry

Yes, we have been publishing for 5 years now. Essentially the consolidated EEO-1. Race and gender by EEO-1 category. In the corporate responsibility and sustainability report. Available online.

Professional and Scientific and Technical Services

We release some information -- percent of women and minorities in domestic operations as part of our sustainability report.

EMPLOYEE HANDBOOKS INQUIRY – 1/18/11

Printing & Postage

1. How are companies handling/distributing their associate handbooks?
Just on the intranet
 2. Are the handbooks strictly on the company's "Intranet" or are companies still using paper copies?
Yes
 3. Do companies have a handbook for their corporate associates and another for field?
May have different policies handbooks based on line of business but each is applies to all employees within that district
 4. Or is there one handbook with a section for "local" policies?
No
-

Paper and Allied Products

1. How are companies handling/distributing their associate handbooks?
We distribute handbooks through our Corporate HR Generalists who notify field HR staff when updates are made that need to be distributed.
 2. Are the handbooks strictly on the company's "Intranet" or are companies still using paper copies?
Our field employees receive paper handbooks, and Corporate employees have electronic access (but can request a paper copy if they want one).
 3. Do companies have a handbook for their corporate associates and another for field?
We have several separate handbooks for instance: Corporate exempt, Corporate non-exempt, Production exempt, production non-exempt.
 4. Or is there one handbook with a section for "local" policies?
We handle local issues through different versions of the handbook (for instance, our California locations have their own exempt and non-exempt handbooks).
-

EMPLOYEE RELATIONS INQUIRY – 1/15/13

We have the following questions from an EEAC member concerning how companies handle and manage "employee relations."

Drugs and Druggists' Sundries Merchant Wholesalers

- (1) Is employee relations in your company within HR, Legal, or a combination?
Primarily HR with advice from Legal
 - (2) Is it included as part of another position (HR Business Partnering, HR Managers/Generalists, EEO, employment counsel etc.)? HR Managers/Generalists
 - (3) Is employee relations at your organization centralized or decentralized? Currently decentralized but we are moving to a shared services model
 - (4) To whom (position title) does this position report - Manager, Director, Vice President?
HR Managers/Generalists report to HR Directors or HR VPs
 - (5) Does employee relations at your organization include EEO responsibilities and/or affirmative action responsibilities? Includes responsibilities related to both.
 - (6) What type of education and experience is required for employee relations at your company? Bachelors degree along with several years experience in most cases
-

Other Heavy and Civil Engineering Construction

- (1) Is employee relations in your company within HR, Legal, or a combination? HR (we call Talent Management) TM
- (2) Is it included as part of another position (HR Business Partnering, HR Managers/Generalists, EEO, employment counsel etc.)? Corporate TM Dept. providing ER/EEO/Diversity support across Business Units. We are consultants to the businesses. Business units may have HR mgr working ER matters but not sole responsibility. We work closely with in house counsel.
- (3) Is employee relations at your organization centralized or decentralized? See #2
- (4) To whom (position title) does this position report - Manager, Director, Vice President?
VP
- (5) Does employee relations at your organization include EEO responsibilities and/or affirmative action responsibilities? YES

(6) What type of education and experience is required for employee relations at your company? Our ER team is seasoned professionals with more than 20 years a piece working in HR/TM and concentrating in ER/EO/Diversity. Graduate schools, SHRM PHR, MBA, and Cornell ILG course work completion.

Line-Haul Railroads

(1) Is employee relations in your company within HR, Legal, or a combination? HR

(2) Is it included as part of another position (HR Business Partnering, HR Managers/Generalists, EEO, employment counsel etc.)?

(3) Is employee relations at your organization centralized or decentralized? Decentralized

(4) To whom (position title) does this position report - Manager, Director, Vice President? We have HR Managers and HR Directors handling employee relations.

(5) Does employee relations at your organization include EEO responsibilities and/or affirmative action responsibilities? Yes

(6) What type of education and experience is required for employee relations at your company? Bachelors and two to three years experience.

Aircraft artillery manufacturing

(1) Is employee relations in your company within HR, Legal, or a combination? It's in HR

(2) Is it included as part of another position (HR Business Partnering, HR Managers/Generalists, EEO, employment counsel etc.)? We have a Shared Services structure where the embedded HRBPs are primarily responsible for employee relations in the businesses.

(3) Is employee relations at your organization centralized or decentralized? Decentralized

(4) To whom (position title) does this position report - Manager, Director, Vice President? Director

(5) Does employee relations at your organization include EEO responsibilities and/or affirmative action responsibilities? EEO/AAP responsibilities are shared between the HRBPs in the business and Shared Services Center of Excellence (AAPs are written centrally, and some OFCCP audit support is centralized)

(6) What type of education and experience is required for employee relations at your company? Senior HRBPs must have proper mix of Bachelors, Masters and/or 10-15 years experience with preferred experience resolving internal and external ER issues.

Medical Laboratories

(1) Is employee relations in your company within HR, Legal, or a combination? HR

(2) Is it included as part of another position (HR Business Partnering, HR Managers/Generalists, EEO, employment counsel etc.)? No, it is an individual function: Employee Relations Manager.

(3) Is employee relations at your organization centralized or decentralized? Centralized

(4) To whom (position title) does this position report - Manager, Director, Vice President? Employee Relations Manager reports to Director and Director reports to VP Employee/Labor Relations

(5) Does employee relations at your organization include EEO responsibilities and/or affirmative action responsibilities? No

(6) What type of education and experience is required for employee relations at your company? College. Prefer some HR experience and/or Management experience (i.e., business partner, recruiter, etc.)

Ball and Roller Bearings

(1) Is employee relations in your company within HR, Legal, or a combination? Within HR but works closely with legal

(2) Is it included as part of another position (HR Business Partnering, HR Managers/Generalists, EEO, employment counsel etc.)? It is included with EEO responsibilities

(3) Is employee relations at your organization centralized or decentralized? Centralized

(4) To whom (position title) does this position report - Manager, Director, Vice President? Director

(5) Does employee relations at your organization include EEO responsibilities and/or affirmative action responsibilities? Yes

(6) What type of education and experience is required for employee relations at your company? Historically, this position has been filled with individuals who have a legal background and/or experience with the EEO compliance.

Anonymous

(1) Is employee relations in your company within HR, Legal, or a combination? HR

(2) Is it included as part of another position (HR Business Partnering, HR Managers/Generalists, EEO, employment counsel etc.)? It is part of the HR Manager/Generalist role

(3) Is employee relations at your organization centralized or decentralized? Centralized

(4) To whom (position title) does this position report - Manager, Director, Vice President? Staff Vice President

(5) Does employee relations at your organization include EEO responsibilities and/or affirmative action responsibilities? Yes, but we also have dedicated staff

(6) What type of education and experience is required for employee relations at your company? Degree preferred/2 – 4 years entry and 4+ for senior level

Insurance Carriers

(1) Is employee relations in your company within HR, Legal, or a combination? Employee Relations resides within HR with Legal acting in an advisory capacity as needed.

(2) Is it included as part of another position (HR Business Partnering, HR Managers/Generalists, EEO, employment counsel etc.)? Employee Relations within HR resides on the HR Customer Team which is aligned to support specific business units within the organization and is also responsible for organizational design, workforce planning, performance management, job descriptions, and HR policy interpretation. HR Managers and Generalists within this team have accountability for all of the functions described above.

(3) Is employee relations at your organization centralized or decentralized? Employee Relations is centralized within this one team within HR.

(4) To whom (position title) does this position report - Manager, Director, Vice President?

The team responsible for Employee Relations reports to a Manager, Human Resources.

(5) Does employee relations at your organization include EEO responsibilities and/or affirmative action responsibilities?

Our Employee Relations function does not include EEO/Affirmative Action responsibilities.

(6) What type of education and experience is required for employee relations at your company?

We look for experience handling Employee Relations matters upon hire.

Beyond hire, our Legal team conducts regular updates, we have internally conducted specific training on handling investigations and documentation and we have also sent team members to external training opportunities.

EMPLOYEE HANDBOOKS INQUIRY – 1/18/11

Industrial Machinery & Equipment

1. How are companies handling/distributing their associate handbooks?
We use an electronic version which is found on our intranet. Hourly employees who do not have access to the intranet are given hardcopies by their local hr manager and local hr reinforces the policies through regular town hall meetings
 2. Are the handbooks strictly on the company's "Intranet" or are companies still using paper copies?
Both, refer to answer above. We also have the capability to send out a specific policy through the (lotus notes) database and to be able to collect and track electronic signatures.
 3. Do companies have a handbook for their corporate associates and another for field?
We have a corporate handbook which includes the policies that apply across the board. There are subsections for region offices, manufacturing plants, etc. When it comes to hourly employees or site specific information, I have access to edit the corporate and the local policies, but each local hr manager has access to revise only their local policies.
 4. Or is there one handbook with a section for "local" policies?
Each location can only see their policy. Only corporate has access to view all online handbooks.
-

Business Services

1. How are companies handling/distributing their associate handbooks?
see #2
 2. Are the handbooks strictly on the company's "Intranet" or are companies still using paper copies?
Intranet only.
 3. Do companies have a handbook for their corporate associates and another for field?
One version of HR policies but some policies apply to certain employee populations and not others (e.g., executives vs. employees; sales reps vs. non-sales; etc.).
 4. Or is there one handbook with a section for "local" policies?
Where applicable, a policy will include mention of state law differences or, if only applicable to a specific location, an issue may be located on that location's intranet website versus the main HR site.
-

EMPLOYEE HANDBOOKS INQUIRY – 1/18/11

Anonymous

1. How are companies handling/distributing their associate handbooks?
Managed and published on the company intranet. PDF is available for printing.
 2. Are the handbooks strictly on the company's "Intranet" or are companies still using paper copies?
See above.
 3. Do companies have a handbook for their corporate associates and another for field?
Same for all employees. Some policies have wording applicable to different locations.
 4. Or is there one handbook with a section for "local" policies?
See above.
-

Health Services

1. How are companies handling/distributing their associate handbooks?
We do not use handbooks, (Company) employees may reference their collective bargaining agreements (on line), and all employees may reference our HR Website.
 2. Are the handbooks strictly on the company's "Intranet" or are companies still using paper copies?
All policies are on line.
 3. Do companies have a handbook for their corporate associates and another for field?
 4. Or is there one handbook with a section for "local" policies?
When applicable, local policies are maintained on line, but we are trying to maintain national policies with addendums when required by state/ local legislation or internal regional practice.
-

Depository Institution

All of our HR policies are posted on our Intranet. No paper copies exist and handbooks are not used any longer. If a business group has policies specific to their business unit, these policies are posted on the business unit's site in the Intranet.

EMPLOYEE HANDBOOKS INQUIRY – 1/18/11

Heavy Construction

Company policies for us are on-line through the company's Intranet. We don't have a separate handbook for employees in the field.

Electric, Gas & Sanitary Services

1. How are companies handling/distributing their associate handbooks?
We use intranet as well as paper copies for our employees. For all field employees, a hard copy is used. Paper copies are shipped to a local HR manager and he/she distributes them to the managers, and then to employees.
 2. Are the handbooks strictly on the company's "Intranet" or are companies still using paper copies?
See #1.
 3. Do companies have a handbook for their corporate associates and another for field?
We have a version for each group (geographical territory. There are 4 in US and one in Canada, and a Corporate version.) They are mostly very similar with minor deviation to reflect state or local requirements. To ensure there are overarching policies and requirements to set a certain standard throughout the Company, we use the Code of Conduct as a company-wide standard.
 4. Or is there one handbook with a section for "local" policies?
See #3.
-

Industrial Machinery & Equipment

1. How are companies handling/distributing their associate handbooks?
Electronic for salaried - hard copy for hourly
2. Are the handbooks strictly on the company's "Intranet" or are companies still using paper copies?
Hard copy for hourly
3. Do companies have a handbook for their corporate associates and another for field?
Yes, different versions, salaried; salaried operatives; hourly; bargaining unit and global.

EMPLOYEE HANDBOOKS INQUIRY – 1/18/11

4. Or is there one handbook with a section for “local” policies?
Handbook very generic - policies are held locally
-

Insurance Carrier

1. How are companies handling/distributing their associate handbooks?
Our employee handbook is online on our intranet. It's actually a two part document with an employee view, which contains the policy, and a manager's view, which contains guidance on the policy. We ask employees to annually acknowledge that they are responsible for content and have had an opportunity to ask questions.
 2. Are the handbooks strictly on the company's “Intranet” or are companies still using paper copies?
See above
 3. Do companies have a handbook for their corporate associates and another for field?
Nothing different for corporate and field employees.
 4. Or is there one handbook with a section for “local” policies?
Not entirely clear on what 'local' policies are, but if that means policies specific to a location/or office, no.
-

Instruments and Related Products

Our company is decentralized so each business can decide. At our headquarters, we only have an online version on the intranet. None are printed and distributed. Each version would be specific to the business unit.

We do have a separate group of corporate policies that apply across our company, then there are local policies specific to the business unit.

Instruments and Related Products

We do not have a handbook and our policies are all in electronic format.

EMPLOYEE HANDBOOKS INQUIRY – 1/18/11

Chemical and Allied Products

1. How are companies handling/distributing their associate handbooks?
We do not have handbooks.
 2. Are the handbooks strictly on the company's "Intranet" or are companies still using paper copies?
Any handbooks/policies are on our intranet. We ask employees not to maintain paper copies for any period of time.
 3. Do companies have a handbook for their corporate associates and another for field?
The corporate handbook/policies on our intranet applies to all employees. The field would have their local policies which should be in line with corporate and they are typically on their local websites/intranet.
 4. Or is there one handbook with a section for "local" policies?
-

Responses to Inquiry re Employee Surveys – June 2009

Wholesale Trade-Nondurable Goods

1. Do you conduct employee engagement surveys? *Yes*
 2. If yes, do you survey all employees (exempt and non-exempt)? *Yes*
 3. Do you use an outside vendor to conduct your survey? If yes, which vendor?
Yes. We used a free survey that was available to us through our membership with the Corporate Leadership Council.
 4. How frequently do you survey employees?
We conducted the survey in April-May 2008. That was first time we had done so.
 5. How are the survey results used?
We identified "themes" from the survey responses, and each location developed action plans to address the areas that could be addressed from the surveys. I also used them to identify "at risk" locations for purposes of union organizing.
 6. How do you report survey findings to employees/management?
We reported the results to management in lead team meetings. Employees received results of survey findings in town hall meetings.
 7. Would you or someone in your organization be willing to discuss your organization's survey practices in more detail? If yes, please provide contact information.
Yes, just let me know and I will put you in contact with the right individuals.
-

Engineering and Management Services

1. Do you conduct employee engagement surveys? *Yes*
2. If yes, do you survey all employees (exempt and non-exempt)?
Yes for the staff satisfaction survey and only a sampling of people for our other surveys (exits, onboarding, recruitment process, etc.)
3. Do you use an outside vendor to conduct your survey? If yes, which vendor?
Our staff satisfaction survey is Sirota Survey Intelligence. Our other surveys are conducted by HR Solutions.
4. How frequently do you survey employees?
The Staff Satisfaction survey used to be annual, but we're now moving to every two years. The other surveys are on a regular basis - all voluntary exits are given

Responses to Inquiry re Employee Surveys – June 2009

the opportunity to take a survey. Soon we'll be sending out applicant/interviewing/offer surveys to a sampling of candidates and onboarding surveys to a sample set of employees.

5. How are the survey results used?

Managers see the satisfaction survey results for their department compared to all the levels above them up to the entire site results. They are to set 2-3 goals around improvement opportunities. On a broad level, the organization reviews overall survey results and looks for opportunities to address institutional concerns.

6. How do you report survey findings to employees/management?

Overall results are shared with top site leadership first then filtered out to managers and supervisors. After that, managers and supervisors receive their department results. It is up to the manager and supervisor to share those results with their staff. General survey results sessions are available for staff who want to hear about overall results for the business. This overall results package is made available electronically online as well.

7. Would you or someone in your organization be willing to discuss your organization's survey practices in more detail? If yes, please provide contact information.

Possibly - it used to be me, but the last two surveys were conducted by my peer, the Total Rewards Manager.

Depository Institution

1. Do you conduct employee engagement surveys? *Yes.*

2. If yes, do you survey all employees (exempt and non-exempt)? *All employees.*

3. Do you use an outside vendor to conduct your survey? If yes, which vendor?

No, we developed the survey and administer it in-house.

4. How frequently do you survey employees? *Approximately every 18 months*

5. How are the survey results used?

We do trending analyses to determine changes in employee engagement. We also conduct regression analyses to identify the major drivers of engagement. Based on these drivers we develop and implement action plans to address these drivers. We also ascertain the effect action plans based on previous survey results had on improving engagement from the last survey period. We also obtain benchmarking data to compare our results with other companies.

Responses to Inquiry re Employee Surveys – June 2009

6. How do you report survey findings to employees/management?

Executive leadership is presented overall findings and management of each line of business receives their results and findings. Communications are sent to all employees on the corporate results and each line of business communicates their specific results with their employees.

7. Would you or someone in your organization be willing to discuss your organization's survey practices in more detail? If yes, please provide contact information.

Yes, I manage the Employee Engagement Survey Program

EMPLOYEES WHO COMMIT FELONIES INQUIRY – 12/9/14

1. *Do you require employees to report a felony at the time of the charge?*
 2. *If so, and they do not report, how do you handle if/when the charge is discovered through other means?*
 3. *If an employee is charged with a felony do you:*
 - *Terminate them;*
 - *Allow them to continue to work;*
 - *Suspend them with pay and provide benefits pending the outcome of the charge;*
 - *Suspend them without pay and benefits pending the outcome of the charge; or*
 - *Other*
 4. *If an employee is suspended with pay and benefits, how long are they maintained? In some cases, it can take 2+ years to finalize a conviction or acquittal. Do you have a set timeframe to maintain pay and benefits?*
 5. *Does the type of felony charge determine whether the employee is suspended with or without pay, or terminated?*
 6. *If an employee is charged with a felony crime against another person do you handle differently? (I.e. domestic abuse; child abuse or molestation)*
-

Manufacturing Industry

We do not require our employees to disclose felonies. Only our applicants during the application period.

Manufacturing Industry

We do not require an employee to report a felony. Typically if something happened we may get this information as the employee is absent from work for some extended period of time.

Manufacturing Industry

1. Employees are expected to promptly report violations of the law.
2. We would handle on a case-by-case basis.
3. Depends on the situation. All of these options are on the table.

- Terminate them;
- Allow them to continue to work;
- Suspend them with pay and provide benefits pending the outcome of the charge;
- Suspend them without pay and benefits pending the outcome of the charge; or
- Other

4. There is no set time frame.

5. Yes, the type of charge will be considered when we are determining how best to handle it.

Finance and Insurance Industry

1. Do you require employees to report a felony at the time of the charge? Our policy does require employees to disclose, at the time of charge, any crime involving breach of trust/dishonesty or money laundering.

2. If so, and they do not report, how do you handle if/when the charge is discovered through other means? It would depend on the job-relatedness of the charge and how the non-disclosure was discovered (e.g. was there intentional misrepresentation?)

3. If an employee is charged with a felony do you: All of the below depends on the job-relatedness of the charge and their ability to be available for work during the criminal process:

- Terminate them;
- Allow them to continue to work;
- Suspend them with pay and provide benefits pending the outcome of the charge;
- Suspend them without pay and benefits pending the outcome of the charge; or
- Other

4. We do not have a set timeframe if the employee is suspended but we do revisit if the criminal process extends more than 9-12 months.

5. Yes.

6. We do not have a distinction like this noted, from a policy perspective, and typically look more closely at financially motivated crimes given their applicability to most of our positions.

Manufacturing Industry

1. Not explicitly, but we do have a company rule that prohibits any violation of federal, state or local law.

2. If so, and they do not report, how do you handle if/when the charge is discovered through other means? We haven't had this situation occur but would handle these on a case by case basis; with review from our employee/industrial relations and legal teams.

Professional, Scientific and Technical Services

1. We do ask that arrests be reported as many of our employees have security clearances that may or may not be impacted by the arrest.
2. This would be handled on a case-by case basis.
3. Handled on a case-by- case basis.
4. We don't have a set timeframe.
5. No.
6. No.

Wholesale Trade-Nondurable Goods

1. Do you currently use a vendor for your I-9s? *No*
 2. Do you currently use a vendor for E-Verify? *No*
 3. In particular, if you have had any experience with HireRight, Form I-9, Maximus or Talx, would you be willing to talk with another member who is considering these vendors? *n/a*
 4. If you do not use a vendor for either the I-9 completion or E-Verify, have you developed your own electronic system for completing I-9s and using E-Verify? *We have not developed our own electronic system, we still do I9's manually. E-Verify is done within the first three days of hire. Both are done by the HR Manager and/or assistant at each location.*
-

Insurance Carrier

1. Do you currently use a vendor for your I-9s? *Yes*
 2. If so, who? *Lawlogix*
 3. Do you currently use a vendor for E-Verify? *Yes*
 4. If so, who? *Lawlogix*
 5. In particular, if you have had any experience with HireRight, Form I-9, Maximus or Talx, would you be willing to talk with another member who is considering these vendors?
I haven't had any experience with these vendors
-

Industrial machinery & Equipment

Cummins uses LexisNexis for both I-9 & E-Verify.

Responses to BP Inquiry re I-9s – June 2009

Paper and Allied Products

1. Do your new hires complete paper or electronic I-9's?
Currently paper, we're transitioning to electronic completion.
 2. If electronic, do you rely upon a vendor to capture/store the I-9's? Which vendor?
We'll be using ADP through the Virtual Edge Applicant tracking System.
 3. Have you converted historical/paper I-9's (for current employees) into electronic I-9's?
We decided not to convert our paper to the new system due to cost/lack of return on investment.
 4. If so, did you use a particular vendor to assist with the conversion?
N/A
-

Electrical, Gas & Sanitary Services

1. Do your new hires complete paper or electronic I-9's? *Paper*
 2. Have you converted historical/paper I-9's (for current employees) into electronic I-9's?
Form I -9s are scanned and maintained in an electronic file (ELVIS) , Electronic Low Volume Imaging System.
 3. If so, did you use a particular vendor to assist with the conversion?
An in-house system developed to store electronic files.
-

Instruments and Related Products

1. Do your new hires complete paper or electronic I-9's?
We use electronic I-9s.
2. If electronic, do you rely upon a vendor to capture/store the I-9's? Which vendor?
We rely upon a vendor. HireRight.

Responses to BP Inquiry re I-9s – June 2009

3. Have you converted historical/paper I-9's (for current employees) into electronic I-9's?
No to my knowledge. This is actually handled by our Talent Acquisition folks.
 4. If so, did you use a particular vendor to assist with the conversion?
N/A
-

Wholesale Trade-Nondurable Goods

1. Do your new hires complete paper or electronic I-9's? *Paper*
 2. Have you converted historical/paper I-9's (for current employees) into electronic I-9's? *No*
 3. If so, did you use a particular vendor to assist with the conversion? *N/A*
-

Depository Institution

1. Do your new hires complete paper or electronic I-9's?
Paper which is then scanned and stored as an imaged file.
 2. Have you converted historical/paper I-9's (for current employees) into electronic I-9's? *No.*
 3. If so, did you use a particular vendor to assist with the conversion? *N/A*
-

Railroad

1. Do your new hires complete paper or electronic I-9's? *Electronic*
2. If electronic, do you rely upon a vendor to capture/store the I-9's?
Which vendor?
No. Our IT department built a system to capture this data internally.
3. Have you converted historical/paper I-9's (for current employees) into electronic I-9's?
Yes. While the historic I9's are captured as images, we store key data as meta tags for reporting purposes.

Responses to BP Inquiry re I-9s – June 2009

4. If so, did you use a particular vendor to assist with the conversion?
No. Our IT department assisted in the conversion.
-

IMAGE PROGRAM INQUIRY – 7/18/11

We have two questions from an EEAC member regarding the Immigration and Customs Enforcement's (ICS's) IMAGE program, which involves a partnership with ICE whereby the employer voluntarily submits to a full I-9 audit in exchange for I-9 and E-Verify assistance and tips.

1) Has your company been approached individually and in person by ICE and invited to join (in some cases through a hard-sell) the IMAGE program?

2) Does your company participate in IMAGE? And if so, is it as a result of the personal visit from ICE?

Hotel

Yes, we have been approached a number of times, but have declined their invitations and have not felt any repercussions as a result. We do not participate in the program at this time.

Health Services

We have been approached also. We are currently involved in an I9 ICE audit and the auditor has suggested we participate in the IMAGE program. She said she would refer our company name to their ICE IMAGE contact. We responded that we would consider participating, but nothing more.

Food and Kindred Products

We have not been approached and we do not participate in such a program.

Food and Kindred Products

1) Has your company been approached individually and in person by ICE and invited to join (in some cases through a hard-sell) the IMAGE program? Yes on both.

2) Does your company participate in IMAGE? And if so, is it as a result of the personal visit from ICE? Yes on both.

IMAGE PROGRAM INQUIRY – 7/18/11

Instruments and Related Products

We were part of a voluntary initial pilot program (don't recall a hard - sell) and continue to use them.

ANONYMOUS COMPLAINTS INQUIRY – 3/15/12

We have an EEAC member who would like to find out how other companies handle anonymous complaints of discrimination, harassment, and/or retaliation. The question is do you require the person to identify themselves for these types of allegations or do you go with the information provided anonymously?

Electric, Gas and Sanitary Services

If the allegation is specific to him/herself, we post messages out to ask for a permission to proceed, as their identity will be revealed if we pursue. If a reporting is described about a third person experience with that third person's identity known, we proceed with investigation.

Industrial Machinery & Equipment

We do not require that the person identifies themselves. The person filing the complaint can remain anonymous through the ethics hot line.

Industrial Machinery & Equipment

We go with what is provided.

Anonymous

This really depends! It's always been a challenge. However, our best effort is to make contact with the location management and get a sense from them if there is something or a rumor or gossip about. Often, we will have those folks take the time to reaffirm the company policy and position as well as their own regarding what is and isn't appropriate workplace behavior. If it's a location we've had rumblings from previously, we will recommend a member of the ER Corporate team visit the site to offer our in person proactive class room harassment sensitivity education program. On the flip, since we do have the toll free help line if there is a message left that's so vague and difficult to pin point a location or working group it may be impossible to do anything.

ANONYMOUS COMPLAINTS INQUIRY – 3/15/12

Health Services

We investigate the anonymous to the best of our ability.

Non-Depository Institution

First, we tell our Ees that they may report anonymously or not. If they do report something anonymously, we will encourage (but not force) them to identify themselves, explaining that it is easier for us to do a more appropriate investigation if they do.

If they still want to remain anonymous, we ask them to provide as much detail about their complaint (including the names of the people involved in the issue in any way, including witnesses) so that we can do a more thorough investigation.

If we get no names, little detail, we still investigate to the extent we can and document what was alleged and found.

Business Services

Anonymous complaints are handled through an ethics hotline (800#). We do not require the person to identify themselves.

Paper and Allied Products

We investigate what we can on the anonymous information we receive.

Rubber & Misc. Plastics Products

We don't require people to identify themselves

Food Products

We have a compliance line that fields calls and records names. The complaint is investigated with names released only to those involved with the investigation. If a

ANONYMOUS COMPLAINTS INQUIRY – 3/15/12

complaint came to HR we would require a name as well, again with names released only to those involved in the investigation.

Instruments and Related Products

We typically contact the person filing the complaint to refine their allegations, but we're not able to do much if they prefer to be anonymous. We have had situations where employees have called in and reported incidents on our hot line and did not provide their contact information, but we were not able to do much then either. We do what we can, but our efforts are limited without a contact.

Insurance Carrier

We do not require individuals to identify themselves when reporting complaints of discrimination, harassment or retaliation. We do try to obtain as much identifying information as possible but if the reporter wishes to remain anonymous, we simply work with the information we have.

We have recently outsourced our Code of Conduct Helpline to a third party. This vendor has a feature by which individuals can remain anonymous and are given a code to call back into the helpline number. As a company we can also post questions/follow-ups back through this service that the individuals can see or answer with the code they are provided. Hopefully this will help us obtain additional information with respect to anonymous complaints.

Chemicals and Allied Products

If an email needs to submit a complain, they can go to their Manager, their local HR Rep, contact our HR Shared Service Center (via phone, email, internet portal), which would come to my group (EEO), or call the Ethics Hotline (Ombudsman). Out of these options, the only one that is anonymous is calling the hotline. So yes, for the most part, we require the person to identify themselves.

ANONYMOUS COMPLAINTS INQUIRY – 3/15/12

Transportation Equipment

If the individual insists on anonymity, we proceed accordingly with the information that they have provided.

INTERNAL COMPLAINT TRACKING SYSTEMS INQUIRY – 4/20/10

What kind of tracking system, if any, does your company use for internal complaints of violations of HR policies or other type of HR or employment/labor law issues? If you use a system, is it used globally? (I mean something separate from tracking reports under the Code of Business Ethics). Who is responsible for making sure information is submitted (HR or Legal)?

Trucking and Warehousing

We have an ethics point hotline through an outside vendor. The number is posted at all facilities and our website. Once a call is received the legal department is notified and assigns the investigation to the appropriate person in HR or security for investigation. The date opened and resolved is documented as well as action taken.

Petroleum and Coal Products

HR annually collects and summarizes a global report for HR core/"foundation" policy violations which includes categorization of the nature of the violation and the associated discipline. Yearly analysis and trends are shared with senior management.

Paper and Allied Products

We use a database that we set up within our email system to track internal complaints and administrative charges. The individual who takes the complaint updates the database (could be Legal or HR). We started with the corporate office and have rolled the system out to about a third of our remote locations. The others should be coming on-line soon.

Depository Institution

In (Company's) HR department we utilize a Lotus Notes database as a case management tool that was developed internally to track all employee relations issues. This includes policy violations, performance/disciplinary actions, complaints and investigations. Only HR has access to it (view/update). However, we can forward all documentation to our Law Group as needed as well as run reports for trends, etc.

Railroad

We have a database called Powerlaw we use for tracking EEO/USERRA/FMLA complaints (any claims that could be filed with government agencies and turn into lawsuits as this is our law department's database). For other HR/Ethics/Conduct issues,

INTERNAL COMPLAINT TRACKING SYSTEMS INQUIRY – 4/20/10

we have a third party vendor called the Network which takes calls from a hotline number for us, creates reports of the calls and sends them to us. We then use their web-based database (called Netclaims) to track and monitor handling of the reports to closure.

Electric, Gas & Sanitary Services

We do not have any other standard tracking system outside of the Ethics Helpline case management system.

Service Station

We use LAWTRAC as the reporting system.

All labor and legally protected employment issues are handled by the Legal/HR dept. and are entered into LAWTRAC by the person assigned to handle the matter. The person assigned to handle the matter would have gathered the data needed to investigate, respond, mediate, arbitrate, etc. and therefore is responsible for entering the appropriate data into the system. This allows us to keep all of the matters in one place and hold accountable each person for entering the appropriate data into the system.

Chemicals and Allied Products

We have a hotline to track our calls and use the system to input other investigations from HR and Security. Legal normally takes charge of getting information submitted.

Food and Kindred Products

We just started using a new system on April 1st that we recently purchased from an external vendor and then customized for our needs. It's called the i-Sight Case Management System. We went live with it for North America and Latin America on 4/1, and will add the rest of the globe over the next 12 months. Ownership is within HR.

INTERNAL EEO COMPLAINT INVESTIGATIONS INQUIRY – 2/12/14

1. *Does your company take internal EEO complaints through some type of “hot line” or other reporting method?*
 2. *If so, who investigates/manages the complaints?*
 - a. *Business unit/Location HR*
 - b. *Corporate or otherwise centralized HR*
 - c. *Corporate or otherwise centralized internal law department*
 - d. *Outsourced to third-party (i.e. external investigator, legal counsel, consultant)*
 - e. *Any of the preceding, depending on severity of allegation*
 3. *How many investigations are conducted on an annual basis?*
 - a. *< 50*
 - b. *50 - 100*
 - c. *100 - 150*
 - d. *150 - 200*
 - e. *200 - 300*
 - f. *300*
-

Lessors of Other Real Estate Property

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? Yes, there is an Ethics Hot Line.
 2. If so, who investigates/manages the complaints? It depends on the nature of the complaint; investigations are conducted internally. Usually the complaints are investigated by the local HR Representative. In some cases the investigation is conducted by an HR Rep, Manager, or Director from a different region, or the Compliance Director may conduct the investigation.
 3. How many investigations are conducted on an annual basis?
 - c. 100 - 150
-

Softwood Veneer and Plywood Manufacturing

We have what we call a CAREs line that employees can use to lodge a complaint. Our legal department handles complaints. Sorry I don't know the number.

INTERNAL EEO COMPLAINT INVESTIGATIONS INQUIRY – 2/12/14

Biological Product (except Diagnostic) Manufacturing

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? Yes
 2. If so, who investigates/manages the complaints?
 - c. Corporate or otherwise centralized internal law department
 3. How many investigations are conducted on an annual basis?
 - a. < 50
-

Ball and Roller Bearing Manufacturing

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? Yes we use a helpline. Employees can anonymously file complaints by phone or email. The complaints are filed and stored by a third party vendor Navex Global.
 2. If so, who investigates/manages the complaints? Our office of ethics and compliance manages the complaints. The complaints are usually assigned to local HR but can be assigned to any one of choices provided below based on the severity of the allegation.
 3. How many investigations are conducted on an annual basis? Anywhere from 200 – 300 investigations
-

Research & Development in Biotechnology

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? A corporate Ethics line is available for any type of complaint, including EEO complaints; however, employees are encouraged and primarily contact our EEO office directly.
 2. If so, who investigates/manages the complaints? Centralized EEO office.
 3. How many investigations are conducted on an annual basis? < 50
-

INTERNAL EEO COMPLAINT INVESTIGATIONS INQUIRY – 2/12/14

Engineering Services

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? We have the option of our Ethics Helpline where folks do call as well as the Employee Dispute Resolution Line. (Ethics line is known to folks and even though events are often not an ethics issue, the call information is turned over to Corporate Employee Relations Team in Talent management Dept.)
 2. If so, who investigates/manages the complaints?
 - a. Any of the preceding, depending on severity of allegation - This is the best answer of the choices. Corporate Talent Management may in some case be working under the direction of in house counsel to conduct a fact finding/investigation.
 3. How many investigations are conducted on an annual basis?
 - b. 50 - 100 - This is a guess, it could be a little higher if local TM don't report events they are working.
-

Line-Haul Railroads

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? Most complaints are received through our EEO Helpline or an email to our EEO mailbox.
 2. If so, who investigates/manages the complaints?
 - b. Corporate or otherwise centralized HR
 3. How many investigations are conducted on an annual basis? 150-200
-

Other Nonhazardous Waste Treatment and Disposal

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? Yes
2. If so, who investigates/manages the complaints? Regional HR department, with guidance by internal Employment Counsel

INTERNAL EEO COMPLAINT INVESTIGATIONS INQUIRY – 2/12/14

3. How many investigations are conducted on an annual basis? More than 300
-

General Medical and Surgical Hospitals

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? Yes, we also accept EEO complaints via an internal complaint form or more direct notification such as by the employee's manager, employee directly or even an HR Manager not designated to conduct an EEO allegation investigation.
 2. If so, who investigates/manages the complaints?
 - e. Any of the preceding, depending on severity of allegation (however, we do have a designated EEO Investigations Unit in our work locations that exceed 50,000 employees eg CA)
 3. How many investigations are conducted on an annual basis? Over 500
-

Insurance Agencies and Brokerages

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? Complaints can be made through local HR
 2. If so, who investigates/manages the complaints?
 - a. Business unit/Location HR– local HR does first intake on complaints
 3. How many investigations are conducted on an annual basis? Less than 50
-

Engineering Services

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? We have regional and international hotline numbers; employees can call the local EEO office directly and/or download a complaint form and submit it to the local EEO office
2. If so, who investigates/manages the complaints?

INTERNAL EEO COMPLAINT INVESTIGATIONS INQUIRY – 2/12/14

- c. Corporate or otherwise centralized HR – Functionally aligned to Corporate HR but EEO is a separate organization
 3. How many investigations are conducted on an annual basis? Prefer not to report
-

All Other Miscellaneous Food Manufacturing

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? Many internal complaints are made directly to HR Managers or other Managers who report them to HR. Compliance does not track those complaints. Employees who prefer not to speak to a local manager can use the Business Conduct Line call system. Established for reporting any type of complaint or concern (EEO complaints, ethics or financial concerns, etc.), the Conduct Line call system is hosted by a third party. The majority of calls received allege harassment, unfair treatment, discrimination or general unhappiness with a given employment situation. Based on established guidance from (Company), the third party service assigns a priority to the call, depending on the nature of the complaint.

Employees are provided information about the purpose and use of the system and brochures are available at each worksite. This system does not support investigation of EEOC charges or other legal allegations and complaints.

2. If so, who investigates/manages the complaints? Call details are forwarded to the HR Compliance Coordinator who, depending on the call priority and/or details, forwards the information to the appropriate group for investigation and a follow up response. Responses are filtered back through the Coordinator who ensures complainant has access to the response in a timely manner.
 3. How many investigations are conducted on an annual basis? Approximately 200. Some require minimal investigation.
-

Research and Development in the Physical, Engineering, and Life Sciences (except Biotechnology)

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? Most EEO complaints come through reports to local or Business HR. Very few come through the ethics helpline, but that is an avenue for reporting.

INTERNAL EEO COMPLAINT INVESTIGATIONS INQUIRY – 2/12/14

2. If so, who investigates/manages the complaints? The local business or site HR manager investigates and responds to internal as well as external charges. Business Unit legal partners with local HR in reviewing external agency submissions.
 3. How many investigations are conducted on an annual basis? 50-100 annually in the US; international claims are handled in country in accordance with local law.
-

Direct Health and Medical Insurance Carriers

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? Employees can submit any complaint through a third-party vendor the Company has contracted with; the concern can be made over the phone or via a web-based form. Employees can also contact their HR Representative, the HR Hotline number, the Code of Conduct Director (by phone or email) or the Code of Conduct mailbox with any concern.
 2. If so, who investigates/manages the complaints?
 - a. Business unit/Location HR
 - b. Corporate or otherwise centralized HR
 - c. Corporate or otherwise centralized internal law department
 - d. Outsourced to third-party (i.e. external investigator, legal counsel, consultant)
 - e. Any of the preceding, depending on severity of allegation
 3. How many investigations are conducted on an annual basis? 50-100
-

Paper (except Newsprint) Mills

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? Yes, a toll free number.
 2. If so, who investigates/manages the complaints?
 - e. Any of the preceding, depending on severity of allegation
 3. How many investigations are conducted on an annual basis? >300
-

INTERNAL EEO COMPLAINT INVESTIGATIONS INQUIRY – 2/12/14

All Other Miscellaneous Electrical Equipment and Component Manufacturing

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? Yes, among other ways. Employees can file a claim/call the ombudspersons’ line to report a violation of (Company) Policy or law. (We have many ombudspersons in the company, including a key ombudsperson in each business, as well as a central ombuds line at Corporate). Employees can also complain to HR and/or management or any counsel (our “open reporting” process). If the complaint alleges a possible violation of law or policy, then the mgr/lawyer records it in our “SPIRIT” system (our “ombuds” system) and it gets reviewed by those with expertise to determine whether it possibly alleges a violation of law or policy or whether it’s simply an HR-type complaint (e.g., I don’t like working with the guy next to me as he rarely showers). If it’s a regular HR-type complaint, it gets investigated/handled by local HR/Mgmt. If it does indeed rise to the level of a possible violation of law or policy, then it gets highlighted as such in our system as an “ombudsperson” Category I complaint and gets assigned and investigated, usually by someone in the business (initial assignment and tracking in the system is usually done by an ombudsperson).

Employees can also file a complaint with our four-step internal ADR program called Solutions.

2. If so, who investigates/manages the complaints? Choice E—depending on the severity OR the nature of the allegation. If it’s a local EEO issue, it is usually investigated by local HR (sometimes an attorney in the business). If the allegation involves an officer in the company or there is a need to have someone independent of that business, a request might be made to have a competent investigator from either Corporate or another business do the investigation (as it may be more difficult for someone in the business to be independent/objective when investigating a high-level person in their own business).
3. How many investigations are conducted on an annual basis? Including all of the above, the answer would have to be 300.

Wireless Telecommunications Carriers (except Satellite)

1. Does your company take internal EEO complaints through some type of “hot line” or other reporting method? We have an internal ethics hotline, widely publicized internally, which receives discrimination related and other types of complaints. Some complaints also come directly to management and Human Resources.

