

**AFFIRMATIVE ACTION PLAN**

**For Employment of People with Disabilities**

At

**GOODWILL INDUSTRIES OF NORTHERN NEW ENGLAND  
PORTLAND, MAINE**

Plan Year: July 1, 2008 -- June 30, 2009



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## PREFACE

Goodwill Industries of Northern New England (hereinafter “the Company”) is fully committed to the concept and practice of equal opportunity and affirmative action in all aspects of employment. To this end, the Company has prepared this written Affirmative Action Plan (“AAP”) for the employment of people with disabilities (in accordance with its obligations arising under) on a voluntary basis. The existence of this AAP should not be understood to represent agreement by the Company that it is a government contractor or subcontractor as those terms are defined and used in the Rehabilitation Act of 1973, as amended (“Rehabilitation Act”), specifically, 29 U.S.C. §793 and its implementing regulations (41 C.F.R. Part 60-741). This AAP should not be construed as a contract between the Company and any government agency, or a contract for the benefit of any third parties including our employees or any applicants for employment.

Furthermore, in preparing this AAP, the terminology utilized in the Office of Federal Contract Compliance Programs (“OFCCP”) implementing regulations, as set forth in the Code of Federal Regulations, has been utilized on a voluntary basis as a guide by the Company. Therefore, use of this terminology should not be understood as agreement on the part of the Company that it has in the past or is now violating any federal, state or local fair employment practice laws, ordinances or regulations.

The material set forth in this AAP is deemed to constitute trade secrets, operations information and confidential statistical data, all of which fall within the Freedom of Information Act, 5 U.S.C. §552 *et seq.*, the Trade Secrets Act, 18 U.S.C. §1905 and 44 U.S.C. §3508, the disclosure of which is specifically prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

## STATEMENT OF EEO POLICY

It has been and will continue to be a fundamental policy of Goodwill Industries of Northern New England ("the Company") not to discriminate on the basis of race, color, religion, sex, national origin, age, disability, gender identification, sexual orientation, or status as a Vietnam era or special disabled veteran with respect to recruitment, hiring, training, promotion and other terms and conditions of employment. Further, it is the policy of the Company to comply voluntarily with the concepts and practices of affirmative action.

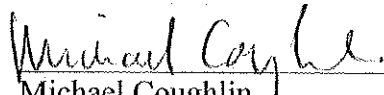
Effective implementation and continuing administration of this policy will be the direct responsibility of this office. Goodwill Industries of Northern New England's Employment Manager has been appointed as Affirmative Action Administrator with responsibilities to maintain and implement our Affirmative Action Plan and to ensure that the coordination, direction and review of equal employment policies, practices and programs are accomplished. He/she will also be responsible for making reports to senior Company management on our equal employment efforts on a periodic basis.

All supervisory personnel should make special efforts to assure that all employees reporting to them understand and effectively implement the policy.

The Company does not condone and will not tolerate the harassment of any employee placed through our affirmative action efforts. In addition it is a violation of Company policy for any employee to engage in sexual harassment. Complaints of discriminatory treatment or harassment of any type, including sexual harassment, should be brought to management and/or the Corporate Compliance Officer.

We must all realize that it is the responsibility of each and every employee of Goodwill Industries of Northern New England to give our policy of equal employment opportunity real meaning and full support.

Plan Year: July 1, 2008 – June 30, 2009

  
Michael Coughlin  
Executive Director

Goodwill Industries of Northern New England

## I. Responsibility for Implementation

### A. Implementation

Affirmative action for people with disabilities is the responsibility of every employee of the Company. The Affirmative Action Administrator is responsible for the implementation and monitoring of the affirmative action program for people with disabilities. The Affirmative Action Administrator will be given necessary top management support and staff to manage the implementation of the program. In carrying out the responsibility for the implementation and monitoring of the affirmative action program for people with disabilities, the Affirmative Action Administrator will:

1. Develop policy statements, affirmative action programs and internal and external communication techniques including periodic discussion with managers, supervisors and employees to assure that this AAP is being fully implemented and that good faith efforts are undertaken to implement it. Supervisors will be informed that the company is obligated to prevent harassment of employees placed through affirmative action efforts.
2. Periodically review the Company's personnel policies and practices in an effort to identify possible problem areas in conjunction with line management and to develop and suggest solutions, including potential accommodation techniques where appropriate.
3. Design and implement internal audit and reporting systems that will assist in measuring the effectiveness of the Company's program; indicate the need, if any, for remedial action; determine the degree to which the Company's objectives have been attained; and determine whether known disabled employees have had the opportunity to participate in Company sponsored educational, training, recreational and social activities; and ensure that each location is in compliance with the Rehabilitation Act and its implementing regulation.
4. Serve as a liaison between the Company and enforcement agencies, and to the extent possible serve as liaison between the Company and organizations of and for disabled persons, and encourage the active involvement by Company representatives in the community service programs of local organizations of and for people with disabilities to the extent possible.
5. Inform management on all internal and external communications regarding the Company's affirmative action program.
6. Periodically keep management informed of the latest developments in the affirmative action area pertaining to people with disabilities.
7. Arrange for career counseling for known people with disabilities.

