



**PROTEK
SECURITY, INC.**

**AFFIRMATIVE ACTION PROGRAM
FOR
WOMEN AND MINORITIES**

AFFIRMATIVE ACTION PROGRAM

TABLE OF CONTENTS

	<u>section</u>
Introduction	1.0
Preface	2.0
Statement of Policy	3.0
Definitions	4.0
Responsibility for Affirmative Action	5.0
Implementation of Affirmative Action	6.0
Review of Personnel Processes	7.0
Review of Physical and Mental Job Requirements	8.0
Harassment	9.0
Compensation	10.0
Outreach, Positive Recruitment, and External Dissemination of Policy	11.0
Internal Dissemination of Policy	12.0
Development and Execution of Affirmative Action Programs	13.0
Internal Review Procedure	14.0
Monitoring and Reporting Systems	15.0
Identification of Problem Areas By Organizational Unit And Job Group	16.0
Exhibits	17.0

1.0 INTRODUCTION

This manual sets forth the requirements of the Affirmative Action Program at the Protek Security, Inc. Corporate Headquarters. The manual will be reviewed and updated by Protek Security, Inc. when appropriate.

To achieve the desired level of performance and to meet any and all applicable requirements of federal and State of Utah codes, each manager shall assure that all operations which he/she is responsible for, are carried out in accordance with the criteria in this manual.

2.0 PREFACE

Protek Security, Inc. (also referred to as the Company) is committed to the concept and practice of equal opportunity and affirmative action. In the preparation of this Affirmative Action Plan (AAP), the U.S. Department of Labor Employment Standards Administration (Title 41 Part 60, et seq.) has been used as a guide by the Company, Therefore, the use of such terminology should not be construed as an admission by the Company, in whole or in part, that in fact either Women or Identified Minorities have been or are presently being underutilized, concentrated, or discriminated against in any way by the Plan in violation of federal, state, or local fair employment practice laws. Further, nothing contained in this AAP or its supporting data should be construed as an admission by the Company, in whole or in part, that it has contravened such federal, state, or local employment practice laws.

In developing and implementing this AAP, Protek Security, Inc. has been guided by its established policy of providing equal employment opportunity. Nothing herein is intended to sanction the discriminatory treatment of any person. Thus, this AAP has been developed in strict reliance upon the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission (EEOC) (29 C.F.R. Part 1608).

The material and instructions contained in this manual have been carefully reviewed for accuracy and presumed to be correct and reliable. However, Protek Security, Inc. assumes no responsibility for inaccuracies and reserves the right to modify and revise this manual without notice. Protek Security, Inc. Provides this manual "as is" without warranty of any kind, either expressed or implied, including but not limited to the implied warranties of use or fitness for any purpose.

2.0.1 DISSEMINATION:

While the Company firmly believes in wide dissemination of its affirmative action policies and equal employment opportunity practices, there is certain proprietary information relating to its business that must be kept confidential. The detailed information provided in good faith as a part of the Affirmative Action Plan contains specific information that, if disseminated, could be detrimental to the competitive and business interest of this Company. At a minimum, the complexity of this data is subject to misinterpretation and misuse, which again can be very harmful to business goals and objectives solely unrelated to the affirmative action and equal employment opportunity concept. Therefore, even though the Company is justifiably proud of the progress and goals that are described in the following pages, the following is requested:

- A. If this information is submitted to the Office of Federal Contract Compliance Programs (OFCCP) pursuant to the relevant Executive Order and regulations, it is to be considered confidential and not subject to disclosure without notifying the Company of the agency's decision to disclose and providing the Company with ample time to contest the disclosure.
- B. If this information is supplied to a government contractor, EEOC representative, or any other person who is given access to the Affirmative Action Plan, it is not to be copied, reproduced, or disclosed without prior notification to the Company.
- C. No information contained in the Affirmative Action Plan is to be copied, removed from the premises, or released to other individuals without a prior notification to the Company.
- D. All monitoring system reports as required by federal regulations and laws have been completed. Reports that require specific data such as names of employees and salary information have not been included within the context of this Plan. This information is on file at the Company as Documentation and Supporting Data for Affirmative Action Plan Reports and is available for review only as required by law.