INTERNAL EEO COMPLAINT INVESTIGATIONS INQUIRY – 2/12/14

2. If so, who investigates/manages the complaints? If the allegation is harassment, discrimination, retaliation, etc., Human Resources investigates. If the allegation involves fraud or criminal activity, Corporate Security investigates. Most other complaints would be sent to management for investigation.
 3. How many investigations are conducted on an annual basis? We investigate more than 300 matters in an average year.
-

CONFIDENTIALITY ADMONITION INQUIRY – 3/2/12

Depository Institution

1. Do you have a standard confidentiality admonition that you use in your investigations?
Yes, all employees interviewed as part of an investigation are required to sign the same form.
 - a. If so, is it the same for all employees or does it depend on the employee (union, non-union, exempt, nonexempt)?
Same form used for all.
2. Would you mind sharing your confidentiality admonition?

Confidential Investigation Acknowledgment

You acknowledge that you are being interviewed in connection with a confidential (company) investigation.

Your interview, the persons involved, the questions asked, and the information communicated during the interview are to remain strictly confidential. Except for your communications with your personal attorney, you are not to communicate with anyone about the interview unless the person or persons interviewing you have specifically authorized the disclosure (e.g., informing your manager that you have been interviewed but not the content of what was said).

(Company) is not making an audio recording of this interview unless you are specifically informed that audio recording is taking place. Likewise, you are not permitted to make an audio recording of this interview.

You are to take no retaliatory action against anyone involved in the investigation process, including the complainant, the accused, and any witnesses.

Your cooperation with the above requirements will ensure the integrity of the investigation and due process for everyone involved (the complainant, the accused, and the witnesses).

Please understand, however, that your failure to follow these requirements will subject you to disciplinary action up to and including your termination of employment.

Your time and attention to this matter are sincerely appreciated.

Dated: _____
Name _____

Business Services

1. Do you have a standard confidentiality admonition that you use in your investigations?
We review the provisions of our Business Conduct Guidelines regarding recording and reporting information with the person being interviewed.

CONFIDENTIALITY ADMONITION INQUIRY – 3/2/12

- a) If so, is it the same for all employees or does it depend on the employee (union, non-union, exempt, nonexempt)?

It is the same for all employees.

2. Would you mind sharing your confidentiality admonition?

Generally, employees are reminded that, under the Business Conduct Guidelines (BCG), providing inaccurate or incomplete information during an internal investigation or audit is a violation of the BCG. They are told that all employees are required to fully cooperate with all authorized internal investigations and reviews, and to promptly, completely and truthfully comply with all internal requests for information, including interviews and documents, during the course of an investigation or review

EEO INVESTIGATIONS INQUIRY – 9/6/12

Anonymous

1) The number of substantiated EEO investigations per 1,000 employees per year

(Company) has over 200 facilities that may be conducting EEO investigations and the company does not track facility investigation activity. Out of approximately 60,000 employees that are protected under the U.S. employment discrimination laws, less than 0.25% of EEO investigations are substantiated.

2) The percentage of substantiated cases by charge type (race, national origin, sex, etc.) per year

For charges filed in 2011 and 2012, (Company) has received no determinations of substantial evidence from state or federal enforcement agencies.

Responses to Inquiry re Investigations - January 2010

Question

1. *Do you do your own workplace investigations (in house) or do you use a third party?*
 2. *If you use outside counsel, do you use the law firm that usually handles your employment litigation or a different firm?*
 3. *Has anyone used one of these “neutral workplace investigations” firms as an alternative to having outside counsel do the investigation?*
 4. *Do you find that it is more cost effective to use these “neutral workplace investigations” firms?*
 5. *Would you mind telling me which firm you use or calling me to discuss further?*
-

Depository Institution

Workplace investigations are performed in-house. We've never used a third party firm. The only time we engage outside counsel is if an actual claim has been filed to be defended.

Industrial Machinery & Equipment

We do our own investigations in-house. We have a team of certified investigators around the world and designated 'master investigators' within each business unit.

Electrical, Gas & Sanitary Services

1. *Do you do your own workplace investigations (in house) or do you use a third party?*
We conduct majority of investigations ourselves. Depending on the nature of the issue, investigations are done by Security, Internal Audit, HR or Ethics & Compliance. At times, we may hire a third party vendor for help.
2. *If you use outside counsel, do you use the law firm that usually handles your employment litigation or a different firm?*
We hire either third party law firm or security firm for help in investigations. This only happens if we want absolute objectivity or want to ensure the perception of absolute objectivity, or simply our internal resources are too thinly stretched.

Responses to Inquiry re Investigations - January 2010

3. Has anyone used one of these “neutral workplace investigations” firms as an alternative to having outside counsel do the investigation?
We have used outside security investigation firms. They are mostly ex-FBI or other law enforcement individuals.
 4. Do you find that it is more cost effective to use these “neutral workplace investigations” firms?
Security firms are definitely more economical than law firms. Also, depending on the issue, we prefer the security firms to handle the investigations.
-

Communications

We conduct all of our workplace investigations in-house.

Insurance Carrier

1. Do you do your own workplace investigations (in house) or do you use a third party?
We conduct the majority of our workplace investigations in-house. On rare occasions, if the area under investigation is Law, HR or Special Investigations, we may use a third-party consulting firm.
2. If you use outside counsel, do you use the law firm that usually handles your employment litigation or a different firm?
On the rare occasions where this is necessary, we have not used the law firm that handles our employment litigation.
3. Has anyone used one of these “neutral workplace investigations” firms as an alternative to having outside counsel do the investigation?
We have used a consulting firm to conduct "environmental audits", which are a form of investigation. I would consider this consulting firm to be a "neutral workplace investigations" firm.
4. Do you find that it is more cost effective to use these “neutral workplace investigations” firms?
It has been less expensive than a law firm, but more expensive than handling in-house.
5. Would you mind telling me which firm you use or calling me to discuss further?
Silverstone Consulting

Responses to Inquiry re Investigations - January 2010

Instruments and Related Products

We have an internal "Alternative Dispute Resolution" program, and the investigations go through various steps of an investigation process with a final review by our in-house counsel. We also have an Ethics department that conducts investigations. Legal very rarely uses an external firm, and none specifically on a regular basis.

Service Station

1. Do you do your own workplace investigations (in house) or do you use a third party?
In house with very few exceptions.
 2. If you use outside counsel, do you use the law firm that usually handles your employment litigation or a different firm?
Our in-house counsel handles our employment litigation with very few exceptions. For those few exceptions we use different firms, we do not use the same firm each time.
 3. Has anyone used one of these "neutral workplace investigations" firms as an alternative to having outside counsel do the investigation?
No
 4. Do you find that it is more cost effective to use these "neutral workplace investigations" firms?
NA
 5. Would you mind telling me which firm you use or calling me to discuss further?
NA
-

Wholesale Trade-Nondurable Goods

With rare exceptions, we do our investigations using in-house staff.

Railroad

1. Do you do your own workplace investigations (in house) or do you use a third party?

Responses to Inquiry re Investigations - January 2010

We conduct our own investigations in house; however, we did use an outside firm in 2008 and early 2009 to assist with handling investigations

2. If you use outside counsel, do you use the law firm that usually handles your employment litigation or a different firm?

N/A

3. Has anyone used one of these “neutral workplace investigations” firms as an alternative to having outside counsel do the investigation?

We utilized a non-legal firm by the name of Bashen Corporation based in Houston, TX.

4. Do you find that it is more cost effective to use these “neutral workplace investigations” firms?

No, I found it to be more expensive.

5. Would you mind telling me which firm you use or calling me to discuss further?

Bashen Corporation. Please feel free to share my information with the requesting Party and I'll discuss our dealings with this agency in more detail if needed.

INVESTIGATION NOTES INQUIRY – 1/7/2014

1. *What does your company do with the notes from an investigation? Notes from an investigation are entered into an investigations database.*
 2. *Do you summarize them and store them in a central location? Yes, a database*
 3. *How long do you retain them? We do not purge data from the database*
-

Anonymous

1. What does your company do with the notes from an investigation? Notes from an investigation are entered into an investigations database.
 2. Do you summarize them and store them in a central location? Yes, a database
 3. How long do you retain them? We do not purge data from the database
-

Drugs and Druggists' Sundries Merchant Wholesalers

1. What does your company do with the notes from an investigation? They are typically kept in a separate investigation file by matter – usually by the department that conducts the investigation, i.e. HR, Legal or Corporate Security and Regulatory Affairs. If outside counsel is engaged for the investigation, then the records are kept by the law firm conducting the investigation.
 2. Do you summarize them and store them in a central location? Not at this time. As we move to a shared service model in Human Resources, that will likely change for investigations that are conducted by HR.
 3. How long do you retain them? Depending on the issue, they are maintained for the appropriate retention period under our Records and Information Management Policies and Procedures.
-

Ball and Roller Bearing Manufacturing

1. What does your company do with the notes from an investigation? Currently we do not have a standard process in place for the storage of notes. The person who completes the investigation would retain the notes. However, we have recently begun the creation of a process to capture the notes from certain investigations in the same system we use track formal complaints made to the company. Once the process is completed in a few weeks we will be able to retain this documentation electronically forever.

2. Do you summarize them and store them in a central location? No.
 3. How long do you retain them? There is no standard time frame.
-

Industrial and Personal Service Paper Merchant Wholesalers

1. What does your company do with the notes from an investigation?
Each location maintains the original notes either electronically or in hardcopy at their preference.
 2. Do you summarize them and store them in a central location?
Yes, we use a third party vendor (Ethics Point) where the summary is entered.
 3. How long do you retain them?
We currently maintain the notes for three years from the date of resolution of the investigation, unless a legal hold is in place.
-

Industrial Gas Manufacturing

1. What does your company do with the notes from an investigation? We keep the investigation summary report only in a central location which is only accessed by the EEO Officer and legal.
 2. Do you summarize them and store them in a central location? No
 3. How long do you retain them? Indefinitely
-

Engineering Services

1. What does your company do with the notes from an investigation? Investigation Notes are scanned and filed electronically.
 2. Do you summarize them and store them in a central location? Investigation notes are reduced to writing (Investigation Summary Report), scanned and stored electronically in a central location.
 3. How long do you retain them? Records are stored according to their status (i.e. active, inactive, etc.) and the appropriate retention period for federal (OFCCP, OSHA, Wage and Hour, EEOC, etc.), state, or local governments, which can be from two to ten years. This time can be extended if there are legal holds administered.
-

Other Nonhazardous Waste Treatment and Disposal

1. What does your company do with the notes from an investigation? HR investigations that did not originate from Ethics helpline call are captured in an investigation file. Ethics investigations are thoroughly documented via a case management system.
 2. Do you summarize them and store them in a central location? HR investigations are stored in each investigator's office. Ethics investigation records are maintained in a database centrally.
 3. How long do you retain them? HR investigations are kept indefinitely. Ethics investigations are kept indefinitely.
-

Anonymous

1. What does your company do with the notes from an investigation? Notes taken during interviews are on our hard drives. Some hand written notes are in a file for the investigation, not always time to type them for electronic record keeping.
 2. Do you summarize them and store them in a central location? The reports and emails are stored in my computer
 3. How long do you retain them? They are still there. We have a central archive unit available to us at larger offices for retention of case files that include interviews and investigation notes.
-

Anonymous

1. What does your company do with the notes from an investigation? We store the notes either electronically or hard copy, but not both in the investigation file.
 2. Do you summarize them and store them in a central location? We store the actual notes as well as the "conclusions" which contains an overview / high level of the investigation and the "recommendations". The investigation files are held at the location where the investigation took place. If the investigation is completed at a corporate level then it is held with Corporate Human Resources in a central location.
 3. How long do you retain them? Investigation folders and notes are retained for five years after the date the investigation is closed.
-

DAE LEAVE INQUIRY – 9/7/2011

We have at least one employee that has been a DAE (Disaster Assistance Employee, also known as a “reservist”) with FEMA for 10 years and was recently appointed to their National IMAT Team as an OPS Specialist (volunteer). Since this is a disaster driven position, it only is an issue when such events like Hurricane Irene occur. This employee has been directed to deploy by a directive from FEMA Administrator, in short order. Naturally we want to do the right thing by this employee, as well as our clients. How has your company handled this type of leave? Do you treat it the same as military reservist leave or under a part of your company's leave policy?

Food and Kindred Products

I haven't heard of this coming up however my best estimate is we'd treat it like an unpaid leave of absence.

Food and Kindred Products

We are not aware of any employee that has a FEMA status, but we have had EMTs who have deployed to work in special/local disaster relief. Those are handled on a case by case basis, depending on the amount of time away from work required.

Health Services

Our Military leave policy includes these categories:

- *Army, Navy, Marine Corps, Air Force or Coast Guard*
 - *Army National Guard or Air National Guard*
 - *Commissioned Corps of the Public Health Service*
 - *Any other category of persons designated by the President in a time of war or emergency*
-

FAMILY LEAVE POLICIES INQUIRY – 9/1/2011

Heavy Contruction

1. Does your organization offer maternity leave? *No*
 2. Is maternity leave paid and if so, what sources pay it (i.e. PTO, STD, company)?
What is the duration? *N/A*
 3. Does your organization offer paternity leave? Is it paid or unpaid? What is the duration? *No*
 4. Does your organization offer anything for adoption? *No*
 5. Does your organization offer any type of family leave? Is it paid or unpaid? What is the duration?
Only what is required by federal or state law, i.e. FMLA, California Paid Family Leave, etc.
-

Electric, Gas & Sanitary Services

1. Does your organization offer maternity leave?
Yes, maternity leave is referred to and treated just as any other Short Term Disability leave.
2. Is maternity leave paid and if so, what sources pay it (i.e. PTO, STD, company)?
What is the duration?
The length of STD leave is determined by the employee's physician, typically 6 weeks recovery for a regular delivery and 8 weeks for a cesarean delivery.
3. Does your organization offer paternity leave? Is it paid or unpaid? What is the duration?
Yes, we offer up to 40 hrs of paid time off for the birth or adoption of a child.
4. Does your organization offer anything for adoption?
Yes, as mentioned above, our company offers up to 40 hrs of paid time off for the birth or adoption of a child.
5. Does your organization offer any type of family leave? Is it paid or unpaid? What is the duration?
No other paid family leave is offered. FMLA benefits are available for those who qualify.

FAMILY LEAVE POLICIES INQUIRY – 9/1/2011

Food and Kindred Products

1. Does your organization offer maternity leave? *Short term disability and FMLA.*
 2. Is maternity leave paid and if so, what sources pay it (i.e. PTO, STD, company)?
What is the duration?
Short term disability (STD) pays for 6 weeks medical recovery for normal deliveries and 8 weeks for c-sections. FMLA runs concurrently with STD. The balance of the 12 weeks of FMLA can be taken after the STD, unless the employee went off early for complications which would have started the FMLA clock ticking.
 3. Does your organization offer paternity leave? Is it paid or unpaid? What is the duration?
No paternity leave however managers can use discretion and provide up to 3 days paid "excused" time for salaried employees. Or the employee can use vacation or floating holidays.
 4. Does your organization offer anything for adoption?
We offer adoption assistance of up to \$4,500 per adoption up to three adoptions per household. For further information on this benefit please contact me.
 5. Does your organization offer any type of family leave? Is it paid or unpaid? What is the duration?
Unpaid 12 weeks of FMLA and then of course whatever California allows. Employees can substitute vacation and/or floating holidays to have some of the time paid.
-

Chemicals and Allied Products

1. Does your organization offer maternity leave? *Yes*
2. Is maternity leave paid and if so, what sources pay it (i.e. PTO, STD, company)?
What is the duration?
 - *An employee can take up to 17 (12 FMLA/STD and 5 Supplemental) weeks of leave.*
 - *12 weeks is FMLA and running concurrent with that is STD. Depending on how long you have been with the company determines how much and for how long you get paid during the STD portion. FMLA portion is not paid.*
 - *5 weeks is the Supplemental Parental Leave that we offers. 2 of those 5 weeks are paid.*
3. Does your organization offer paternity leave? Is it paid or unpaid? What is the duration? *The Supplemental Parental Leave is for fathers as well. Same rules.*

FAMILY LEAVE POLICIES INQUIRY – 9/1/2011

4. Does your organization offer anything for adoption? Yes, see below...

Adoption Benefit Plan

The Plan reimburses you for up to \$5,000 of the cost of adopting a child. Costs of adopting a child can include legal fees, placement charges and medical expenses. The benefit is payable only after the child is placed in your home, and neither you nor your spouse can be the natural parent or grandparent.

Under current Internal Revenue Service guidelines, the reimbursement may be excludable from your taxable income. Also, a federal income tax credit is available for unreimbursed adoption expenses. You should consult your tax advisor about these alternatives before submitting expenses to the company for reimbursement.

To claim benefits under this Plan, complete the Adoption Reimbursement Form and submit it with your bills and copies of the adoption papers to HR//direct. Claims must be submitted within two years of the final adoption date; a claim submitted more than two years after the adoption takes place will be denied. The company will reimburse you in up to two installments for each adoption.

Eligibility

If you are a regular non-bargaining unit employee scheduled to work at least 20 hours per week, you are eligible for the Adoption Benefit Plan.

Coverage for this plan ends on your last day of work. This plan is not available if an employee is on severance when the adoption is finalized.

5. Does your organization offer any type of family leave? Is it paid or unpaid? What is the duration? *I think this is answered above.*

Service Station

1. Does your organization offer maternity leave?
We offer leave as provided under FMLA. Employees can take medical leave for the portion of the 12 weeks that they are medically disabled per doctor's notes. The remaining weeks can be taken as parental leave.
2. Is maternity leave paid and if so, what sources pay it (i.e. PTO, STD, company)? What is the duration?
Medical portion is paid through STD and parental leave portion paid through accrued vacation and floating holidays.

FAMILY LEAVE POLICIES INQUIRY – 9/1/2011

3. Does your organization offer paternity leave? Is it paid or unpaid? What is the duration?

Offered under FMLA and paid through accrued vacation. Can take up to 12 weeks if it is for the care of mother/child.

4. Does your organization offer anything for adoption? *Covered under FMLA*

5. Does your organization offer any type of family leave? Is it paid or unpaid? What is the duration?

The other leaves are as follows (all covered under FMLA):

- a) Care for Injured Military Personnel (next of kin eligible), paid through accrued vacation, duration up to 26 weeks.*
 - b) Family Exigency (spouse, child, parent) paid through accrued vacation, duration up to 26 weeks. (Time permissible while*
 - c) Care for immediate family member (spouse, child or parent), paid through accrued vacation, duration up to 12 weeks.*
 - d) Civil Leave (which included Educational Leave), unpaid, duration up to 1 year.*
-

Heavy Construction

1. For FMLA purposes, how do you determine the location and eligibility for employees who work from home?
All of our employees are eligible for FMLA as long as they are in the U.S. and meet eligibility requirements as far as length of service.
 2. What process do you use to determine if employees in a specific work location are eligible for FMLA (50 employees within a 75 mile radius)?
Don't have an established process. All employees in U.S. are eligible.
 3. Are you aware of any software programs that provide this functionality (ability to quickly calculate distances between numerous work locations and provide related detail and summary data to the user...)? Any recommendations?
Not aware of any software. We currently outsource our FMLA leaves.
-

Industrial Machinery & Equipment

1. For FMLA purposes, how do you determine the location and eligibility for employees who work from home?
We would determine location based on their home address. We would then look to see if there is a Company facility within 75 miles of their residence to determine if they meet the 50 employees within 75 mile radius qualification.
 2. What process do you use to determine if employees in a specific work location are eligible for FMLA (50 employees within a 75 mile radius)?
We use Google maps.
 3. Are you aware of any software programs that provide this functionality (ability to quickly calculate distances between numerous work locations and provide related detail and summary data to the user...)? Any recommendations?
None that we are aware of. (If anyone tells you of one - let us know)
-

Hotel

We do not determine eligibility by location. Everyone is assumed to be eligible for FMLA regardless of location.

INQUIRY RE FMLA ELIGIBILITY DETERMINATIONS – 4/6/

Transportation Equipment

1. For FMLA purposes, how do you determine the location and eligibility for employees who work from home?
We use the work location, which would include home for an employee on an approved telecommuting arrangement.
 2. What process do you use to determine if employees in a specific work location are eligible for FMLA (50 employees within a 75 mile radius)?
We do not apply the 75 mile radius rule for telecommuters. If the annual hour requirement is satisfied we extend FML benefits.
 3. Are you aware of any software programs that provide this functionality (ability to quickly calculate distances between numerous work locations and provide related detail and summary data to the user...)? Any recommendations?
No, but I would be interested if anyone has this.
-

FMLA VENDORS INQUIRY – 6/19/14

If you use a third-party vendor for your FMLA leave management, who do you use? Are you satisfied with them?

All Other Miscellaneous Electrical Equipment and Component Manufacturing

We use The Hartford. They have done a great job for us. They prefer to handle both disability leaves and FMLA/leave management at the same time. (We only use them for FMLA leaves and state/local leaves—state FMLA, crime victims, civil air patrol and emergency aid leaves, parent-school conferences leaves, organ donor, etc. They administer about 180 different types of leave laws for us.)

Drugs and Druggists' Sundries Merchant Wholesalers

We use Aetna. I think we are fairly satisfied with them.

INCREMENTS OF PAID SICK LEAVE INQUIRY – 2/13/12

Food and Kindred Products

- 1) What is the smallest increment of time your company uses to track paid sick leave for exempt employees?
Our paid sick leave is really short term disability. We will track by the hour if need be. We prefer to track by full or half day though.
 - 2) What is the smallest increment of time your company uses to track paid sick leave for nonexempt employees?
Same.
-

Wholesale Trade-Nondurable Goods

- 1) What is the smallest increment of time your company uses to track paid sick leave for exempt employees?
We really don't "officially" have sick leave for exempt employees – but "sick days" are tracked in full-day increments.
 - 2) What is the smallest increment of time your company uses to track paid sick leave for nonexempt employees?
Our non-exempt employees are allowed to take sick leave increments as small as 15 minutes.
-

Instruments and Related Products

We use "Paid Time Off" (PTO) for exempt and non-exempt. PTO is a combination of vacation, sick and personal days and must be taken in increments of at least 1/10th of an hour.

Service Station

We have no formal rules around minimum hours for sick time. If an employee is ill one hour before the end of the work day, they can charge 1 hour of sick time for that day.

INCREMENTS OF PAID SICK LEAVE INQUIRY – 2/13/12

Electric, Gas & Sanitary Services

- 1) What is the smallest increment of time your company uses to track paid sick leave for exempt employees?

One day increment

- 2) What is the smallest increment of time your company uses to track paid sick leave for nonexempt employees?

I believe we allow online time keeping at an hour increment, but there is also a concurrent occurrence count managers keep track of.

Heavy Construction

We don't have actual "sick leave". We have PTO (paid time off). We do not have a minimum allowable increment of PTO that employees can take. Our timekeeping system can track as low as 1/10th of an hour.

LEAVE OF ABSENCE POLICIES INQUIRY – 4/24/13

1. *How long do you allow employees to remain on LOA past FMLA? (Occupational and Non-Occupational)*
 2. *How long do you provide benefits past FMLA? (Occupational and Non-Occupational)*
 3. *Do you require a certain length of time after returning from an LOA before allowing another LOA to begin?*
-

Tobacco and Tobacco Product Merchant Wholesalers

Leave of Absence Policies (Unpaid Leaves):

Discretionary Leave: Request is without pay for any legitimate reason which may be granted for a period of up to 3 months with approval of employee's management in consultation with HR. This leave does not constitute a break in the continuity of service (seniority) of an eligible employee and employee will continue to accrue vacation leave for the following calendar year based on completed, continuous years of service as of the return-to-work date. Request reviewed on case-by-case basis.

Maternity Leave: The Company is firmly committed to protecting the rights of expectant mothers. As a result, the Company allows sixteen (16) weeks of unpaid leave, to run concurrent with FMLA, for all employees. The Company's policy is to treat employees affected by pregnancy, childbirth or related medical conditions in the same manner as other employees unable to work because of their physical condition in all employment aspects.

Benefits are provided during these leaves. The outstanding premiums are collected when they return to work through our arrears process.

All Other Nondepository Credit Intermediation

We allow one year for non-occupational and 18 mos. for occupational. However, we send an automatic alert to the HRM and manager (from our HRIS) prior to the time the leave is to end to make sure that they explore whether there is any need for additional accommodation/leave time due to a disability.

Meat and Meat Product Merchant Wholesalers

We offer short term disability benefits for 52 weeks for our non-exempt parent company staff and 56 weeks for parent company exempt staff. FMLA runs concurrently for the first 12 weeks.

Benefits remain intact for the full 52 or 56 weeks of short term disability.

No length of time requirement between leaves, however short term disability benefits expire after those 52 or 56 weeks. An employee is limited to 104 weeks of short term disability eligibility in the last 208 weeks. Disability eligibility is also reduced by the number of days used in the past 12 months. For example, if an employee went off on a 3 week short term disability leave their 52 or 56 weeks are reduced by 3 weeks for the next occurrence within 12 months.

Engineering Services

1. It really depends on the kind of leave. If it's an employee medical leave, we allow an employee to be off work for 12 months (paid or unpaid) in most cases.
2. Employees would continue to receive health insurance for the 12 month period. If the leave is unpaid, the employee is responsible for paying their portion of the premium.
3. We do not require a certain length of time before allowing another LOA to begin provided we have the appropriate documentation.

Commercial Banking

1. As long as there is medical documentation indicating the need for leave. If leave is 26 weeks or longer the employee would transition to LTD.
2. As long as the employee is on approved leave.
3. No.

Drugs and Druggists' Sundries Merchant Wholesalers

1. If the LOA also qualifies for Short Term Disability, they remain on LOA for the remainder of their approved Short Term Disability leave, and in some cases longer, if there is a reasonably anticipated return to work date. If it is Workers' Compensation, they will remain on a Workers' Compensation LOA for as long as the case remains open.

2. As long as someone is on a paid LOA (like Short Term Disability) their employee contributions continue to be deducted and they stay active on our benefits. If they are on unpaid LOA or LOA that isn't paid through payroll (like Workers' Comp), they have to make their employee contributions directly. If they fail to make those contributions – after a couple of “warnings”, we will terminate benefits and make them eligible for COBRA.
 3. We have no specific length of time.
-

Ball and Roller Bearing Manufacturing

1. The answer varies based on length of service, hourly vs. salary etc. Associates on Workers' Compensation paid leave remain active and with benefits for a total of 6 months. Associates on Short term disability (salary and salary operatives) are entitled to Short-term disability (STD) benefits for 6 months and then become inactive if/when they transition to Long-term disability. During their STD time, they maintain their benefits. Associates with the local bargaining group can continue on Sickness and Accident paid leave with benefits for 1-2 years based on their length of service. Associates are required to provide updated disability in order to continue to receive their benefits and to maintain an authorized status with the Company.
 2. See above.
 3. No. Though their claim may be considered as a continuous claim depending on the length of time between the claims and the reason for the disability periods.
-

PAID LEAVE POLICIES INQUIRY – 11/24/14

1. *How does your company keep up with the various new sick and paid time off policies that come out of state/local legislation?*
 2. *Has your company gone, or considered going, to a PTO approach vs. separate vacation/personal holiday policies?*
 3. *For companies operating in Illinois, does your company give part-timers vacation? If so, what are the eligibility requirements? If there's a PTO approach instead, what is that approach?*
-

Mining Industry

1. Utilize a third-party to administer FMLA and STD.
 2. No, continue to use vacation/sick/STD.
 3. N/A
-

Professional, Scientific and Technical Services Industry

1. Going to PTO policy December 1. I hope we are up to speed. We are considering BLR as a resource.
 2. See above.
 3. We give them PTO if they work 80%; in line with the ACT effective January 1, 2015.
-

Health Insurance Industry

1. Yes, we have legal counsel who monitors these types of policies, however see #2.
 2. We have PTO therefore personal and vacation days as well as sick days are all merged.
 3. Part time associates get pro-rated PTO.
-

Manufacturing Industry

1. It is incumbent upon the local HR/leadership to stay informed of these types of changes in the law.

2. No.
 3. N/A.
-

Manufacturing Industry

1. Compliance Supervisor, myself, EEAC and several websites that automatically notify me of any changes.
 2. No.
 3. No vacation for part timers.
-

Retail Trade Industry

1. We have alerts from Mercer. Some additional links/sources:
<https://www.municode.com/>
<http://www.amlegal.com/library/>
 2. We have PTO policies for most associates. In jurisdictions where sick pay is required, we normally adjust the PTO to the particular accrual, sick day amounts, notices, etc...
 3. Yes, we give all regular part-timers a pro-rated vacation, with the same accrual and schedule (pro-rated for hours worked) as everyone else.
-

Professional, Scientific and Technical Services Industry

1. We are attempting to program our HRIS to calculate PTO based on individual state requirements.
 2. We have a PTO policy for vacation and sick as well as a set holiday schedule.
 3. PTO is prorated, yes.
-

Financial Industry

1. To keep track of local/state obligations, we have developed a state notification matrix that is maintained by our HR Shared Services department that tracks all state/local legislative requirements that would impact our processes, procedures, and/or policy. A team was established (members of the Legal, HR Shared Services,

AA/EEO depts.) to assist with maintaining the matrix, and also communicate any updates received regarding legislative updates that would impact our processes, procedures and/or policy. We receive the communications by subscribing to various websites, articles, memberships, and by our employment law poster vendor.

2. Yes – PTO.

3. Yes - all part timers are eligible for PTO (not just state of IL). PTO is based on exempt/non exempt status. Non Exempt based on hours worked and years of service (for both full and part time). Exempt - based on years of service and officer title.

Commercial and Industrial Machinery and Equipment

1. We have a small Leave COE (Center of Excellence) team that tracks the various sick and safe leave laws/ordinances.

2. We are currently considering implementing PTO.

3. All of our part-timers who work 20 hours or more are eligible for vacation. If they work in a city/state where paid sick and safe leave exists, we pay them for time off if they qualify per the law/ordinance.

Health Insurance Industry

1. We rely on several sources. Our internal compliance department, the internal legal department, our TPA's who manage some of our leave programs, our outside consulting firm, as well as the benefits consultant's ongoing training and development.

2. Our company switched to a PTO approach in the year 2000. We no longer have vacation or personal holidays, or sick leave. PTO is intended to cover all of those occasions.

3. We have two classifications of part time employees. Regular Part Time Employees earn a pro-rated PTO balance depending on their schedule and years of service. Part time employees receive two PTO days per year.

Insurance Industry

We give employees 5 personal/sick days per year on January 1 of each year. We also add to the number of personal/sick days with the floating holidays that cannot fit into the calendar otherwise. For many state and local laws, this amount is sufficient. We try to monitor the sick time situations by educating managers in the impacted areas and absence

case managers in our Health Services Department. When it is brought to our attention that someone should get more sick time than is available under our policies, we use payroll codes that allow additional paid time off.

PERFORMANCE BONUSES INQUIRY - 6/20/13

1. *Does your company pro-rate performance bonuses (not production bonuses) for employees out on FMLA, military, or other statutorily protected leave?*
 2. *If so, what is the criteria for the pro-ration (e.g. Consecutive leave? Amount of time? Other factors?)*
 3. *Is your bonus program based upon individual contributions, collective achievement of corporate goals, or both?*
-

Ball and Roller Bearing Manufacturing

1. Does your company pro-rate performance bonuses (not production bonuses) for employees out on FMLA, military, or other statutorily protected leave? Yes
 2. If so, what is the criteria for the pro-ration (e.g. Consecutive leave? Amount of time? Other factors?) Associate has to have earnings during the performance year to be eligible.
 3. Is your bonus program based upon individual contributions, collective achievement of corporate goals, or both? Annual award is based on corporate, business unit and individual performance goals.
-

Drugs and Druggists' Sundries Merchant Wholesalers

1. Does your company pro-rate performance bonuses (not production bonuses) for employees out on FMLA, military, or other statutorily protected leave? Yes.
 2. If so, what is the criteria for the pro-ration (e.g. Consecutive leave? Amount of time? Other factors?) We pro-rate by amount of time out on leave.
 3. Is your bonus program based upon individual contributions, collective achievement of corporate goals, or both? Both.
-

Engineering Services

1. Does your company pro-rate performance bonuses (not production bonuses) for employees out on FMLA, military, or other statutorily protected leave? No set policy, but this seldom occurs. Leave would need to be at least three months or more for pro-ration to be considered.

2. If so, what is the criteria for the pro-ration (e.g. Consecutive leave? Amount of time? Other factors?) Amount of time
3. Is your bonus program based upon individual contributions, collective achievement of corporate goals, or both? Both

INQUIRY RE PTO POLICIES – 9/23/2010

Instrument and Related Products

1. Do you have a PTO program for any segment of your employee population?
Yes
 2. How is the accrual of PTO handled? Is it based on hours or days? Portions thereof? *Hours*
 - a) What are the accrual rates?
PTO is earned (accrued) on a calendar year basis
 - b) Can you “use-as-you-accrue” or is it accrued during one year for use the following year?
You can "use-as-you-accrue"
 3. Do you allow carry-over of unused PTO's? And/or, do you allow “cash-out?”
Employees are able to carry over all unused earned (accrued) PTO hours into the next year, and will not lose PTO hours once they become earned (accrued). However, there are a maximum number of PTO hours an employee can accumulate in any given year.
 4. Would you recommend a PTO program?
Yes
 5. Would you be willing to discuss in more detail any advantages/disadvantages of your program?
Yes
-

Insurance Carrier

1. Do you have a PTO program for any segment of your employee population?
No
2. How is the accrual of PTO handled? Is it based on hours or days? Hours and minutes or portions thereof?
Yes.
 - a) What are the accrual rates?

INQUIRY RE PTO POLICIES – 9/23/2010

Maximum Vacation Earned per Twelve Month Period

Accumulated Service	Months of Service	In Days	In Hours (Scheduled 38.75 hrs)	In Hours (Scheduled 40 hrs)
Up to 5 yrs of service	0-59	10 days per year	77.50	80
5 yrs of service	60-119	15 days per year	116.25	120
10 yrs of service	120-179	17.5 days per year	135.63	140
15 yrs of service	180-299	20 days per year	155.00	160
25 yrs of service	300 +	25 days per year	193.75	

- b) Can you “use-as-you-accrue” or is it accrued during one year for use the following year?

Vacation is accrued during the year and is available for use once the vacation earned has been posted to the employee's vacation account.

3. Do you allow carry-over of unused PTO's?

Yes. Accrued vacation may be brought over to the next year. Employees may only accrue up to the maximum annual amount earned plus 5 days.

- a) And/or, do you allow “cash-out?”

Only at termination. If you allow cash out during active employment, the IRS will insist that Vacation be taxed when earned and not when it is used.

4. Would you recommend a PTO program?

We rejected a PTO program design because adding the average sick time of 5 days per year to the vacation liability on the balance sheet was an unnecessary cost. Reflecting the sick time liability on the balance sheet for us would have increased our balance sheet liability by about 25%. We believe that paying out accrued sick pay at termination is a waste. Of course all of this would adversely impact our bottom line.

When a standard PTO program is used, the employer loses the ability to track why the employees are not at work. All the employer knows is that the employee used PTO. The employer does not know if the employee was sick or planned a vacation. We use time codes that tell us this information.

In its place we allow 5 sick days that we call Personal Time. Employees can use personal time for any reason, including vacation but they will not be paid out for personal time at term and they cannot carry over any personal time from one year to the next.

5. Would you be willing to discuss in more detail any advantages/disadvantages of your program? *Yes*

INQUIRY RE PTO POLICIES – 9/23/2010

Service Station

1. Do you have a PTO program for any segment of your employee population?
Yes - 1 small facility
 2. How is the accrual of PTO handled? Is it based on hours or days? Portions thereof? What are the accrual rates? Hourly allotment at 24 hours/year? Can you “use-as-you-accrue” or is it accrued during one year for use the following year?
Time is accrued in one year for the following year.
 3. Do you allow carry-over of unused PTO’s? And/or, do you allow “cash-out?”
No carryover or cash out
 4. Would you recommend a PTO program?
No.
 5. Would you be willing to discuss in more detail any advantages/disadvantages of your program?

-

Industrial Machinery & Equipment

1. Do you have a PTO program for any segment of your employee population?
Yes - vacation policy
 2. How is the accrual of PTO handled?
Earn as you go based on days worked
 3. Do you allow carry-over of unused PTO’s? And/or, do you allow “cash-out?”
Can carry over 5 days only into the next year
 4. Would you recommend a PTO program?
Yes.
 5. Would you be willing to discuss in more detail any advantages/disadvantages of your program?
I would but ours is pretty typical.
-

SICK LEAVE FOR TEMPORARY PROJECT EMPLOYEES INQUIRY –
4/29/2014

Does your company offer limited sick leave to temporary project employees (those that are company employees, not independent contractors or temp agency employees)?

Companies in the following industries indicated that they do not:

Meat and Meat Product Merchant Wholesalers
All Other Miscellaneous Food Manufacturing
Pharmaceutical Preparation Manufacturing
Ball and Roller Bearing Manufacturing
Engineering Services

Electric Power Distribution

The company does not; however, for San Francisco-based employees for any company, there is a Healthy SF requirement to give sick time and also contribute to health care plan.

“UNOFFICIAL” FMLA LEAVE – 11/8/12

Do any of your companies allow for family/medical leave to care for a person who is not “officially” covered by the FMLA? For example, domestic partners or children of domestic partners? If so, how do you handle the administration of this since these people are not “technically” covered by the Act?

Poultry Processing

We have other medical/personal leave that is used mostly by employees who are not eligible for FML yet, or who have exhausted their FML. However, we usually use this as an accommodation for the employee’s disability.

Railroads

We follow the regulations and do not permit FMLA for an individual who is not officially designated in the regulations.

Supermarkets

Here is how we define a family member in our FMLA – Care for a Family Member Policy:

- Family member is an employee's child, parent or spouse according to the following:
 - "Child" means a biological, adopted or foster child, stepchild, legal ward, or child of a person standing in loco parentis, who is either under age 18, or 18 or older and incapable of self care because of a physical or mental disability.
 - "Parent" means a biological parent or an individual who stands or stood in loco parentis to an employee when the employee was a "child" as defined above.
 - "Spouse" is a husband or wife as recognized under state law for purposes of marriage.^[1]

^[1] California: Includes a registered domestic partner according to state law.

Financial Services

Our family leave policy does allow time off for domestic partners as FMLA allows for spouses. However, we don't count the leave time against the employee's FMLA entitlement.

Engineering & Construction

Our FMLA is administered by (Company) as a third party, and they adhere to the letter of the law.

Health Insurance

We evaluate each request for family FMLA on a case by case basis to determine if the employee has met the FMLA definition of "in loco parentis" responsibility for the care or financial support of the child. This would include not only biological children, but also step children, legal wards, foster children and adopted children of the employee. We also check with each state specific "leave laws" to determine any obligations related to domestic partner situations.

MANDATORY PAY PRACTICES INQUIRY – 12/18/12

We have a member who was wondering if it would be possible to institute mandatory direct deposit as well as mandatory electronic pay stubs for employees in all 50 states. Do any of you have any information on this issue?

Hotels and Resorts

Not all employees have bank accounts or trust their money in a bank. We encourage direct deposit but it is not mandatory.

Pharmaceuticals

We went through this process a year or so ago. It's possible to do, although I think in California and Hawaii (and maybe some other states) you still have to give the employee the option to "opt out" of the electronic pay stubs. I think as long as you provide a method by which the employee can print out a copy of the electronic pay stub you are OK.

If the member uses ADP or someone like that as their payroll company, ask them. I seem to recall that ADP provided us with a summary – by state – on the issues around mandatory direct deposit and electronic paystubs.

Food Products

We have not made it mandatory for all employees to go on direct deposit because that is still illegal in some states. We have made it mandatory for all exempt and office nonexempt employees to either have direct deposit or the ADP Total Pay Solution, which is a combination of a pay card and Money Network Checks, allowing us to be compliant in all 50 states. We have this as an option for plant hourly employees, but because of union contracts we have not made it mandatory for them at this point. We are also only providing pay statements electronically to the exempt and office nonexempt employees that are in their own pay groups.

Defense

When we last looked at doing something similar, we discovered that a few states prohibit mandatory direct deposit. I recall that NH was one.

Health Insurance

Each state has its own regulations with regards to mandatory direct deposit and electronic pay stubs. You cannot mandate direct deposit in every state. When our employees acknowledge their agreement to direct deposit (see below), they are also acknowledging agreement to receive their pay stubs electronically.

I do hereby authorize the Payroll Dept. to deposit my checks as indicated on the following screen. In addition, I do hereby authorize the Payroll Dept to provide my pay information electronically.

Engineering and Construction

It is my understanding that it isn't legal in all 50 states. In many states, the employee must be provided the ability to opt out and receive paper checks and paper pay stubs.