The material set forth in this AAP is the property of Protek Security, Inc., and is deemed to constitute trade secrets, operations information, confidential statistical data, and other confidential commercial and financial data, within the meaning of the Freedom of Information Act, 5 U.S.C- Section 552. Title VII of the Civil Rights Act of 1964 (as amended), 42 U.S.C- Sections 2000e et seq., the Trade Secrets Act, 18 U.S.C- Section 1905, and 44 U.S.C- Section 3508, the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

Protek Security, Inc. Personnel Policy manual (AAP part thereof) is copyrighted by Protek Security, Inc. and is proprietary in nature. All rights reserved. No part of this publication may be reproduced, stored in a retrieval system, or transmitted in any form by any means, electronic, photocopying, recording, or otherwise without the prior written permission of Protek Security, Inc.

This Affirmative Action Plan does not constitute an express or implied contract between the Company and its employees, job applicants, or other persons, nor does it change in any way the basic at-will employment relationship that all Company employees have with the Company

3.0 AFFIRMATIVE ACTION PLAN STATEMENT OF POLICY

It is the policy of Protek Security, Inc. not to discriminate on the basis of a physical or mental disability or an individual's status as a disabled veteran, a veteran of the Vietnam Era, or any other eligible veteran or any identified minority with regard to recruitment or recruitment advertising, hiring, training, promotion, and other terms and conditions of employment, provided the individual is qualified, with or without reasonable accommodations, to perform the essential functions of the job.

The Company does and will take affirmative action to employ, advance in employment, and otherwise treat qualified minority individuals without discrimination, in all employment practices as follows:

All personnel actions or programs that affect qualified minority individuals, such as employment, upgrading, demotion or transfer, recruitment, advertising, termination, rate of pay or other forms of compensation, and selection for training will be made without discrimination based upon the individual's status and insuring the equal opportunity for all persons, without regard to race, color, religion, sex, or national origin,

3.0.1 ASSIGNMENT:

John Buntin, Affirmative Action Officer for the Company, will manage Affirmative Action Plan for individuals with disabilities, disabled veterans, veterans of the Vietnam Era and other eligible veterans and identified minorities. All managers and supervisors will take an active part in the Company's Affirmative Action Plan to ensure that all qualified employees with disabilities, disabled veterans, veterans of the Vietnam Era, other eligible veterans or identified minorities and prospective employees are considered and treated in a non-discriminatory manner with respect to all employment decisions. Furthermore, the Affirmative Action Officer will solicit the cooperation and support of all employees for the Company's policy and Affirmative Action Plan. The Affirmative Action Officer has been assigned responsibility for periodically reviewing progress in the compliance and implementation of the policy of affirmative action for individuals with disabilities, disabled veterans, veterans of the Vietnam Era, other eligible veterans and identified minorities. In accordance with public law, the Company's program of affirmative action for individuals with disabilities, disabled veterans, veterans of the Vietnam Era, other eligible veterans and identified minorities is available for inspection in the Human Resources Department during regular business hours upon request.

4.0 DEFINITIONS

- A. "IDENTIFIED MINORITY" means, for the purpose of this plan, the ethnic groups of Blacks, Hispanics, Asians/Pacific Islanders, American Indians/Alaskan Natives. As well as Women.

5.0 RESPONSIBILITY FOR AFFIRMATIVE ACTION

Affirmative action for individuals with disabilities and covered veterans (Vietnam Era, other eligible, and disabled) and identified minorities is the responsibility of every employee at Protek Security, Inc. The Company's Affirmative Action Officer, is responsible for the implementation and monitoring of this Affirmative Action Plan at the Company. John Buntin, a member of Senior Management, has the support and staff to manage the implementation of this Plan.