Depository Institution

1. Does your company conduct annual pay equity analyses? *Yes*
If so, are you a Fortune 500 or 100 company? *500*
What type of industry are you in? *Financial Services/Banking*
 2. Does your company conduct annual or periodic analyses of performance management systems (i.e., performance ratings)?
Yes
-

Heavy Construction

1. Does your company conduct annual pay equity analyses? *Yes*
If so, are you a Fortune 500 or 100 company? *No*
What type of industry are you in? *Engineering & Construction*
 2. Does your company conduct annual or periodic analyses of performance management systems (i.e., performance ratings)? *Yes*
-

Instruments and Related Products

1. Does your company conduct annual pay equity analyses? *Yes*
If so, are you a Fortune 500 or 100 company? *Yes*
What type of industry are you in? *Manufacturing*
 2. Does your company conduct annual or periodic analyses of performance management systems (i.e., performance ratings)? *Yes*
-

Insurance Carrier

1. Does your company conduct annual pay equity analyses?
Yes, as part of the annual compensation self-audit. We also review equity at the time of offer and job changes (e.g., promotions).

If so, are you a Fortune 500 or 100 company? *Yes, Fortune 500*
What type of industry are you in? *Financial Services/Insurance*

PAY MANAGEMENT PROCESSES INQUIRY – 3/29/2011

2. Does your company conduct annual or periodic analyses of performance management systems (i.e., performance ratings)?
Yes, we conduct an annual adverse impact analysis of performance ratings based on age, gender and minority/nonminority status.
-

Anonymous

1. Does your company conduct annual pay equity analyses?
No, periodic analysis. We are currently in the process.

If so, are you a Fortune 500 or 100 company? *Yes*
What type of industry are you in? *Petroleum/Refining*
 2. Does your company conduct annual or periodic analyses of performance management systems (i.e., performance ratings)? *Yes, we do a yearly analysis.*
-

Health Services

1. Does your company conduct annual pay equity analyses? *Yes*

If so, are you a Fortune 500 or 100 company? *No -nonprofit*
What type of industry are you in? *Health care*
 2. Does your company conduct annual or periodic analyses of performance management systems (i.e., performance ratings)? *Yes*
-

Industrial Machinery & Equipment

1. Does your company conduct annual pay equity analyses? *Yes*

If so, are you a Fortune 500 or 100 company? *Yes - 500*
What type of industry are you in? *Manufacturing*
 2. Does your company conduct annual or periodic analyses of performance management systems (i.e., performance ratings)? *Yes*
-

Transportation Equipment

1. *Yes, yes, aerospace/defense/IT.*
 2. *Yes, but as a new initiative.*
-

RESERVIST AND NATIONAL GUARD COMPENSATION INQUIRY – 6/19/14

What is your policy with regard to paying Reservists and National Guard members for the time they are absent from work for training? If you pay them, does the pay include travel time also?

Meat and Meat Product Merchant Wholesalers

Regular full-time employees will be eligible to receive the difference between their military pay (excluding expense reimbursement items) during the leave and their (Company) base pay for up to ten workdays (a maximum of 80 hours of pay for an hourly employee and two weeks base salary for a salaried employee) per calendar year. Employees will initially be docked for the time on leave. However, they will receive the difference pay after providing the company with the official military orders and record of pay.

Health care benefits, life insurance benefits, and accidental death and dismemberment insurance will be continued during a military leave of 30 calendar days or less.

Ball and Roller Bearing Manufacturing

Yes, we pay them for the time they are absent for training. It does not include travel time.

Fabricated Pipe and Pipe Fitting Manufacturing

We pay differential pay for Active Duty, National Guard training duty as well as civil emergencies (up to 15 days). Our policy doesn't specifically call out travel time but if the travel occurred on a day the employee would ordinarily be eligible for pay they would qualify for differential.

Drugs and Druggists' Sundries Merchant Wholesalers

Our policy will pay employees up to 10 days for any time they spend away on training or other active duty.

Setting Starting Salary Inquiry 5/29/12

We have an inquiry from a member wanting to find out what processes other companies use for setting employee starting salaries and who within the organization is responsible for making that starting salary determination?

Sanitary Services

Our Corporate Compensation department is in charge of monitoring and setting a salary range for all jobs (they call that pricing out a job.) They use various external data such as Mercer comp report to assess where (Company)'s jobs are in terms of their pay, and make revisions ongoing basis to make sure our jobs are priced competitively.

Once a job's salary range has been set by the Comp team, each local HR team sets a starting salary level based on their local employment condition and the job's qualification requirements.

Industrial Machinery & Equipment

The first step for establishing the appropriate cash compensation for a position is the collection and documentation of information concerning the duties, responsibilities, skills, knowledge and experience required to do the job. This information provides the basis for ranking positions internally and for comparing positions externally for the purpose of establishing competitive levels of cash compensation. The purpose for creating position descriptions is to communicate job responsibilities, to provide input for performance and talent management, to assist with planning and organizing workload, to identify training needs and to support candidate selection.

The process begins when a pay manager or associate initiates a position description questionnaire. The pay manager is responsible to ensure the position description accurately reflects the job's requirements and responsibilities. The job description is not a review of the capabilities of the current incumbent. When a position description is completed, the pay manager will submit the document to the appropriate Business Unit or Corporate Center HR representative for approval and submission to the job evaluation committee. The committee assigns the appropriate job level after reviewing the characteristics of the job using the Hay Guide Chart method. This method is used by many other companies throughout the world and provides the basis for a national comparison. This analysis takes into consideration the knowledge and experience required, the problem solving applied and the accountability assigned as stated in the job description. The committee also takes into account the relativity of the position compared to other jobs in the Business Unit or Corporate Center.

For position levels of senior manager or above, a position review committee with corporate-wide responsibility also considers the job level to assure consistency across the company worldwide. To confirm that positions are competitive with similar jobs outside of the company, some positions are also —market priced to validate that they are designated at a job level that will provide competitive compensation.

Wholesale Trade-Nondurable Goods (Pharmaceuticals)

- 1) *How does your company cascade AA report results to all levels of management?*
HR Managers receive the reports and then meet with first line management to inform them of goals, if any.
- 2) *How does your company train its decision makers on AA and what format do you use (i.e., cascade, all-employee meeting, etc.)?*
Training is conducted on Compliance with AA laws and on each component of the AA program. How often do you do this training? This training isn't done on an annual basis but as needed. The EEO policy is communicated every year, but training is not done.

Non-Depository Institution

- 1) *How does your company cascade AA report results to all levels of management?*
The person responsible for Affirmative Action at a site presents an "Executive Summary" to site management at a staff meeting informing them of progress vs. goals for the last AAP year and goals for the current AAP year.
- 2) *How does your company train its decision makers on AA and what format do you use (i.e., cascade, all-employee meeting, etc.)? How often do you do this training?*
We have a couple of tiers of training:
 - a) We have on-line training for all managers that covers their responsibilities with respect to making non-discriminatory employment related decisions. It also provides information on Affirmative Action.
 - b) Managers and other decision makers who take interviewer training receive information on Affirmative Action obligations.
 - c) We remind them of their obligations at the same time we present the AAP Executive Summary.

Sanitary Services

- 1) *How does your company cascade AA report results to all levels of management?*
We disseminate to our HR partners and request they sit down with the managers they service.

DISSEMINATION OF AA RESULTS AND TRAINING – 6/20/12

- 2) *How does your company train its decision makers on AA and what format do you use (i.e., cascade, all-employee meeting, etc.)? How often do you do this training?*
We provide a training kit (content) to our HR partners and request they cover the basics. We are also in the process of building an online training course to cover the basics of AA/EEO for all managers. This will be a required course for all managers.
-

Instruments and Related Products

- 1) *How does your company cascade AA report results to all levels of management?*
We have designated AA custodians at each of our sites and they are responsible for:
- Briefing the site executives, site leadership team members and applicable HR team members. The site leaders and HR team members are responsible for making sure the information is filtered to all levels of management.
 - Monitoring updates and briefing leaders quarterly of any changes.
- 2) *How does your company train its decision makers on AA and what format do you use (i.e., cascade, all-employee meeting, etc.)? How often do you do this training?*
Our managers are required to take an online AA course when they are new to the role as managers or when there are changes.
-

Heavy Construction

- 1) *How does your company cascade AA report results to all levels of management?*
Executive summary reports are sent to the Directors and legal counsel. Conference calls are conducted with Directors and legal counsel to review results. Directors review results and implement the plans with staff, recruiters and management.
- 2) *How does your company train its decision makers on AA and what format do you use (i.e., cascade, all-employee meeting, etc.)? How often do you do this training?*
We train (company) and recruiting staff who work with managers to implement plans and conduct training. Training is conducted as needed.
-

CA TRANSPARENCY ACT POLICIES INQUIRY – 10/20/11

California's "Transparency in Supply Chains Act of 2010" requires many manufacturers and retail sellers doing business in the state to post on their websites the efforts being taken to eradicate human trafficking and slavery from their direct supply chains for tangible goods offered for sale. How is your company handling compliance with this requirement?

Anonymous

We are creating: (1) A Policy Statement; and (2) A compliance statement to give to vendors who ask about SB 567.

Here is the draft document we plan to use for both:

Conformity with Applicable Laws and Regulations

{COMPANY} believes that all employees deserve to be treated with dignity and respect. {COMPANY} believes in the fair treatment of and fair wages for all employees, and that no employee will be discriminated based on genetic information and family medical history, race, color, religion, sex, age, physical ability, national origin, or any other protected class. {COMPANY}'s long-standing policy is to comply with all local and national laws wherever conducting business and to uphold a high standard of ethics.

In addition, {COMPANY} suppliers must conform to all pertinent local and national legal requirements, customs, and published industry standards pertaining to employment and manufacturing. If there is a conflict between legal requirements and published industry standards, at minimum, suppliers must comply with the law that takes precedence.

Employment Practices Forced Labor:

The use of or forced labor by a supplier is strictly prohibited. The use of labor under any form of indentured servitude is prohibited, as is the use of physical punishment, confinement, threats of violence, or other forms of physical, sexual, psychological, or verbal harassment or abuse as a means of punishment or control. Suppliers will not engage production facilities that force work to be performed without pay or to force persons to work against their will. Nor will suppliers contract for the manufacture of goods for {COMPANY} on behalf of subcontractors that condone such behaviors.

Child Labor: The use of child labor by suppliers or a subcontractor of suppliers is strictly prohibited. Child is defined for the purposes of employment as a person who has not reached the age of 15 unless the local law allows for the minimum age of 14. At no times is the supplier to allow individuals under the age of 14 to be involved in the production or handling of {COMPANY}'s product. In either situation, the supplier will not permit individuals between the ages of 14 and 16 to work during the hours in which

CA TRANSPARENCY ACT POLICIES INQUIRY – 10/20/11

the minors are by law required to attend school except in situations where the minor is enrolled in a legally approved apprenticeship or similar program.

Working Hours: Suppliers must guarantee that all individuals working on goods supplied to {COMPANY} do so in conformity with national and local laws pertaining to the number of hours and days worked.

Compensation: It is {COMPANY}'s belief that all employees, including suppliers and suppliers subcontracted employees be given fair wages and benefits. This includes compensation for overtime pay, that comply with local and national regulations. If local and national regulations do not support overtime pay, at minimum, employees must be paid at regular pay for all hours worked.

The Integrity and Good Business Line

{COMPANY} is committed to operating with integrity in a fair, honest and ethical manner. As a result, we have implemented a communications tool called the "Integrity and Good Business Line (IGBL)" to reinforce the company's long-standing commitment to ethical business conduct. Employees are encouraged to report any of the concerns listed above as well as any unlawful or unethical accounting and/or auditing matters within {COMPANY}. Issues such as unethical principles and policy violations including bribery, equal employment and unsafe working conditions must also be reported. Employees are subject to discipline if they fail to report a known or suspected concern. In addition, {COMPANY} prohibits retaliation against those who raise integrity concerns and imposes discipline on anyone who is found to have engaged in retaliation.

This IGBL is a proactive communications tool that:

- Provides a safe place to report concerns of any inappropriate behavior in a confidential manner, without fear of retaliation or retribution.
- Reduces fraud, theft and abuse.
- Reinforces {COMPANY}'s Values, Culture and Philosophy

Employees must immediately report any concerns. Reports can be made anonymously to:

Phone {PHONE#}

Email: IGBL@{COMPANY}.com

Mail:

Integrity and Good Business
{COMPANY}
{ADDRESS}

Communications

You might talk with the California Attorney's General office on this one. We did, and the basic message from them is that the California Franchise board (I think that's the title) is responsible for defining which retailers will be covered by this requirement, and they likely will not provide a list to the Cal AG's office (responsible for enforcement) until the end of 2012 or into 2013. The AG seems to feel that "retailer" will be defined narrowly, perhaps only the very large retailers, like Walmart, Target, etc. will be covered. The AG put me on a contact list and said they'd contact anyone on that list with updates. I haven't heard from them since I talked with them early this year.

We have statements on our website regarding ethics, child labor, etc., and places those requirements in its contracts with suppliers. We will re-examine those again to make certain we feel that we are compliant.

Non-Depository Institution

We are committed to ensuring that our supply chain reflects our values and respect for human rights and the environment. To that end, our Spirit and Letter policy provides:

- Our relationships with suppliers are based on lawful, efficient and fair practices.
We expect our suppliers to obey the laws that require them to treat workers fairly, provide a safe and healthy work environment and protect environmental quality. Following guidelines helps ensure that our supplier relationships will not damage our reputation.

In furtherance of this policy, (company) obligates its suppliers by contract to comply with our "Supplier Expectations," including the requirement that they "[n]ot utilize forced, prison, or indentured labor, or subject workers to any form of compulsion or coercion." Our suppliers are obligated to expect the same standards of their suppliers in turn.

Our program to ensure compliance with our supplier expectations, including on-site audits of suppliers in the developing world, is described on our [Supplier Program Description](#) Citizenship web site page. Between 2008 and 2011, we conducted on-site assessments in 67 countries. Under our Supplier Responsibility Program, personnel who perform on-site audits are given extensive training in auditing techniques to recognize and report non-compliance with our expectations. In addition, sourcing personnel follow an "eyes always open" approach under which all relevant personnel are trained to recognize environment, health, safety, and labor red flags, including red flags

CA TRANSPARENCY ACT POLICIES INQUIRY – 10/20/11

relating to forced labor, and to report and investigate all suspicions of improper conduct at all suppliers globally. While third-party auditors are employed to conduct some on-site audits, the majority of our examinations are performed by personnel, subject to a program for conducting spot-checks on the accuracy of the auditors, and occasional reviews by Corporate Audit Staff.

Suppliers that fail to meet our Expectations are terminated. Employees and leaders who violate the spirit or letter of our policies are subject to disciplinary action up to and including termination of employment.

Food and Kindred Products

Below is our formal response. We've also added it to our PO terms and conditions.

To Whom It May Concern:

(Company) requires our suppliers to act in accordance with all applicable federal, state and local laws and regulations. We have Supplier Responsibility Principles that outline these expectations. Materials used in the products that our customers purchase from (Company) comply with existing local and federal laws regarding slavery and human trafficking in the United States.

To view our Supplier Responsibility Principles, please visit the Responsibility section of our website,.

Director of Purchasing

ELECTRONIC POSTING REQUIREMENTS INQUIRY – 5/26/2011

For those of you that take applications electronically, a fellow EEAC member would like to know how you handle meeting your posting requirements for applicants?

Non-Depository Institution

We have an internal electronic posting system called COS (Career Opportunity System) on which HR managers post our jobs. All employees have access to COS. (Hourly jobs are also posted in hard copy for those who don't have ready access to a computer.) If the business wants to look externally as well, they just click a button in COS and the posting automatically goes out to our external site, gecareers.com. Direct Employers then takes the jobs off of our external site to post them with the local/state employment delivery services, as required by the regulations.

Railroad

We use Direct Employers' service to do this for us with the state employment agencies if those are the posting requirements you are referring to.

Food and Kindred Products

We use Direct Employers for jobs posted through our central recruiting at headquarters. Direct Employers electronically "grabs" the posting and distributes it to a local office of the state's employment service. We also encourage all of our locations to establish relationships with their local office of the state employment service (whatever it is called – we have facilities in almost every state) and to post all of their openings with those offices directly. It is very possible that some of our jobs may be sent to the local employment office twice, but we prefer that over missing a posting.

HUMAN TRAFFICKING POSTING POLICIES INQUIRY – 11/4/11

One of our members would like to know how those of you who are federal contractors are dealing with the FAR human-trafficking notification requirements (FAR 22.1705 and FAR clause 52.222-50. The FAR requires that the contractor shall "notify its employees" of its zero-tolerance policy and that it will take action against employees for violation of this policy). Are you literally posting something, putting it on your website, handouts, something else?

Communications

On our website, under Corporate Responsibility, our Human Rights Statement refers to the UN Declaration of Human Rights, <http://www.un.org/en/documents/udhr/>. Then also on our webpage, in our Code of Supplier Conduct, we have a section called "Labor Standards," in which we define our standards and insist that our suppliers certify to our provisions on nondiscrimination, respect and dignity, freely chosen employment, no child labor, freedom of association, fair working hours, wage and benefits, and safety and health. This language is based primarily on sections 4-8 ("Labour") of the UN Supplier Code of Conduct. http://www.un.org/Depts/ptd/pdf/conduct_english.pdf.

Heavy Construction

We have a business unit, "(Company) Infrastructure and Technology", that specifically handles government contracts. PI&T has a written policy/procedure on-line "Combating Trafficking in Persons" that each employee upon hire within the PI&T business unit reviews. The employee then acknowledges understanding of the policy and consequences for failure to uphold zero tolerance for trafficking in persons by signing and submitting a Certification Form in paper or electronic format.

REQUIRED POSTINGS PLACEMENT INQUIRY – 1/21/2011

Anonymous

1. Does your company use hard copy bulletin boards for required government posters under various employment laws (e.g., USERRA; Title VII; ADA, OSHA; state wage/hour laws, etc.)? *Yes.*
 2. If you only use hardcopy bulletin boards, how do you address employees who work remotely - e.g., from home, at a customer location on an on-going basis? *We use electronic and hardcopy. We mail out hardcopies to remote offices.*
 3. Does your company also use "electronic" posting for any of these required posters? If yes, where are they posted electronically: the company's main intranet page? The company's HR intranet webpage? Other? *Online handbook for employees and job posting site for applicants.*
-

Chemical and Allied Products

1. Does your company use hard copy bulletin boards for required government posters under various employment laws (e.g., USERRA; Title VII; ADA, OSHA; state wage/hour laws, etc.)? *Hard copies on bulletin boards.*
 2. If you only use hardcopy bulletin boards, how do you address employees who work remotely - e.g., from home, at a customer location on an on-going basis? *Not addressed at this time for home locations but do note we have started to move away from having remote locations (very rare now).*
 3. Does your company also use "electronic" posting for any of these required posters? If yes, where are they posted electronically: the company's main intranet page? The company's HR intranet webpage? Other? *Not at this time but we are looking to have some like E-verify be electronic and it would be on the main intranet page.*
-

Health Services

1. Does your company use hard copy bulletin boards for required government posters under various employment laws (e.g., USERRA; Title VII; ADA, OSHA; state wage/hour laws, etc.)? *Hard copy bulletin boards*
2. If you only use hardcopy bulletin boards, how do you address employees who work remotely - e.g., from home, at a customer location on an on-going basis? *Workplace postings are at their assigned work location*

REQUIRED POSTINGS PLACEMENT INQUIRY – 1/21/2011

3. Does your company also use "electronic" posting for any of these required posters? If yes, where are they posted electronically: the company's main intranet page? The company's HR intranet webpage? Other?

E-Verify postings are electronic and hard copy

Insurance Carrier

1. Does your company use hard copy bulletin boards for required government posters under various employment laws (e.g., USERRA; Title VII; ADA, OSHA; state wage/hour laws, etc.)? *Yes.*

2. If you only use hardcopy bulletin boards, how do you address employees who work remotely - e.g., from home, at a customer location on an on-going basis?
N/A

3. Does your company also use "electronic" posting for any of these required posters? If yes, where are they posted electronically: the company's main intranet page? The company's HR intranet webpage? Other?

Yes. They are posted on the Associate Information Center, which is every associate's link to all information HR-related (policies, programs, compensation information, performance management - EVERYTHING THEY COULD POSSIBLY NEED/WANT INFORMATION ON.)

Industrial Machinery & Equipment

We use hardcopy bulletin boards.

Communications

1. Does your company use hard copy bulletin boards for required government posters under various employment laws (e.g., USERRA; Title VII; ADA, OSHA; state wage/hour laws, etc.)? *Yes*

2. If you only use hardcopy bulletin boards, how do you address employees who work remotely - e.g., from home, at a customer location on an on-going basis?
Issue electronic annual statement and indicate where postings can be found.

REQUIRED POSTINGS PLACEMENT INQUIRY – 1/21/2011

3. Does your company also use "electronic" posting for any of these required posters? If yes, where are they posted electronically: the company's main intranet page? The company's HR intranet webpage? Other?

No postings, but we use notices to notify where postings can be found.

Heavy Construction

1. Does your company use hard copy bulletin boards for required government posters under various employment laws (e.g., USERRA; Title VII; ADA, OSHA; state wage/hour laws, etc.)?

Yes, the vendor is Personal Concepts. Each of our Global Business Units has an appointed person to place orders. This all became a billing and charge number nightmare when we were doing it for them! We do monitor and remind them of required updates.

2. If you only use hardcopy bulletin boards, how do you address employees who work remotely - e.g., from home, at a customer location on an on-going basis?

We do also have electronic notification on the on boarding and orientation process. Employees sign their acknowledgement that they've been told of such etc..

Insurance Carrier

1. Does your company use hard copy bulletin boards for required government posters under various employment laws (e.g., USERRA; Title VII; ADA, OSHA; state wage/hour laws, etc.)? *Yes.*

2. If you only use hardcopy bulletin boards, how do you address employees who work remotely - e.g., from home, at a customer location on an on-going basis?

We use both medians for notice postings, see #3 response.

3. Does your company also use "electronic" posting for any of these required posters? *Yes.* If yes, where are they posted electronically: the company's main intranet page? No not on the company's intranet main page. The company's HR intranet webpage? Other?

Yes, we have a link to an external website within the HR site on the company intranet. This is provided by a vendor. Also employees can access the company's HR portal when away from work i.e. "HR @ Home."

REQUIRED POSTINGS PLACEMENT INQUIRY – 1/21/2011

Service Station

We only post hard copies on bulletin boards. We have not addressed employees working from home; however, each employee does have a home office which they visit periodically.

STATE POSTING REQUIREMENTS INQUIRY – 12/6/12

How do you handle the distribution of state laws, regulations, new requirements, etc. to current employees?

Health Funds

We have a vendor help us with postings (they send them to offices in impacted states and leaders of those offices ensure posting). Otherwise, we house respective state law info (leave, voting regs, etc.) on our intranet, as appropriate.

Ball Manufacturing

We use a third party vendor, GovDocs, to handle the distribution of all mandatory federal and state postings. Every poster and every update to a poster is shipped directly to the location where it should be posted.

Greeting Cards

We have physical boards that get updated, as well as an employee intranet that we utilize. If there are actionable items, they get distributed in a management and/or employee e-letter as applicable.

Pharmaceuticals

We have a vendor that we work with who advises us when new posting requirements come up, and then we distribute them to the local HR representatives for posting/distribution.

Railroads

We have a vendor called PersonnelConcepts that handles our federal and state postings and they are paid for by each geographic Division.

Wood Manufacturing

We have a designated person at Corporate Headquarters who tracks regulatory updates and distributes new posters to our 84 locations nationwide.

HR professionals at each location are responsible for ensuring that state laws are enforced.

Wireless Telecommunications

We have a docshare section with all federal and state posting requirements and copies of posters (designated by state). The facilities managers (real estate team) is notified of the link to their facility's required postings and each time anything new comes up. They visit the site, see the requirements, print off the posters and place them in the appropriate areas (break rooms, HR, etc.).

Anonymous

We have a poster service that we use to be sure the new posters are sent to our sites. This seems to work pretty well for us.

EQUEST INQUIRY – 7/31/13

- 1. Have your jobs been posted timely to the state job boards?*
 - 2. Are you using them with Taleo? If yes – have you had any problems with the EQuest/Taleo linkage?*
 - 3. Anyone willing to speak with me about their experience with EQuest?*
-

Anonymous

1. Have your jobs been posted timely to the state job boards? Not Applicable
 2. Are you using them with Taleo? If yes – have you had any problems with the eQuest/Taleo linkage? We utilize eQuest with Taleo and recently RFP'd for job board distribution partners – the result of which is that we found there were not any established competitors in this space who matched the integration capabilities of eQuest with Taleo. However, last year Taleo released their API to other vendors so we would expect more competition from an integration aspect will be emerging.
 3. Anyone willing to speak with me about their experience with eQuest? Cannot speak to the compliance solutions aspect – would offer that our eQuest experience has been largely dependent upon whom is on point for managing our account. We have had good and bad experiences as a result. One of the issues our organization has had is that we are not a 100% media client of eQuest and much of their support is tied to status as a media client. The primary account support is an email interface only (i.e. if you are having a big issue they still want you to go through a self-serve portal which has caused some abrasion from a customer service standpoint when immediate help has been needed). We have had some strong account managers who have been more helpful in this space while others have declined helping us and pointed us only to the self-serve portal. Our current management structure with them is good.
-

TALEO INQUIRY – 7/17/13

Have you had the experience of moving your ATS from Taleo to another system? If so, would you be willing to chat with this member about your experiences?

Lessors of Other Real Estate Property

No

Engineering Services

No

Pharmaceutical Preparation Manufacturing

We moved from Kenexa/Brass-Rings to Taleo. Not because of the ATS, but because of the entire suite of products that Taleo offers.

Meat and Meat Product Merchant Wholesalers

We moved from Taleo to ADP several years ago. Our experience was that Taleo was less than helpful with providing access to our own data.

Other Nonhazardous Waste Treatment and Disposal

We migrated off Taleo and consolidated into one (used to have two.) Talent Acquisition department was responsible for the migration. I would be happy to connect the project manager to the inquirer.

Biological Product (except Diagnostic) Manufacturing

No

Direct Health and Medical Insurance Carriers

No

All Other Miscellaneous Electrical Equipment and Component Manufacturing

No

Drugs and Druggists' Sundries Merchant Wholesalers

We just started using Taleo as our system of record for applicant tracking. Prior we used a home-grown system.

Softwood Veneer and Plywood Manufacturing

No

Insurance Agencies and Brokerages

We currently use Taleo.

Sanitary Paper Product Manufacturing

We are currently moving from VURV to Taleo.

Petroleum Refineries

Haven't had this experience.

Engineering Services

No

Engineering Services

No

Ball and Roller Bearing Manufacturing

We still use Taleo.

All Other Miscellaneous Food Manufacturing

We just moved from Kenexa to Taleo.

BACKGROUND CHECKS INQUIRY – 10/17/11

Does anyone have a company policy they would be willing to share that requires employees to advise HR (or someone else within the company) if they are arrested and charged with a crime?

Chemical and Allied Products

If you conduct background checks of new hires:

1. Approximately how many new hires do you have each year? *500 - 700*
 2. What do you check? (Employment, Education, Criminal Record, Driving Record, Excluded Parties Listing, Terror Watch List, Other (please specify)) *employment, education, criminal (county, state, federal), excluded parties, terror watch, social security number trace, sex offender registry*
 3. Are your background checks conducted in house or by a 3rd party vendor? *3rd party*
 4. If you use a vendor to conduct background checks, how long does it take (average) for the vendor to complete the background checks? *5 – 10 days*
 5. If you are very satisfied with the vendor that conducts background checks for your company, would you please provide the name of the vendor and contact information? *Not satisfied and evaluating new vendors*
-

Communications

If you conduct background checks of new hires:

1. Approximately how many new hires do you have each year? *We will conduct approximately 10,000 background checks on external candidates this year.*
2. What do you check? (Employment, Education, Criminal Record, Driving Record, Excluded Parties Listing, Terror Watch List, Other (please specify)) *The checks conducted are dependent on the job for which the candidate has applied. Depending on the job the background could include any or all: driving record, criminal history, SSN trace, sex offender registry, education – highest degree completed, previous employment – up to four employers within the past five years*
3. Are your background checks conducted in house or by a 3rd party vendor? *3rd party vendor*

BACKGROUND CHECKS INQUIRY – 10/17/11

4. If you use a vendor to conduct background checks, how long does it take (average) for the vendor to complete the background checks? *Over 80% of background checks are completed within five days*
 5. If you are very satisfied with the vendor that conducts background checks for your company, would you please provide the name of the vendor and contact information? *We would not be able to provide any information on our vendor*
-

Paper and Allied Products

1. Approximately how many new hires do you have each year? *Domestically, we hired about 1250 employees last year.*
 2. What do you check? (Employment, Education, Criminal Record, Driving Record, Excluded Parties Listing, Terror Watch List, Other (please specify)) *Generally, we check SSN, criminal background, and do a verification of employment. For positions that require driving a company vehicle we do a driving record, and for a very limited number of positions a credit check.*
 3. Are your background checks conducted in house or by a 3rd party vendor? *Background checks are done by a third party vender.*
 4. If you use a vendor to conduct background checks, how long does it take (average) for the vendor to complete the background checks? *Anywhere from 3 days to a week depending on how many places the individual has lived and worked.*
 5. If you are very satisfied with the vendor that conducts background checks for your company, would you please provide the name of the vendor and contact information? *We've had the most luck with Verifications, Inc. their web address is: <http://www.verificationsinc.com/>*
-

Depository Institution

1. Approximately how many new hires do you have each year? *@4000*
2. What do you check? (Employment, Education, Criminal Record, Driving Record, Excluded Parties Listing, Terror Watch List, Other (please specify)) *Employment, Education, Criminal Record, Excluded Parties Listing, Terror Watch List, Employment Credit Report*
3. Are your background checks conducted in house or by a 3rd party vendor? *In-house except*

BACKGROUND CHECKS INQUIRY – 10/17/11

criminal check is outsourced.

4. If you use a vendor to conduct background checks, how long does it take (average) for the vendor to complete the background checks? *SLA is 5 business days*

5. If you are very satisfied with the vendor that conducts background checks for your company, would you please provide the name of the vendor and contact information?
Choicepoint does criminal checks.

Electric, Gas & Sanitary

1. Approximately how many new hires do you have each year? *Over 5000*
 2. What do you check? (Employment, Education, Criminal Record, Driving Record, Excluded Parties Listing, Terror Watch List, Other (please specify)) *Only employment, education, criminal records and driving records (in general).*
 3. Are your background checks conducted in house or by a 3rd party vendor? *Via a vendor*
 4. If you use a vendor to conduct background checks, how long does it take (average) for the vendor to complete the background checks? *On average a week, but there are cases that take much longer.*
 5. If you are very satisfied with the vendor that conducts background checks for your company, would you please provide the name of the vendor and contact information?
-

Heavy Construction

1. Approximately how many new hires do you have each year? *2000 average new hires*
2. What do you check? *Employment and Education verification, Criminal Record, Driving Record for those driving a company vehicle, credit check and drug testing*
3. Are your background checks conducted in house or by a 3rd party vendor? *By a 3rd party.*
4. If you use a vendor to conduct background checks, how long does it take (average) for the vendor to complete the background checks? *3 days*
5. If you are very satisfied with the vendor that conducts background checks for your company, would you please provide the name of the vendor and contact information?

BACKGROUND CHECKS INQUIRY – 10/17/11

Anonymous

1. Approximately how many new hires do you have each year? 750
2. What do you check? (Employment, Education, Criminal Record, Driving Record, Excluded Parties Listing, Terror Watch List, Other (please specify)) *Employment, Education, Social Security Trace, Social Security Validation, Criminal Felony & Misdemeanor, Federal Criminal, Statewide Criminal, GSA/OIG, Global Sanctions & Enforcement Check, National Criminal Search and National Sex Offender Search (credit, professional license and mvr are run depending upon job description)*
3. Are your background checks conducted in house or by a 3rd party vendor? *3rd Party Vendor*
4. If you use a vendor to conduct background checks, how long does it take (average) for the vendor to complete the background checks? *3.04 days*
5. If you are very satisfied with the vendor that conducts background checks for your company, would you please provide the name of the vendor and contact information?
HireRight
Dawn O’Kieff
Account Manager HireRight
615-320-9800 ext 20997 Tel

Wholesale Trade-Nondurable Goods

1. Approximately how many new hires do you have each year? Approximately 1,100
2. What do you check? (Employment, Education, Criminal Record, Driving Record, Excluded Parties Listing, Terror Watch List, Other (please specify)) *Criminal Record, Excluded Parties Listing, Education for all; Driving Record for anyone who is on the Company Car program; Additional Checks, like Terror Watch List, as required by specific customer contracts.*
3. Are your background checks conducted in house or by a 3rd party vendor? *Third party vendor*
4. If you use a vendor to conduct background checks, how long does it take (average) for the vendor to complete the background checks? *Usually back within a day or two – except for certain states where it sometimes takes up to seven days.*

BACKGROUND CHECKS INQUIRY – 10/17/11

5. If you are very satisfied with the vendor that conducts background checks for your company, would you please provide the name of the vendor and contact information? *We use Justifacts. Their website is: <http://justifacts.com/>*
-

BACKGROUND INVESTIGATIONS INQUIRY – 9/13/12

Rubber and Misc. Plastic Products

1. Do you perform credit checks on applicants with access to sensitive personal information (customer or employee) (SPI) or financial information, etc.? **No**
 2. Do you perform criminal background checks / credit checks periodically on **current** employees in positions that provide access to SPI/financial information, etc.? **No**
 3. Do you require employees to report all criminal convictions? **Yes** Arrests? **No**
-

Bank/Financial Institution

1. The bank does not conduct credit checks on any candidate for employment because of the sensitivity and risks with doing so. The bank has also found that in the past when the bank used to conduct credit checks, the credit checks did not really have any bearing on the employee's job performance or workplace conduct.
2. The bank does not conduct background checks or credit checks on current employees. To ensure compliance with banking laws, the bank has a policy that requires employees, who if at any time during their employment, are arrested, charged, indicted, convicted of, or pleads guilty or no contest to: (1) any felony; (2) any misdemeanor that involves the purchase or sale of a security, the taking of false oath, the making of a false report, bribery, perjury, larceny, burglary, theft, robbery, extortion, forgery, fraudulent concealment, counterfeiting, embezzlement, fraudulent conversion, or misappropriation of funds or securities or substantially equivalent activity to any of the foregoing; (3) drug-related charges; (4) a conspiracy to commit any of the preceding misdemeanor or felony charges, to report it. Reports by employees of this nature are reviewed and action taken, as appropriate, with regard to continued employment.
3. Yes, candidates for employment are requested to report all arrests and convictions. Language on the application and criminal background check reads as follows: Be advised, you are not obligated to disclose records of arrests or records of convictions which have been fully expunged (i.e., removed from your criminal record by a specific court order) or sealed by a court of law. A conviction includes a plea, verdict or finding of guilt regardless of whether sentence is imposed by the court. This includes any

BACKGROUND INVESTIGATIONS INQUIRY – 9/13/12

convictions for making/issuing worthless checks and any convictions for driving while intoxicated and/or under the influence. Disclosure of a criminal record will not necessarily disqualify you for employment. Each conviction or guilty plea will be evaluated on its own merits with respect to time, circumstances and seriousness in relation to the job for which you are applying. However, failure to disclose a conviction which has not been expunged or sealed by a court of law will automatically result in your ineligibility for employment and/or termination of employment (even if the conviction would not have resulted in your ineligibility for employment had it been properly disclosed).

Food and Kindred Products

1. Do you perform credit checks on applicants with access to sensitive personal information (customer or employee) (SPI) or financial information, etc.? **No**
2. Do you perform criminal background checks / credit checks periodically on current employees in positions that provide access to SPI/financial information, etc.? **No**
3. Do you require employees to report all criminal convictions? **No**. Arrests? **No**.

Chemical and Allied Products

1. Do you perform credit checks on applicants with access to sensitive personal information (customer or employee) (SPI) or financial information, etc.? **No we do not at this time.**
2. Do you perform criminal background checks / credit checks periodically on **current** employees in positions that provide access to SPI/financial information, etc.? **No**
3. Do you require employees to report all criminal convictions? **No, we currently ask about felonies.** Arrests? **No**

Gas Stations

Below is the response from our Corporate HR dept.

BACKGROUND INVESTIGATIONS INQUIRY - 9/13/12

1. Do you perform credit checks on applicants with access to sensitive personal information (customer or employee) (SPI) or financial information, etc.? **We do not generally perform credit checks however, if we need to hire a person in a high level financial function we might.**
2. Do you perform criminal background checks / credit checks periodically on **current** employees in positions that provide access to SPI/financial information, etc.? We do not perform periodic criminal background or credit checks on current employees.
3. Do you require employees to report all criminal convictions? **No** Arrests?
No

Below is the response from our Convenience Store division

1. **We perform credit checks on managers. However, we are not aware of an employment decision based on credit alone.**
 2. **We do not run periodic credit/criminal checks on current employees**
 3. **We do not require all employees to report all criminal convictions - The 'non Philadelphia and Massachusetts' applications ask the question if they have been convicted within the past 7 years. We do not ask about arrests.**
-

Insurance Carrier

1. Do you perform credit checks on applicants with access to sensitive personal information (customer or employee) (SPI) or financial information, etc.? **No, we do not perform credit checks**
2. Do you perform criminal background checks / credit checks periodically on **current** employees in positions that provide access to SPI/financial information, etc.? **We perform crim checks on associates moving into ngs (national government services). We do not perform credit checks.**
 - a) If so, have you terminated a current employee because you have concluded that the credit information or conviction indicates the employee is unqualified for his/her job? **Not privy to this**

BACKGROUND INVESTIGATIONS INQUIRY – 9/13/12

3. Do you require employees to report all criminal convictions? **Yes, during the annual compliance process and via policy**
-

Health Services

1. Do you perform credit checks on applicants with access to sensitive personal information (customer or employee) (SPI) or financial information, etc.? **Currently we have suspended doing credit checks.**
2. Do you perform criminal background checks / credit checks periodically on **current** employees in positions that provide access to SPI/financial information, etc.? **No**
3. Do you require employees to report all criminal convictions? **Yes** Arrests? **No**
-

Industrial Machinery & Equipment

1. How does your organization determine where to recruit top talent?

We have developed a Focus School scorecard which we break out into categories and then rank the schools that we have identified as our target schools with current data. The 6 categories are as follows:

- 1. Strength of Academics*
- 2. Diversity of Student Population*
- 3. Recruiting Metrics*
- 4. Quality of Candidates*
- 5. Geographic considerations*
- 6. Academic Relations*

This scorecard will become our baseline for assessing all of the Universities we target.

2. Would you be willing to share the criterion you use to evaluate individual programs/universities?

Yes, as long as there was a willingness to share all best practices.

3. How does your company evaluate curriculum when making school selection decisions?

We use the US and News World report as well as Business Week and use their college rankings. We also get feedback from our folks in the business to help us get information on those schools.

4. Which universities have you had the greatest success at recruiting females and people of color?

Females we have been successful at most schools, however people of color we have struggled. We do invest in diversity organizations such as Society of Women Engineers/National Society of Black Engineers/National Society of Hispanic Engineers to help us recruit diverse engineers into our organization.

5. How would you define a successful recruiting relationship?

I believe any successful recruiting relationship comes down to the personal and close relationship you establish with students, school administrators, or the career development center. When you are at a point where it is an open and honest dialogue and you are getting quality referrals to the company, and the company has a strong

CAMPUS RECRUITMENT STRATEGIES INQUIRY – 12/6/10

employment brand, then you have made an impact both at the academic and student level.

Insurance Carrier

1. How does your organization determine where to recruit top talent?

We look at the programs of study at the colleges/universities and determine if they are a good fit for what we are currently looking for in terms of specific business units requirements/strategies. The business units in conjunction with Staffing identify top talent and note what colleges the high achieving students are attending. Managers build relationships with the professors and Staffing builds relationships with the Career service offices at all of the identified colleges.

2. Would you be willing to share the criterion you use to evaluate individual programs/universities?

Yes. Generally our criterion is based on the programs of study offered, motivation/drive of students, response from the students to our internships/positions, and feedback from the students.

3. How does your company evaluate curriculum when making school selection decisions?

We work very closely with our business units to determine type of skillsets/knowledge needed based on their strategies and then work with professors/staff at identified colleges/universities to determine congruency.

4. Which universities have you had the greatest success at recruiting females and people of color?

University of Nebraska Omaha, University of Nebraska Lincoln, and Bellevue University.

5. How would you define a successful recruiting relationship?

There must be cooperative/helpful staff on both sides. In the end, the success really comes from a relationship that produces highly motivated individuals that meet the future needs of our business units in terms of skills, knowledge, and abilities.

CAREER FAIR INQUIRY – 8/16/2011

When participating in Career Fairs (either college or national), how do you get your "job seekers" into your online application process?

Communications

We hand out cards at the event with our career website address where they can go to review and apply for positions. If they are interested in being considered for a position they must do so via our online process.

Electric, Gas & Sanitary Services

We follow a similar process and leave it up to the candidate to apply.

Printing and Postage

We also use cards to direct them to the website -- we usually have access available at the career fair to facilitate the process.

Wholesale Trade-Nondurable Goods

Many times, we will take a laptop(s) with us and be connected via WiFi or MiFi. Applicants we're serious about will be asked to complete their profile and apply on line right there.

Otherwise, we collect their information and then send them a link to our career page to apply.

Instruments and Related Products

We direct them to our website to apply for positions.

CAREER FAIR INQUIRY – 8/16/2011

Heavy Construction

We make them apply on-line. Sometimes take business cards with the [\(compasny\)jobs.com](http://(compasny)jobs.com) address, but in all cases, we do not take resumes. We tell them to register and apply on-line.

Service Station

We direct them to our website.

Food and Kindred Products

We have "contact cards" that look like little business cards that we hand out to career fair participants who stop by our booth. The contact cards have our company logo and our careers website and our recruiters who help out at the booth instruct the candidates to apply to our open positions on line. Once they apply to a position, our corporate recruiters then send them an electronic application via our applicant tracking system to complete.

Food and Kindred Products

We distribute "business cards" to career centers and make them available at meet & greets. It is up to the student to apply.

Industrial Machinery & Equipment

There are several things that we do to get job seekers from college career fairs into our online application process.

1. We post our jobs on the University job board, which automatically re-routes students back to our careers website and that particular position.
2. At the career fair, we hand out our business cards that have our careers website on them and inform the students to create a profile and apply for jobs online.
3. If a student is interviewed on campus and they have not applied for a job with us, they will get an email before or immediately after their interview asking them to apply immediately.

CAREER FAIR INQUIRY – 8/16/2011

4. Finally, we tell every student that comes up to us (even if they are not ready to apply) that if they are interested in our organization, they must fill out an online profile and if they do that, they will get automated job alerts from our system that inform them of jobs that they may be interested in.
-

Insurance Carrier

We have postcards and other information that all direct prospective job seekers to apply on-line at our career site.

DEGREE VERSUS RELEVANT EXPERIENCE INQUIRY – 12/11/14

1. *In regards to Basic Qualifications, does your company accept “relevant/related” job experience in lieu of a degree? For example, BQ = Bachelor's degree and four years related work experience or eight years related work experience post high school.*
 2. *How does your company compare related job experience to a degree? In other words, how much related experience is equivalent to a Bachelor's Degree, Master's Degree, Associate Degree, etc.?*
-

Mining Industry

1. Only if we list it on the requisition. For example, we'll accept BQ of X in place of degree. Depends on the job. Not in every position. Limited in use. We have many technical/professional positions at our Company.
 2. No specific standard. Case-by-case basis.
-

Professional and Scientific and Technical Services Industry

We would take one year of related work experience for every year of college. A bachelors would be 4 years related work experience and 6 yrs. for a masters.

Finance and Insurance Industry

1. Yes, for some positions we do, but not all.
 2. Our current guidance is 1 ½ years of experience is equivalent to one year of additional education. However, this is currently under review, and may be shifting to 2 years of experience as equivalent to one year of additional education.
-

Manufacturing Industry

1. In regards to Basic Qualifications, does your company accept “relevant/related” job experience in lieu of a degree? For example, BQ = Bachelor's degree and four years related work experience or eight years related work experience post high school. We do allow this where the hiring manager can articulate how the experience and the education provide the same knowledge, skills, or abilities.

2. How does your company compare related job experience to a degree? In other words, how much related experience is equivalent to a Bachelor's Degree, Master's Degree, Associate Degree, etc.? The hiring manager works with his/her assigned HR Business Partner to determine what type and amount of experience would equate to the degree requirement based on the requirement.
-

Manufacturing Industry

1. In regards to Basic Qualifications, does your company accept "relevant/related" job experience in lieu of a degree? For example, BQ = Bachelor's degree and four years related work experience or eight years related work experience post high school. This depends on the type of job the person is applying for; we are less likely to consider relevant experience as the position becomes higher level and more technical.
 2. How does your company compare related job experience to a degree? In other words, how much related experience is equivalent to a Bachelor's Degree, Master's Degree, Associate Degree, etc.? I would estimate this as an Associate's degree being 1 – 5 years, Bachelor's anywhere from 5 – 10, and Master's degree being more than 10 years.
-

Manufacturing Industry

1. In regards to Basic Qualifications, does your company accept "relevant/related" job experience in lieu of a degree? For example, BQ = Bachelor's degree and four years related work experience or eight years related work experience post high school. Yes, depending on the position. In some cases we may accept relevant experience in place of our preferred credential (i.e. an advanced degree).
 2. How does your company compare related job experience to a degree? In other words, how much related experience is equivalent to a Bachelor's Degree, Master's Degree, Associate Degree, etc.? This would be determined on a position by position basis, but generally the relevant experience is as much or more than the typical time spent on each level of degree.
-

Information Industry

1. Yes, we do accept relevant experience unless the BQ states a Bachelor's Degree is required. If the BQ is written with an education or experience then we look at both to satisfy the BQ.
2. We utilize a 3-to-1 experience equivalency. If a basic qualification is written as a Bachelor's Degree or equivalent experience and the job seeker doesn't have a BA/BS

degree they would need at least 12 years related experience to satisfy that BQ requirement. We also highly value internal experience, so for internals we utilize a reduced 1.5-to-1 experience equivalency.

Professional and Scientific and Technical Services Industry

From a recruiting perspective -- degree substitution in lieu of work experience is based on project requirements and type of positions. For example, engineering types of positions that require a Professional Engineer will not allow degree substitution. If a degree can be substituted with years of experience, typically it's around 8-10 yrs of experience for bachelor's degree.

EMPLOYEE REFERRAL PROGRAMS INQUIRY – 8/3/2011

Hotel

Q: Who is eligible to participate in the (company) Associate Referral Program?

A: All management and non-management associates are eligible to participate in this program. Exceptions include:

- Franchised employees
- Anyone involved in the hiring of an associate (including those involved in the interview process)
- Anyone involved directly or indirectly in the employment/staffing function for any SBU/Staff Department within the Company
- Executives at the Vice-President level and above
- Full-Service General Managers (CFRST General Managers are eligible to make referrals to other properties as long as they are not involved in the selection process)

Q: Who can associates refer for employment at (Company)?

A: Associates may refer a business contact, friend, acquaintance, or family member.

Q: Are there any groups of individuals that could be referred that would not be eligible for the referral bonus award?

A: Yes, individuals in the following categories would not be eligible for consideration:

- Current associates
- A referral to a Payrolled Temporary Associate Position
- Current temporary, pool, seasonal, or task force associates
- Contract associates currently on a project
- Consultants/Independent contractors currently on a project
- Current Interns
- Interns that have worked with us within the last 18 months
- Outside temporary agency employees currently on assignment with us or who have an obligation to the vendor for the referral source
- Previous associates who have been employed by the company within the past 12 months
- Candidates who have been interviewed within the previous six months by a recruiting manager or hiring manager.
- Referrals gained by advertising, purchasing, or obtaining list of any nature
- Current associates from Avendra, (company) Credit Union, (Company)Franchise properties, and any other company affiliated with us
- Positions reporting directly to the ExecuStay business
- Associates who become associates through an acquisition

Q: What timeframe guidelines are there for applying for an employee referral

EMPLOYEE REFERRAL PROGRAMS INQUIRY – 8/3/2011

bonus?

A: All claims must be received no later than 6 months from the referred associate's hire date.

Q: When will you receive your referral bonus award?

A: For all management positions and headquarters hourly/non-management positions, the referral bonus is paid after the referred associate completes 90 days of service. In order for the referring associate to receive his/her referral bonus, both the referring associate and hired applicant must be on (Company's) payroll at the end of the 90-day introductory period AND still employed with (Company) on the date that the bonus is paid.

Q: What happens if multiple associates refer the same applicant and the applicant is hired?

A: The bonus will be paid only to the associate who first referred the candidate. Multiple associates will not be paid and are not eligible to split the bonus payment.

Anonymous

1. Does your organization currently have an incentive program in place for employees referring qualified job applicants?
Yes
2. Who is eligible to make a referral?
Any Parent Company employee
3. What incentives are offered?
\$5 gift certificate to SUBWAY for turning in a referral, \$50 gift certificate/Debit Card if the referred candidate makes it to our corporate office interview stage (after the phone screen stage), \$750 if the referred candidate is eventually hired. (For intern hires, the \$750 comes in parts: the referrer receives \$250 if the intern is hired and \$500 if the intern is offered and accepts full time employment after the intern graduates.
4. Are there other conditions, e.g., the referred employee must remain at the company through their probationary period?
No
5. How effective is your program in promoting your overall recruiting efforts?
We've found that we've only hired around the same percentage of ERP referrals of those referred as we do for our external hires who just apply on line or who come from our focus schools (around 1% of all applicants are actually hired and

EMPLOYEE REFERRAL PROGRAMS INQUIRY – 8/3/2011

around 1% of all employee referrals are actually hired). Therefore, we consider the employee referral a piece of our hiring strategy but one of many components. You also need to be sure to keep track of the diversity of the employee referrals to ensure it is in line with diversity hiring efforts as well.

6. Would you be willing to have a 1:1 discussion regarding your program?

Sure

Heavy Construction

1. Does your organization currently have an incentive program in place for employees referring qualified job applicants?

Yes

2. Who is eligible to make a referral?

All employees in a U.S. pay status are eligible to participate, with the following exceptions:

- *Talent Management Department employees and representatives*
 - *Managers or Supervisors with any influence over the hiring decision Officers*
- All positions are eligible for a Referral Award except:*
- *Casual, Agency, Temporary, Part-Time and Craft / Seasonal positions*
 - *Former employees who are returning within 18 months of separation*

3. What incentives are offered?

Varies depending on job working to be filled, length of time needing to fill etc., but the range is \$500 (entry level/non exempt to \$2,500 for exempt and engineer design (non-ex) assignments). Pots can be even greater depending on the difficulty to fill assignment.

4. Are there other conditions, e.g., the referred employee must remain at the company through their probationary period?

After referred employee has been employed 90 days, then the referring party files paperwork for compensation/award.

5. How effective is your program in promoting your overall recruiting efforts?

Good quality of hire usually but not as effective on promoting diversity. Nor is it something that can be counted on, just can't be sure of obtaining any referrals.

6. Would you be willing to have a 1:1 discussion regarding your program?

Sure, I'd direct them to our staffing lead.

EMPLOYEE REFERRAL PROGRAMS INQUIRY – 8/3/2011

Paper and Allied Products

1. Does your organization currently have an incentive program in place for employees referring qualified job applicants?
Yes.
2. Who is eligible to make a referral?
See below.
3. What incentives are offered?
Generally, the referring employee receives \$125 after the referred employee successfully completes 12 weeks of employment, and another \$125 after the referred employee successfully completes 6 months of employment. We have tried some other approaches (full reward at 12 weeks, and higher dollar value) for specific locations or positions when there was a critical need to fill positions.
4. Are there other conditions, e.g., the referred employee must remain at the company through their probationary period?
The referring employee must also remain in good standing in order to receive the reward.
5. How effective is your program in promoting your overall recruiting efforts?
I don't have access to the data on this, but my perception is that we are paying for referrals to candidates we would reach anyway. I think that the more targeted programs, by location or position, were more valuable than the general program.
6. Would you be willing to have a 1:1 discussion regarding your program?
Always happy to help, but I'm not sure I have much more to offer on the subject than what is included here.

EMPLOYEE REFERRAL REWARD PROGRAM

The following guidelines are set for the Employee Referral Reward Program:

1. The candidate must indicate the name of the referring employee on the Application for Employment at the time the application is submitted.
2. Referrals are subject to policy 2.1.23, Employment of Relatives. The referring employee must know the candidate and have encouraged him/her to apply.
3. The referral must meet both the minimum job and standard hiring requirements.

EMPLOYEE REFERRAL PROGRAMS INQUIRY – 8/3/2011

4. The employee making the referral must be in good standing and not have received any written warnings (discipline or attendance) or suspensions during the ninety (90) days prior to being eligible for the Referral Reward.
 5. The employee making the referral will be eligible to receive \$125.00 (gross) when the referral completes 84 days of continuous employment.
 6. When the referral completes 6 months of employment, the employee making the referral will be eligible to receive an additional \$125.00 (gross).
 7. Rehires and transfers are not eligible for the Referral Reward Program.
 8. Individuals hired for temporary assignments are not eligible.
 9. Supervisors and Managers may not receive a Referral Reward for a referral who will report directly to them.
 10. Human Resources employees who are involved in the recruitment and selection process may not receive a Referral Reward.
 11. Referral does not guarantee employment.
 12. The Referral Reward will be paid in a separate check(s) and is subject to taxes.
-

INQUIRY re EMPLOYMENT & EDUCATION VERIFICATION – 8/25/2010

Engineering and Management Services

Do you currently verify previous employers for non-exempt hires? X Yes No

If so, do you capture this information by number of years? X Yes No

How many years? Past 10 years

If you capture previous employment data by some other metric please describe.

 N/A

Do you verify education if provided for non-exempt hires? Yes X No

We only verify post high school education if required by the position description.

What options do you provide candidates whose previous employers or schools do not respond or who do not verify their employment?

Employers – If we're unable to gather prior employment verification from a prior employer, and have not been able to gather such from other prior employers to a satisfactory level, we may ask the candidate to obtain and provide us with written verification. Schools – Same. We may ask the candidate to obtain and provide us with written verification.

Depository Institution

Do you currently verify previous employers for non-exempt hires? X Yes No

If so, do you capture this information by number of years? X Yes No

How many years? Employment for last 7 years as applicable

Do you verify education if provided for non-exempt hires? X Yes No

What options do you provide candidates whose previous employers or schools do not respond or who do not verify their employment?

Provide copy of diploma if received degree or W-2 for employment

INQUIRY re EMPLOYMENT & EDUCATION VERIFICATION – 8/25/2010

Electric, Gas & Sanitary Services

Do you currently verify previous employers for non-exempt hires? X Yes No

If so, do you capture this information by number of years?

We verify what is provided by applicants

Do you verify education if provided for non-exempt hires? X Yes No

What options do you provide candidates whose previous employers or schools do not respond or who do not verify their employment?

It depends on the position. The verification process is more strict for fiduciary positions than other positions such as drivers. For drivers, the main focus would be verification of their CDL and DOT requirements.

Electric, Gas & Sanitary Services

Do you currently verify previous employers for non-exempt hires? X Yes No

If so, do you capture this information by number of years? X Yes No

How many years? 7 years

Do you verify education if provided for non-exempt hires? X Yes No

What options do you provide candidates whose previous employers or schools do not respond or who do not verify their employment?

We rely on the background check report from a 3rd party vendor who performs the checks. Based on the totality of the report we decide whether we will hire the candidate. In extremely rare circumstances, we will require the candidate to provide documentation to support the information that was provided on the resume/application.

Instruments and Related Products

Do you currently verify previous employers for non-exempt hires? X Yes No

If so, do you capture this information by number of years? X Yes No

How many years?

The number of years vary depending on the information provided.

INQUIRY re EMPLOYMENT & EDUCATION VERIFICATION – 8/25/2010

If you capture previous employment data by some other metric please describe.

We do not use other metrics to capture previous employment data.

Do you verify education if provided for non-exempt hires? ☒ Yes ☐ No

What options do you provide candidates whose previous employers or schools do not respond or who do not verify their employment?

We offer the individual an opportunity to provide the documentation such as transcripts and other applicable records.

Industrial Machinery & Equipment

Do you currently verify previous employers for non-exempt hires? ☒ Yes ☐ No

If so, do you capture this information by number of years? ☐ Yes ☒ No

If you capture previous employment data by some other metric please describe.

We verify dates and ensure they match the information provided on the application

Do you verify education if provided for non-exempt hires? ☒ Yes ☐ No

What options do you provide candidates whose previous employers or schools do not respond or who do not verify their employment?

Our vendor utilizes many different means to obtain this information including verification documentation provided by the candidates.

EMPLOYMENT OF MINORS INQUIRY – 11/21/14

1. *Does your company employ individuals under the age of 18 either full-time or part-time, excluding interns?*
 2. *If so, for what types of positions do you hire them?*
 3. *Do you have a policy addressing employment of minors' protocols that you would be willing to share?*
-

Companies that do not employ minors at all:

Transportation and Warehousing (2)

Utilities Industry

Manufacturing Industry (3)

Administrative/Support and Waste Management/Remediation Services Industry

Finance and Insurance Industry

Professional and Scientific and Technical Services

Health Care and Social Assistance

1. Yes, primarily part-time.
 2. Typically food services and kitchen positions in our senior living facilities.
 3. No policies addressing this population. The number of employed minors is very small at < 0.5% of our workforce. However, an evening orientation was developed partially to address this population since most are high school students and unable to attend our usual Monday orientations. We also send out annual reminders to managers who employ minors in their departments reminding them of the state work rules for minors.
-

Mining Industry

1. Generally, no.
2. N/A.
3. Generally, our company does not hire persons less than 18 years of age, but occasionally, persons 16 or 17 years of age are hired for non-hazardous jobs of known short duration. Supervisors must comply with federal, state and local regulations for the employment of minors. No individual under the age of 16 shall be hired in any capacity.

Anonymous

We have a general rule that an employee should be 18. There are some exceptions that are made for good reason: 1) sometimes in a country (e.g., Austria), we were asked by the government to support its initiative in employing minors (15-almost 18) to give them some limited work experience. 2) Other exceptions might include students (usually someone's relative) who come in during holiday breaks or summers to do clerical work (they are paid; and we ask the business to obtain state permits where required). In any case, we do not want minors working in hazardous areas or on machinery.

FIELD INVESTIGATORS/INDEPENDENT CONTRACTOR AUDITS INQUIRY – 2/5/14

1. *If your company utilizes field investigators to conduct background checks, are they classified as independent contractors, employees, or do you have some of each?*
 2. *If you utilize independent contractors as field investigators, have state enforcement officials scrutinized that classification? If so, what was the result of that investigation?*
-

Ball and Roller Bearing Manufacturing

1. If your company utilizes field investigators to conduct background checks, are they classified as independent contractors, employees, or do you have some of each? We outsource this entire function in our selection process. HireRight, third party provider, does the background check.
 2. If you utilize independent contractors as field investigators, have state enforcement officials scrutinized that classification? If so, what was the result of that investigation? n/a
-

Engineering Services

We do not utilize field investigators but outsource screening to a third party vendor.

Responses to Inquiry re Green Card Agreements (October 2009)

Employee Agreement for Permanent Residency (Green Card) Sponsorship

Company agrees to file an employment based petition on behalf of _____ (hereinafter "Employee"), that, if approved, will permit the employee and immediate members of employee's family to apply for U.S. permanent resident status. Company agrees to pay the costs and attorney's fees related to filing of this petition and application for permanent resident status. Attorney's fees relating to motions to reconsider, a denial of said petition, and/or application or attorney's fees related to appeals of the denial of said petition or application are not specifically included in this Agreement.

In consideration of the foregoing, if the employee's employment relationship with Company is terminated, either within two years from the date permanent resident status is granted to him by the U.S. Citizenship and Immigration Services or at any time prior to a decision once legal costs have been incurred, employee agrees to reimburse the Company for all costs and attorney's fees paid by the Company on employee's behalf pursuant to this Agreement.. Reimbursement by the employee is required whether the termination of employment is voluntary or involuntary. Reimbursement will not be required if employee's termination is a result of a job elimination as defined by the Company's Salary and benefit Continuation Plan. If requested by the Company, the employee will execute a promissory note for the full amount owed at the time of termination of employment.

The employee should be aware that the costs and attorney's fees for filing a petition for permanent resident status with the U.S. Citizenship and Immigration Service will cost approximately \$5,000 to \$12,000. The employee agrees that the Company may seek reimbursement through a deduction of the employee's paycheck, severance package, or any other legal means of collection available to the Company. This Agreement in no way constitutes a contract of employment for any length of time. The employee acknowledges that the employment relationship continues to be "at will".

As to your question regarding how far in advance do we initiate the green card process, that depends. We are in the process of establishing a policy, but in general, we like to have the employee go through at least one performance cycle to make sure they are meeting our expectations and we are meeting their expectations. That said, we will normally begin the green card process about 1 - 1.5 years into their first visa being granted.

HIRING PRACTICES – 10/21/2010

What are companies doing about executives who tend to refer their golf buddy or neighbor's child for a position, whether available or not and whether qualified or not, with the expectation that the person will be interviewed and most likely hired?

Anonymous

We conduct a courtesy interview (that's all we promise the referring executive), but in terms of actual hiring decisions, it is based on the person's qualifications. We also try to set an expectation among the executives that they all need to follow a proper process. My personal feeling is that this approach is better followed in the corporate office, but not in the field offices. Unfortunately, we do not have a clear answer.

Anonymous

We do process senior executive requests with special written correspondence to the requester and candidate, but the process and criteria for employment are the same regardless of the connections to senior executives. For all positions handled through e-employment systems, the first step in the process remains registering in the e-system.

Anonymous

We have an understood process that candidates who are not minimally qualified are not given the chance to move forward in our process. That being said, if we receive a referral from any of our employees, whether an executive or not, we ensure that the recruiter in charge of that requisition, take a close look at the credentials, and, at times, we may go one step further than we would with another candidate with a courtesy phone interview, etc. But, in the end, if they are not the best qualified candidate, they are not moved forward in the process.

Anonymous

HIRING PRACTICES – 10/21/2010

While we do interview executive referrals and keep the executive updated on the status of their referral, we do not consider candidates for positions for which they do not meet the minimum qualifications for the role. If the referral does meet the qualifications, there is no promise that the candidate will get interviewed or hired. As an organization, we believe strongly that we should hire the most qualified candidate for the role.

Anonymous

The executive referrals I receive fall into two categories. The first and easiest to deal with are ones where the executive clearly states that they do not expect any special treatment or consideration. For these I will simply invite them to create a profile on our careers site and apply for any position they are interested in. I then ensure that they receive the proper acknowledgement for their application.

The second and more interesting is when there is a specific request to consider the candidate for a particular role. In this case I ensure the candidate follows the same process as all other candidates and is not treated differently from a process and evaluation standpoint. I will however communicate differently and more frequently with the candidate to ensure they always know where they stand in the process. We generally are not asked to give any special consideration outside our process, but certainly a referral from the right executive can go a long way.

PHOTO TOOLS INQUIRY – 1/29/13

We have another EEAC member who would like to know if your company uses any type of photo tool as part of your succession planning or other high potential evaluations. If so, who is the vendor and would you mind chatting with this EEAC member about the photo tool you use?

Companies Who Do Not Use a Photo Tool

Ball and Roller Bearing Manufacturing
Engineering Services
All Other Basic Organic Chemical Manufacturing
Engineering Services (2)
Softwood Veneer and Plywood Manufacturing

Photographic Film, Paper, Plate, and Chemical Manufacturing

We do use photographs. We actually use our business cards which contain our photographs - all done internally.

All Other Nondepository Credit Intermediation

We have in our HR systems photos of employees (to the extent that the employee has uploaded their own digital photo and by doing so consents to its use in various tools, processes and systems).

Drugs and Druggists' Sundries Merchant Wholesalers

We use a program called Success Factors for our succession planning. There is a feature within the system whereby a photo of the associate can be uploaded into their profile. Right now, it's completely optional and up to the associate whether they want to add their photo to their profile or not. I don't think there are any restrictions – so the associate can basically log in and it acts like any other photo upload tool (similar to Facebook, Twitter, etc.) where the person can just pick a photo from a file on their computer and upload it into the system.

The only time that we specifically request an associate to put a photo in – or obtain a photo to put into the system – is if it's a higher level executive, and they are doing succession planning at the C-Suite level or the level just below that.

Line-Haul Railroads

Yes, we use a photo tool as a part of succession planning. Pictures are added to charts using Microsoft Visio.

SUCCESSION PLANNING INQUIRY – 10/31/13

1. *Do you allow your succession planning groups to supplement applicant lists on job openings?*
 2. *If so, do you make the employees identified on the list apply to the opening, or do you link them into the opening for consideration?*
 3. *Would you be willing to discuss your process with this EEAC member company?*
-

Wireless Telecommunications Carriers (except Satellite)

1. Do you allow your succession planning groups to supplement applicant lists on job openings? For Executive positions, HR reviews our succession planning groups and identifies individuals that are qualified for open positions. If HR finds someone in succession planning group that we think should be considered for the position, we recommend they apply for the position. It is the responsibility of the individual identified to apply for the position through the normal job posting process to be considered in the applicant pool.
 2. If so, do you make the employees identified on the list apply to the opening, or do you link them into the opening for consideration? Yes, it is recommended to the individual to apply if interested in the position. If interested, the individual applies through the (Company) internal job site.
 3. Would you be willing to discuss your process with this EEAC member company? Yes, if needed.
-

RETENTION OF INTERVIEWING NOTES INQUIRY – 6/8/2011

Do you retain the notes of all those who interviewed the applicant or only the final decision maker(s)?

Heavy Construction

Our policy is to retain all the notes not just the decision maker's. They are attached to the candidate record in Taleo.

Hotel

We retain notes for all who interviewed.

Wholesale Trade-Nondurable Goods

I think it varies by location, but for the most part we have notes from anyone who does an interview, i.e. it isn't limited to the final decision-maker(s)' notes.

Paper and Allied Products

We retain all interview notes from all stages of the process.

Food and Kindred Products

It is our practice to retain all interview documents or at the very least, the consensus forms. Collecting all of the actual interview documents for the job file folders is sometimes a challenge because each candidate is often interviewed multiple times by teams of two or more.

Insurance Carrier

We keep notes on all who interviewed.

DIVERSITY OF INTERVIEWING PANELS INQUIRY – 2/23/2011

Has anyone developed a formal process for tracking the diversity of interviewing panels and if so, what is the process, and have you developed metrics re same?

Insurance Carrier

We do not do many panel interviews, but do have multiple interviews for some levels of positions. The interviewers are selected by position and functional area. We do not have any formal process in place for this type of interviewing, it is very situational.

Heavy Construction

We have used interview panels with limited degree but do not have a process for tracking diversity metrics of them.

SIGN LANGUAGE INTERPRETERS INQUIRY - 6/25/13

1. *Does your organization utilize a sign language interpretation service to conduct employment interviews?*
 2. *If so, have you considered or do you use a video remote interpretation service?*
 3. *Do you have an interpretation service you can recommend?*
-

AmerisourceBergen

1. Does your organization utilize a sign language interpretation service to conduct employment interviews? We don't have someone who regularly does this – but we have hired them on occasion on a one-off basis for important events/meetings.
 2. If so, have you considered or do you use a video remote interpretation service?
No.
 3. Do you have an interpretation service you can recommend? We don't use a service on a regular enough basis to provide recommendations.
-

VIDEO CONFERENCING OF INTERVIEWS INQUIRY – 4/20/2011

Are any of you are using video conferencing to conduct interviews, instead of an in-person interview, in situations where travel is a challenge or too costly? The interview most likely would not actually be recorded and retained.

Industrial Machinery & Equipment

No, we don't. The closest we would use to this is a telephone screen, but usually we use this in the earlier stages of recruitment.

Insurance Carrier

We actually had a request from a hiring manager last week to conduct an interview via Skype. There were a few issues with the scenario: Skype is not an approved software for our systems, so he would have had to use his personal computer. That's a "no-go". Secondly, I believe Skype does have the ability to record...which is also a "no-go". As a result of the request, however, we are beginning to talk about what our policy is going to be on this and if there is a way to incorporate some flexibility into the process.

Instruments and Related Products

We do not conduct conference or electronic interviews.

Industrial Machinery & Equipment

We have used video conferencing for interviews, both for international as well as domestic interviews. The final candidate is ultimately interviewed in person as well, but the initial interviews, may be held via video conference when there has been time constraints or costly travel involved.

Transportation Equipment

We are using video conferencing to interview internal candidates for positions at (Compnay) locations with that capability and discussed launching this capability for externals, but I do not believe the initiative was launched.

VIDEO CONFERENCING OF INTERVIEWS INQUIRY – 4/20/2011

Wholesale Trade-Nondurable Goods

For the most part, people have not done video conferencing for interviews except in one subsidiary. They do not use Skype, however. In most cases they require the person to go to one of the company's local offices to do the video-conference interview, though in a couple of cases they have had the person go to a FedEx/Kinkos or other such place that has video conferencing capabilities. They have not, to my HR Director's knowledge, allowed the candidate to use their own personal laptop or computer for these interviews.

The only other exception was a candidate who was here at our Corporate office for interviews, but one of the interviewers was in our California Regional Office – so she did part of her interview by video conference, but everything was handled with internal equipment.

Insurance Carrier

We have only used it once and it was for a high level candidate due to travel schedules. We did not record it.

VIDEO CONFERENCING OF INTERVIEWS INQUIRY (2) – 3/26/14

1. *Are any of you using video conferencing to conduct interviews, instead of in-person interviews, in situations where travel is a challenge or too costly?*
2. *If so, do you record and/or retain the video?*

Electrical Contractors and Other Wiring Installation Contractors

Yes, we have used Skype or other similar technologies. No, we have not recorded interviews for retention.

Meat and Meat Product Merchant Wholesalers

1. *Are any of you using video conferencing to conduct interviews, instead of in-person interviews, in situations where travel is a challenge or too costly?* We've done a few via Skype when a US position supported our international business and the international side wanted to interview the candidate as well.
2. *If so, do you record and/or retain the video?* We haven't kept the recording, just interview notes.

Insurance Agencies and Brokerages

1. *Are any of you using video conferencing to conduct interviews, instead of in-person interviews, in situations where travel is a challenge or too costly?* Yes, this option is offered to hiring managers. We use a vendor, greenjobinterviews.com, who sets up the meeting, ships the camera (if needed), and handles the logistics of the call. While it's offered to all, it is still not used very often.
 2. *If so, do you record and/or retain the video?* No, we do not. Managers use a candidate evaluation form (CEF) for these interviews, as they do for any interviews conducted. The CEF is the only documentation kept to document the interview results and hiring decision.
-

VIDEO CONFERENCING OF INTERVIEWS INQUIRY (2) – 3/26/14

Savings Institutions

We are piloting with Skype. Videos are not recorded. We don't see Skype as an enterprise-wide solution. We'd probably search for a vendor that offered more functionality for video meetings, etc.

Anonymous

1. Are any of you using video conferencing to conduct interviews, instead of in-person interviews, in situations where travel is a challenge or too costly? Our Corporate Talent Acquisition does use video conference interviews with some of our remote candidates, which is done primarily through Jabber or through our internal video conference equipment.
 2. If so, do you record and/or retain the video? We don't record the interviews, but what we do retain are the interview guides/notes that are taken during the interviews.
-

Drugs and Druggists' Sundries Merchant Wholesalers

1. Are any of you using video conferencing to conduct interviews, instead of in-person interviews, in situations where travel is a challenge or too costly? We haven't done this as a regular practice. There may have been one or two interviews conducted via Skype, but it's been a rare occurrence.
 2. If so, do you record and/or retain the video? In the event that the interview was conducted via Skype, the video was not retained – only the interviewer's notes.
-

Construction Machinery Manufacturing

We do not do this.

VIDEO CONFERENCING OF INTERVIEWS INQUIRY (2) – 3/26/14

All Other Miscellaneous Electrical Equipment and Component Manufacturing

1. Are any of you using video conferencing to conduct interviews, instead of in-person interviews, in situations where travel is a challenge or too costly? Yes, just starting. Will be using HireVue's technology.
 2. If so, do you record and/or retain the video? Will be using their technology for both live, non-recorded interviews, and recorded interviews (if candidates consent).
-

Other Nonhazardous Waste Treatment and Disposal

1. Are any of you using video conferencing to conduct interviews, instead of in-person interviews, in situations where travel is a challenge or too costly? Yes
 2. If so, do you record and/or retain the video? No. We capture an interview via an interview guide booklet, which captures questions and applicant's responses. This is the same process for an in-person interview.
-

Direct Health and Medical Insurance Carriers

1. Are any of you using video conferencing to conduct interviews, instead of in-person interviews, in situations where travel is a challenge or too costly? We do conduct video interviews. We use Green Interview as our vendor and we also have technology that our IT department created.
 2. If so, do you record and/or retain the video? We do not record the video.
-

Anonymous

A small pocket of one of our GBUs has used video conferencing BUT does not retain the videos.

Frankly, it isn't something we support from the corporate groups.

VIDEO CONFERENCING OF INTERVIEWS INQUIRY (2) – 3/26/14

Direct Life Insurance Carriers

I am not aware of any video interviews taking place at Prudential.

Research & Development in Biotechnology

1. Are any of you using video conferencing to conduct interviews, instead of in-person interviews, in situations where travel is a challenge or too costly? No, we have not had to yet, but do consider it an option.
 2. If so, do you record and/or retain the video? No, we would not retain the video. The interview would be treated the same as if it were in person.
-

Ball and Roller Bearing Manufacturing

1. Are any of you using video conferencing to conduct interviews, instead of in-person interviews, in situations where travel is a challenge or too costly? It is not part of our standard process but occasionally we have used video conferencing where travel issues arise.
 2. If so, do you record and/or retain the video? We do not retain the video. We do keep all of the documentation we would retain in a standard interview.
-

Responses to Inquiry re On-Line Application Process for IWD (September 2009)

Business Services

Equal Opportunity: All qualified applicants will receive consideration for employment without regard to race, color, religion, gender, gender identity or expression, sexual orientation, national origin, genetics, disability, age, or veteran status.

If you are a qualified individual with a disability or a disabled veteran, you may request a reasonable accommodation if you are unable or limited in your ability to use or access [www.\(company\).com/employment/us](http://www.(company).com/employment/us) as a result of your disability. You can request reasonable accommodations by calling (phone number) or by sending an email to (email address).

Electric, Gas & Sanitary Services

We had to place a note that if an applicant needed special accommodation in order to apply for a position they had to click on a link. Once they clicked on the link a broader explanation was given along with a phone number. The following is the broader message:

ADAAA Accommodation Request

In compliance with the Americans with Disabilities Act Amendments Act (ADAAA), if you have a disability and want to request an accommodation in order to apply for a position with (company), please call (phone number) or email.

Before we added the broader message we received a large number of calls from individuals who wanted to check the status of their application. Now we rarely get any calls.

Paper and Allied Products

In the past year we have tested our website for use with assistive technology and where problems were identified we are making changes to the webpage to make it as accessible as possible. Unfortunately, we found out that the ATS that we are in the process of bringing up is not compatible. Therefore, we will be using the following text when we bring up our new careers page in the next few weeks:

(Company) is an equal opportunity employer. Individuals with disabilities who wish to request an accommodation in the application process, or who experience difficulties accessing this website with assistive technology may call (Company) at (phone number) or email

Responses to Inquiry re On-Line Application Process for IWD (September 2009)

us. Relay calls can be made by dialing 711 or the relay number for your state.

We are hoping that by specifying "Individuals with disabilities" in the statement we will limit the number of people who try to circumvent the on-line system for personal reasons; however, our plan would be to push them back to the website if there was no indication that the request was being made for an ADA qualifying reason.

Management Services (Health)

We have a note on our internet site on how people may request accommodations

They call the number listed online and reach the (company) Employee Service Center (ESC). The ESC asks a few questions about the assistance they require. If it's to accommodate a disability, they send them a paper application or try to set up some assistance for them. They may forward the accommodation request to the recruiter.

If it's just because the person doesn't want to apply online or doesn't have a computer - the ESC advises them to go to a local library or come to (Company) and use one of our application kiosks.

In the last 2 years, (company) in Arizona has never had to process a paper application. We've been able to accommodate through the kiosks or local libraries, etc. Even for those applicants who do not speak English.

Electric Services

We have a link on the "careers" website that instructs an individual with an impairment to click on to request assistance. Someone will contact them in person to help them.

JOB LISTING SERVICE PROVIDERS INQUIRY – 2/20/14

For a number of years, a member company has used Direct Employers to list their jobs with the local ESDS (employment service delivery systems) through their signed agreement with each State Workforce Agency. eQuest has made a proposal to the member company to provide this same service. The member is interested in the following information:

- 1. What service does your company use for job listings with the ESDS or do you handle this in-house?*
 - 2. If your company uses eQuest, how long have you used them?*
 - 3. Why did you choose eQuest versus another provider?*
 - 4. Have you ever used Direct Employers for this service?*
 - 5. If so, what prompted you to change to a different provider?*
 - 6. Have you had any audit issues resulting from either provider failing to list a job?*
 - 7. Does your company post jobs in all states?*
-

Pharmaceutical Preparation Manufacturing

1. What service does your company use for job listings with the ESDS or do you handle this in-house? DirectEmployer
 2. If your company uses eQuest, how long have you used them?
 3. Why did you choose eQuest versus another provider?
 4. Have you ever used Direct Employers for this service?
 5. If so, what prompted you to change to a different provider?
 6. Have you had any audit issues resulting from either provider failing to list a job?
 7. Does your company post jobs in all states? Not all but many via DirectEmployer
-

JOB LISTING SERVICE PROVIDERS INQUIRY – 2/20/14

Meat and Meat Product Merchant Wholesalers

1. What service does your company use for job listings with the ESDS or do you handle this in-house? Direct Employers
 2. If your company uses eQuest, how long have you used them? n/a
 3. Why did you choose eQuest versus another provider? n/a
 4. Have you ever used Direct Employers for this service? Currently using
 5. If so, what prompted you to change to a different provider? n/a
 6. Have you had any audit issues resulting from either provider failing to list a job? Haven't had any issues but haven't been asked.
 7. Does your company post jobs in all states? Only through DirectEmployer.
-

Medical Laboratories

1. What service does your company use for job listings with the ESDS or do you handle this in-house? LocalJobNetwork
 2. If your company uses eQuest, how long have you used them? Do not use them
 3. Why did you choose eQuest versus another provider?
 4. Have you ever used Direct Employers for this service? We used them in the past, and they were often not able to provide the job listing detail required by the OFCCP for audits, so we changed vendors
 5. If so, what prompted you to change to a different provider? See above answer
 6. Have you had any audit issues resulting from either provider failing to list a job? Difficult to tell if Direct Employers was or was not listing the jobs as they couldn't provide documentation to show that they were
 7. Does your company post jobs in all states? Yes
-

JOB LISTING SERVICE PROVIDERS INQUIRY – 2/20/14

Anonymous

1. What service does your company use for job listings with the ESDS or do you handle this in-house? We moved from DirectEmployers to handling this in-house.
2. If your company uses eQuest, how long have you used them?
3. Why did you choose eQuest versus another provider?
4. Have you ever used Direct Employers for this service? Yes
5. If so, what prompted you to change to a different provider? They were not able to have our positions actually posted to the appropriate ESDS site. They were only emailed to the branch manager.
6. Have you had any audit issues resulting from either provider failing to list a job? No because we were posting ourselves when we were audited.
7. Does your company post jobs in all states? I think we are up to 34 different states at this time.

As a note: We found the Direct Employer representative in our area left only to go to eQuest. They gave us the same song and dance at eQuest as they did at DirectEmployers. Found both companies to be pushy to try and force you to use their solution as the only way to be compliant. Typical sales process. Poor knowledge of regulations. Awful!

Other Nonhazardous Waste Treatment and Disposal

1. What service does your company use for job listings with the ESDS or do you handle this in-house? DirectEmployers
2. If your company uses eQuest, how long have you used them? No
3. Why did you choose eQuest versus another provider? N/A
4. Have you ever used Direct Employers for this service? Yes, and still use their services
5. If so, what prompted you to change to a different provider? N/A

JOB LISTING SERVICE PROVIDERS INQUIRY – 2/20/14

6. Have you had any audit issues resulting from either provider failing to list a job? A couple years ago, we had an issue providing a specific requisition listing due to technical issues between DE and our other vendor that was handling requisitions. The issue has been resolved since.
 7. Does your company post jobs in all states? Yes
-

Industrial Gas Manufacturing

1. What service does your company use for job listings with the ESDS or do you handle this in-house? Local Job Network
 2. If your company uses eQuest, how long have you used them?
 3. Why did you choose eQuest versus another provider?
 4. Have you ever used Direct Employers for this service? Yes
 5. If so, what prompted you to change to a different provider? They couldn't provide proof of job posting and LJN could. Cost was also cheaper.
 6. Have you had any audit issues resulting from either provider failing to list a job? I'm in the middle of this now. We have an open audit and we can't show proof of posting.
 7. Does your company post jobs in all states? No
-

Anonymous

We have heard that several contractors, including (a large construction management company) had issues with eQuest posting their jobs. We would not use them.

All Other Miscellaneous Electrical Equipment and Component Manufacturing

1. What service does your company use for job listings with the ESDS or do you handle this in-house? DirectEmployers

JOB LISTING SERVICE PROVIDERS INQUIRY – 2/20/14

2. If your company uses eQuest, how long have you used them? NA
3. Why did you choose eQuest versus another provider? NA
4. Have you ever used Direct Employers for this service? Yes
5. If so, what prompted you to change to a different provider? Still with them
6. Have you had any audit issues resulting from either provider failing to list a job? I think just one state—Pennsylvania (but my colleague can confirm). My colleague/others have worked with DirectEmployers to address open issues.
7. Does your company post jobs in all states? Yes. The system DirectEmployers currently has in place works well with the ESDS in 38 states. They are working on the changes needed to be able to deliver jobs in the manner accepted by the ESDS for the other 12 states and should have that in place by year end. They do currently deliver job postings to all 50 states and will provide documentation of job postings delivered to a state's ESDS in the event of an audit.