5.0.1 DEVELOPMENT:

In carrying out this responsibility, the Affirmative Action Officer and designated staff will:

- A. Develop policy statements, affirmative action programs, and internal and external modes of communication;
- B. Oversee regular discussions with local managers, supervisors, and employees to ensure that the Company's policies are being followed;
- C. Advise supervisors that their work performance is being evaluated on the basis of their affirmative action efforts and results, as well as other criteria, and that the Company is obligated to prevent harassment of employees placed through affirmative action efforts;
- D. Identify, in conjunction with line management, known disabled employees, disabled veterans, veterans of the Vietnam Era, other eligible veterans, identified minorities and any problem areas in implementing the Affirmative Action Plan, and develop solutions, including possible modes of accommodation;
- E. Design and implement internal audit and reporting systems that will measure the effectiveness of the Company's Plan, indicate the need for remedial action, determine the degree to which the Company's objectives have been attained, determine whether known employees with disabilities, covered veterans and identified minorities have had the opportunity to participate in all Company-sponsored educational, training, recreational, and social activities, and ensure that each Company location is in compliance with the act and federal regulations listed;
- F. Serve as liaison between the Company and enforcement agencies, and between the Company and organizations of and for persons with disabilities, covered veterans, identified minorities and encourage active involvement by Company representatives in the community service programs of local organizations of and for individuals with disabilities and covered veterans and identified minority groups;
- G. Keep management informed of the latest developments in the entire affirmative action area;

6.0 IMPLEMENTATION OF AFFIRMATIVE ACTION INVITATION TO IDENTIFIED MINORITIES

Following an offer of employment but prior to an employee's first day, the Affirmative Action Office or his/her designate, will invite job applicants who are individuals of an identified minority, identify themselves in order to receive the benefits of affirmative action (see Exhibit A).

7.0 REVIEW OF PERSONNEL PROCESSES

Protek Security, Inc., continues to review its personnel procedures to determine whether they assure the careful thorough, and systematic consideration of the job qualifications of employees or job applicants who are known individuals of identified minorities for job vacancies,

promotions, and/or educational or training opportunities and to assure that they are so designed as to facilitate the implementation of the Company's affirmative action obligations.

Vacancies are advertised, and applications are accepted from any interested person. Employment application includes a full non-discrimination statement to further assure applicants of the Company's policy of equal employment. Available positions that are not expected to be filled from within, may be referred to the State Department of Employment and Training, as well as other recruiting sources.

7.0.1 PROCEDURES:

Consistent with the regulations, the Company has instituted the following procedures to further assure the careful, thorough, and systematic consideration of the job qualifications of employees or job applicants who are known individuals of identified minorities, for job vacancies, promotions, and/or educational or training opportunities and to assure that they are so designed as to facilitate the implementation of the Company's affirmative action obligations:

- A. As covered individuals apply for positions within the Company, their personnel form will be annotated to identify each vacancy for which he or she was considered.
- B. The personnel records of each known covered individual will include (i) the identification of each promotion for which he or she was considered, and (ii) the identification of each training program for which he or she was considered.
- C. In each case where a covered individual is rejected for employment, training, or promotion, a statement of the reasons will be appended to the file, This statement will include a comparison of the qualifications of the covered individual and the person(s) selected, as well as a description of the accommodations considered.
- D. Where applicants or employees are selected for hire, promotion, or training, and the Company undertakes any accommodation, which makes it possible to place a covered individual on the job, the personnel file will contain a description of that accommodation.

Consistent with the published regulations, this information, upon reasonable advanced notice will be retrievable for review by government officials and the Company's personnel officials for use in investigations and compliance activities.

8.0 REVIEW OF PHYSICAL AND MENTAL JOB QUALIFICATIONS

Protek Security, Inc., has recently reviewed physical or mental job qualification requirements, to ensure that qualification requirements do not screen out qualified individuals for reasons that are not job-related, consistent with business necessity and the safe performance of the essential functions of the job.

9.0 HARASSMENT

Protek Security, Inc., has developed and implemented procedures to ensure that employees are not harassed because of their identified minority status.

In addition, employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in, or may have engaged in, activities such as filing a complaint, assisting or participating in an investigation, compliance review or hearing, or opposing any act or practice made unlawful, or exercising any other right protected by the Act.

10.0 COMPENSATION

In offering employment or promotions, Protek Security, Inc., does not reduce the amount of compensation offered to individuals because of identification as a minority.

11.0 OUTREACH, POSITIVE RECRUITMENT, AND EXTERNAL DISSEMINATION OF POLICY

Protek Security, Inc., has reviewed its employment practices to determine whether personnel programs provide the required affirmative action for employment and advancement of qualified individuals. This review has revealed a high percentage of identified minority individuals employed in a variety of jobs.

While the Company believes that there are no deficiencies in its current employment practices with respect to these employees, it has planned the following outreach, positive recruitment, and external dissemination programs to augment its existing affirmative efforts:

External:

- A.** The Company will communicate to employees its obligation to take affirmative action to employ qualified individuals and will encourage employee referrals of covered applicants.
- B.** All executives, management officials, supervisors, and other employees of the Company will be encouraged to assist in the effort to disseminate Protek Security, Inc., policy of affirmative action to individuals outside the Company.
- C.** The Company will inform recruiting sources of Protek Security, Inc., policy of affirmative action. Recruiting sources will be requested to actively recruit and refer qualified individuals of identified minority groups for all positions.
- D.** Protek Security, Inc., will, if needed, enlist the assistance and support of local recruiting sources and social service agencies. These sources will be informed of the Company's Affirmative Action Plan and will be requested to refer qualified individuals for employment consideration, including those not currently in the work force who have requisite skills.

- E. While advertising is very limited, Protek Security, Inc., will endeavor to include minority individuals, when employees are pictured in consumer and personnel recruitment advertising.
- F. The Company will send written notification of Company AAP policy to all contractors subcontractors, requesting appropriate action on their part.
- G. When Protek Security, Inc., advertises in newspapers for prospective employees, the advertisement will include the EEO solicitation "Equal Opportunity Employer M/F/D/V" or a relevant abbreviation.

12.0 INTERNAL DISSEMINATION OF POLICY

The Company recognizes that, however strong its outreach program, internal support from supervisory management and other employees is necessary to ensure maximum effectiveness of its plan of affirmative action for identified minorities. Accordingly, the Company will utilize the following procedures to maximize the internal implementation and dissemination of its policy:

- A. Protek Security, Inc., will invite its identified minority representatives to participate in the Affirmative Action Plan.
- B. Protek Security, Inc., policy on affirmative action for identified minorities, is posted on Company bulletin boards. The posting includes a statement that employees and applicants are protected from coercion, intimidation, and interference or discrimination for filing a complaint or assisting in an investigation, under U.S. Department of Labor (41 C.F.R. Chapter 60) (See Exhibit B.)
- C. Meetings with executive management and supervisory personnel will be conducted at least annually to explain the Company's policy of affirmative action and to impart to these personnel their responsibility in making the plan a success. Top-level management personnel will attend these meetings so that their attitudes on affirmative action will be known to all.
- D. Meetings with all employees of the Company will be conducted by department heads, to inform the employees of Protek Security, Inc.'s policy of affirmative action and to explain the employees' responsibility to comply with the policy.
- E. An invitation to participate in policy of affirmative action is disseminated to all applicants once the company has extended a job offer but prior to the applicant's first day of employment.
- F. Since Protek Security, Inc., has no collective bargaining agreement, no notification of union officials is necessary.