Ball and Roller Bearing Manufacturing

1. What service does your company use for job listings with the ESDS or do you handle this in-house? We currently use America's Job Exchange but are in the process of switching to eQuest.
 2. If your company uses eQuest, how long have you used them? N/A
 3. Why did you choose eQuest versus another provider? eQuest package included a comprehensive service then what we were receiving from AJE.
 4. Have you ever used Direct Employers for this service? No
 5. If so, what prompted you to change to a different provider? eQuest offered a more comprehensive set of services which better met our compliance and posting needs
 6. Have you had any audit issues resulting from either provider failing to list a job? No
 7. Does your company post jobs in all states? Yes
-

JOB LISTING SERVICE PROVIDERS INQUIRY – 2/20/14

Savings Institutions

1. What service does your company use for job listings with the ESDS or do you handle this in-house? (Company) has contracted with both DirectEmployers Association and eQuest to meet compliance posting obligations.
 2. If your company uses eQuest, how long have you used them? (Company) has been using eQuest for about three months.
 3. Why did you choose eQuest versus another provider? We chose eQuest because they can fully meet the posting and recordkeeping compliance obligations. By using accounts we already had set up with each state employment delivery system, they manually log in and post our jobs, as well as keep all of the required records and documentation.
 4. Have you ever used Direct Employers for this service? We chose to continue our DirectEmployers contract as well, so that we can have access to their network of diversity posting sites, as well as the membership community, traffic and analytics reporting that we find very valuable, and some of the other new things they are working on that are not yet available.
 5. If so, what prompted you to change to a different provider? Per my responses above, we are using both DirectEmployers and eQuest.
 6. Have you had any audit issues resulting from either provider failing to list a job? None, to date.
 7. Does your company post jobs in all states? No – only those states where we do business and have jobs.
-

ONLINE APPLICATIONS INQUIRY – 11/28/12

1) Does your company take online applications only, hard copy only, or a combination of the two?

2) If online only, are you concerned about possible disparate impact discrimination against those who may not have access to, or know how to use, a computer?

Health Funds

1) Online only

2) Not very much. All of our jobs require understanding how to use computers. We task our recruiting function with reaching out in numerous ways to get to external applicants. Having online only helps us with recordkeeping.

Railroads

1) Yes, we only take online applications for all jobs.

2) Possible disparate impact discrimination is not a concern. In the past two years we have successfully closed 30 OFCCP Compliance Reviews and this point was never brought up.

Food Products

1) We only take online applications for corporate, sales, and salaried positions across the company. Our plant locations only accept paper applications.

2) If we receive inquiries about applying for corporate, sales, and salaried positions, we steer them to our online portal. If they ask for an accommodation in applying, we will assist or explain options such as a library, family friend, workforce center, etc.

Hotels & Resorts

- 1) We only take applications on line.
 - 2) No. Computers are accessible to everyone now. Libraries make computers available and CBOs help their clients.
-

Oil & Gas

- 1) We only take them via online process as they must agree to our ERA before becoming an applicant for employment.
 - 2) No
-

Health Insurance

- 1) Only online
 - 2) No, as people can access public computers (i.e., library) and many job service organizations help them with online applications. In addition, we have three workstations here on campus should they elect to come in to apply and we will help them navigate.
-

Poultry Processing

We take only online applications. We have extremely entry level jobs (no education requirements, no language or literacy requirements). We transitioned away from an all-paper process in 2010. We do not have kiosks or computer stations for applicants at our locations. We saw an increase in applicant flow that we suspect is related to:

- More flexibility in when and where people apply. Under our paper process they had to come into our office and pick up an application. Since our offices are only open 8-5, M-F if they already worked a full time job or were a driver, this was inconvenient.
- More flexibility to get assistance completing the application. If someone needed assistance completing an application, because of literary or language barriers, they had to find a time when both they and their helper could come in during those hours. If the applicant's helper worked or was in school this was inconvenient.

Now applicants can complete applications on the weekends or after normal business hours.

Anecdotally we noticed a lot of people in our lobby waiting for paper applications playing with their smart phones. This indicated to us that our population of applicants was tech savvy enough to complete applications online. We also see about 60% of our entry level applicants have an email address (of course, this is not required). We assume this means they are active computer users already.

We have made an extra effort to reach out to AARP and other organizations that target older workers, because we thought that population might not be as comfortable with technology. During the transition we also made a list of public libraries that offered computers, local unemployment offices (employment security commissions), and other nearby resources for people to access computers. We handed these out when people came into the office to pick up an application.

Engineering & Construction

- 1) Combination of the two.
 - 2) No.
-

Ball Manufacturing

- 1) We use online only.
 - 2) No. There are several different methods for people to not only access a computer, but get assistance in completing the application online. For example, a company can establish a relationship with local job service organizations and those organizations will assist people in completing the application. Another option is an on site kiosk.
-

Healthcare Management

We take online only applications. However, if an individual with a disability requests support we will assist by helping them to upload their resume or connect them with others who may assist with their online applications. As far as having adverse impact for those who do not have access, the local libraries are available with free access to the

internet and computers for all. All one needs to do is sign up and set aside a time to work on their application. We do not have kiosks for applicants to complete applications online. We are a service industry and most of our jobs require at least a basic knowledge of how to use a computer. Also there are free classes at libraries, first come first serve here in Indiana where individuals can take classes on basic computer knowledge, word, excel, access etc.

Food Processing

1. To date, we have selection practices in place where both manual (paper) applications are used as well as online applications. Some of our factories never made the move from paper apps but as we migrate all sites to Taleo this year and next, all of our locations will be using the online apps exclusively.
2. We are not concerned about the move to online apps because we have had great success with these in factories where you might have expected some issues regarding access to computers. In SC, the State Workforce Offices provide access for online applications. In southwest VA, applicants use the public libraries if they don't own computers. In rural areas of IL, IN, and GA, applicants for entry level jobs have found a way to access computers to apply. Diverse applicant pools have not been an issue in any of these areas.

I can't speak to the concern around not having the knowledge to use a computer. We've found that many other companies have taken the same direction we have and applicants appear to be resourceful. If we saw an issue with the applicant pools, I would have been concerned but even in states where our facilities are in rural areas, there has not been an issue.

Engineering & Construction

- 1) Online applications taken only for professional jobs. Take hard copy at our project sites, but only for those that are prescreened and invited to continue thru the process. Candidates cannot just walk up and get an application.
 - 2) No. If someone does not know how to use a computer, they would not be qualified for our positions, other than at the project sites for which we have an alternative process. Access to computers is available thru public sources for those that don't have one.
-

Pharmaceuticals

We just very recently moved to an online-only application, so we haven't had occasion to experience any issues – yet – with folks that may not have access to/know how to use a computer.

PRE-HIRE ASSESSMENTS INQUIRY – 8/6/13

1. *Do you conduct pre-hire assessments?*
 2. *If so, do you ask for demographic information in any of the areas listed below?*
 - a. *Race/ethnicity*
 - b. *Gender*
 - c. *Military status*
 - d. *Disability*
 - e. *Do you capture age information? Age (which of the following options do you provide?)*
 - i. *Over or under 40*
 - ii. *Year of birth*
 3. *Do you inform candidates that the data will not be used as part of the hiring decision and if so, how and when are candidates informed?*
 4. *Do candidates have the ability to opt-out or decline to provide the information?*
 5. *Do you gather this information from the ATS or the assessment vendor?*
-

Industrial and Personal Service Paper Merchant Wholesalers

1. Do you conduct pre-hire assessments? Yes
2. If so, do you ask for demographic information in any of the areas listed below?
 - a. Race/ethnicity – Yes
 - b. Gender – Yes
 - c. Military status – Not until post-offer
 - d. Disability – Not until post-offer
 - e. Do you capture age information? Age (which of the following options do you provide?)
 - i. Over or under 40 – No
 - ii. Year of birth – Only where required for DOT Compliance
3. Do you inform candidates that the data will not be used as part of the hiring decision and if so, how and when are candidates informed? Yes. We include a statement on the request form: Submission of this information is voluntary, and refusal to provide it will not subject you to any adverse treatment. The information obtained will be kept confidential and may only be used in accordance with the provisions of applicable laws, executive orders, and regulations, including those that require the information to be reported to the federal government for civil rights enforcement. The information that you provide on this form will not be made available to hiring officials, and will not be

retained with applicant or employee files.

4. Do candidates have the ability to opt-out or decline to provide the information?
Candidates must respond, but have the option of selecting "I choose not to disclose this information"
 5. Do you gather this information from the ATS or the assessment vendor? We request the information in the ATS during the profile creation process.
-

Elevator and Moving Stairway Manufacturing

1. Do you conduct pre-hire assessments? Yes, we use assessments to help us evaluate final management candidates.
 2. If so, do you ask for demographic information in any of the areas listed below? No to all below
 - a. Race/ethnicity
 - b. Gender
 - c. Military status
 - d. Disability
 - e. Do you capture age information? Age (which of the following options do you provide?)
 - i. Over or under 40
 - ii. Year of birth
 3. Do you inform candidates that the data will not be used as part of the hiring decision and if so, how and when are candidates informed? - Yes, the candidates are told verbally that the assessment is given to all management candidates in the particular position but that the information is used to supplement the information already provided at their interviews.
 4. Do candidates have the ability to opt-out or decline to provide the information? – No
 5. Do you gather this information from the ATS or the Assessment vendor? – Assessment Vendor
-

Other Nonhazardous Waste Treatment and Disposal

1. Do you conduct pre-hire assessments? Yes

2. If so, do you ask for demographic information in any of the areas listed below? NO!!
 - a. Race/ethnicity
 - b. Gender
 - c. Military status
 - d. Disability
 - e. Do you capture age information? Age (which of the following options do you provide?)
 - i. Over or under 40
 - ii. Year of birth
 1. Do you inform candidates that the data will not be used as part of the hiring decision and if so, how and when are candidates informed? N/A
 1. Do candidates have the ability to opt-out or decline to provide the information? N/A. If we were to use such an assessment, we would definitely have those questions optional.
 2. Do you gather this information from the ATS or the assessment vendor? N/A. Our pre-hire assessment is conducted by a vendor.
-

Engineering Services

1. Do you conduct pre-hire assessments? When candidates apply, they complete a profile with standard employment application information and in some cases pre-screening questions. We do not conduct pre-employment testing or assessments.
2. If so, do you ask for demographic information in any of the areas listed below? All candidates are invited to self-identify for race/ethnicity and gender only. We do ask if they have military experience as part of the employment history section.
 - a. Race/ethnicity Yes
 - b. Gender Yes
 - c. Military status Yes
 - d. Disability No
 - e. Do you capture age information? Age (which of the following options do you provide?)
 - i. Over or under 40 No
 - ii. Year of birth No
3. Do you inform candidates that the data will not be used as part of the hiring decision and if so, how and when are candidates informed? Our self-identification invitation includes this statement: We are a Federal contractor subject to affirmative action recordkeeping and reporting requirements, which require the employer to invite job applicants to voluntarily self-identify their race/ethnicity and gender. Submission of this

information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information obtained will be kept confidential and may only be used in accordance with the provisions of applicable federal laws, executive orders and regulations, including those, which require the information to be summarized and reported to the Federal Government for civil rights enforcement purposes.

4. Do candidates have the ability to opt-out or decline to provide the information? Yes
 5. Do you gather this information from the ATS or the assessment vendor? ATS
-

All Other Miscellaneous Food Manufacturing

1. Do you conduct pre-hire assessments? We have facilities that conduct a variety of pre-employment assessments. Use of the assessments is not standard across the organization.
 2. If so, do you ask for demographic information in any of the areas listed below? We ask for race/ethnicity and gender. No other information (such as military, disability or age) is requested.
 - a. Race/ethnicity
 - b. Gender
 - c. Military status
 - d. Disability
 - e. Do you capture age information? Age (which of the following options do you provide?)
 - i. Over or under 40
 - ii. Year of birth
 3. Do you inform candidates that the data will not be used as part of the hiring decision and if so, how and when are candidates informed?
If the assessment is integrated into the ATS (some are), then the information is captured on the initial application and there is a note that the information is not visible to the recruiter or manager who is recruiting and that submission of the data is voluntary. If the assessment is conducted outside the ATS, then there is an instruction that the information is captured for analysis by the test vendor and that submission is voluntary.
 4. Do candidates have the ability to opt-out or decline to provide the information? Yes.
 5. Do you gather this information from the ATS or the assessment vendor? See response to #3.
-

Ball and Roller Bearing Manufacturing

1. Do you conduct pre-hire assessments? Yes
 2. If so, do you ask for demographic information in any of the areas listed below? Not as part of the pre hire assessment
 - a. Race/ethnicity
 - b. Gender
 - c. Military status
 - d. Disability
 - e. Do you capture age information? Age (which of the following options do you provide?)
 - i. Over or under 40
 - ii. Year of birth
 3. Do you inform candidates that the data will not be used as part of the hiring decision and if so, how and when are candidates informed? n/a
 4. Do candidates have the ability to opt-out or decline to provide the information? n/a
 5. Do you gather this information from the ATS or the assessment vendor? We gather this information as part of the application process
-

RECRUITERS SELF-AUDIT CHECKLIST TEMPLATE INQUIRY – 6/12/14

Construction Machinery Manufacturing

You may share this template. We use this template to audit the recruiters work. The recruiters can also use this to ensure they are following each of our process/policy requirements.

2014 USTST Mgmt Recruiting Standard Work Audit Filled Requisition Audit Worksheet

Audit Date:

Auditor:

Requisition Information

Requisition No:

Bus. Unit:

Recruiter (R):

Posting Title:

Coordinator (C):

No. of Openings:

Data Entry (DE):

Req. Creation and Approval (R.)		Irreg. (3)	Comments
Is the Strategy Discussion sheet complete and saved to the electronic req folder on the recruiting share drive?	Y / N		
Is the standard approval line used?	Y / N		
If no, is appropriate approval documentation attached to the req in Taleo?	Y / N		
If SPG or process exception approval was required at this point, is appropriate documentation included on the req in Taleo?	Y / N		

Data Integrity (R.)		Irreg. (35)	Comments
Is the data in all fields required by our process correct on the req? (Count each incorrect or missing field as a separate irregularity; 35 possible, see list on last page)	Y / N		

Screening Questions (R.)		Irreg. (5)	Comments
Are the Work Authorization and Nepotism questions on the req? (Separate irregularity for each missing question, 4 possible)	Y / N		
Do the additional screening questions appropriately reflect the required/desired qualifications?	Y / N		

Job Posting (R.)		Irreg. (12)	Comments
Do the description and requirements accurately reflect the position?	Y / N		
Is the posting appropriately formatted and free of spelling/grammar errors?	Y / N		
Are the marketing, EEO, relocation, and work auth statements listed, if necessary? (Separate irregularity for each missing required statement, 4 possible)	Y / N		
If multiple locations, is this information included in the posting?	Y / N		
If 50% travel or more, is this information included in the posting?	Y / N		
Was the initial posting for at least 5 business days?	Y / N		
Was Internal posting posted to both Cat Corporate and Cat Subsidiaries portals?	Y / N		
If the req was reposted, did the reposting times adhere to compliance requirements?	Y / N		
If posting process exception approval was required, is appropriate documentation included on the req in Taleo?	Y / N		

Initial Candidate Screening (R.)		Irreg. (2)	Comments
Were candidates that did not meet minimum screened and dispositioned appropriately?	Y / N		
Were candidates that met minimum screened appropriately? (In Comments, include how many candidates applied and how many were forwarded to the HM)	Y / N		

Interview Process (R and C)		Irreg. (6)	Comments
Was candidate pre-work conducted? (Verify candidate eligibility) (C.)	Y / N		
Was the correct process followed for candidate/interview type? (Consistent type, method, travel, etc) (C.)	Y / N		
Was the 'Interview Type' field populated with the correct information on the req in Taleo? (C.)	Y / N		
If interview process exception approval was required, is appropriate documentation included on the req in Taleo? (R.)	Y / N		
Were multiple candidates interviewed? If only one candidate interviewed, check req for appropriate documentation/dispositioning of other candidates. (Excludes PCPP hires, Do Not Posts, etc) (R.)	Y / N		
Were TSI or Internal/Informal results entered into TS Access and/or saved appropriately to the shared drive? (R.)	Y / N		

Select/Reject Info & Disp. (R or C)		Irreg. (2)	Comments
Is the necessary candidate selection/rejection info attached to the req in Taleo?	Y / N		
Were candidates rejected appropriately? (If mass dispositioning, explanation documentation must be attached)	Y / N		

Internal Transfer Data Entry (R or C)		Irreg. (2)	Comments
Was the internal transfer data entered correctly and within the appropriate timeframe in relation to the start date?	Y / N		
Was a benefits orientation scheduled, if necessary?	Y / N		

External Offer/Accept Process (R.)		Irreg. (13)	Comments
Was the candidate moved correctly through the offer/accept steps in Taleo?	Y / N		
Were the BG and Drug results entered into Taleo?	Y / N		
Are all the necessary documents saved in the 'To Print' folder on the shared drive? (Offer Form/Letter(s), Accept Letter(s), TSI, Drug, BG, Consent, Resume, Service Date Form) (Separate irregularity for each missing file, 10 possible)	Y / N		
If process exception or additional approval was required, is appropriate documentation included on the req in Taleo or on the shared drive, as necessary?	Y / N		

Relocation (R.)		Irreg. (1)	Comments
If the candidate required relocation, is the completed relocation form saved to the req folder on the shared drive?	Y / N		

External Hire Data Entry (R or DE)		Irreg. (2)	Comments
Was the data entry completed correctly and within the appropriate timeframe in relation to the start date?	Y / N		
Was the new hire orientation scheduled correctly?	Y / N		

Closing Reqs/Share Drive Maint. (R,C, or DE)		Irreg. (2)	Comments
Was the req closed according to process timeframes?	Y / N		
Was the electronic req folder moved to the 'Closed' folder on the shared drive?	Y / N		

Total Irregularities (85 Possible): _____
Recruiter Total: _____ **Coord. Total:** _____ **DE Total:** _____
Additional Comments:

Taleo Requisition Required Data Fields

Justification	New Position or Replacement
Number of Openings	
Justification Explanation	
Employee Being Replaced (If Needed)	If Replacement, ee name must be listed
Posting Title	Check accuracy (esp on Eng/Tech jobs)
Corporate Title (If Needed)	Should be populated if Posting Title differs from Corp Title
Posting Destination	Internal, Internal/External, or Not Applicable (for Do Not Posts)
Relocation Available?	Yes or No (if No, posting should also state this)

Evergreen Req?	Must always be 'Specific Req'
Billing Exception?	Yes or No (if Yes, 'Billing Exception Reason' field must also be populated)
User Group	Main Group
Recruiter	
Hiring Manager	
Recruiter Assistant	
Organization	Verify against CLUES data
Primary Location	If multiple, posting should also state locations
Job Field	Should reflect functional area
Department	Verify against CLUES data
Requisition Template	
Job Code	If SG span, should correspond to higher SG
Company/Legal Entity	
PeopleSoft Business Unit	
GL Code/Cost Center	
Accounting Distribution	
Minimum Salary Grade	
Maximum Salary Grade	Check for incorrect SG spans (23-24, etc)
Salary Grade	
Employee Status	Regular
Schedule	Full-Time
Shift	If off-shift, info should also be listed in Posting Title and posting verbiage
Travel	If 50% or more, should also be be stated in posting
Candidate Selection Workflow	Automatically Reject All Submissions..." should never be checked, "When a candidate is hired for the requisition..." should always be checked.
Maximum Salary	Midpoint of highest SG on req
Establishment ID	Hiring Manager Estab ID, NOT job location Estab ID (must reflect where hiring decision was made)
Background Check/Employment Screen	For external reqs, box checked and 'Professional (InsuranceCo/MIDO)' package selected

Responses to Inquiry re Recruiting – June 2009

Electric and Gas Services

1. When recruiting, what guidelines do you use to determine if you have obtained adequate diversity representation in your applicant pool?
We ensure that our positions are posted with the state employment center and if there is an AAP goal, we make special out reach efforts to ensure a diverse pool of candidates.
 2. Are your recruiting functions centralized, and if so, how do you partner with the generalist to fill the position?
Our recruiting function is decentralized so each generalist is responsible for their own recruiting efforts.
-

Management Services (Health)

1. When recruiting, what guidelines do you use to determine if you have obtained adequate diversity representation in your applicant pool?
We go by our AAP and quarterly monitoring reports. It's a retrospective approach at this point. We're trying to get more prospective...
 2. Are your recruiting functions centralized, and if so, how do you partner with the generalist to fill the position?
Yes. Our recruiters are each assigned to a 'client service team'. Each team includes an HR person responsible for Employee Relations, a Staffing Specialist and an Administrative Assistant. Each team is assigned a group of managers / employees. The ER person is almost like an HR manager for a small company (about 40 managers / 800 staff assigned to each team). Staffing reports to the Employment Manager but the ER person and the Staffing Specialist work together on a daily basis. We're all in the same building which helps.
-

Chemical and Allied Products

1. When recruiting, what guidelines do you use to determine if you have obtained adequate diversity representation in your applicant pool?
We don't have any guidelines that relate to diversity.
 2. Are your recruiting functions centralized, and if so, how do you partner with the generalist to fill the position?
We have centralized recruitment. The recruiter phone screens the candidates and typically the generalist does the face to face interview. The recruiter is re-engaged at offer.
-

REFERENCE CHECKS INQUIRY – 7/23/12

Insurance Carrier

- 1) *Does your company conduct a reference check of potential hires?*
We do not standardly perform these. They are performed on an exception basis when requested by the hiring leader.
 - 2) *If yes, when do you obtain approval from an applicant?*
With background check at time of application.
 - 3) *If yes, when do you conduct reference verification (at what stage? Before a job offer or after?)*
Generally at time of offer.
 - 4) *If yes, who conducts a reference check (recruiters, a third party – Background check vendor, HR, etc?)*
Third party
 - 5) *If yes, how much information do you share with the hiring manager? Everything captured or a cleaned out version?*
Everything from the reference check.
 - 6) *Do you share any information with the applicant?* No
 - 7) *Do you document the information capture?* Yes
 - 8) *If you conduct a reference check, would you be willing to chat with the inquirer about your process?* Briefly.
-

Food and Kindred Products

We do not do reference checks, only background checks by a third party vendor. We do not share the background check results with hiring managers unless there's a concern. For example if they were a sales person who had several DWI's and had a probation condition that might affect the job requirements of driving a car.

Engineering and Management Services

- 1) *Does your company conduct a reference check of potential hires?*
Most positions. Note: all positions get background check.

REFERENCE CHECKS INQUIRY – 7/23/12

- 8) *If you conduct a reference check, would you be willing to chat with the inquirer about your process?* Yes
-

Service Station

- 1) *Does your company conduct a reference check of potential hires?*
Typically only at the higher level management positions
- 2) *If yes, when do you obtain approval from an applicant?*
During interview process
- 3) *If yes, when do you conduct reference verification (at what stage? Before a job offer or after?)* Before the job offer is extended
- 4) *If yes, who conducts a reference check (recruiters, a third party – Background check vendor, HR, etc?)* Recruiter
- 5) *If yes, how much information do you share with the hiring manager? Everything captured or a cleaned out version?* Whatever is captured
- 6) *Do you share any information with the applicant?* No
- 7) *Do you document the information capture?* Minimal notes
- 8) *If you conduct a reference check, would you be willing to chat with the inquirer about your process?* Yes
-

Business Services

- 1) *Does your company conduct a reference check of potential hires?*
Yes, we conduct 2 professional references.
- 2) *If yes, when do you obtain approval from an applicant?*
All candidates that come in to interview complete an application before their interview providing work history and reference information. They sign the application providing us with authorization to check/call references.
- 3) *If yes, when do you conduct reference verification (at what stage? Before a job offer or after?)*
We will typically check once they are in the final stages of interviewing and we are anticipating an offer.

REFERENCE CHECKS INQUIRY – 7/23/12

- 4) *If yes, who conducts a reference check (recruiters, a third party – Background check vendor, HR, etc?)* Our corporate recruiters.
 - 5) *If yes, how much information do you share with the hiring manager? Everything captured or a cleaned out version?*
We don't share our reference information with managers.
 - 6) *Do you share any information with the applicant?* No.
 - 7) *Do you document the information capture?*
Yes, we keep references with their application information.
 - 8) *If you conduct a reference check, would you be willing to chat with the inquirer about your process?* Yes
-

Industrial Machinery & Equipment

- 1) *Does your company conduct a reference check of potential hires?* Yes
- 2) *If yes, when do you obtain approval from an applicant?* Upon application
- 3) *If yes, when do you conduct reference verification (at what stage? Before a job offer or after?)* Before job offer
- 4) *If yes, who conducts a reference check (recruiters, a third party – Background check vendor, HR, etc?)* A third party vendor does the reference check
- 5) *If yes, how much information do you share with the hiring manager? Everything captured or a cleaned out version?* Everything captured
- 6) *Do you share any information with the applicant?* No
- 7) *Do you document the information capture?* Yes
- 8) *If you conduct a reference check, would you be willing to chat with the inquirer about your process?* No

REFERENCE CHECKS INQUIRY – 7/23/12

- 2) *If yes, when do you obtain approval from an applicant?*
At interview scheduling
 - 3) *If yes, when do you conduct reference verification (at what stage? Before a job offer or after?)*
I presume reference verification is what we call background check (i.e., prior employment, prior salary, position, etc)
 - 4) *If yes, who conducts a reference check (recruiters, a third party – Background check vendor, HR, etc?)*
Recruiter for reference and third party for background
 - 5) *If yes, how much information do you share with the hiring manager? Everything captured or a cleaned out version?*
Depends on position level but most often pass fail.
 - 6) *Do you share any information with the applicant?*
No, unless is questionable whereby we give them chance to correct
 - 7) *Do you document the information capture? Yes*
 - 8) *If you conduct a reference check, would you be willing to chat with the inquirer about your process? No*
-

Heavy Construction

- 1) *Does your company conduct a reference check of potential hires? Yes*
- 2) *If yes, when do you obtain approval from an applicant? At application time*
- 3) *If yes, when do you conduct reference verification (at what stage? Before a job offer or after?) After offer*
- 4) *If yes, who conducts a reference check (recruiters, a third party – Background check vendor, HR, etc?) Third party*
- 5) *If yes, how much information do you share with the hiring manager? Everything captured or a cleaned out version?*
Usually a summary, depends on the situation
- 6) *Do you share any information with the applicant?*
Only if there is a problem or some sort of discrepancy
- 7) *Do you document the information capture? Yes*

SEXUAL ORIENTATION SELF-IDING INQUIRY – 12/28/12

Does your company invite employees to self-identify with regard to their sexual orientation? If so, at what point and how do you solicit that information?

Companies that do not:

Direct Health and Medical Insurance Carriers
Meat and Meat Product Merchant Wholesalers
Engineering Services
Pharmaceutical Preparation Manufacturing
Hotels (except Casino Hotels) and Motels
Computer Systems Design Services
Ball and Roller Bearing Manufacturing
Other Nonhazardous Waste Treatment and Disposal
All Other Miscellaneous Food Manufacturing
Health and Welfare Funds
Drugs and Druggists' Sundries Merchant Wholesalers
All Other Miscellaneous Electrical Equipment and Component Manufacturing
Petrochemical Manufacturing
Offices of Bank Holding Companies
Softwood Veneer and Plywood Manufacturing
Line-Haul Railroads
Savings Institutions
Aircraft Engine and Engine Parts Manufacturing

Soft Drink Manufacturing

Yes, at the time they join the Company during first-day orientation, at the same time they self-ID for other demographics.

TEMP-TO-PERM HIRES INQUIRY – 8/15/13

1. *How often does your company hire temps through a staffing agency and convert them to permanent employees?*
 2. *Do you have a specific process that you follow for all temp-to-perm hires or does it depend on the position they are filling – Customer Service Representative, IT professional, etc.?*
 3. *When filling temp positions, does your company post those positions in addition to using the temp agency?*
 4. *In your contract with the temp agency, do you require them to post your openings with the State Employment Service?*
 5. *Have you experienced OFCCP looking at your temp-to-perm hire process during an audit?*
-

All Other Miscellaneous Food Manufacturing

1. How often does your company hire temps through a staffing agency and convert them to permanent employees? We prefer not to convert temps to hires but it has happened. Hard to provide a frequency, depends on the location and the position but occasionally a professional level temp is converted to a hire though they must still apply to the position. We discourage this for our entry level positions.
 2. Do you have a specific process that you follow for all temp-to-perm hires or does it depend on the position they are filling – Customer Service Representative, IT professional, etc.? All temps must apply to posted positions in order to be considered.
 3. When filling temp positions, does your company post those positions in addition to using the temp agency? Typically we do not post these but expect the agency to post instead.
 4. In your contract with the temp agency, do you require them to post your openings with the State Employment Service? Yes.
 5. Have you experienced OFCCP looking at your temp-to-perm hire process during an audit? Not recently. We've only had one situation where it became an audit issue and that was due to the location filling all of their entry level positions with temp conversions. A conciliation agreement resulted.
-

Softwood Veneer and Plywood Manufacturing

1. How often does your company hire temps through a staffing agency and convert them to permanent employees? Never
 2. Do you have a specific process that you follow for all temp-to-perm hires or does it depend on the position they are filling – Customer Service Representative, IT professional, etc.? Our establishments are required to post all job openings and let temp employees know that they can apply for the job, along with other candidates.
 3. When filling temp positions, does your company post those positions in addition to using the temp agency? It depends on the need. If truly a temporary need, the company may use only the temp agency to fill a short-term need. If the need becomes permanent, then a job is posted.
 4. In your contract with the temp agency, do you require them to post your openings with the State Employment Service? Our establishments are responsible for posting with the State Employment Service.
 5. Have you experienced OFCCP looking at your temp-to-perm hire process during an audit? Not in past audits – all in the past 10 years have closed at the desk audit! Had “0” audits during 2011 & 2012 and have received 3 audits this cycle. So far no additional information has been requested beyond the desk audit materials for audit responses that were sent to the OFCCP in May, 2013.
(Southwest and Rocky Mountain Region)
-

Elevator and Moving Stairway Manufacturing

1. How often does your company hire temps through a staffing agency and convert them to permanent employees? Regularly
2. Do you have a specific process that you follow for all temp-to-perm hires or does it depend on the position they are filling – Customer Service Representative, IT professional, etc.? Depends upon position they are filling
3. When filling temp positions, does your company post those positions in addition to using the temp agency? Yes, however, if we decide to hire someone that we obtained from our posting, we pay them through a payroll vendor or through a temp agency that we have a relationship with in the area.
4. In your contract with the temp agency, do you require them to post your openings with the State Employment Service? No

5. Have you experienced OFCCP looking at your temp-to-perm hire process during an audit? No
-

Savings Institutions

1. Periodically – we have temp to hire staffing, contingent workforce staffing and direct hire staffing situations.
 2. In the last eighteen months to two years, we started working with a third party vendor called IQ Navigator to help us manage this process. All temp/staffing agencies and search firms must work with IQN in order to do business with (company) – there is a specific approval process, fee arrangement, contractual agreement, and all agencies must sign the (company) Vendor Code of Conduct, which outlines their responsibilities, including to follow our drug screen and background check processes, recordkeeping for applicants and those considered for placement in positions at the bank. When there is a placement situation, the (company) Talent Acquisition team places a work request in the IQN system, and IQN works with the various staffing agencies to find the right candidate and place them at the bank, subject to approval by the Talent Acquisition team, interviews with the (company) hiring manager and other (company) team members, etc. Using IQN and this new process is more efficient and streamlined, and now no managers are able to make their own temp/staffing decisions without going through IQN and following the new procedure; also, it has cut down on the volume of selling and “cold calling” we get from executive recruiters and search firms contacting (company) employees directly – we tell them they have to work through IQN and go through the contractual agreement process and agree to our terms and fees to do business with us.
 3. Yes – this is part of the contractual agreement responsibilities.
 4. Not yet.
-

Ball and Roller Bearing Manufacturing

1. How often does your company hire temps through a staffing agency and convert them to permanent employees? The company does not convert anyone but temps from the staffing agency are permitted to apply online.
2. Do you have a specific process that you follow for all temp-to-perm hires or does it depend on the position they are filling – Customer Service Representative, IT

professional, etc.? All temps are required to apply for the position and go through the company's standard employee selection process.

3. When filling temp positions, does your company post those positions in addition to using the temp agency? No
 4. In your contract with the temp agency, do you require them to post your openings with the State Employment Service? There is no specific language requiring the opening be posted by the temp agency.
 5. Have you experienced OFCCP looking at your temp-to-perm hire process during an audit? Not at this time
-

TEMP-TO-PERM HIRES INQUIRY (2) – 12/10/13

1. *Do you use temporary, contract, or union hiring hall staff? (Will refer to as temporary going forward)*
 2. *If a position currently filled by a temporary worker becomes a regular opening, do you allow automatic conversion of the temporary worker to regular employee status?*
 3. *Do you require the temp to apply for the job and go through regular search process?*
 4. *Do you have pre-employment tests for any jobs? If so, do you require that temporary staff also pass tests successfully before coming onboard?*
 5. *Do you give any preference in hiring to current or previous temporary staff?*
-

Softwood Veneer and Plywood Manufacturing

1. Do you use temporary, contract, or union hiring hall staff? (Will refer to as temporary going forward) Yes, sometimes.
 2. If a position currently filled by a temporary worker becomes a regular opening, do you allow automatic conversion of the temporary worker to regular employee status? NO!
 3. Do you require the temp to apply for the job and go through regular search process? Yes
 4. Do you have pre-employment tests for any jobs? If so, do you require that temporary staff also pass tests successfully before coming onboard? Some establishments use validated testing. If it's done for one, it's done for all, including temporary staff who have applied for a position.
 5. Do you give any preference in hiring to current or previous temporary staff? Establishments who use temporary staff are instructed to consider all candidates equally.
-

Pharmaceutical Preparation Manufacturing

1. Do you use temporary, contract, or union hiring hall staff? (Will refer to as temporary going forward) Yes

2. If a position currently filled by a temporary worker becomes a regular opening, do you allow automatic conversion of the temporary worker to regular employee status? No, position is posted, though the temporary person has an advantage knowing the job. Cost is a consideration of hiring a temporary, as we may have to pay a fee to agent.
 3. Do you require the temp to apply for the job and go through regular search process? Yes see above
 4. Do you have pre-employment tests for any jobs? If so, do you require that temporary staff also pass tests successfully before coming onboard? Do not have pre-employment test
 5. Do you give any preference in hiring to current or previous temporary staff? Only to the extent that they know the job
-

Engineering Services

1. Do you use temporary, contract, or union hiring hall staff? (Will refer to as temporary going forward) Yes.
 2. If a position currently filled by a temporary worker becomes a regular opening, do you allow automatic conversion of the temporary worker to regular employee status? If we hire a temporary employee into (Company), we typically have the temporary staff on a System One contract initially and then convert them to (Company).
 3. Do you require the temp to apply for the job and go through regular search process? We request they apply to requisition and fill out an application.
 4. Do you have pre-employment tests for any jobs? If so, do you require that temporary staff also pass tests successfully before coming onboard? We have all of our new employees clear a standard drug screen and background check. System One also has their own drug screen and background check procedures.
 5. Do you give any preference in hiring to current or previous temporary staff? Whenever warranted (based on credentials, job performance, salary, ESOP eligibility, etc), we like to bring former employees and temporary staff back to the company.
-

Industrial and Personal Service Paper Merchant Wholesalers

1. Do you use temporary, contract, or union hiring hall staff? (Will refer to as temporary going forward) We use agency temporary staff, direct hire temporary staff, and contract labor.
 2. If a position currently filled by a temporary worker becomes a regular opening, do you allow automatic conversion of the temporary worker to regular employee status? We allow for conversion without posting the job if the hiring manager obtains Vice-presidential approval for a sound business reason.
 3. Do you require the temp to apply for the job and go through regular search process? We require application to the position, but with Vice-presidential approval the competitive process can be waived.
 4. Do you have pre-employment tests for any jobs? Yes, for some positions. If so, do you require that temporary staff also pass tests successfully before coming onboard? If the temporary worker will be performing the full job of a regular employee in the position he/she must take and pass required testing.
 5. Do you give any preference in hiring to current or previous temporary staff? Not explicitly, but the knowledge they have gained on the job is considered.
-

Other Nonhazardous Waste Treatment and Disposal

1. Do you use temporary, contract, or union hiring hall staff? (Will refer to as temporary going forward) yes
 2. If a position currently filled by a temporary worker becomes a regular opening, do you allow automatic conversion of the temporary worker to regular employee status? yes. In that case, we require to capture the applicant log for the original temp position
 3. Do you require the temp to apply for the job and go through regular search process? yes
 4. Do you have pre-employment tests for any jobs? If so, do you require that temporary staff also pass tests successfully before coming onboard? yes
 5. Do you give any preference in hiring to current or previous temporary staff? yes, only if they apply for similar positions as their prior assignments with good performance records
-

Ball and Roller Bearing Manufacturing

1. Do you use temporary, contract, or union hiring hall staff? (Will refer to as temporary going forward) Yes
 2. If a position currently filled by a temporary worker becomes a regular opening, do you allow automatic conversion of the temporary worker to regular employee status? No, we would post the position.
 3. Do you require the temp to apply for the job and go through regular search process? Yes, the temp must apply for the position and go through our standard selection process.
 4. Do you have pre-employment tests for any jobs? If so, do you require that temporary staff also pass tests successfully before coming onboard? Yes we have pre-employment tests and the successful completion of such tests would be considered a basic qualification of the related job. A temp applying for the position must take and pass the pre-employment test.
 5. Do you give any preference in hiring to current or previous temporary staff? No. Current or previous temporary staff may be a good fit based on their experience but during the selection process we may find an even better fit for the role.
-

All Other Miscellaneous Food Manufacturing

1. Do you use temporary, contract, or union hiring hall staff? (Will refer to as temporary going forward) Yes – temporaries.
2. If a position currently filled by a temporary worker becomes a regular opening, do you allow automatic conversion of the temporary worker to regular employee status? No, there is no automatic conversion process.
3. Do you require the temp to apply for the job and go through regular search process? All temporaries interested in a job with the company must apply to the posted opening. We do have locations that only consider temps who apply but that is not our defined selection process. The defined process requires recruiters to consider qualified applicants, whether or not the applicant has worked for us previously as a temp.
4. Do you have pre-employment tests for any jobs? If so, do you require that temporary staff also pass tests successfully before coming onboard? Yes, we use pre-employment tests in some locations and those sites require any temps who apply to pass the tests.

5. Do you give any preference in hiring to current or previous temporary staff?
Because we use behavior based interviews as part of the selection process, an applicant who has previously (or currently) works for us as a temp will often be successful in the interview and as a result receive a conditional offer. There is no guarantee however and we have seen situations where the temp doesn't pass the pre-employment test or fails the drug screen or the background check. This can happen even though we require the agency to drug screen and background check temps prior to assignment.
-

VETS and IWDS RECRUITMENT THIRD-PARTY OUTREACH- 9/28/12

We have an EEAC member who would like to talk to other members who may have used a third-party source for their Vets and PWDs recruitment outreach. If you are willing to talk with this person, please let me know and I'll pass on your contact information to them.

Heavy Construction

Per our in house EO Specialist, other than Direct Employers all of our other outreach is through TMP with Military.Com (Monster) and a few sites that aggregate through Indeed.

VETS and IWDS RECRUITMENT TRAINING RESOURCES – 8/22/12

We have a member who is wondering if any of you are aware of any training programs – either Web-Based or Instructor-Led -- for purchase that would be of value to people leaders and HR professionals in regards to hiring and continued employment/career development of individuals with disabilities and/or military veterans.

Paper and Allied Products

I have not come across any but I would suggest checking with vendors Click4 and ELT – they seem to have a lot of civil training where this might fall. You could also check (www.dol.gov).

Insurance Carrier

I have received these suggestions from our D&I area.