13.0 DEVELOPMENT AND EXECUTION OF AFFIRMATIVE ACTION PROGRAMS

In addition to the affirmative action programs mentioned, the Company is developing and executing the following programs:

- A. The Company will continue to review all physical or mental job qualifications.
- B. The Company will continue to review and evaluate its entire personnel selection process, including training and promotion, to ascertain whether the process permits the stereotyping of minority groups or Women, in a manner that limits their access to jobs for which they are qualified.
- C. All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes will have the opportunity to participate in training forums relating to affirmative action for individuals with disabilities, disabled veterans, veterans of the Vietnam Era, and other eligible veterans.
- D. If Protek Security, Inc., holds briefing sessions for recruitment sources, representatives from agencies who specialize in placement of Women and minorities will be included. Formal arrangements will be made for the referral of job applicants, for follow-up, and for feedback on the disposition at applicants referred.
- E. Arrangements will be made to provide opportunities for identified minority employees to discuss their problems with their supervisor.
- F. When Protek Security, Inc., conducts recruiting efforts at various schools, special effort will be made to reach identified minority students.

14.0 INTERNAL REVIEW

The Company's employee review process affords the opportunity whereby identified minority employees can raise any issues or claims that may arise during the course of and concerning their employment. This valuable time provide opportunities for employees to discuss their problems with their supervisor.

General communication procedures encourage any and all employees, including those with a disability, disabled veterans, veterans of the Vietnam Era and other eligible veterans to discuss such issues or claims.

All matters brought to the attention of the Affirmative Action Officer will be formally and confidentially addressed.

15.0 MONITORING AND REPORTING SYSTEMS

It is the responsibility of the Company's Affirmative Action Officer to monitor all employment and personnel practices to ensure compliance with applicable regulations and adherence to the Company's Statement of Policy, to report specific problems to the appropriate management personnel, and to measure the effectiveness of Protek Security, Inc.'s, Affirmative Action Plan.

In this regard, all records concerning identified minority applicants will be maintained for two years, and all personnel actions involving these employees will be individually maintained as a part of their personnel files.

Special reports summarizing affirmative action efforts to assist covered employees, descriptions of any formal complaints, etc. will be provided to upper management personnel at least annually.

This Affirmative Action Plan will be updated annually and will include a summary of the previous year's actions and programs.

16.0 IDENTIFICATION OF PROBLEM AREAS BY ORGANIZATIONAL UNIT AND JOB GROUP

We have conducted in-depth analyses of our total employment process, including workforce by organizational unit and job group, personnel activity, compensation, and other personnel procedures to determine whether and where impediments to equal employment opportunity exist.

An analysis of each of these processes follows:

1. Composition of the Work Force by Organizational Unit and Job Group:

- A. Our analysis by organizational unit reveals that minorities and women are not significantly underrepresented or concentrated in a particular organizational unit.

Minorities are employed at a rate of 0% and are represented in 0% of the Company's 1 department. Further, minorities are represented in 100% of the departments that employ 10 or more people. Women are employed at a rate of 0% and are represented in 100% of all departments. This analysis suggests that there is no policy or practice excluding minorities or women from any departments, nor is there any racial or sexual discrimination in the selection process.

- B. Pursuant to the Office of Federal Contract Compliance Programs (OFCCP) regulations, we have conducted an availability analysis by job group, taking into account both external and internal availability, and have compared incumbency to availability to determine underutilization. In determining availability, we have selected our reasonable recruitment area as Davis County and our pool of promotable, transferable, and trainable employees in such a way as not to exclude qualified minorities and women. The Corporate Headquarters is located in Davis County and employee hiring is accomplished by managers and supervisors at this location.

17.0 LISTING OF EXHIBITS

Exhibit "A"

EMERGENCY CONTACT INFORMATION AND SURVEY

Exhibit "B"

AFFIRMATIVE ACTION PROGRAM FOR WOMEN AND MINORITIES

Exhibit "C"

ORGANIZTIONAL PROFILE

Exhibit "D"

JOB GROUP ANALYSIS

Exhibit "E"

UTILIZATION ANALYSIS

Exhibit "A"



**PROTEK
SECURITY, INC.**

**"An Equal
Opportunity
Employer"**

Our Automated Payroll System provides the Company with the capability to maintain useful information on you for emergency situations and for compiling statistical reports for Federal and State agencies. We request that you voluntarily complete the needed information.

Emergency Contact:

Name: _____
(please print)

Relationship _____

Phone Number ____ (____) ____ - ____

Doctor _____

Phone Number ____ (____) ____ - ____

Hospital _____

SURVEY

Equal Opportunity Reporting:

Gender: Male Female

Ethnic Origin: White Black Hispanic Asians/Pacific Islanders
 American Indian/Alaska Native

Veteran Reporting:

Disabled Veteran Qualified Disabled Veteran
 Veteran of Vietnam Era Other Eligible Veteran

Protek Security, Inc., is subject to Section 503 of the Rehabilitation Act of 1973, as amended, which requires us to take affirmative action to employ and advance in employment qualified individuals with disabilities.

Protek Security, Inc., will not coerce, intimidate, interfere, or discriminate against any employee for filing a complaint or assisting in an investigation under the Rehabilitation Act. The Company's Plan of affirmative action for women and minorities, individuals with disabilities, disabled veterans, veterans of the Vietnam Era, and other eligible veterans as is available for inspection in the office of the Affirmative Action Officer during regular business hours.

A qualified individual with a disability means an individual with a disability who is capable of performing the essential functions of a particular job with or without reasonable accommodations to his or her disability. In order to be considered "disabled," an individual must either have a physical or mental impairment that substantially limits one or more of his or her major life activities, have a record of such impairment, or be regarded as having such impairment.

If you would like to be considered under Protek Security, Inc.'s, Affirmative Action Plan, you should inform John Buntin the Affirmative Action Officer, at this time and/or at any time in the future, providing medical documentation as requested. The submission of information regarding your disability is voluntary, and the refusal to provide it will not subject you to discharge or other disciplinary treatment. Information obtained concerning your disability will be kept confidential, except that supervisors and managers may be informed regarding restrictions on the work or duties of disabled individuals and regarding necessary accommodations.

First aid, safety and supervisory personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment, and government officials investigating compliance with the Rehabilitation Act of 1973, will be informed.

If you have a disability, please tell us about (i) any special methods, skills, and procedures which you believe qualify you for positions which you might not otherwise be able to do so that you will be considered for any Position of that kind, and (ii) the accommodations which you believe we could make which would enable you to perform the job properly and safely, including special equipment, changes in the physical layout of the job, elimination of certain duties related to the job, provision of personal assistance services, or other accommodations by completing the following:

American Disabilities Act (ADA)

Individual With a Disability Qualified Individual With a Disability

Date of Disability: _____

Type of Disability: _____

Special methods, skills, and procedures required: _____

Exhibit “B”



**PROTEK
SECURITY, INC.**

**AFFIRMATIVE ACTION PROGRAM
FOR
WOMEN AND MINORITIES**

Pursuant to the U.S. Department of Labor Employment Standards Administration (Title 41 Part 60, et seq.), it is the policy of Protek Security, Inc. not to discriminate based upon the individual's status as a identified minority or woman, and insuring the equal opportunity for all persons, without regard to race, color, religion, sex, or national origin with regard to recruitment or recruitment advertising, hiring, training, promotion, and other terms and conditions of employment, provided the individual is qualified, with or without reasonable accommodations, to perform the essential functions of the job.

Employees and applicants are protected from coercion, intimidation, and interference or discrimination for filing a complaint or assisting in an investigation.

In addition, a copy of Protek Security, Inc., “Affirmative Action Program” is available for inspection. Employees wishing to obtain specific information, or for any other good reason, may, upon reasonable advance notice, inspect the “Affirmative Action Program” at any reasonable time during normal office hours. However, such information may not be reproduced, removed, or altered without the consent of an Officer of the Company. All AAP records are considered confidential and the property of the Company. “Affirmative Action Program” will therefore be available or disclosed only to those persons who are authorized by the Company under legal rights to review or obtain applicable parts of such records.

The designated “Affirmative Action Program” Action Officer is John Buntin, who has possession of the documentation in a readily accessible and clearly marked binder. Please direct your request accordingly. Upon adequate notice, documents are available during normal business hours 9:00AM – 5:00PM, Monday – Friday.