- “Windmills” <http://www.damonbrooks.com/windmills.html> (webinar)
 - <http://www.usblnannualconference.org/> (real-time training)
 - <http://www.askearn.org/>. (webinars)
-

WATCHLISTS INQUIRY – 10/23/12

With regard to watchlists such as global terrorist watchlists, Office of Foreign Assets Control (OFAC) lists, and Specially Designated Nationals (SND) lists:

Wholesale Trade-Nondurable Goods

1. Does your company check new hires against lists of this type? **Yes, our standard pre-employment background screen includes checks against these lists.**
 2. Does your company check current employees periodically against lists of this type? **For certain positions, which we classify as “compliance critical” these checks are also done on an annual basis.**
 3. If you answered yes to either question, would you be willing to chat with the member making this inquiry? **Yes, feel free to give my contact information.**
-

Transportation Equipment

1. Does your company check new hires against lists of this type? **Yes**
 2. Does your company check current employees periodically against lists of this type? **Under some circumstances, yes**
 3. If you answered yes to either question, would you be willing to chat with the member making this inquiry? **Yes**
-

Sanitary Services

1. Does your company check new hires against lists of this type? **Only for our international entities (very small).**
2. Does your company check current employees periodically against lists of this type? **Again, only for the international entities.**
3. If you answered yes to either question, would you be willing to chat with the member making this inquiry? **We have several very small international entities (handful employees at each, and a JV in China.) The exposure is**

WATCHLISTS INQUIRY - 10/23/12

very small, so this work is exclusively allocated to our Corporate Security department for those rare occasions.

Holding and Other Investment Office

Yes, we check new hire employees against these lists (the ones that you listed below for sure, and I'll need to verify if there are others). We do not currently check current employees periodically, so only upon hire to the organization, although we have been talking about doing so - I think we'll probably start checking every two years beginning in 2013. I would be happy to chat with the member about this, as we've been discussing it too.

AFFIRMATIVE ACTION ALL PERSONNEL TRAINING INQUIRY – 12/19/13

Does your company train all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure that the commitments of affirmative action are implemented? Yes

- a. If so, how frequently?*
 - b. What type of materials do you use?*
 - c. Would you be willing to discuss this further with the member making the inquiry?*
-

Other Nonhazardous Waste Treatment and Disposal

Does your company train all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure that the commitments of affirmative action are implemented? Yes

- a. If so, how frequently? A few times a year, especially given the new regs
 - b. What type of materials do you use? Developed internally
 - c. Would you be willing to discuss this further with the member making the inquiry?
Yes
-

Industrial and Personal Service Paper Merchant Wholesalers

Does your company train all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure that the commitments of affirmative action are implemented?

- a. If so, how frequently? We train managers and supervisors annually, and train Recruiting staff within the first few weeks of employment.
 - b. What type of materials do you use? We have used in-house developed materials, but we are planning to add EEAC's Fair Employment Practices training program for all new supervisors and manager within the first 3 months of employment.
 - c. Would you be willing to discuss this further with the member making the inquiry?
Yes.
-

Ball and Roller Bearing Manufacturing

Does your company train all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure that the commitments of affirmative action are implemented? The company trains all pay managers on fair employment practices. Other personnel may receive some training as needed based on their role within the company.

- a. If so, how frequently? Each pay manager is required to be certified once every three years. The course is offered by the company throughout the US several times a year.
 - b. What type of materials do you use? The course we use is Civil Treatment for Managers provided by Employment Learning Innovations. We have participant guides, videos, and a PowerPoint presentation we use to cover the materials.
 - c. Would you be willing to discuss this further with the member making the inquiry?
Yes
-

Pharmaceutical Preparation Manufacturing

Does your company train all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure that the commitments of affirmative action are implemented? Some

- a. If so, how frequently? Once a year
 - b. What type of materials do you use? PowerPoint presentations, class room training
 - c. Would you be willing to discuss this further with the member making the inquiry?
-

CONTRACTOR/TEMP TRAINING INQUIRY – 11/27/12

How does your company handle training for temps and contractors? For example, do you require temporary employees or contractors to go through the same training that employees do with respect to Sexual Harassment/Workplace Harassment, Code of Conduct/Business Ethics, Drug Free Workplace and the like?

Ball Manufacturing

The staffing agency is responsible for that training.

Railroad

Their own employers are responsible for training them.

Energy/Manufacturer/Financial Institution

We permit supervisors to assign training (most of which is on-line) to contingent workers as needed for their assignment here. This usually includes some basic “integrity” training on our key company policies or other courses that relate to their work (e.g., certain EHS—Environmental Health and Safety---courses if they work in a manufacturing facility).

Food Products

At this time we do not. We only require they complete a pre-employment drug screen.

Hotels & Resorts

We do not expect externally employed folks to take our training. We do have an internal temp pool who are employed by us and therefore expected to complete mandatory training.

Engineering & Construction

We do require contractors to go through our Code of Conduct training. They do not attend other training in order to protect against co-employment/joint employer situations.

Engineering & Construction

Our temps and contractors are not our employees and they are not typically managers and supervisors so they wouldn't be required to complete our harassment training. They would however, be expected to abide by our policies.

CORE/FUNDAMENTAL TRAINING REQUIREMENTS – 5-29-13

1. *What core/fundamental training do you offer employees at hire and throughout their employment tenure?*
 2. *To the extent you have international business operations, what core/fundamental training do you offer employees at hire and throughout their employment tenure, and in what countries?*
 3. *Would you or a colleague be willing to discuss your training program with the inquiring member company?*
-

Bearings, ball and roller, manufacturing

1. What core/fundamental training do you offer employees at hire and throughout their employment tenure? The training offered at hire tends to focus more on an introduction to the systems that will be used instead of core/fundamental training. There is an overview of company policies and procedures which is later reinforced with training from our office of ethics and compliance.
 2. To the extent you have international business operations, what core/fundamental training do you offer employees at hire and throughout their employment tenure, and in what countries? The international training is similar to what is offered in the US.
 3. Would you or a colleague be willing to discuss your training program with the inquiring member company? Yes
-

Line-Haul Railroads

1. What core/fundamental training do you offer employees at hire and throughout their employment tenure? EEO training and Code of Ethics training.
 2. To the extent you have international business operations, what core/fundamental training do you offer employees at hire and throughout their employment tenure, and in what countries? We are not international.
 3. Would you or a colleague be willing to discuss your training program with the inquiring member company? Yes.
-

FCPA Due Diligence Training – 3/14/2011

We have an inquiry from a member who is looking for the names of companies or law firms that you may use to conduct your Foreign Corrupt Practices Act (FCPA) due diligence training in South East Asia generally, but in India specifically.

Instruments and Related Products

For our India office, we use our internally developed training module. However, TRACE provides training via its website to many third parties across the globe. They will need to register and pay a fee.

Electric, Gas & Sanitary Services

We use a vendor (Corpedia) product for our employees who get involved in international operations, but we don't have any operations in India.

Non-Depository Institution

- 1) Trace, Int'l, a non-profit that does training, is a good choice. Trace, however, requires a corporate membership.
 - 2) Richard Grime at O'Melveny (law firm) has handled FCPA matters in India. He is excellent, though based in DC.
-

Transportation Equipment

A colleague of mine, Darwin Bolden, recently left the Company (voluntarily) to set up his own practice. He did FCPA work while here. His contact information is below:

Bolden Law, PC | 1200 G St NW | Washington, DC 20005
(202) 5251946
dbolden@boldenlawfirm.com

FCPA Due Diligence Training – 3/14/2011

Industrial Machinery & Equipment

We use Trace International to assist us with due diligence. Training is done online using SAI Global courses or through instructor-led sessions conducted by our associates.

GENDER TRANSITION TRAINING INQUIRY – 8/10/12

We have a member company that is requesting resource/training recommendations to support team members who are undergoing gender transitions and to glean best practices for educating and promoting a cultural competence around preventing gender identity discrimination and maintaining a trans-inclusive environment.

Insurance Carrier

A couple of years ago we developed Gender Transition Guidelines, an awareness tool, that I can share with you. An excellent resource for this is the Human Rights Campaign organization. Their website (www.hrc.org) has tons of resources on the topic and they are more than willing to consult with any organization that's looking to expand their inclusion efforts.

Workplace Gender Transition Guidelines

Overview

Just as there are gay, lesbian and bisexual individuals at (Company), there are also individuals who are transgender. Some are open about their gender identity or expression and others may not be. Given that many individuals who are transitioning from one set of socially defined gender behaviors or type to another must “come out” to their employers in order to live consistently with their new gender identity full-time, employers may need to become involved in an individual's transition.

These gender transition guidelines were created to help foster dialogue and understanding of transgender issues in the workplace. They include recommendations for associates, managers and Human Resources on how to provide a welcoming and supportive environment for individuals undergoing gender transition. If you have questions concerning your rights or responsibilities as an associate or manager, please contact Human Resources.

These guidelines apply to all associates, contractors and temporary individuals who work at or for (Company).

Policy

(Company) includes “gender identity” in its Equal Employment Opportunity and Affirmative Action policy to clarify that discrimination against transgender individuals is prohibited. This policy is consistent with our workplace philosophy that all individuals should be treated fairly and with respect. Failure to comply with company policies could result in corrective action, including termination of employment.

Transgender status of an individual is considered private and should be disclosed only on a need-to-know basis and only with the individual's consent. However, transitioning

GENDER TRANSITION TRAINING INQUIRY – 8/10/12

individuals are encouraged to participate in the necessary education of their coworkers at the level they are comfortable. As with all associates, transgender individuals should not be subjected to unnecessary disclosure of medical information.

Definitions

There are many words that you may or may not know or be familiar with regarding transgender issues. Knowing the meaning of these words will help you understand these guidelines and have a more productive dialogue with transgender associates and individuals. You should consider level setting the vocabulary you will use in each conversation to ensure everyone involved is using the applicable terms in the same way.

- **Transgender** A broad range of people who experience and/or express their gender differently from what most people expect — either in terms of expressing a gender that does not match the sex listed on their birth certificate, or physically changing their sex. It is an umbrella term that includes people who are transsexual, cross-dressers or otherwise gender non-conforming. Not all people who consider themselves (or who may be considered by others as) transgender will undergo a gender transition.
- **Gender identity** The term “gender identity,” distinct from the term “sexual orientation,” refers to a person’s innate, deeply felt psychological identification as male or female, which may or may not correspond to the person’s body or **designated sex** at birth (meaning what sex was originally listed on a person’s birth certificate).
- **Gender expression** Gender expression refers to all of the external characteristics and behaviors that are socially defined as either masculine or feminine, such as dress, grooming, mannerisms, speech patterns and social interactions.
- **Transitioning** The process through which a person modifies physical characteristics and/or manner of gender expression to be consistent with his/her gender identity. This may or may not include medical procedures (surgery, hormone therapy, etc.)
- **Transsexual** A transsexual person has changed, or is in the process of changing, his or her physical and/or legal sex to conform to his or her internal sense of gender identity. The term can also be used to describe people who, without undergoing medical treatment, identify and live their lives full-time as a member of the gender opposite their birth sex. Transsexuals transitioning from male-to-female are often referred to as “MTFs.” Similarly, female-to-male transsexuals are frequently called “FTMs.”

GENDER TRANSITION TRAINING INQUIRY – 8/10/12

- **Cross-dresser** A cross-dresser wears the clothing and/or accoutrements, such as makeup and accessories considered to correspond to the “opposite sex.” Unlike transsexuals, cross-dressers typically do not seek to change their physical characteristics and/or manner of expression permanently. A person who cross-dresses on or off-duty is still protected by our EEO policy. **Transvestite** is an outdated word frequently used for cross-dressers and is no longer considered to be an appropriate term.

- **Sexual orientation** “Sexual orientation” is the preferred term used when referring to an individual’s physical and/or emotional attraction to the same and/or opposite gender. “Heterosexual,” “bisexual” and “homosexual” are all sexual orientations. A person’s sexual orientation is distinct from a person’s gender identity and expression.

Example:

Here is an example of how these terms may be used:

Alex was born female (**designated sex**) but feels that she is really male (**gender identity**)—“trapped in the wrong body.” She is sexually attracted to females, but not as a homosexual (**sexual orientation**). Her feelings that she needs to behave and dress as a man (**gender expression**) grew stronger until she felt she must do something. She decided to start by dressing and grooming as a man (**cross-dressing/gender expression/transitioning**). Later she decided to make the change permanent (**transitioning/transsexual**) by undergoing surgical and hormone treatments.

Guidelines for Transitioning Individuals

If you are a transgender individual, you should feel that you can be who you are openly. This includes expressing your gender identity without fear of consequences. We expect that you will work with others to ensure they understand your needs and you understand the expectations of you. The decision as to when and how to begin the real-life experience is a personal choice. It is important for you to do your part to make the transition successful. These guidelines are created to help you meet that goal in partnership with your manager and Human Resources. Contact should be made well ahead of your planned transition date (one year is recommended for transitions involving medical treatment).

Appearance Standards

All individuals are permitted to dress according to their gender identity and are also required to comply with the same company Dress Code and appearance standards as all other individuals in the workplace and in similar positions.

GENDER TRANSITION TRAINING INQUIRY – 8/10/12

Restroom Access

Restrooms and other sex-segregated facilities (e.g., locker rooms) use will be handled with sensitivity not only to (Company's) obligation to provide transitioning individuals with the same level of facilities access available to all other individuals, but also to the responses of co-workers and the comfort of the individual. Whenever possible, you will be permitted to use the facilities that correspond to your gender identity. If single-occupancy or unisex facilities are available and reasonably located, they may be considered for a temporary period during your transition process or on an ongoing basis. You will not be required to use the restroom of your designated sex at birth after you have begun transitioning.

Short Term Disability (STD) and Leave Benefits for Transsexual Individuals

Transsexual individuals may be eligible for short term disability benefits (subject to the terms of the STD plan) which are related to absences as a result of medical treatments for transsexual transition. Transsexual individuals may also be eligible for Family Medical Leave if the specific procedure or procedures being undertaken fall within the Family Medical Leave guidelines. Contact the HRSolutions Leave of Absence Unit for more information specific to individual circumstances.

Checklist for Transitioning Individuals

These items should be considered as you plan your transition. Some may take longer than others to complete so plan accordingly. Ideally, all items should be completed on or before your official transition announcement day. Work with HR and your manager to complete these items.

- Develop a timeline identifying your expected transition completion date and work backwards from there. If your transition requires medical treatment, your timeline may need to be at least a year in advance.
- Who needs to know: Make a list of all individuals who will need to know about your transition. This typically begins with your designated Human Resources representative and your manager. It may also include your team lead and facilities personnel, as well as supportive co-workers.
- What they need to know: Think through what others will need to know about your transition. What questions will they have that you can address up front? Is there anyone you think may not be receptive to your change?
- Think about how you want your coworkers and customers/clients to find out about your transition (for example, a staff meeting, memo from your manager,

GENDER TRANSITION TRAINING INQUIRY – 8/10/12

individual discussions). Discuss options and concerns with your manager and HR.

- Name change: Depending on if your name has been legally changed or not, these items may require updating:

- Payroll/PeopleSoft:
 - Enter name change through Employee Self Service.
 - Call HRSolutions for changes to:
 - Gender designation change
 - Life insurance and beneficiary forms
 - 401(k) and ESPP stock
 - Health and vision benefit plan cards
 - Tax forms
 - Email: Your email address name will be changed via a feed from payroll. You will need to manually change your email signature line. Distribution lists may need to be changed manually.
 - Licenses, certificates, professional designations required for your job
 - Business cards
 - Company ID and other security cards: Have your photograph retaken after the transition is complete. Contact your facilities department.
 - Office nameplate
 - Interoffice/department contact lists, phone trees, documents/websites listing your name as the contact, etc.
- Which restrooms/locker rooms will you plan on using?

Guidelines for Management & Human Resources

If an individual informs you of his or her intention to transition, or if an individual is currently in the transitioning process, your support is critical. Your actions will impact the outcome of the transition. It may be frightening to an individual to make him- or herself vulnerable to a person upon whom their job depends. If you are not familiar with transsexuals, allow the individual to educate you, contact your designated Human Resources consultant, and seek information from the resources listed in this document.

GENDER TRANSITION TRAINING INQUIRY – 8/10/12

Dress Code

If the individual dresses inappropriately, this issue should be dealt with in the same manner it would with any other individual under the Dress Code policy. Contact Human Resources, if you have any questions or concerns.

Respecting Privacy

The transgender status of an individual is considered private and should only be disclosed on a need-to-know basis, and only with the consent of the individual. However, transitioning individuals are encouraged to participate in the necessary education of their co-workers at whatever level they are comfortable.

Addressing Concerns of Co-workers and Clients

A lack of knowledge about transgender issues has the potential for creating misunderstanding and tension in the workplace. Remind all individuals that they are expected to conduct themselves in accordance with company policies. Share these guidelines and resources with individuals so they are educated on terminology, policy and expectations. They should be informed that they are expected to work cooperatively with their co-workers regardless of any differences and that failure to do so could result in corrective action, including termination of their employment.

In addition to the initial meeting where the individual's transition is announced, offer trainings or briefing sessions for individuals on transgender issues (if possible through Human Resources or the Diversity and Inclusion Team) prior to the transition date; this will help promote a positive work environment for everyone. Establishing some level of comfort as to what the transition is and why it is happening is important for preventing future misunderstandings or issues.

If individuals have concerns with a transsexual co-worker's usage of a restroom or other sex-segregated facility, the individual with the concern may be permitted to use a different or single-occupancy facility, if such facilities exist at that work location. Discuss options with HR and facilities.

Name Changes

In everyday written and oral speech, the new name and pronouns should be used when the individual is ready. If a co-worker is transitioning and you are not certain which pronouns to use, it is appropriate to respectfully ask his or her name and which pronouns you should use.

Individual records and work-related documents should be retained under the individual's legal name (as reflected on identification documents verified at the start of employment) unless and until the individual makes a legal change. Where a person's legal name does not match his or her new name, the new name should be used on all items seen and used

GENDER TRANSITION TRAINING INQUIRY – 8/10/12

by other individuals such as e-mail, phone directory, company identification card or access badge, name plate, etc., except where records must match the legal name, such as on payroll and insurance documents.

Leave Benefits for Transsexual Individuals

Short term disability usually does not apply for medical treatments related to gender transition. The associate may be eligible for Family Medical Leave if the medical condition falls within the Family Medical Leave guidelines (contact the HRSolutions Leave of Absence Unit for more information specific to the circumstances).

Time off for medical procedures is to be treated the same as any other scheduled medically necessary procedures. We encourage managers to provide sufficient flexibility to meet the individual's need for counseling or medical appointments. A transitioning associate may or may not have surgical or other medical treatments for any number of personal reasons. As with other aspects of a transition, plans should be discussed and communicated only as needed in order to ensure confidentiality. Medical information, including surgery plans communicated by the individual, should always be treated confidentially.

Manager Checklist and Guidance:

Initial Contact

- Upon notification from the individual, immediately reassure the individual (in person if possible or via phone) that the Company will be as supportive as possible. Assure the individual that he or she is covered by the existing policies outlined in the “Overview” section of this document and be sure the individual has a copy of these guidelines. Make it clear to the individual that your conversation will be held in confidence—as much as possible under the circumstances—and inform the individual that you want to discuss how you and the Company can assist him or her during their transition. Ask the individual for his or her suggestions on what you can do to help.
- Let the individual know that you will contact Human Resources and schedule a meeting with the individual to discuss and agree upon an action plan to assist the individual in his or her transition. Human Resources will provide advice and assistance for you in working with a transitioning individual.
- Be sure the individual has a copy of these guidelines. Review the Guidelines for Transitioning Individuals section to be aware of the individual's responsibilities and identify where you can provide support.
- Discuss the expected timeline and ask if anticipated time off will be required. Remember not to ask for specific medical information. Refer the associate to the Leave of Absence unit through HRSolutions if appropriate.

GENDER TRANSITION TRAINING INQUIRY – 8/10/12

- Ask the individual if he or she wishes to inform their manager, co-workers and clients themselves, or prefers that this to be done for them. Then determine together the best timing for that process.
- Ask the individual if he or she expects to change his or her name. If yes, ask what name and pronoun the individual will use and when the individual will want you to begin referring to him or her using the new name and/or pronoun.
- Discuss and agree upon adhering to the Dress Code and agree on the timing in which the individual will begin the transition at work. This will probably be the point at which the individual begins to outwardly present his or her gender identity, including change of name, pronouns, dress, grooming, appearance and restroom use.
- Discuss the individual's needs and plans for restroom and other sex-designated facility use.
- Ask him or her to inform you of anything else you can do to be of assistance. Schedule follow up meetings, if appropriate

Initial Preparation

- Meet with individual and Human Resources to discuss needs, transition time line. etc. (read the individual's checklist for items where you can support the individual). You may wish to give a general notice to your own management.
- Identify the people who will help plan the transition. In addition to Human Resources, this could include supportive co-workers identified by the individual, ANGLE – Associate Network for Gay and Lesbian Equality Associate Resource Group, facilities, the Employee Assistance Program (EAP).
- Plan the transition to include:
 - The date of the transition, i.e., the first day of the change of gender presentation, pronoun usage and name (see the individual's guidelines for a name change checklist). Recognize that the date of the transition will be driven primarily by the individual's situation and concerns.
 - Work with the individual on how to best design the announcement to internal associates (i.e. staff meeting, individual discussions, follow up memo, distribution of educational materials, etc). In-person or phone conferences to announce the transition are preferable to an impersonal email.
 - Work with the individual on how to communicate to external customers or clients (if appropriate or necessary).
 - Identify facility issues (restrooms, locker rooms, etc)

GENDER TRANSITION TRAINING INQUIRY – 8/10/12

- Communicate to the individual (if appropriate) the current policies against discrimination, harassment and the benefits programs (found on My HR)
- Discuss how the dress code will be followed.
- Ask if any time off required for medical treatment is needed (remember not to ask for medical or confidential details) and direct the associate to the HRSolutions Leave of Absence Unit if appropriate.
- Consider how long certain Human Resources functions take (e.g., legal name changes in Human Resources systems, company directory, etc. See individual's checklist for name change considerations).

The Day of the Announcement

- Hold a workgroup meeting, or include this in an already-scheduled face-to-face meeting. Teleconference in any non-local team members. Everyone in the workgroup whom the individual interacts with often should be included. Do not do this by e-mail. The individual should choose whether to be personally present at this meeting, depending on his/her comfort level.
- The manager should make the announcement, in conjunction with the Human Resources. The manager's announcement should:
 - Make it clear that the transitioning individual is valued and has management's full support during the transition process at work.
 - Explain company policy and expectations you have of individuals' working together and respecting each other in all situations.
 - Stress that on the transition day the individual will present him- or herself consistently with his or her gender identity and should be treated as such; for example, he or she should be called by the new name and new pronouns.
 - Lead by example. Use the new name and pronouns in all official and unofficial communication.
 - Take the approach that this is "no big deal" and that work will continue as before.
 - While it may be tempting to make light of the situation with jokes regarding gender or sexual transformation, statements of this nature should be avoided.
 - Give an opportunity for individuals to ask questions. Human Resources should also be available to help address questions or concerns.

GENDER TRANSITION TRAINING INQUIRY – 8/10/12

- Provide individuals with resources that can be accessed if they wish to better understand transgender and gender transition matters.

The First Day of Full-Time Workplace Gender Transition

Many of these steps will have been taken or coordinated in advance:

- On the first day of transition, plan to be on site if reasonable and the individual is comfortable with your presence to make introductions, support the worker, ensure respectful and inclusive treatment and make sure that work returns to normal.
- Issue a new company identification badge with a new name and photo.
- Place a new nameplate on the individual's workstation.
- Update any organization charts, mailing lists and other references to the new name.
- Ensure that all payroll information has been changed by working with Human Resources and HRSolutions.
- Ensure that email name has been changed (if applicable)
- Check in with the individual near the end of the work day to see how the day went and address any concerns.
- Plan to check in with the individual in a week or so as well. Ask the individual if there is anything that they need you to do.

Additional Resources

- ANGLE (Associate Network for Gay and Lesbian Equality)-(Company's) LGBT Associate Resource Group
- Human Rights Campaign Foundation — www.hrc.org/workplace/transgender
- Transgender at Work — www.tgender.net/taw
- National Center for Transgender Equality — www.nctequality.org
- Out & Equal Workplace Advocates — www.outandequal.org
- Harry Benjamin International Gender Dysphoria Association — www.hbigda.org

GENDER TRANSITION TRAINING INQUIRY – 8/10/12

These guidelines were developed primarily from resources found on the Human Rights Campaign foundation website. This also follows best practice examples from other companies. If you have any questions regarding this information, please contact your designated Human Resources consultant or the Diversity and Inclusion Team.

Non-Depository Institution

With regard to global employee policies:

1. What tools do you use to train supervisors/managers and employees on appropriate behaviors and what to do when inappropriate behavior is recognized?

We have our company policies embodied in a booklet that we refer to as our Integrity Guide. It's called "The Spirit & the Letter". It includes our Code of Conduct (which mentions fostering an atmosphere in which fair employment practices extend to everyone and also being honest, fair and trustworthy in all your relationships) as well as our official company policy on Fair Employment Practices (in which we address both harassment and bullying). New employees have to take a course on our FEP Policy (and other policies) within 30 to 90 days of hire. Harassment training is offered periodically throughout our businesses, and as required by law.

A key part of our Integrity training relates to the need to recognize violations of policy and to report it. We have anonymous (or not) compliance/integrity help lines that employees can call no matter where they are in the world if they recognize inappropriate behavior. We also have internal ADR programs where employees can report concerns. We also have an emergency shield on employees' desktops (in many of our businesses), through which employees can report behavior that might lead to an emergency-type situation (e.g., if any bullying seems threatening).

2. How often are you using these tools?

Employees are using the reporting tools everyday. Training is automatically assigned as mentioned below and assigned or conducted at other times, as needed. We also have a world-wide employee survey (used to be done every year; now every 2 years), in which employees are asked about treatment by their managers. Sometimes training needs are identified after reviewing survey results.

3. Who would be involved in this process (HR, Legal/compliance, other)?

Most of our training is on-line and much of it is automatically assigned by our HR system that recognizes when someone is a new hire or new supervisor. We less frequently conduct classroom training...but if we do, it would be typically conducted by HR or lawyers who specialize in labor and employment. Sometimes our compliance leaders will hold sessions, too.

4. We would appreciate any general comments that may help us in addressing global compliance (training, employee behavior, etc).

Our on-line systems are available globally. We also have about 1500-2000 HR managers outside the US who provide additional training. We have also

Responses to Inquiry re Global Training – January 2010; updated May 2011

spent the money to translate all of these policies into about 20 different languages, which has been requested by our non-US employees. We (our senior mgmt.) conduct compliance reviews ever year with all of our businesses re: key compliance issues under our integrity guide (including those under our FEP Policy). These include reviews in our various regions and all of our businesses outside the US. The businesses do a lot of their own auditing and compliance work to make sure they are in good order before they have to report to Sr. Mgmt.

Transportation Equipment

With regard to global employee policies:

1. What tools do you use to train supervisors/managers and employees on appropriate behaviors and what to do when inappropriate behavior is recognized?
Online Ethics and Foreign Corrupt Practices Act training is utilized.
2. How often are you using these tools? *Annual requirement.*
3. Who would be involved in this process (HR, Legal/compliance, other)?
Ethics for training. Ethics, HR and Legal for compliance.

Added May 2011

Brewer

Our UK employees complete “Workplace Harassment Prevention” computer based training program when they are hired, and then every two years thereafter. We are currently evaluating how to administer training to our other entities outside the U.S.

Petroleum and Coal Products

We do not have a global anti-harassment training program, but all employees are subject to the Anti-Harassment Policy keeping in mind that local country law will over-ride certain aspects of the policy.

Business Services

We are just now doing framework for this type of training in 2012. Early stages right now, but on the surface, we are looking at rolling out to all U.S. managers in 2012,

Responses to Inquiry re Global Training – January 2010; updated May 2011

making it mandatory for CA/CT and Maine managers, and then include those countries outside of the US which have harassment training requirements as a mitigating factor either explicitly or implicitly identified by law.

We would have to roll this training out in phases because we will have over 40,000 managers taking the course. That's all I have for now -- just in the planning stages with many conference calls.

For the U.S. offering, we will use a SkillsSoft course; outside the US, we are searching for the appropriate vendor to meet our global needs.

Insurance Carriers

At (Company) we have provided some harassment training to managers and employees outside the US. In Ireland, we have trained both managers and employees on bullying and harassment. The training was developed in house and delivered by a US HR professional who traveled to Ireland. We have modified the training to use with managers and employees in Dubai. The focus of the training is on harassment (particularly sexual harassment) and will be delivered by a local HR professional.

We will continue to look at training opportunities going forward and may engage an outside vendor, particularly in countries where there are requirements around the language in which the training is delivered. We have not yet begun to look for vendors.

HARASSMENT TRAINING INQUIRY – 8/24/12

Miscellaneous Retail

1. Does your organization require employees to take harassment prevention training?
If yes, is it required for all employees? **Yes 30 min for hourly and 2.5 for managers
Or only supervisors?
Other?**

2. How often do you require the training?
For employees? **One time, generally**
For supervisors? **Every 2 years**

3. If you do require periodic training, do you use the same content or do you refresh the content?
If refresh content, how often do you refresh it? We have not refreshed the content but plan to do so

4. Do you require additional workplace training for employees and/or supervisors?
If yes, please include brief description. **Yes, we require a multitude of employment training courses from EEO and Diversity, Selection Practices and Constructive Discipline.**

Anonymous

1. Does your organization require employees to take harassment prevention training?
Yes

If yes, is it required for all employees?
Or only supervisors? **It is required for our California supervisors.**
Other? **We offer sexual harassment classes through our online learning system and we have a policy to cover sexual harassment.**

2. How often do you require the training?
For employees? **We require the training if we determine a need.**
For supervisors? **It is required every two years for our California supervisors.**

3. If you do require periodic training, do you use the same content or do you refresh the content? If refresh content, how often do you refresh it? **We refresh the content as California AB 1825 changes or as we are made aware of new updates.**

HARASSMENT TRAINING INQUIRY – 8/24/12

4. Do you require additional workplace training for employees and/or supervisors? If yes, please include brief description.

We require IT Security, Diversity, Environmental Health and Safety, and Ethics training

Health Services

1. Does your organization require employees to take harassment prevention training? If yes, is it required for all employees? Or only supervisors?

Managers and supervisors per CA requirement 1x 24 mos period

Other? **Available but not required**

2. How often do you require the training?

For employees? **n/a**

For supervisors? **1x 24 mos period**

3. If you do require periodic training, do you use the same content or do you refresh the content? If refresh content, how often do you refresh it? **The content is refreshed periodically (typically after 2-3 training cycles, so for us it has been refreshed 3x)**

4. Do you require additional workplace training for employees and/or supervisors? If yes, please include brief description. **Annual compliance training, principles of responsibility (workplace expectations/policies), attendance management**

Heavy Construction

1. Does your organization require employees to take harassment prevention training? If yes, is it required for all employees?

Or only supervisors? **Yes**

Other? **Employees are offered but not mandated, although encouraged.**

2. How often do you require the training?

For employees?

For supervisors? **Every other year**

3. If you do require periodic training, do you use the same content or do you refresh the content?

If refresh content, how often do you refresh it? Refresh, vendor assists

HARASSMENT TRAINING INQUIRY – 8/24/12

4. Do you require additional workplace training for employees and/or supervisors? If yes, please include brief description.

HR Training Processes – 4/12/2010

*What do other companies do with regards to rolling out their HR training processes?
What incentives/penalties do they provide their staff/locations for complying with their
HR compliance processes?*

Wholesale Trade-Nondurable Goods

At our Company compliance training is sponsored by our Legal department or functional experts embedded in corporate human resources. Training is usually rolled out to division VPs of HR or other HR leaders who deliver the training and then update PeopleSoft master records. Recently, some compliance training has been done on-line with a third-party partner providing the Learning Management System where employees can sign-on and take training. Training records are then batch loaded to PeopleSoft.

Incentives or penalties are not used. Compliance is the responsibility of the local HR leader with follow-up from Legal or the corporate human resource expert.

Petroleum and Coal Products

The annual review of our Standards of Business Conduct policies is sent electronically across the globe and must be responded to electronically that it has been read and fully understood. Every four years there is mandatory attendance classroom training. The annual and every four year attendance classroom training is closely stewarded and all ultimately comply. Noncompliance would ultimately put someone's job at risk.

Mandatory training for OSHA, controls, safety etc. is also stewarded electronically.

Transportation Equipment

We have annual mandatory EEO and Ethics compliance training which is delivered online. Compliance is tracked, leaders are held accountable for completion and individual compliance is factored into annual performance assessments. We also recently implemented HR basics modules for HR professionals and compliance was tracked and reported to the HR VPs for each business area. Compliance was factored into annual performance assessments.

MANDATORY EEO TRAINING INQUIRY – 5/20/2014

With regard to federally-mandated EEO training for HR and managers by federal contractors:

1. *What subjects are included in your training?*
2. *What, if any, new subjects will you include in light of the new veterans' and individuals' with disabilities regulations?*
3. *How long is your training?*
4. *Is it mandatory?*
5. *Do you use computer-based training (CBT) at all?*

Research and Development in the Physical, Engineering, and Life Sciences (except Biotechnology)

- We conduct two training classes: EEO/AA/Diversity Training and Sexual Harassment Training.
- Both are required for all supervisors and managers, however anyone can sign up to attend.
- During the EEO class, we have a slide on “Trends and Recent Cases” in which for the time being we are giving some high level vets/disability regs info. We only update the class at the beginning of the FY so we will probably incorporate the new regs beginning 10/1/14 (FY15).
- The training is scheduled for 1.5 hours and is in a classroom setting to encourage discussion. No CBT used.

Insurance Agencies and Brokerages

1. What subjects are included in your training? Nondiscrimination based on race, gender, disability and veteran status; AAP/EEO obligations; Diversity information
2. What, if any, new subjects will you include in light of the new veterans' and individuals' with disabilities regulations? Goals may be discussed, also disability etiquette training for managers
3. How long is your training? We have several decks for training, each are about one hour.

MANDATORY EEO TRAINING INQUIRY – 5/20/2014

4. Is it mandatory? The training is not mandatory.
5. Do you use computer-based training (CBT) at all? Yes, the training is a CBT's

Other Nonhazardous Waste Treatment and Disposal

1. What subjects are included in your training? Basic AA obligations by EO 11246
2. What, if any, new subjects will you include in light of the new veterans' and individuals' with disabilities regulations? Include all requirements of the new regs
3. How long is your training? 15 – 20 min.
4. Is it mandatory? Yes
5. Do you use computer-based training (CBT) at all? Yes. Internally developed

Ball and Roller Bearing Manufacturing

1. What subjects are included in your training? Harassment (sexual, hostile work environment), Discrimination (disability, pregnancy, race, sex, etc.), FMLA, Duty to Act, Retaliation, Diversity, Inclusion, Mutual Banter, other company policy and procedures
 2. What, if any, new subjects will you include in light of the new veterans' and individuals' with disabilities regulations? Changes may be mentioned at a very high level
 3. How long is your training? Four to eight hours depending on the size of the class and the instructor
 4. Is it mandatory? Yes. Managers must take the course at least once every three years
 5. Do you use computer-based training (CBT) at all? Yes. Computer based training is often used for various ethics and compliance type of training.
-

Responses to Inquiry re Training Videos (Nov. 5, 2009)

We are looking at working with a production company to develop an EEO training video for use in training our employees, and I wanted to benchmark with other members whether they have done this and if so, who did they use and how much did it cost. Can you put these questions out to other members for me? Thanks!

Instruments and Related Products

1. How many employees are in your organization? *We have over 70,000*
 2. Does your organization use any type of a video for EEO training with your employees?
We have training videos for different areas, such as diversity, harassment, etc.
 3. If so, was the video developed in-house, developed specifically for your company's use by an outside vendor/production company, or did you purchase it "off the shelf" (i.e. was it a standard, ready-made product without customization)?
Some of the videos are a joint effort with in-house and external vendors. Other videos were purchased from vendors.
 4. If purchased off the shelf, when did you purchase it, who did you purchase it from, and how much did it cost? Was there any ability to customize the product for your organization's needs in any way?
The most recent video was purchased in September 2009, and others were purchased at different times. The cost vary.
 5. If developed specifically for your organization (either in-house or by an outside vendor), when was it developed, who did you work with to develop and produce the video (if an outside vendor was used) and how much did it cost? How long is the video?
The videos are mostly based on mandated training requirements. For example, California has a harassment training requirement that requires the participant engage for a minimum of two hours. Some videos are developed specifically for our organization and others are more generic. The videos were developed or completed in September 2009. I do not have the vendor's information or the cost since they were purchased from other business units.
-

Wholesale Trade-Nondurable Goods

1. How many employees are in your organization? *Somewhere between 9,000 – 10,000*
2. Does your organization use any type of a video for EEO training with your employees?
For a time we were using the video series Patterns: Preventing and Responding to Sexual Harassment. A good deal of our training is on-line now and we use various vendors for that. In California, we use online training developed by the California Chamber of

Responses to Inquiry re Training Videos (Nov. 5, 2009)

Commerce. We really leave it up to the local management teams how they want to conduct/deliver this training.

3. If so, was the video developed in-house, developed specifically for your company's use by an outside vendor/production company, or did you purchase it "off the shelf" (i.e. was it a standard, ready-made product without customization)?

The video training we purchased was "off the shelf"

4. If purchased off the shelf, when did you purchase it, who did you purchase it from, and how much did it cost? Was there any ability to customize the product for your organization's needs in any way?

We purchased it in 2007. I don't recall how much we paid for it then, but I think each of the videos is priced at around \$600-650 today. The videos came with facilitator materials so we were able to do some customization of the written materials, but not the videos themselves.

**AFFIRMATIVE ACTION & WORKPLACE CONDUCT WEB-BASED
TRAINING VENDORS – 12/19/13**

Can anyone recommend web-based training for affirmative action and workplace conduct?

Other Nonhazardous Waste Treatment and Disposal

We use an internally developed training course

Supermarkets and Other Grocery (except Convenience) Stores

emTRAiN offers eLearning for AA 101 and Code of Conduct. There is a short vignette from me on their website about how I use their programs. <http://emtrain.com/>

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President

emtrain

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ANONYMOUS

Our policy isn't stated as 'zero tolerance' but of course we reserve the right to take action up to & including termination based on the results of our investigation.

1. How do you train your new associates on the company's zero tolerance harassment policy?
Orientation covers this on day 1 or 2 of employment. People who are promoted into supervisory positions are required to take further training on this and other management responsibilities (managing leaves of absence, performance management, etc.) Supv training usually occurs in the first year of being in that role.
2. Do you repeat the training for associates after they've been hired? If so, how often?
Yes - when they move into a management role (within a year of entering new role) or as part of our annual integrity / mutual respect training (web-based) for non-management.
3. How do you keep associates apprised of the company's zero tolerance harassment policy?
Policy is published online and tenets are reiterated in various forms. Core values include Mutual Respect and in that policy there is a reference back to the harassment policy. There are many ways that we reference and reinforce this message (Diversity policy / education, integrity and compliance policy / education, etc.).
4. Where is the zero tolerance message initiated? *In New Hire Orientation by HR*

Insurance Carrier

1. How do you train your new associates on the company's zero tolerance harassment policy?
We do this via our new hire on-boarding, diversity training (one class required for all employees and an additional class required for all formal leaders) and the annual memo from the CEO to all employees regarding harassment, discrimination, etc. I believe our employee handbook is referenced in each of these.

ZERO TOLERANCE HARASSMENT POLICY TRAINING INQUIRY – 4/12/2010

2. Do you repeat the training for associates after they've been hired? If so, how often?
Employees are currently required to complete diversity training courses only once.
 3. How do you keep associates apprised of the company's zero tolerance harassment policy? *Annual CEO memo is sent to all employees.*
 4. Where is the zero tolerance message initiated?
CEO sends out the annual memo... Legal and AA/EEO staff are involved in drafting this message.
-

Petroleum and Coal Products

1. How do you train your new associates on the company's zero tolerance harassment policy?
The Harassment in the Workplace policy is part of our "foundation policies" in our Standards of Business Conduct. Each new employee is required to review the foundation policies and discuss, as needed, with their supervisor. Each employee receives a copy of the Working Together booklet which provides examples and additional information about our harassment-free workplace. Also, online training on the policy is available at the Company HR intranet site. Some groups require new employees to take the online training.
 2. Do you repeat the training for associates after they've been hired? If so, how often?
No less often than once every four years, employees attend a classroom based review and discussion of the foundation policies. Copies of Working Together are provided to all attendees. HR and Law are present at these sessions.
 3. How do you keep associates apprised of the company's zero tolerance harassment policy?
Annually each employee is required to attest that they have reviewed and understand the foundation policies. Supervisors receive additional annual reminders.
 4. Where is the zero tolerance message initiated?
The Standards of Business conduct.
-

ZERO TOLERANCE HARASSMENT POLICY TRAINING INQUIRY – 4/12/2010

Instruments and Related Products

1. How do you train your new associates on the company's zero tolerance harassment policy?
We have computer based training (CBT) and it is in our electronic directives/policies and procedures.
 2. Do you repeat the training for associates after they've been hired? If so, how often?
The training is repeated if annually for supervisors and other employees on and as needed basis.
 3. How do you keep associates apprised of the company's zero tolerance harassment policy?
It is posted on our intranet website and reviewed during "Leadership Training."
 4. Where is the zero tolerance message initiated?
During the "New Employee's Orientation."
-

Trucking and Warehousing

1. How do you train your new associates on the company's zero tolerance harassment policy?
All employees review a video called "In this together" during new hire orientation. We also review our "Respect Letter that is also posted at all facilities. All exempt level employees go through a 2 hour "Respect Training" which is repeated every 2 years.
2. Do you repeat the training for associates after they've been hired? If so, how often?
"Respect Training" every 2 years. Review of the "Respect Letter" annually.
3. How do you keep associates apprised of the company's zero tolerance harassment policy?
Reviewing the "Respect Letter" annually.
4. Where is the zero tolerance message initiated?
There are several avenues by which an employee can make us aware of a situation.

Railroad

1. How do you train your new associates on the company's zero tolerance harassment policy?
All new labor agreement employees review a one-hour EEO training video; all management employees receive a 3-hour in-person EEO training during new employee orientation.
 2. Do you repeat the training for associates after they've been hired? If so, how often?
On an ad-hoc basis; there is nothing scheduled or mandated.
 3. How do you keep associates apprised of the company's zero tolerance harassment policy?
The EEO Policy (which has a zero-tolerance harassment section) is mailed to all employees' homes or company e-mail addresses once per year. (If they are sent the policy by company e-mail, they have to respond and acknowledge that they have reviewed.)
 4. Where is the zero tolerance message initiated?
Not sure what this question is asking, but enforcement of the zero tolerance harassment policy is done or overseen by the company's EEO office which is part of HR. Our zero tolerance harassment policy only applies to harassment based on a protected characteristic as described in the EEO policy. (All other non-EEO, general conduct rule related violations are enforced by local management.) The "message" of zero tolerance is initiated by senior executives (ie, mailings and other dissemination of the policy is always accompanied by a letter or message from a senior executive underscoring its importance to the company, etc.
-

POLICY TRANSLATIONS INQUIRY – 12/28/11

We have an EEAC member who would like to know to what extent, if any, your company translates your company policies and benefits information into languages other than English. This would be other than what might be required by state or federal law. For instance, if you have a facility where the majority of the workers are Vietnamese and English is their second language, have you translated your policies and benefits information into Vietnamese?

Trucking and Warehousing (Agriculture)

We translate almost 100% of our policies and benefits information into Spanish. We do have other languages used, but do not translate due to lack of in-house resources and the various dialects of our Asian employees.

Sanitary Services

We do translate ours into Vietnamese, Polish and a few other languages as needed. We do not promise to translate for all policies, but would do it if we received a request from the local management with a reason (i.e. more than 50% of the employee population speaks a certain language.)

Paper and Allied Products

We have a process in place that allows us to provide printed materials in languages other than English in the following circumstances:

- 1) If the materials already exist in another language (for instance for use in another country), we will provide them to employees upon request.
- 2) If an employee or plant representative requests materials in another language and there is a 20% population of employees in the location who speak that language we will provide translated materials.
- 3) Upon request, our EEO, Legal and production management teams will consider other translation requests, and if there is a business-related benefit we will approve the translation.

Non-Depository Institution

Other than as required by law (e.g., in France, where we translate almost everything into French), we have translated (by choice) our official company policies (and the procedures associated with those policies, such as how to report concerns, etc.) in over 20 different languages because we believed that it was essential for all employees to understand their rights and responsibilities under those policies. When any employee clicks on our “integrity” website, they choose which language they want and the site opens up again but in their chosen language.

TRANSLATION OF NEW HIRE PAPERWORK INQUIRY – 4/5/12

- 1) Does your company translate its new hire paperwork/documentation, and if so, into what languages?*
 - 2) Can you recommend a certified translation service provider?*
-

Business Services

We translate where required by law. We generally use in-house services.

Non-depository Institution

We have used a particular company many times for translating all sorts of documents---called, “The Big Word”. Then we give the translated documents to people within our company who speak the languages and have them double check what the Big Word has translated. (Since our own people are in a better position to understand what our intent was.)

AAP CONSULTANTS INQUIRY – 7/17/13

1. *Do you handle your AAPs in-house or use a consulting firm? If consulting firm, which one?*
2. *Have you heard anything about the AAP consulting firm CHW, Inc.? If so, would you be willing to chat with this member about them?*

Lessors of Other Real Estate Property

1. Do you handle your AAPs in-house or use a consulting firm? If consulting firm, which one? Peoplefluent prepares my Company's AAPs.
2. Have you heard anything about the AAP consulting firm CHW, Inc.? If so, would you be willing to chat with this member about them? I have no info or experience with CHW.

Engineering Services

We prepare our AAPs in-house and I've never heard of CHW.

Pharmaceutical Preparation Manufacturing

Our consultant is Peoplefluent. However, we still have a staff to gather and organize the data for the consultant and the staff to promulgate the AAPs. We also do compensation analysis in-house.

I am not familiar with CHW.

Meat and Meat Product Merchant Wholesalers

We handle our AAPs in-house and have not heard of CHW.

Other Nonhazardous Waste Treatment and Disposal

Consulting Firm – PeopleFluent (we also have capability to build an AAP in-house using a software licensed through the contract with PeopleFluent.)

Biological Product (except Diagnostic) Manufacturing

We utilize Ogletree Deakins for our AAPs. Have not heard of CHW.

Direct Health and Medical Insurance Carriers

We use a consulting firm, EASI. Have not heard of CHW.

All Other Miscellaneous Electrical Equipment and Component Manufacturing

We use Biddle to help prepare most of our AAPs. Haven't heard of CHW.

Drugs and Druggists' Sundries Merchant Wholesalers

We just brought this process back in house. Prior to bringing it back in house we used Ellen Shong & Associates. Never heard of CHW.

Softwood Veneer and Plywood Manufacturing

We brought our AAPs in-house and have never heard of CHW.

Insurance Agencies and Brokerages

Yes, we use Outsolve out of New Orleans but have never heard of CHW.

Sanitary Paper Product Manufacturing

We use PeopleFluent to run the statistical reports, we but we prepare the plans in-house. Have not heard of CHW.

Electric Power Distribution

We handle our AAPs in-house and I've never heard of CHW.

All Other Miscellaneous Chemical Product and Preparation Manufacturing

A law firm – Seyfarth as of this year handles our AAPs. Never heard of CHW.

Petroleum Refineries

We handle our AAPs in-house and have never heard of CHW.

Engineering Services

We use Biddle and have never heard of CHW.

Engineering Services

We use Employment Advisory Services, Inc. (EASI) and I've never heard of CHW.

Ball and Roller Bearing Manufacturing

We have an amazing outside consulting group named EASI that helps with our AAPs.
We Have never heard of CHW.

All Other Miscellaneous Food Manufacturing

We use EASI for AAPs, happy to talk about how wonderful they are. Have never heard of CHW.

AAP SCORECARDS INQUIRY – 2/28/13

Does your company use an AAP Scorecard to rate each of your company's AAPs throughout each year? If so, would you be able to share a copy of it?

Petroleum Refineries

No, we do not currently use a scorecard. We recently began exploring options to evaluate individual AAP performance.

All Other Basic Organic Chemical Manufacturing

No.

Softwood Veneer and Plywood Manufacturing

No.

General Line Grocery Merchant Wholesalers

We maintain a type of scorecard where we track AAP *completion* (data submitted and verified and then narrative completion). We do not track AAP performance (goal completion, representation, etc).

Ball and Roller Bearing Manufacturing

We do not currently use an AAP scorecard.

Engineering Services

We do not.

Savings Institutions

No.

Communication Benchmarking Survey

Survey #1

1. Is your HR department centralized or decentralized?
We are centralized in a Shared Service environment, however we have HR Business Partners at every site and we have some off site recruiters, but they report to the Manager of Recruiting, who is located in the centralized location.
 2. What methods does your Company utilize to build HR knowledge of its HR employees?
The HR Front Office, which is a 'help desk' of employees who answer calls/emails from all employees who have HR related questions. We have an HR website that employees can access that has all of our policies and procedures for their reference. We have HR Business Partners at every site in case they need to meet with an HR person face-to-face.
 3. How do you communicate HR information to your HR employees?
 - a) What communication channels do you use to communicate (web, email, phone calls, etc.)?
Web, email, newsletter, we have an HRCC (community council) that meets and gets the word out to the HR community of any important news/information, and we have quarterly HR meetings for the whole department.
 - b) What information do you communicate?
Position changes, departures of employees, new hires, processes, important dates, changes in policies or procedures
 4. How do you communicate HR information to all employees
 - a) What communication channels do you use to communicate (web, email, phone calls, etc.)?
Web, email and newsletter
 - b) What information do you communicate?
Change in policies, change in vendors, upcoming important dates, best practices, process tips (for example if there is a process like Performance Management Plans that can cause confusion, we alert employees of the instructions and 'tips' to make the process go smoother.
 - c) What gets communicated centrally and what gets communicated from those outside of HQ?
Not sure.
-

Communication Benchmarking Survey

Survey #2

1. Is your HR department centralized or decentralized?

Decentralized

- a) If decentralized:

- i. How many HR employees are located outside of Headquarters? *36*
- ii. In how many different locations? *16*
- iii. Are they functionally diverse (vs. generalists)? *No; all generalists.*

2. What methods does your Company utilize to build HR knowledge of its HR employees?

Annual HR Conference; on the job training; workshop, seminar and conference attendance; webinars; encourage and support HR & Compensation Certifications.

3. How do you communicate HR information to your HR employees?

- a) What communication channels do you use to communicate (web, email, phone calls, etc.)?

Weekly staff meetings, emails and teleconferences.

- b) What information do you communicate?

Proposed policy changes, issues that impact multiple employees or worksites.

4. How do you communicate HR information to all employees

- a) What communication channels do you use to communicate (web, email, phone calls, etc.)?

HR website, emails, and employee meetings.

- b) What information do you communicate?

Policy and benefit changes; reorganizations, new business.

- c) What gets communicated centrally and what gets communicated from those outside of HQ?

Centrally - things that impact multiple locations and broad based. Info that needs to be discussed with time for questions is communicated outside of HQ

Survey #3

1. Is your HR department centralized or decentralized?

YES and No - working on centralizing core services.

DEMOGRAPHIC INQUIRIES INQUIRY – 8/9/12

1) Does your company ask for individuals' demographic data beyond that which is required as federal contractors (such as race and gender)?

2) If so, what additional demographic data do you gather?

Anonymous

We are beginning to ask if the individual is a veteran during the application stage. We do not ask them which category they fall into, we simply ask if they are a veteran or not.

Instruments and Related Products

1) Does your company ask for individuals' demographic data beyond that which is required as federal contractors (such as race and gender)?

We only ask for Race and Gender at the pre-hire stage.

2) If so, what additional demographic data do you gather?

We offer the opportunity to provide veterans and/or disability status at the post offer, but before the person begins to work stage.

Electronic Equipment

Pre-offer just race/gender and Post-offer vet status and disability status.

Food and Kindred Products

The only other information we request post offer, pre-hire, is disability status as it relates to the essential functions of the job and veterans status. We do not inquire of LGBT or family status.

DEMOGRAPHIC INQUIRIES INQUIRY – 8/9/12

Insurance Carrier

Yes, annual disability and veterans demographics.

Industrial Machinery and Equipment

1) Does your company ask for individuals' demographic data beyond that which is required as federal contractors (such as race and gender)? - Yes

2) If so, what additional demographic data do you gather? – Veteran status

Non-Depository Institution

We only ask race/ethnicity and gender up front and then Vets and disability status post-offer. We do NOT ask about age, sexual orientation, religion, etc.

Health Services

We only ask for race and gender.

Communication Benchmarking Survey

- a) If decentralized:
- i. How many HR employees are located outside of Headquarters?
65 at one location
 - ii. In how many different locations? *2 off site locations in total*
 - iii. Are they functionally diverse (vs. generalists)?
Mostly broken out by HR function (recruiting, employee relations, comp, benefits, etc.)
2. What methods does your Company utilize to build HR knowledge of its HR employees?
Online, classroom, tuition reimbursement, internal and external training opportunities, shadowing and rotations through areas of HR, development of client service teams where employee relations, staffing, comp, benefits and admin support are assigned to service areas of the business (i.e. all of nursing has one core client service team)
3. How do you communicate HR information to your HR employees?
- a) What communication channels do you use to communicate (web, email, phone calls, etc.)?
All of them.
 - b) What information do you communicate?
Process changes, business changes, finances, press releases, etc.
4. How do you communicate HR information to all employees
- a) What communication channels do you use to communicate (web, email, phone calls, etc.)?
Any and all.
 - b) What information do you communicate?
New research trials, major business accomplishments, finances, process changes, kudos / positive stories (caught in the act of doing something good or a great patient story), eDr T. - a weekly podcast from our CEO.
 - c) What gets communicated centrally and what gets communicated from those outside of HQ?
Becoming more central and getting more communications from HQ on benefits, policy alignment, process alignment.

~We have over 50,000 employees and my experience has been that we have to communicate messages in simple, straightforward language. The messages have to be consistent. And we have to communicate the same message over and over in every possible format available (email,

Communication Benchmarking Survey

video, live, newsletters, etc.). Too much information hitting us all day every day - we're competing for air time against ourselves in many cases. We have to meet our employees where they live. If that's Facebook - we'll be there. If that's a podcast - we'll be there, too. It's hard work...

Survey #4

1. Is your HR department centralized or decentralized?

The majority of our HR department is centralized, but we have seven HR employees in areas outside of HQ.

- a) If decentralized:

- i. How many HR employees are located outside of Headquarters?

Seven

- ii. In how many different locations? *Five*

- iii. Are they functionally diverse (vs. generalists)?

Two are Generalist the remaining five and functionally diverse.

2. What methods does your Company utilize to build HR knowledge of its HR employees?
On-line training and classroom training.

3. How do you communicate HR information to your HR employees?

- a) What communication channels do you use to communicate (web, email, phone calls, etc.)?

Web, Newsletter, and email.

- b) What information do you communicate?

Changes that will affect the workforce such as changes in benefits, upcoming open enrollment, union specific data, etc.

4. How do you communicate HR information to all employees

Email to those with access and mailings for those that do not have access to email. We also distribute to leaders, managers and post on bulletin boards

- a) What communication channels do you use to communicate (web, email, phone calls, etc.)?

Web, email and mailings.

- b) What information do you communicate?

Communication Benchmarking Survey

Job openings, health watches, pandemic health watches, computer threats (viruses), changes in benefits, changes in personnel (promotions, retirements, etc.), training requirements, and any information that will possibly affect the employees and/or the business.

- c) What gets communicated centrally and what gets communicated from those outside of HQ?

The distribution is the same

CONTRACTORS' PARTICIPATION IN ENGs – 8/1/12

Does your company have Employee Resource/Networking Groups and if so, do you allow contractors to participate and in what capacity?

Food and Kindred Products

We do have Employee Resource Groups and we do not allow contractors to participate in them.

Insurance Carrier

Yes, we have ENGs, but no, we don't allow contractors to participate. It creates risk – blurs the line between contractor and employee.

Rubber and Tire Producer

Two ERG's, no contractors.

Industrial Machinery and Equipment

We do have employee resource/networking groups. Contractors and contingents are not allowed to participate in the groups. However, if there is some event that is open to the public and it is not during working hours then the contractor/contingent can attend.

Insurance Carrier

We do not allow contractors to participate.

CONTRACTORS' PARTICIPATION IN ENGs – 8/1/12

Insurance Carrier

Yes, we have ARGs (eight of them) and, no, contractors are not permitted to join these groups as members. ARGs are groups for our associates, sponsored by the company. Contractors are not Company employees –we don't pay their salary nor we provide benefits to them. Most companies do not allow contractors to join groups/ efforts/ programs that are targeted at associates, because of the risk associated to co-employment (creating the perception that the company provides any kind of benefits or privileges to non-employees may also create the perception that the company has obligations as a co-employer). I would definitely advise the person who asks this question to consult with their Legal department.

Sanitary Services

Yes, but they are strictly for employees. Contractors are not allowed to join as they are company sponsored and funded organizations.

Depository Institution

Yes, we have employee resource/networking groups, but contractors are not eligible to participate. They are for employees only.

Paper and Allied Products

Yes we do have Employee Resource/Networking Groups but we do not allow contractors to participate.

Instruments and Related Products

We have eight ERGs and the membership is restricted to employees.

Chemicals and Allied Products

Yes we do. Employee Resource Groups are open to employees only but I'm not sure how closely we monitor participation.

CONTRACTORS' PARTICIPATION IN ENGs – 8/1/12

Insurance Carrier

We have a number of Employee Resource Groups. However, only employees are able to participate, not contractors.

Industrial Machinery & Equipment

1. Do you have a separate department/other organization handling CSR?

We have a small community relations team at our corporate headquarters with an extended global team who have community relations as a part of their role. This includes our plant, country and facility leaders as well as some other designated associates in each location.

2. If so, how many people staff it?

Our corporate staff is 2 FTE (1 full time and 2 part time). Our extended global team is less than 5 FTE spread over perhaps 25 people or more.

3. What is their annual budget?

Our annual budget for community relations is \$300K. Our annual charitable giving is between \$2-4 million. We don't track the budget of our extended global team (we do track the global giving, but not the S&A).

Also re environmental issues - Complementing above response, which generally applies to environmental as well, we have 4.5 people dedicated to environmental, budget of approximately \$500k.

DIVERSITY & INCLUSION RECOGNITION PROGRAMS INQUIRY – 5/31/2011

All too often individuals in organizations are charged with running diversity programs with little to no support or recognition. We would like to develop a culture of recognition within our Diversity & Inclusion community. It is our intentions to have this D & I recognition initiative maintain employee engagement and motivation, while supporting Business goals.

If you have a recognition program at your company, can you please share the following:

Instruments and Related Products

What key steps did you take to develop an effective D&I recognition program?
None, just launching diversity initiative now. We feel CEO level support and communication directly from his office is important.

- How did you put those key steps into practice?

Roll out from CEO to his direct reports and Board of Directors.

- What does D&I recognition look like at your company?

Not only targeted on recognition but here was our initial focus: Defining inclusion; measuring against internal and external comparisons; looking at representation (female and minority) in our senior ranks based on EEO-1; improve that representation through increased focus on diverse slate of candidates; increasing our visibility and support of diversity recognition events and internal recognition; review of engagement surveys and employee perspectives on our efforts.

Hotel

The (Company) Award was established in 2005 to recognize business units or corporate departments that demonstrate excellence in promoting diversity and building an environment of inclusion for all. Beginning in 2007, an individual who promotes these same ideals can also be nominated for the award. It is the highest form of recognition of diversity efforts.

DIVERSITY REWARDS INQUIRY – 6/27/12

Anonymous

1) Do you measure diversity achievements, especially for good hire/promotion stats?

We link manager compensation to diversity and inclusion by cascading goals to increase racial and gender diversity in leadership from the CEO down to her direct reports and their leadership teams' performance plans. There is also a goal to increase supplier diversity partners in the performance plans of the CEO, CFO, and CDO. In addition, our health services director and CDO have a shared goal to increase cultural competency across our workforce and to reduce ethnic health disparities. We work very hard to ensure that we don't set arbitrary diversity goals across the company; instead we seek to ensure that the right goals are integrated into respective business units so that it becomes a natural way for us to conduct business.

2) If so, what does the reward program look like (i.e. added bonus, company merchandise, etc.)

○ How long has this program been in place?

This reward program has been in place for approximately seven years

○ How effective is it in positively influencing diverse hire stats?

As Johnnetta Cole is often quoted as saying, "We need to move beyond counting heads to making sure that every head counts," and we definitely follow that principle. The point of measuring our progress under workforce demographics as it relates to our organizational culture is in order to drive change. Diversity and numbers --- it is not about representation but about utilization. Diversity isn't something to be finished --- it's an ongoing aspect of organizational culture. It's not about having the company look different, but rather about having the company work better and smarter.

○ Any negative points?

Nothing "negative" ... only a realization that this is indeed a "journey" and the commitment can never waver and the bar must continuously be set higher in order to strive for excellence and reflect true progress.

DIVERSITY REWARDS INQUIRY – 6/27/12

Anonymous

- 1) *Do you measure diversity achievements, especially for good hire/promotion stats?*

Yes, we have a couple of programs. Emphasis at the moment is on what we call ECP (Early Career Professional). The better our hiring numbers into these professional level positions, the better our pool for upward mobility.

- 2) *If so, what does the reward program look like (i.e. added bonus, company merchandise, etc.)*

The divisions within the business units establish a number of ECP's goal. As they are successful meeting these goals, this is goodness towards the group. I'm not aware of plus or minus to comp or bonus at this time.

- *How long has this program been in place?* 3 years
 - *How effective is it in positively influencing diverse hire stats?*
Generally speaking fairly successful. However, in the last 2 years not the same previous volume of hiring.
-

DOMESTIC PARTNER BENEFITS INQUIRY – 4/12/12

Wholesale Trade-Nondurable Goods

1. Are same-sex partners of your employees eligible for the same benefits that are offered to opposite sex spouses?
Yes
 2. If yes, do you require any type of proof of relationship?
We require an affidavit of domestic partnership.
 3. If you operate in a state that has legalized same-sex marriage, has that impacted your business in any measurable way?
No
 4. If you operate in a state that has legalized same-sex marriage, what has been the impact on your HSA contributions?
There has been no measurable impact.
-

Insurance Carrier

1. Are same-sex partners of your employees eligible for the same benefits that are offered to opposite sex spouses?
We provide the same benefits eligibility for same sex domestic partners as for opposite sex spouses of our employees.
2. If yes, do you require any type of proof of relationship?
We do require all employees to provide us with proof of marriage (marriage license) in order to cover a spouse or same sex domestic partner when electing coverage. For employees covering same sex partners, if they reside in jurisdictions that recognize same sex marriage, civil unions or other formal recognition, we require documentation reflecting their marriage, civil union or registered domestic partnership. If they do not live in such a jurisdiction, a written affidavit of domestic partnership must be provided.
3. If you operate in a state that has legalized same-sex marriage, has that impacted your business in any measurable way?
We have provided eligibility for same sex partners since 2005, and even though we have locations in states that have legalized same sex marriage, we have not noticed any impact on enrollment as a result.

DOMESTIC PARTNER BENEFITS INQUIRY – 4/12/12

4. If you operate in a state that has legalized same-sex marriage, what has been the impact on your HSA contributions?

N/A - our health plans aren't HSA eligible

Anonymous

1. Are same-sex partners of your employees eligible for the same benefits that are offered to opposite sex spouses?

Yes

2. If yes, do you require any type of proof of relationship?

A signed affidavit of domestic partnership (see below) . An employee must provide proof of date of birth and address, matching the employee's address. In addition they need to provide proof of joint financial interdependence. The employee must provide this information at the time the domestic partner is added as well as during the dependent verification process.

3. If you operate in a state that has legalized same-sex marriage, has that impacted your business in any measurable way?

No, we have been offering coverage to domestic partners, same and opposite sex for many years, so this has had no impact.

4. If you operate in a state that has legalized same-sex marriage, what has been the impact on your HSA contributions?

We do not offer an HSA.

Affidavit

AFFIDAVIT OF DOMESTIC PARTNERSHIP

SECTION I

I, _____ certify that I, and _____
Name of Employee (print) Name of Domestic Partner (print)

are Domestic Partners, and we:

1. Share the same regular and permanent residence* and who has lived with the employee for at least one year AND

2. Have a close personal relationship AND

DOMESTIC PARTNER BENEFITS INQUIRY – 4/12/12

3. Are jointly responsible for ‘financial interdependence’(Joint Ownership)* AND

4. Are not married to anyone AND

5. Are each eighteen (18) years of age or older* AND

6. Are not related by blood or marriage in a way that would prohibit marriage in your State of Residence AND

7. Were mentally competent to consent to contract when our Domestic Partnership began AND

8. And each other’s sole Domestic Partner and are responsible for each other’s common welfare

Is Domestic Partner employed _____ and does s/he have healthcare coverage Yes No

Are they covered under an employer group health plan? _____ Yes No
If so, what plan?

Name of plan (print)

***VERIFICATION REQUIRED: Submit the state or municipality Registration of Domestic Partnership OR Affidavit of Domestic Partnership AND Proof of Joint Ownership AND Proof of Residency See list below of Acceptable Documents for Proof of Joint Ownership and Residency.**

SECTION II

I understand that this affidavit shall be terminated upon the death of my Domestic Partner, or by a change of circumstance attested to in this affidavit. I agree to notify the Company’s Benefits Service Center and submit a Dissolution of Domestic Partnership form if there is any change of circumstances attested to in this affidavit within thirty (30) days of change.

Signature Date

**Acceptable Documents for Proof of Joint Ownership and Residency
Proof of Joint Ownership***

*Proof of joint ownership documents must include **BOTH** the employee’s AND domestic partner’s names on the document. You must submit **ONE** of the following documents:

☐ Mortgage statement, credit card statement, car note, bank statement, school taxes, home equity loan, Rent-A-Center, or utility bills dated from **any time in the last 3**

DOMESTIC PARTNER BENEFITS INQUIRY – 4/12/12

months.

- ☐ Rental/lease agreement, property appraisals from the city, county or state for tax purposes or property tax document, school taxes, deed, or bankruptcy paperwork dated from **any time in the last 12 months.**
- ☐ Automobile registration that is currently in effect and shows joint ownership.
- ☐ Auto insurance statement – must show both the employee and domestic partner listed on the policy and must be currently in effect.
- ☐ Homeowner's insurance statement – must list the employee and dependent and be currently in effect.
- ☐ Power of Attorney for HealthCare and/or Property.
- ☐ Joint Wills.
- ☐ Safe deposit box signature form.

AND

Proof of Residency

- ☐ Copies of the employee's and his/her domestic partner's individual driver's license or state issued ID, showing the same address.

SUBMIT TO THE COMPANY'S BENEFIT SERVICE CENTER WITH YOUR PAPERWORK WHEN ADDING A DOMESTIC PARTNER TO YOUR COVERAGE – For Questions, contact the Benefits Service Center at 555-555-5555.

Service Station

1. Are same-sex partners of your employees eligible for the same benefits that are offered to opposite sex spouses?
Yes
2. If yes, do you require any type of proof of relationship?
Yes – employees must sign an affidavit indicating that their same-sex partners are dependents, as defined by the IRS. They are subject to audit, just as all employees are subject to audit.

DOMESTIC PARTNER BENEFITS INQUIRY – 4/12/12

3. If you operate in a state that has legalized same-sex marriage, has that impacted your business in any measurable way?

No – all of our plans are self-insured and not subject to state laws

4. If you operate in a state that has legalized same-sex marriage, what has been the impact on your HSA contributions?

N/A – we do not offer HSA plans.

Insurance Carrier

1. Are same-sex partners of your employees eligible for the same benefits that are offered to opposite sex spouses?

They are eligible for the same benefits other than they pay for them on an after tax basis.

2. If yes, do you require any type of proof of relationship?

Currently they complete an online certificate, where they answer 11 questions to certify they meet the criteria of a domestic partner. Beginning May, 2012 in addition to this certificate any new domestic partners added to coverage will be required to show 1 piece of documentation to also support this (we will be requiring documentation from anyone being added or removed from the plan).

3. If you operate in a state that has legalized same-sex marriage, has that impacted your business in any measurable way?

Since our plans follow ERISA rules and not state rules, we would classify a same-sex marriage as a domestic partner relationship.

4. If you operate in a state that has legalized same-sex marriage, what has been the impact on your HSA contributions?

Same as above.

Industrial Machinery & Equipment

1. Are same-sex partners of your employees eligible for the same benefits that are offered to opposite sex spouses?

Yes

2. If yes, do you require any type of proof of relationship?

We do require a copy of the marriage certificate or civil union certificate, whichever is applicable. This is the same requirement for opposite-gender marriages.

DOMESTIC PARTNER BENEFITS INQUIRY – 4/12/12

3. If you operate in a state that has legalized same-sex marriage, has that impacted your business in any measurable way?

Virtually no impact at all.

4. If you operate in a state that has legalized same-sex marriage, what has been the impact on your HSA contributions?

Virtually no impact at all.

Paper and Allied Products

1. Are same-sex partners of your employees eligible for the same benefits that are offered to opposite sex spouses?

Yes, same-sex partners are eligible for Medical, Dental, Vision and Life Insurance coverage. The only exception is an accidental insurance policy which is only offered to spouses.

2. If yes, do you require any type of proof of relationship?

No proof is required to enroll a same-sex partner into coverage; however, we conduct semi-annual dependent audits. The audits require randomly selected employees to provide documentation providing verification of their dependent's eligibility under our Plans. The audit considers all employees who cover at least one dependent in coverage, not just employees covering same-sex partners.

3. If you operate in a state that has legalized same-sex marriage, has that impacted your business in any measurable way?

N/A

4. If you operate in a state that has legalized same-sex marriage, what has been the impact on your HSA contributions?

N/A

EEO-1 REPORTS INQUIRY – 8/16/12

1) How do you code your "unknowns" when you've exhausted every means of identifying an individual's race/ethnicity? Do you code them as "white," "two or more races," or simply do not include them in the total count?

2) Do you do visual identifications as part of your attempts to obtain this information or just leave them as "unknown"?

Wholesale Trade Non-Durable Goods

Guessing is not an option, so if we have exhausted every means necessary to obtain the information we make a visual identification.

Food and Kindred Products

When an employee refuses to self-identify, we advise the employee that we will make a determination for our records based on the information available to their HR Representative including visual appearance and name. We do not leave employees in an unknown status, only applicants.

Rubber and Tire Producer

I believe we do a visual when all else fails.

Industrial Machinery and Equipment

We ensure that there are no employees of unknown race or gender in our HRIS. If the employee does not self-identify, then either HR or the manager does a visual identification. If you've not done so already, please refer the member to Appendix 4 Race and Ethnic Identification (pp4-5) in the EEO-1 Instruction booklet.

EEO-1 REPORTS INQUIRY – 8/16/12

Insurance Carrier

We have not had too many issues with this. Typically, when asked, even if not pleased about it, our employees answer. If they still refuse, we would do a visual identification.

Heavy Construction

We do visual identifications.

Sanitary Services

We conduct visual identification by local HR reps.

Paper and Allied Products

If an employee refuses to disclose race and gender after hire, we ask HR to do a visual and make a “best guess” because the regs allow employers to do this and it’s the best we can do under the circumstances. The government tells federal contractors that they have to report on employee and applicant demographics, but they insist that the disclosure be voluntary on the individual’s part. Lastly, all employees in the US headcount (i.e., not intermittents, co-ops, interns, etc.) are counted in the EEO-1 report – there are no exceptions. We don’t leave people off if we don’t have their information – we get their information and count them.

Health Services

You are required to guess via visual inspection. If the employee does not complete a self-id and, via visual inspection, we are unable to tell if the person is White, then we default to two or more races, and advise the employee of our decision with an explanation as to why legally we have to record a race in their record. We also advise them to correct their records if they do not wish to remain two or more races.

ELECTRONIC FILES INQUIRY - 6/27/13

1. *Do you have electronic files?*
 2. *If so, do you scan in the entire paper file or only include information that is required to be in the file?*
 3. *Were you able to structure your electronic files in the same way as your paper files?*
-

Lessors of Other Real Estate Property

1. Do you have electronic files? We are in the process of converting our paper files to electronic ones.
 2. If so, do you scan in the entire paper file or only include information that is required to be in the file? We decided to scan the entire paper file.
 3. Were you able to structure your electronic files in the same way as your paper files? Yes.
-

General Medical and Surgical Hospitals

(Company) is currently working on making all employee files electronic. We are a little more than half way there. Anything that was in the file when we started scanning was scanned.

We probably do scan things that don't need to be in the file, but the majority of documents are required.

Prior to scanning, most of our files had a very loose structure and some had no structure at all – just a plain file folder with all paper placed inside. Now, any new documents that we have for scanning are indexed into one of several document classes and they also are assigned a document type and a date for easy retrieval. We have integrated our document storage system with our HRIS so that if we are looking at a staff member's record in our HRIS, we can click on a link within the HRIS that will open the employee file.

Sanitary Paper Product Manufacturing

1. Do you have electronic files? Yes, we have both electronic and paper files.
2. If so, do you scan in the entire paper file or only include information that is required to be in the file? It depends on the document and the size. For the most

part, we scan in the entire record but do not back-scan previously prepared documentation. Those would be retained in paper form.

3. Were you able to structure your electronic files in the same way as your paper files? Yes, although cost is a factor both in the resources to scan/manage the data and the cost to retain it in an electronic server/format.
-

Ball and Roller Bearing Manufacturing

1. Do you have electronic files? Yes
 2. If so, do you scan in the entire paper file or only include information that is required to be in the file? This depends on what type of file it is. If it is a legal matter or an investigation we would probably scan everything for our records. If it was something similar to an I-9 Form, with specific requirements, then we would only scan what we are required to.
 3. Were you able to structure your electronic files in the same way as your paper files? No. There is no set structure on the way an electronic file would be scanned. It may all be in the same electronic folder but probably not organized the same way paper files would be.
-

Software Publishers

Yes, we have electronic files. It is a home grown system. Most everything in the paper file was scanned in to the online file. We no longer keep or create a paper file. It is structured similar to our paper file and there is an employee only side and an HR only side.

Engineering Service

We are in the process of scanning files. A very large project. We plan to scan the files into folders. Based on the type of document it will direct the form/doc to 3 places, personnel file, I-9/e-verify and payroll. We will scan what is required in the file.

Drugs and Druggists' Sundries Merchant Wholesalers

1. Do you have electronic files? Our onboarding is still paper-based and processed manually. However, we utilize an imaging vendor and they scan and upload our documents into electronic filing cabinets.

2. If so, do you scan in the entire paper file or only include information that is required to be in the file? All HR paperwork required in the personnel file is scanned.
 3. Were you able to structure your electronic files in the same way as your paper files? Yes
-

ELECTRONIC SIGNATURES POLICIES INQUIRY – 6/17/2010

For which documents (employment applications, consent forms for background checks, etc.) do you require the employee's actual handwritten signature, and for which do you allow electronic signatures?

Engineering and Management Services

We allow electronic signatures for everything but I-9s. Our legal has advised us that as long as there is a login ID and password required in order to access the form, they are usually comfortable with accepting an electronic signature. If there is no login required - electronic signatures won't be accepted.

Service Station

All of our new hire forms require a handwritten signature, however, we will accept them electronically until the hard copies are obtained. (Application, Offer letter, Release, Consent, Personal Data, Emergency Contact, W-4, I-9)

Electric, Gas & Sanitary Services

We accept electronic signatures for employment applications, Conflict of Interest survey, training completion certification, etc., but accept actual hand written signature for release of background check, drug test, etc.

Petroleum and Coal Products

We have moved to electronic signatures on most documents. We do not require handwritten signatures for e-employment applications, however, we do require handwritten signatures for background checks (post offer). Background checks are authorized via a scanned or faxed signature with the actual paper copy returned via mail.

Railroad

We do not require applicants to physically sign anything -- all documents related to hiring process, including consents, are electronic. If they want to make changes to their application at the interview, we have them initial and sign the paper copy at the interview, but that is all.

EPL INSURANCE INQUIRY - 6/25/13

1. *Has your company ever had employment practices liability insurance?*
 2. *If so, were you satisfied or not?*
 3. *If so, did/do you still handle your own investigations and position statements or does the insurance company handle them for you?*
-

Ball and Roller Bearing Manufacturing

1. Has your company ever had employment practices liability insurance? Yes, Chubb Insurance
 2. If so, were you satisfied or not? Yes, we have had no major issues
 3. If so, did/do you still handle your own investigations and position statements or does the insurance company handle them for you? Chubb will provide us with a list of approved counsel that we can select from. The attorney that we select will work with employee relations and someone from HR to gather the necessary information and documents and prepare the position statement. When we have the capacity, we will draft our own position statements to save on attorney fees.
-

Sanitary Paper Product Manufacturing

1. Has your company ever had employment practices liability insurance? Yes, for many years.
 2. If so, were you satisfied or not? Yes, satisfied. The insurance is managed as part of our Company's risk management department – it's not part of the Legal or HR function.
 3. If so, did/do you still handle your own investigations and position statements or does the insurance company handle them for you? We conduct our own internal investigations under the attorney-client privilege, but outsource management of state and federal discrimination charges and related position statement prep to outside counsel.
-

Engineering Services

1. Has your company ever had employment practices liability insurance? Yes

2. If so, were you satisfied or not? No, I am not satisfied. Legal handles this contract. The deductible is so high, that we rarely utilize it. My prior employer had a lower deductible and we were able to cover legal fees fairly often.

3, If so, did/do you still handle your own investigations and position statements or does the insurance company handle them for you? We handle our own investigations and position statements. Our deductible is set at \$1M so we don't usually hit the threshold to get coverage. I have asked Legal to do some analysis on if it now makes sense to lower the deductible, realizing the premiums will cost more.

Engineering Services

1. Has your company ever had employment practices liability insurance? Yes
2. If so, were you satisfied or not? Yes
3. If so, did/do you still handle your own investigations and position statements or does the insurance company handle them for you? We still handle our own investigations and positions statements

Drugs and Druggists' Sundries Merchant Wholesalers

1. Has your company ever had employment practices liability insurance? Yes.
 2. If so, were you satisfied or not? We still have it, but our self-insured retention is so high I hardly ever have to deal with them directly.
 3. If so, did/do you still handle your own investigations and position statements or does the insurance company handle them for you? Because of the high self-insured retention, we have discretion to handle our own investigations and assign counsel to our cases.
-

ERG's and EMPLOYEE LISTS INQUIRY – 10/10/12

How does your company handles requests from employee resource groups (ERGs) for lists of employees who share the same "category" as those in the ERG. For example, how do you handle a request from your Latino ERG for a list of employees who have self-identified as Hispanic?

Engineering and Management Services

We would never release such information to the ERG. The ERG should be able to attract members on its own. We would not want an employee to feel obligated to join an ERG. Additionally, we treat such information as highly confidential. Anyone wanting to run a report with any EEO information must go through us for approval first, so we can ensure the data is being used appropriately and very few are ever approved.

Food and Kindred Products

We just started ERG's about 2.5 years ago so I consider it somewhat new still. HR used to email those who self-identified as a specific category and state that due to privacy reasons, the company won't release their name to the group. However, they should feel free to reach out to the ERG as an interested party.

Our new practice is to have all groups open to all employees so there is no need to specifically "target" employees.

Business Services

Information provided by employees is not shared with employee resource groups. Emails are sent to new employees during their first month of employment letting them know about all of the ERGs and they are encouraged to send emails to the group leaders if they are interested. Even if you are not a "member" of the category, you can still join the group.

ERG's and EMPLOYEE LISTS INQUIRY – 10/10/12

Instruments and Related Products

We do not provide employee lists to our ERGs because we do not limit the participation to a specific group. The ERGs are open to all employees and not just those that share a common category. We also treat that information as "confidential." For example, we would not provide a list of employees that self-identified as individuals with disabilities to that ERG.

Industrial Machinery & Equipment

We will provide high level data, but never any data where individuals are identifiable.

Sanitary Services

We do not send a list to any ERG as we consider each employee's self-id information as confidential. If we had such a request, we would have them submit the message they want to disseminate and have the Corporate Communications team blast it out to all (the communication goes out to all, not only to a certain group.) If it is an invite to a meeting, all employees are invited but typically those who share a common interest will show up.

Anonymous

We pull the names from PeopleSoft and then send it to the requester.

Insurance Carrier

As the HR liaison to our ERG's, we have not yet received a request of this nature. However, if we were to receive such a request, we would not be inclined to release a list of employee names.

ERG's and EMPLOYEE LISTS INQUIRY – 10/10/12

Within your example, if we were asked by our Latino ERG for a list of all Hispanic employees, we would probe for the reason behind the request. If it was to understand counts of Hispanic employees and/or calculate a metric/statistic, we would likely offer to generate that information for the ERG (and keep the list of Hispanic employee names within HR).

If the reason for the request was to communicate to all Hispanic employees, we'd encourage other methods to reach this audience (the company's Intranet site, the ERG's LinkedIn Group, etc.). If a specific email communication to Hispanic employees were needed, we'd send the email out of HR using a distribution method that does not broadcast recipient names within the message.

Wholesale Trade Non-Durable Goods

We do not offer up or share the list of employees with ERGs. In my previous role, we did target specific employee pools (Latino, Asian, etc) but now I target all new hires. The list of new hires is generated and sent to me. I then send one welcome letter on behalf of all the ERGs, with their contact information for further contact, to all new hires on a monthly basis.

Healthcare and Medical Research

We do not share lists of individuals. We stand by our commitment that the information regarding an individual's race is treated as personal and confidential when stored in our employee database, and that as a federal contractor it will be used only for Affirmative Action purposes.

GPS TRACKING INQUIRY – 6/19/14

1. *Does your company use GPS in its company-owned vehicles or has it considered doing so?*
 2. *If so, have you had any EEO or other compliance issues arise as a consequence of this tracking?*
 3. *Do you have your employees who are using company vehicles with GPS tracking sign written acknowledgements that their work-related travel is being monitored and/or that they agree to obey all traffic laws?*
-

Other Nonhazardous Waste Treatment and Disposal

1. Does your company use GPS in its company-owned vehicles or has it considered doing so? Yes, currently using the system.
 2. If so, have you had any EEO or other compliance issues arise as a consequence of this tracking? No. As long as the system is applied to all vehicles, I don't see any reason why.
 3. Do you have your employees who are using company vehicles with GPS tracking sign written acknowledgements that their work-related travel is being monitored and/or that they agree to obey all traffic laws? No, since most of our drivers are required to hold a CDL, the requirements/acknowledgement to obey traffic laws is part of their DOT certification.
-

Electric Power Distribution

1. Does your company use GPS in its company-owned vehicles or has it considered doing so? We do not use it currently but we are considering it.
 2. If so, have you had any EEO or other compliance issues arise as a consequence of this tracking? N/A
 3. Do you have your employees who are using company vehicles with GPS tracking sign written acknowledgements that their work-related travel is being monitored and/or that they agree to obey all traffic laws? No.
-

GPS TRACKING INQUIRY – 6/19/14

Anonymous

We have used them in the past for some projects but not across the board. We've recently started piloting them for some of the fleet vehicles with an aim toward greater implementation should the pilot work. These devices have been widely used for company fleets so I don't think there would be too much of an EEO concern. We currently have our fleet drivers sign agreements for use that cover complying with laws, company procedures (like no mobile phone while driving), etc.

HR MANAGEMENT TOOLS FOR INVESTIGATIONS – 11/14/12

- 1) Does your company have an HR management tool that assists in tracking claims, investigations, terminations, disciplinary actions, etc.?*
 - 2) Is it the same tool that your ethics/business practice team uses?*
 - 3) Would you be willing to talk to this member about the management tool(s) you use?*
-

Railroads

We developed internal tools for tracking EEO charges, 20109 claims, internal complaints and ADA requests for accommodations.

Ball Manufacturing

- 1) Do you have an HR management tool that assists in tracking claims, investigations, terminations, disciplinary actions, etc.? Yes, we use globalcompliance.com
 - 2) Is it the same tool that your ethics/business practice team uses? Yes it is
 - 3) Would you be willing to talk to this member about the management tool(s) you use?
Yes
-

Supermarkets

We have a custom database to track claims, investigations and disciplinary actions. Investigations are the primary reason for use of this database. Some locations use it to track claims and disciplinary actions. Terminations are tracked through our HRIS. It is not the same tool that our ethics/business practice team uses.

Railroads

We use Axentis, as does our ethics/business practice team.

Engineering & Construction

1) Do you have an HR management tool that assists in tracking claims, investigations, terminations, disciplinary actions, etc.? Yes....almost. We are finishing up development of a system. Go live January 1, 2013. Prior to our company, have had case management systems. Believe strongly in them. Let's you analyze your trouble spots and trouble employees.

2) Is it the same tool that your ethics/business practice team uses? It is a modified version of what they use....more extensive in the names and types of categories so we can drill down to specific issues, detect policy change needs, detect training needs, etc.

3) Would you be willing to talk to this member about the management tool(s) you use? Absolutely. Big believer in having this data and sharing with management so they can "see" the issues. Helps in planning and training.

INDEPENDENT CONTRACTOR AUDITS INQUIRY – 1/30/14

1. *Have you noticed any significant increase in agency audits of independent contractors that you utilize?*
 2. *If so, have those audits focused on any particular group or group of independent contractors?*
 3. *Have you reclassified any independent contractors as employees? If so, what types of independent contractors have been reclassified as employees?*
-

Ball and Roller Bearing Manufacturing

1. Have you noticed any significant increase in agency audits of independent contractors that you utilize? No
 2. If so, have those audits focused on any particular group or group of independent contractors? N/A
 3. Have you reclassified any independent contractors as employees? We would not reclassify but they could apply to any position we have posted. If so, what types of independent contractors have been reclassified as employees?
-

Biological Product (except Diagnostic) Manufacturing

1. Have you noticed any significant increase in agency audits of independent contractors that you utilize? No
 2. If so, have those audits focused on any particular group or group of independent contractors?
 3. Have you reclassified any independent contractors as employees? No. If so, what types of independent contractors have been reclassified as employees?
-

General Medical and Surgical Hospitals

1. Have you noticed any significant increase in agency audits of independent contractors that you utilize? No

INDEPENDENT CONTRACTOR AUDITS INQUIRY – 1/30/14

2. If so, have those audits focused on any particular group or group of independent contractors?
 3. Have you reclassified any independent contractors as employees? If so, what types of independent contractors have been reclassified as employees? We have a very tight process of screening independent contractors to ensure they meet the federal guidelines for an independent contractor. If someone doesn't meet the guidelines, we have them go through an agency as a named resource.
-

INDEPENDENT CONTRACTOR PROCESSES INQUIRY – 1/4/11

How does your company process their independent contractors?

Wholesale Trade-Nondurable Goods

1. Organization and Ownership:

-- Is Contract Management organized/owned by a specific business unit? (ex: HR, Law, Procurement, Finance or other)

It's usually owned by the individual business unit, though in some cases HR does get involved – it really depends on the business unit.

-- Are contracts for Independent Contractors organized/owned by a specific business unit? (ex: HR, Law, Procurement, Finance or other)

Same as above.

2. Contract Approval Authority:

-- Does each business unit approve contracts for Independent Contractors or is contract approval the responsibility of a centralized authority?

Our company is very decentralized so this is normally handled at the business-unit level.

3. Tracking & Reporting:

-- How do you track and report counts/spend for Independent Contractors? (ex: Contract Mgmt system, multiple tools, manually, etc.)

I believe this is tracked manually by the business unit/department as part of their budget.

Depository Institution

1. Organization and Ownership:

-- Is Contract Management organized/owned by a specific business unit? (ex: HR, Law, Procurement, Finance or other)

Policy and procedure was developed by HR, Legal and Procurement and is administered by Procurement.

-- Are contracts for Independent Contractors organized/owned by a specific business unit? (ex: HR, Law, Procurement, Finance or other)

Contract language and template developed by HR, Legal and Procurement and Procurement is responsible for creating individual contracts and retaining them.

INDEPENDENT CONTRACTOR PROCESSES INQUIRY – 1/4/11

2. Contract Approval Authority:

-- Does each business unit approve contracts for Independent Contractors or is contract approval the responsibility of a centralized authority?

Each business unit approves contract terms with oversight by Procurement.

3. Tracking & Reporting:

-- How do you track and report counts/spend for Independent Contractors? (ex: Contract Mgmt system, multiple tools, manually, etc.)

General Ledger system.

Electric, Gas & Sanitary Services

1. Organization and Ownership:

-- Is Contract Management organized/owned by a specific business unit? (ex: HR, Law, Procurement, Finance or other)

Procurement

-- Are contracts for Independent Contractors organized/owned by a specific business unit? (ex: HR, Law, Procurement, Finance or other)

A contract is owned by each business function that is financially responsible for that contract.

2. Contract Approval Authority:

-- Does each business unit approve contracts for Independent Contractors or is contract approval the responsibility of a centralized authority?

Each business function that is financially responsible for a contract approves that contract.

3. Tracking & Reporting:

-- How do you track and report counts/spend for Independent Contractors? (ex: Contract Mgmt system, multiple tools, manually, etc.)

Not centrally managed.

INDEPENDENT CONTRACTOR PROCESSES INQUIRY – 1/4/11

Industrial Machinery & Equipment

We are divided by Business Units and then departments within the business units. We have a policy that is enterprise (U.S.) wide, but each department manages all aspects of the contract employee individually.

INTERNAL SOCIAL NETWORKS/DIRECTORIES INQUIRY – 5/8/13

1. *Do you have an internal social network site where employees may share both work, project business and personal business?*
 2. *If so, do you allow individuals to post pictures of themselves on the site, similar to Face Book?*
 3. *Do you have an internal company directory with office location and phone number to identify employees?*
 4. *If so, do you allow pictures of employees in the internal company directory?*
-

Other Gasoline Stations

1. No
 2. NA
 3. Yes
 4. Yes, but the pictures posted are the pictures that were taken by Sunoco expressly for our directory.
-

Anonymous

1. Do you have an internal social network site where employees may share both work, project business and personal business? Yes. It is quite popular and all employees even those in our international offices can and do participate.
 2. If so, do you allow individuals to post pictures of themselves on the site, similar to Face Book? Yes, if they wish to post a picture they may.
 3. Do you have an internal company directory with office location and phone number to identify employees? Yes.
 4. If so, do you allow pictures of employees in the internal company directory? Yes, if the employee wishes to have it posted.
-

Poultry Processing

We don't have an internal social network.

We do have a directory, but the directory is not capable of taking pictures. I don't think we would prevent it if the directory could do it. We typically include pictures on our intranet with hiring and promotion announcements.

Anonymous

1. Yes
2. Yes
3. Yes
4. No

Anonymous

1. Yes
2. Yes
3. Yes
4. Yes

Engineering Services

1. Do you have an internal social network site where employees may share both work, project business and personal business? We have an internal social network site and employees are allowed to discuss pretty much anything except proprietary business.
2. If so, do you allow individuals to post pictures of themselves on the site, similar to Face Book?
Employees post their picture, but not much other than that. It is typically a head shot.
3. Do you have an internal company directory with office location and phone number to identify employees? We have an internal company directory with office locations and phone numbers.
4. If so, do you allow pictures of employees in the internal company directory?
Employees are permitted to include a photo on the internal company directory, but it is up to them. Some employees include a photo and some do not.

General Medical and Surgical Hospitals

We have a company directory with location and contact information through MS Outlook. We also have a separate directory on our intranet site which is only accessible to employees. Each employee manages the content displayed for himself with the exception of his name, so some choose to omit location and contact information. We recently started allowing employees to upload photos to the Outlook directory.

Employees are instructed to upload current, professional looking, forward facing head shots only.

Direct Health and Medical Insurance Carriers

1. Do you have an internal social network site where employees may share both work, project business and personal business?

We are currently in the process of implementing (Company) Connections as an internal collaboration tool. We will primarily be using it for work and project business, but there is a social networking component that we will allow.

2. If so, do you allow individuals to post pictures of themselves on the site, similar to Face Book?

During the pilot phase of the implementation, we are allowing individuals to post pictures. The person who manages the community for any given community is and will be responsible for monitoring their community to ensure professional content, pictures, etc.

3. Do you have an internal company directory with office location and phone number to identify employees?

We currently use Lotus Notes for our directory, and yes, it includes office location, phone number, etc.

4. If so, do you allow pictures of employees in the internal company directory?

We do not have pictures.

Engineering Services

1. Do you have an internal social network site where employees may share both work, project business and personal business? Yes. We just implemented an (Company) product that we call OneFluor. It is limited to work issues. No sharing of personal business.

2. If so, do you allow individuals to post pictures of themselves on the site, similar to Face Book? Yes.

3. Do you have an internal company directory with office location and phone number to identify employees? Yes.

4. If so, do you allow pictures of employees in the internal company directory?
No. But both of my former employers did. It was fabulous. Highly recommend it to whomever is considering it. Helps people get to know each other and put faces and names together ...especially in larger companies.

Line-Haul Railroads

1. No
 2. No
 3. Yes
 4. No
-

INTERNATIONAL EMPLOYMENT LAW RESOURCES INQUIRY – 1/25/13

We have an EEAC member who would like to know what resources your company uses for keeping up-to-date on international employment law.

Line-Haul Railroads

We have operations in Mexico and Canada with just a few employees and rely on EEAC memos for any updates.

Ball and Roller Bearing Manufacturing

We use outside counsel at our international locations to keep us up-to-date with changes in the law.

Engineering Services

We just subscribed to BNA, which has an international module. Happy to discuss with anyone and refer them to our account rep.

Petroleum Refineries

We rely primarily on internal resources.

We have regional (Americas, EAME, AP) employment law networks that meet quarterly (via conf call) to discuss ongoing and emerging legal issues. Lawyers on the calls specialize in labor & employment law and represent the various countries in which we operate. Calls are coordinated by our Houston labor & employment law group, and pertinent information from the calls is shared with EEO and other HR functions.

Wireless Telecommunications Carriers (except Satellite)

We subscribe to an online service for European legal updates called FEDEE (legal and general updates including tax and payroll updates <http://www.fedee.com/>) and on local counsel in each country in which we do business. In addition, our international HR managers are good about attending seminars and the like. We get a number of newsletters from various international law firms.

Engineering Services

For work we are doing already in Canada, we use Employment Matters. Hicks Morley is the law firm we've used.

LABOR ECONOMIST/STATISTICIAN INQUIRY – 2/3/2011

An EEAC member is considering hiring a labor economist/statistician who would be responsible for conducting statistical analysis of their employment transactions for audit purposes and to support their proactive reviews of the company's people practices. They would like to know if any other EEAC members have such a position within their companies.

Wholesale Trade-Nondurable Goods

We do have such a position.

Anonymous

We don't, but we have staff who handle those things but not a PhD level person.

Insurance Carriers

We do not have this type of position.

Wholesale Trade-Nondurable Goods (Food)

We do not have this type of position.

Non-Depository Institution

We don't have a labor economist, but we do have a couple of I/O psychologists who assist on statistical analyses and reviews of our HR practices.

Industrial Machinery & Equipment

We use statistical techniques to analyze the data for audit and proactive review purposes, but we don't currently require an advanced degree in labor economics or statistics to do this. If such expertise were deemed necessary for a particular matter, we would likely use external consultants under the direction of counsel.

LABOR ECONOMIST/STATISTICIAN INQUIRY – 2/3/2011

Wholesale Trade-Nondurable Goods

We do not.

Food and Kindred Products

We've "borrowed" a statistician from within the Company for several years to help us run our statistical analysis on proposed merit, bonus and stock awards, as well as when we do our annual pay equity analysis. He's just retired, so we are now using him on a contract basis. This only requires 15-20 hours per week for 4-6 weeks.

Chemical and Allied Products

We do not have such a position. But we hired a statistician on a temporary basis to help with similar practices.

Heavy Construction

We do not have such a position. Our EO Specialist would work this broadly.

Transportation Equipment

We do not have that capability in-house.

LEAD EMPLOYMENT COUNSEL LEVEL INQUIRY – 12/11/12

Is your lead employment/labor counsel a:

- Vice-president level*
 - VP equivalent*
 - Higher than VP level*
 - Lower than VP level*
 - Other*
-

Companies with Vice-Presidential Level Employment/Labor Counsel

Food Products
Anonymous
Anonymous
Healthcare Management
Engineering & Construction
Engineering & Construction
Defense
Waste Treatment & Disposal
Aerospace & Defense

Companies with VP Equivalent

Engineering/Manufacturing Conglomerate
Health Insurance
Anonymous

Companies with Lower than VP Level

Chemical Products
Railroads
Tire Manufacturer
Anonymous (2)

Companies with Higher than VP Level

Cable Programming

Anonymous

Other - Director Level

Wood Manufacturing

Lead employment/labor counsel for our company is Associate General Counsel – reports to SVP General Counsel & Secretary

Lead employment/labor counsel for our company is Associate General Counsel – reports to SVP HR/General Counsel

Anonymous

For the employment/ labor group we have:

EVP and Deputy General Counsel

-VP and Asst. General Counsel

-VP and Senior Counsel

Life Insurance

Our lead counsel is a VP-level. There are three levels of VP within our company. This position is a higher-level VP.

Engineering & Construction

VP and Associate General Counsel. She reports to the head of the Legal Dept, General Counsel.

Ball Manufacturing

That depends on how you define “labor”. If labor means collective bargaining unit employees then it is manager level or other. If labor is referring to the workforce in general then it is VP level.

Anonymous

Lower than VP, but that is due to the fact that I think we are an unusual company in this regard---we are very large in size, but less than 200 VP's in the company. Anywhere else, I think our senior L&E lawyer would definitely be a VP.

LINKEDIN REFERENCES INQUIRY – 2/28/13

Does your company get requests from former and/or current employees for LinkedIn "references"? If so, how do you handle these requests?

Petroleum Refineries

No.

All Other Basic Organic Chemical Manufacturing

At this time our practice is not to provide any references.

Softwood Veneer and Plywood Manufacturing

No.

General Line Grocery Merchant Wholesalers

We do not accept requests from current or former employees for references, including LinkedIn. If an individual manager wishes to recommend a former employee, they must do so as a private citizen.

Ball and Roller Bearing Manufacturing

The company has a policy against providing references of any kind. Current employees are only allowed to provide a 1-800 number when a reference is requested. The 1-800 number will provide confirmation that someone was an employee.

Engineering Services

No.

Line-Haul Railroads

No.

Savings Institutions

We do get requests, and we discourage our employees from providing references when they come to HR or managers to ask for approval or guidance. We do not have a formal policy or guidelines on this, though.

Insurance Carrier

- 1) *Does your company have a mentoring program for employees?*
(Company) has several mentoring programs for their associates. In general, our executive and leadership development programs include a mentoring component; some areas offer mentoring programs for new associates or new managers; and associate resource groups have a 1:1 mentoring program for ARG members –the goal is to help them develop professional skills, business and organizational savvy and support career development goals. In addition, (Company) offers to all associates robust materials to help support informal mentoring partnerships.
 - 2) *If so, how do you match up mentor and mentee?*
In general mentors and mentees are matched according to the mentoring goals and areas of development of the protégé. Protégés are asked to complete an application form in which they state career goals and areas of development and then a mentor (normally someone about two levels more senior) is selected based on those goals.
 - 3) *Do you have guidelines or requirements for incorporating or linking diversity (specifically, PWDs, vets, minorities and females) to your mentoring program?*
As mentioned, associate resources groups have established a cross-ARG mentoring program where individuals from different backgrounds come together to mentor each other.
-

Sanitary Services

We do not have an official mentoring program, but very informal mentoring is utilized very heavily. For example, when a high-potential employee is identified, we manually identify a mentor based on the proposed job/position the high-profile employee is being developed for. We are in midst of discussing how that should be/can be incorporated into our diversity efforts.

Industrial Machinery and Equipment

- 1) *Does your company have a mentoring program for employees?* Yes
- 2) *If so, how do you match up mentor and mentee?*
There is a list of mentors from which mentees can chose.

INQUIRY re Mentoring Programs – 6/14/12

- 3) *Do you have guidelines or requirements for incorporating or linking diversity (specifically, PWDs, vets, minorities and females) to your mentoring program?*
No.
-

Paper and Allied Products

- 1) *Does your company have a mentoring program for employees?*
Yes, we have mentoring programs through the individual businesses and then also through our diversity program.
 - 2) *If so, how do you match up mentor and mentee?*
People volunteer to be mentors, get trained, and then matched with mentees. Sometimes individual employees approach or get recommendations for mentors from past mentees and ask the mentor themselves.
 - 3) *Do you have guidelines or requirements for incorporating or linking diversity (specifically, PWDs, vets, minorities and females) to your mentoring program?*
We have individual diversity groups (employee networks) that are involved in mentoring through the networks as well as general mentoring.
-

Instruments and Related Products

- 1) *Does your company have a Mentoring program for employees?*
We have a formal and informal Mentoring program.
 - 2) *If so, how do you match up mentor and mentee?*
We have a link under our Career Development to the Mentoring program where employees create a profile or update their profile. Employees are also given an opportunity to search for a mentor/mentee through the database.
 - 3) *Do you have guidelines or requirements for incorporating or linking diversity (specifically, PWDs, vets, minorities and females) to your Mentoring program?*
I do not know of specific links to Diversity, but we have a number of Employee Resource Groups that offer Mentoring programs as well and those ERG's are listed on our Mentoring website.
-

INQUIRY re Mentoring Programs – 6/14/12

Industrial Machinery & Equipment

- 1) *Does your company have a mentoring program for employees?*
Not an official program though mentoring takes place based on the individual's career and role in the company.
 - 2) *If so, how do you match up mentor and mentee?*
There is no official process in place, but previously when mentoring has taken place, it has been based on job requirements/expectations or incorporating diversity.
 - 3) *Do you have guidelines or requirements for incorporating or linking diversity (specifically, PWDs, vets, minorities and females) to your mentoring program?*
No
-

NONEXEMPT TIME REPORTING INQUIRY – 1/24/2012

Food and Kindred Products

How does your company record time worked for nonexempt employees:

1. Log in/log out system
Yes. Employees track time on weekly paper sheets. The paper sheet gets reviewed by the manager and turned into a department timekeeper who then records it electronically.
 - a. If yes, are managers required to review and approve time? *Yes*
 - b. How often? *Weekly*
 2. Do you use a vendor for your time recording system? *Yes*
 - a. If yes, who do you use? *ADP*
-

Instruments and Related Products

How does your company record time worked for nonexempt employees:

1. Log in/log out system
We use an electronic reporting system. Nonexempt employees are required to record their time daily.
 - a. If yes, are managers required to review and approve time? *Yes*
 - b. How often? *Weekly*
2. Employee affirmative self-reporting of time worked
 - a. If yes, are managers required to review and approve time? *Yes*
 - b. How often? *Weekly*
3. Pre-populated time schedules with reporting of exception time (PTO, etc.)
 - a. If yes, are managers required to review and approve time? *Yes*
 - b. How often? *Prior to the end of the next work day.*
4. If your company has a combination of the above, what is the reason for the different methods of time recording for different groups of employees (all non-exempt)?
We have both one for exempt and one for non-exempt. Exempts are exceptions (PTO, etc.) otherwise it is an automatic population.
5. What percentage of your company's employees are non-exempt?
8%
6. Do you use a vendor for your time recording system? *No*

NONEXEMPT TIME REPORTING INQUIRY – 1/24/2012

Sanitary Services

We use Kronos system that comes with a time-clock that employees punch in and out. The system is pre-programmed for regular time offs like a required daily meal break. Managers are required to review their times every week, and approve any exceptions (i.e. if an employee did not take their meal break.) This system is strictly for employees. Contractors/consultants use their own firm's time report system. We do have a high number of non-exempt employees (over 30,000.)

Insurance Carrier

How does your company record time worked for nonexempt employees:

1. Employee affirmative self-reporting of time worked
 - a. If yes, are managers required to review and approve time?
Yes, when hours entered by employee are different than their regular hours that are programmed in the system
 - b. How often? *For any variance*
2. Pre-populated time schedules with reporting of exception time (PTO, etc.)
 - a. If yes, are managers required to review and approve time? *Yes*
 - b. How often?
Any time there is time-off entered, as well as anytime that the employee notes that overtime was worked
3. If your company has a combination of the above, what is the reason for the different methods of time recording for different groups of employees (all non-exempt)?
It is not different groups, just a combination of methods. The hours for the employee are pre-populated, but the employee is still required to log their time on a daily basis. If the hours match, no management approval is necessary. However, when there is missing time, overtime, or vacation time entered, then management approval is necessary.
5. What percentage of your company's employees are non-exempt? *About 45%*
6. Do you use a vendor for your time recording system? *No*
7. Would you be willing to discuss your time recording system? *Yes*

NONEXEMPT TIME REPORTING INQUIRY – 1/24/2012

Food and Kindred Products

How does your company record time worked for nonexempt employees:

1. Log in/log out system: *Yes*
 - a. If yes, are managers required to review and approve time? *Yes*
 - b. How often?
Daily w/ a summary check at the end of the pay period (weekly)
 2. Employee affirmative self-reporting of time worked *Yes*
 - a. If yes, are managers required to review and approve time? *Yes*
 - b. How often? *weekly*
 3. Pre-populated time schedules with reporting of exception time (PTO, etc.) *No*
 4. If your company has a combination of the above, what is the reason for the different methods of time recording for different groups of employees (all non-exempt)?
The different methods are determined based on the associate's proximity to a time clock or AWS (primarily a home location).
 5. What percentage of your company's employees are non-exempt? *90%*
 6. Do you use a vendor for your time recording system? *Yes*
 - a. If yes, who do you use? *Kronos*
 7. Would you be willing to discuss your time recording system? *Yes*
-

Insurance Carrier

How does your company record time worked for nonexempt employees:

1. Log in/log out system
Managers or designated time keepers enter the time for the hourly non-exempt employees and enter the exceptions only time for the non-exempt salaried employees. No approval process.

NONEXEMPT TIME REPORTING INQUIRY – 1/24/2012

Time entry varies by manager/time keepers - some enter daily, some weekly, most enter only twice a month

2. Employee affirmative self-reporting of time worked
Most employees do not enter their own time.
 3. Pre-populated time schedules with reporting of exception time (PTO, etc.)
Most employees have a schedule pre-populated and only need to enter exceptions.
 4. If your company has a combination of the above, what is the reason for the different methods of time recording for different groups of employees (all non-exempt)?
Currently we have some non-exempt employees paid hourly and some paid salaried. Effective July 16, 2012 all non-exempt employees will be paid hourly.
 5. What percentage of your company's employees are non-exempt?
42% are non-exempt
 6. Do you use a vendor for your time recording system?
We use the PeopleSoft (Oracle) time and labor system.
 7. Would you be willing to discuss your time recording system? *Yes*
-

REMOTE/AGILE EMPLOYEES INQUIRY – 1/16/2011

How does your company identify your "agile/remote" employees in your HRIS system for both EEO/AAP purposes and tax reporting purposes?

They are defining "agile" as employees working from a company facility, but where the employee does not have an assigned desk, phone, etc. "Remote" employees are those working from a home office with occasional visits to a company facility for meetings, etc., but again, without designated work space.

Paper and Allied Products

We roll those employees up to the AAP location that includes the worker's supervisor.

Service Station

Our agile/remote employees are assigned an establishment ID consistent with a designated "home office facility" for EEO Reporting. When no office is available for them their establishment should be consistent with their manager. For purposes of AAP's, we have functional plans where they are assigned according to their business units.

Depository Institution

(Company) has Functional AAPs so we use the employee's actual home address for reporting and tax purposes. If employees don't have an assigned work location, then they are considered to work from home.

Heavy Construction

(Company) defines work locations for remote employees in our HRIS as state (VA for example) Works at Home. Some of these employees do have a designated work space. We define work locations for agile employees as state (VA for example) Field. All others have a specific work location which is described as state (VA for example) street address. Since we have a FAAP, we breakout our employees by division or GBU rather than the traditional establishment/location.

REMOTE/AGILE EMPLOYEES INQUIRY – 1/16/2011

Industrial Machinery and Equipment

Associates that work out of their homes are tagged as "home" in our HRSS system. We have not currently developed any other identifiers for all of the newer flexible work arrangements that have been established.

Non-Depository Institution

We code and track every “remote or unassigned to a facility” employee in our OHR system based on the AAP where that person’s manager is reported.

REQUESTS FOR INFORMATION INQUIRY – 3/8/12

Non-Depository Institution

1. How does your company handle requests from former employees for their personnel files and do you charge a copying fee?
We grant requests and do not charge for copies (to my knowledge). HR gathers information from electronic and manual files. If specific law in the state re personnel files (e.g., CT, MA), we make sure we provide the appropriate docs in accordance with state definition of a personnel file.
2. How does your company respond to requests from third parties for information such as the following:
 - a. Employment verification
 - b. Compensation, tax and benefit information

We have a third-party supplier provide verification. Eee gives the prospective employer or the bank issuing the mortgage (or whatever) the third-party supplier's 800 number.

Industrial Machinery & Equipment

1. How does your company handle requests from former employees for their personnel files and do you charge a copying fee?
I do not know. I do not think we would give it to them. Not many of these types of requests.
2. How does your company respond to requests from third parties for information such as the following:
 - a. Employment verification:
We tell them whether or not the person is currently employed.
 - b. Compensation, tax and benefit information;
We do not disclose

Industrial Machinery & Equipment

1. How does your company handle requests from former employees for their personnel files and do you charge a copying fee?
We allow them to come in and take notes. We have someone sit with them the entire time. We do not allow for copies. If we get a request from law enforcement or a subpoena, of course we comply. If we get a written request from outside

REQUESTS FOR INFORMATION INQUIRY – 3/8/12

counsel – we look at it on a case by case basis. Some states mandate the right to let associates have copies, in those cases we comply.

2. How does your company respond to requests from third parties for information such as the following:
 - a. Employment verification
We have a “Works” number that is run by a 3rd party that will supply employment verification.
 - b. Compensation, tax and benefit information
The Works will give them information they need re: compensation.
-

Chemical and Allied Products

1. How does your company handle requests from former employees for their personnel files and do you charge a copying fee?
Employee makes an appointment with HR. HR will be present during the review of files. Employee may make written comments but cannot alter or remove any item in the file. Copies and a fee may apply where permitted by law.
 2. How does your company respond to requests from third parties for information such as the following:
 - a. Employment verification
We utilize TALX. Employees are not allowed to provide any information.
 - b. Compensation, tax and benefit information
Not sure on this one, but if get something I will let you know.
-

Anonymous

1. How does your company handle requests from former employees for their personnel files and do you charge a copying fee?
We do not give copies of personnel files
2. How does your company respond to requests from third parties for information such as the following:
 - a. Employment verification
There is a toll-free number, and only date employed from and to are given, as well as ending title.

REQUESTS FOR INFORMATION INQUIRY – 3/8/12

- b. Compensation, tax and benefit information
This information is not provided

Business Services

- 1. How does your company handle requests from former employees for their personnel files and do you charge a copying fee?
It depends upon the requirements of state law and the circumstances surrounding the request, and the information requested. We do not generally charge a copying fee.
 - 2. How does your company respond to requests from third parties for information such as the following:
 - a. Employment verification
We will provide dates of service and last job title.
 - b. Compensation, tax and benefit information
We will only provide additional information with written authorization from the employee or in response to a judicial subpoena or other court process.
-

Insurance Carrier

We pay a 3-month salary differential (between military or service pay and civilian pay) paid for employees with less than 1 year of service with us. There will be up to a 6-month salary differential paid for employees with more than 1 year of service with us.

The employee earns vacation while on active duty. Upon returning, the vacation can be paid out in a lump sum.

SUBSTANCE ABUSE AND SAFETY-SENSITIVE POSITIONS INQUIRY –
9/13/12

Does your company prohibit employees from operating in safety-sensitive positions if they have a history of rehabilitation for alcohol or drugs?

Anonymous

No.

Paper and Allied Products

No we don't. Instead, we would apply the same safety standards to all employees regardless of any past history of substance abuse.

Industrial Machinery & Equipment

Yes, we could, but each case would be evaluated separately and the answer could change based on the history, ADA, the substance being used, the safety concerns, etc. So our response would be that it is possible, but it depends on the situation.

Food and Kindred Products

No. We do pre-employment drug screening and random drug testing. But we do not make employment decisions based on history of drug or alcohol abuse.

SUITABLE PRAYER LOCATIONS INQUIRY – 12/6/11

Depending upon the work site, it is not always possible to allocate a separate room in order to accommodate individuals requesting a place to pray as a religious accommodation. One of our members would like to know if you have faced this issue before and, if so, how have you addressed it? Anyone come up with any out-of-the-box, creative solutions?

Instruments and Related Products

We use one room, called the Quiet /Lactation Room. It can be used for anything. It is equipped with the necessary items for new mothers as well as a telephone and a small TV. There is an open area where a person could sit and pray as well. It is only used by one person at a time.

Insurance Carrier

We did a religious accommodation for an individual and found a small suitable room in one of our lower levels that he could use. He had key access and used the room 4 days per week.

Sanitary Services

We arrange to have them utilize available conference/meeting rooms.

TATTOOS and BODY PIERCINGS INQUIRY – 7/26/12

Do you have a policy on body piercings and tattoos? If so, would you mind sharing it?

Companies Having No Formal Policy

Insurance Carrier
Business Services
Rubber and Tire Maker

Industrial Machinery and Equipment

Jewelry, makeup, perfume, cologne, tattoos and piercings when worn or displayed need to be in good taste. All associates should be cognizant of potential allergies and sensitivities to certain aromas and chemicals in perfumes and colognes and use these substances with restraint. Appropriateness will be measured at the sole discretion of the company through its management.

Heavy Construction

We do cover these items in our dress and grooming policy. Which includes the following:

Modest ear piercing and small nostril studs are permitted. However, excessive pierced jewelry expressions are not professional and not acceptable. Small tattoos can be exposed provided that they are not extreme. If a tattoo is too large, too colorful or otherwise is unprofessional or a distraction, it must be covered.

INQUIRY RE TEMPORARY WORK SLOWDOWNS – 7/13/12

As a defense contractor, in the current environment we seem to be experiencing a lot of “stop work orders”, that is our customers run out of budget, which require us to literally stop production temporarily for periods of days or weeks. In many cases, we can’t re-deploy individuals and must send them home immediately. Most state unemployment statutes require a one week waiting period to collect benefits, and many of our non-exempt folks can’t afford to go unpaid. In many cases the affected employees have run out of PTO, or don’t want to be forced to use it, and our current policy does not allow employees to borrow PTO.

What are member companies doing to deal with these kinds of temporary work slowdowns?

Anonymous

We have experienced the same issue as cited below, which we are only able to address by using CCLOA (company convenience leave of absence) -- on a limited basis at that. With CCLOA we maintain the benefits not salary.

One thought....perhaps your company should/could consider setting up a PTO pool for employees that would allow them to use donated PTO if/when they run out of leave and need to use due to lack of work. If the lesser-paid non exempt staff generally are the ones that need the PTO and the higher-paid exempt staff are the ones donating to the bank, then the company actually might save money by reducing their PTO balances of higher paid staff (which would have to be paid out at higher rates when/if those folks leave). We don’t do that but.....

Food and Kindred Products

We try to find them work in other areas of the facility based on seniority. Otherwise we communicate that they can file for unemployment. If employees don't substitute vacation, they unfortunately have to wait the 5 days, as we do not provide other monetary benefits.

Industrial Machinery & Equipment

Yes, we have experienced this. We have done the following:

INQUIRY RE TEMPORARY WORK SLOWDOWNS – 7/13/12

- Deployed associates to facility improvements and CI initiatives during the slow down
 - Allowed associates to volunteer for time off without pay
 - Some states have furlough programs that supplemented their wages during the furlough
 - Employed mandatory temporary layoffs
 - Reduced the # of hours worked/week
 - Sent employees to other plants to work for a period of time
-

TESTING AND ASSESSMENT VENDORS INQUIRY – 2/21/13

We have an EEAC member who is looking for the names of some testing and assessment vendors that other members have used and been satisfied with. In particular, they are looking for vendors that can help them with pre-employment tests for mechanical/electrical aptitude, general aptitude including reading, basic math, observation or locating information, and/or also physical capability.

Poultry Processing

I've worked with PAN at two different companies and I highly recommend them:
<http://www.pantesting.com/>

Softwood Veneer and Plywood Manufacturing

PSI Talent Assessment
2950 N. Hollywood Way, Suite 200
Burbank, CA 91505
Phone: 818.847.6180
Fax: 818.847.8701
Toll Free: 800.367.1565

Biological Product (except Diagnostic) Manufacturing

Select International is very good.

Ball and Roller Bearing Manufacturing

We have used the following vendors:

SHL
Ramsey Corporation
Select International
Shaker Consulting

Line-Haul Railroads

We use AON Hewitt.

Anonymous

We use DDI and AON for testing and assessments.

Other Gasoline Stations

We no longer administer tests, however, when we did testing, we used several vendors. Unfortunately, at this point our people could only remember one vendor that we used: Bennett Mechanical Comprehension Testing. Dr. Clyde Mao validated our tests.

TOP PERFORMERS INQUIRY – 11/12/13

1. *Do you identify a group of “top performers” in your company?*
 2. *If yes, what percentage do you identify (e.g. 10-20%, 25%)?*
 3. *Would you be willing to chat with this member about your system?*
-

Anonymous

1. Do you identify a group of “top performers” in your company? Yes
 2. If yes, what percentage do you identify (e.g. 10-20%, 25%)? 20%
 3. Would you be willing to chat with this member about your system? No
-

Anonymous

1. Do you identify a group of “top performers” in your company? Yes
 2. If yes, what percentage do you identify (e.g. 10-20%, 25%)? Top 20%
 3. Would you be willing to chat with this member about your system? Yes
-

GLOBAL EMPLOYEE SURVEY VENDORS INQUIRY – 4/17/13

Do you know of a vendor or software program that can help a company develop and manage a global employee survey project that is capable of providing reports including graphs, charts, and demographics by country?

Supermarkets and Other Grocery (except Convenience) Stores

Towers Watson

Medical Laboratories

For several years, Mayo Clinic has contracted with Sirota Survey. We have been very pleased with their services, as you can probably tell by the display of our logo on their website.

All Other Nondepository Credit Intermediation

We use CEB Valtera. Have also recently heard really great things about OrgVitality.

Others:

- Sirota Survey Intelligence
- Towers Watson
- Hay Group

Software program: Quatrics

INQUIRY re VENDORS FOR UNEMPLOYMENT CLAIMS, TAXES and E-VERIFY/I-9 – 6/17/2011

Industrial Machinery & Equipment

We use ADP for all of these services.

Railroad

We handle unemployment claims internally, but that task is relatively minimal since our workforce is almost entirely railroad. With regard to I-9/E-Verify, we use Lookout Services. I would highly recommend.

Paper and Allied Products

We do unemployment and taxes in-house, so I don't have any suggestions for those areas. We've using ADP for electronic I-9s and E-Verify for about 18 months. They have been very responsive to questions and easy to get in touch with. They've also been willing to do web workshops to train our staff which has been helpful. On the other hand, I've been disappointed in the reporting capability and with some of the advice they've provided (for instance, ADP had a problem with their E-Verify photo tool a couple of weeks ago as they brought that capability on-line, and they suggested to our site administrator that she ask the new employee to provide a different document that wasn't part of the photo tool screening). They have some major updates coming in the near future, and if they work well it looks like it will correct most of the system concerns we've had. Their prices were among the lowest of the providers we considered, but that was two years ago so things may have changed.

Communications

We use the Company called Eclipse HR Solutions, Deborah Hoffman, Owner. She can be reached at (847) 612-7967. Her firm recently completed an outsourced solution to meet our E-Verify/I-9 support.

INQUIRY re VENDORS FOR UNEMPLOYMENT CLAIMS, TAXES and E-VERIFY/I-9 – 6/17/2011

Hotels

We have a long relationship with TALX handling our unemployment claims and are considering them to handle e-verify/I9 support.

Health Services

We use TALX for unemployment and I9/E Verify.

Insurance Carrier

We use TALX for unemployment claims and taxes. They can also do E-Verify/I-9 support, but we have not used them for this service. A contact person would be Margery Schumick at 614-658-3030.

VOLUNTARY SEVERANCE PROGRAMS INQUIRY – 9/4/13

1. *Does your company have a voluntary severance program that is offered when conducting staff reductions?*
 2. *If you do, are all employees offered the voluntary severance or do you have stipulations around who is offered? For example, do you say that your high performers are not eligible?*
 3. *Does your voluntary severance program offer the employees more cash/benefits than your normal severance program?*
-

Sanitary Paper Product Manufacturing

1. Does your company have a voluntary severance program that is offered when conducting staff reductions? Not as part of our US Severance Pay Plan, but a VSP is allowable as an exception to the plan with related plan amendments made.
 2. If you do, are all employees offered the voluntary severance or do you have stipulations around who is offered? For example, do you say that your high performers are not eligible? Depends. Usually, the VSP is offered to a select group of jobs based upon where the redundancy exists. We would probably not exclude high performance but we would exclude jobs where we would have to backfill a loss through the VSP.
 3. Does your voluntary severance program offer the employees more cash/benefits than your normal severance program? The benefits are the same as our normal severance pay plan for involuntary job loss through no fault of the employee related to restructure, job elimination, etc.
-

Engineering Services

1. Does your company have a voluntary severance program that is offered when conducting staff reductions? Yes.
 2. If you do, are all employees offered the voluntary severance or do you have stipulations around who is offered? For example, do you say that your high performers are not eligible? Usually targeted depending on the driver for the program.
 3. Does your voluntary severance program offer the employees more cash/benefits than your normal severance program? No.
-

Anonymous

1. Does your company have a voluntary severance program that is offered when conducting staff reductions? Not in the US. We have offered voluntary programs that are not offered when conducting other staff reductions; however, these are not offered regularly and differ according to the particular plan.
 2. If you do, are all employees offered the voluntary severance or do you have stipulations around who is offered? For example, do you say that your high performers are not eligible?
 3. Does your voluntary severance program offer the employees more cash/benefits than your normal severance program?
-

Ball and Roller Bearing Manufacturing

1. Does your company have a voluntary severance program that is offered when conducting staff reductions? In the past we have offered a voluntary severance program.
 2. If you do, are all employees offered the voluntary severance or do you have stipulations around who is offered? For example, do you say that your high performers are not eligible? Generally, we have started with the employees who have the most seniority. We have the authority to restrict certain people from being eligible (e.g., high performers, people in key roles, etc.). However, we prefer to not restrict certain people as it may create issues of fairness.
 3. Does your voluntary severance program offer the employees more cash/benefits than your normal severance program? No.
-

Industrial Gas Manufacturing

We do not have a voluntary program. While someone's stated willingness or desire to accept a severance package is a factor that is considered in the Legal Review process, all staff reductions warranting severance are involuntary.