## B. Training

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes shall be trained to ensure that the commitments to the Company's affirmative action program are implemented.

## II. Implementation of Affirmative Action

### A. Invitation to Covered Veterans Applicants and Employees

All applicants who are formally offered positions with the Company and all employees who believe themselves to be covered by the Rehabilitation Act of 1973, 29 U.S.C. §701 *et seq.*, specifically, 29 U.S.C. §793(a), and who wish to identify themselves as disabled for the purposes of affirmative action and proper job placement will be invited to do so. The form of this invitation is included as Exhibit A. It will be posted in appropriate and conspicuous places within the Company's offices. For the purpose of this self-identification process, the term "individual with a disability" is defined in Exhibit A. A request to benefit under the Company's affirmative action program may be made immediately and/or at any time in the future.

### B. Proper Consideration of Qualifications

The Company's personnel process will be reviewed to make good faith efforts to ensure that the procedures utilized assure consideration of known disabled applicants and employees for job vacancies and training opportunities. The following are the procedures that will be used to make every good faith effort to assure such consideration.

1. Records will be maintained regarding each known disabled applicant for the purpose of identifying each vacancy for which the applicant was covered.
2. Records of each known disabled employee will include identifications of promotions considered for, received and any training programs participated in by employees with disabilities.
3. Where applicable, records will be maintained regarding each known disabled employee or applicant containing a statement of reasons why they may have been rejected for promotion, training or employment, and including a comparison of people with disabilities, individual and the person(s) selected, along with a description of the accommodations considered.
4. Such records will also contain a description of any accommodations made which have permitted a disabled employee or applicant to be placed in a job.

C. Physical and Mental Qualifications

Physical and mental job qualifications will be reviewed to ensure that to the extent they screen out qualified persons with disabilities, they are job-related and consistent with business necessity and the safe performance of the job.

D. Medical Examination/Confidentiality

The Company has the right to conduct both pre-employment post-offer, and post-employment medical examinations consistent with section 503 of the Rehabilitation Act and its implementing regulations, 41 C.F.R. Part 60-741 or any other federal, state or local law. Where medical examinations are given to those indicating they are disabled, the dissemination of results will be used only in accordance with federal and state regulations.

E. Reasonable Accommodation

Reasonable accommodation will be made to the known physical or mental limitation of a qualified individual with disability. If an employee with a known disability is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the employee will be notified confidentially of the performance problem and will be asked whether the problem is related to the employee's disability; if the employee responds affirmatively, a confidential inquiry will be made of the employee as to whether he/she is in need of reasonable accommodation. In determining the reasonableness of possible accommodations, the factors of business necessity and financial cost and expense will be considered, among others.

A review and inspection of the facilities will be made to determine if and where reasonable accommodations for people with disabilities may be made. In addition, the results of such an accommodation review will be considered with respect to employment decisions involving employees with disabilities and applicants. In determining the reasonableness of possible accommodations, the factors of business necessity and financial cost and expense will be considered, among others. Further, the Company will consider whether, given the disability, the person is nevertheless qualified to perform the job.

F. Compensation

The amount of compensation offered to applicants/employees with disabilities will not be reduced because of any disability income, pension

or other benefit people with disabilities applicant or employee may receive from other sources.

G. Harassment

The Company will develop and implement procedures to ensure that employees with disabilities are not harassed because of disability.

H. Outreach, Positive Recruitment and External Dissemination of Policy

The Company's employment practices will be reviewed to determine whether personnel programs provide the necessary affirmative action for employment and advancement of qualified disabled individuals. Positive outreach and recruitment activities designed to effectively recruit qualified individuals with disabilities that will be instituted may include:

1. Communicating internally to its employees the Company's obligation to take affirmative action to employ qualified individuals with disabilities and doing so in a manner which will ensure understanding, acceptance and support.
2. Periodically reviewing personnel procedures in an effort to assure that this AAP is being fully implemented and that good faith efforts are undertaken to implement it.
3. Informing employees and prospective employees of its commitment to make good faith efforts to increase the employment opportunities for qualified individuals with disabilities.
4. Enlisting the assistance and support of recruiting sources (including state employment security agencies, state vocational rehabilitation agencies or facilities, college placement officers, state education agencies, labor organizations and organizations of or for individuals with disabilities.
5. Incorporation special efforts to reach students with disabilities when the Company engaged in recruitment efforts at schools. The Company will engage in recruitment activities at educational institutions which participate in training of individuals with disabilities, such as schools for the blind, deaf, or learning disabled. The Company will also make an effort to participate in work-study programs with rehabilitation facilities and schools which specialize in training or educating individuals with disabilities.
6. Establishing meaningful contacts with appropriate social agencies, organizations of and for people with disabilities and similar groups for

the purpose of obtaining advice, technical assistance and the referral of qualified disabled employees.

7. Periodically reviewing employment records to determine the availability of promotable and transferable known qualified disabled individuals in order to make every good faith effort to determine whether their potential skills are being fully utilized or developed.
8. Endeavoring to include employees with disabilities whenever employees are pictured in consumer, promotional or help-wanted advertising. The Company will endeavor to make individuals with disabilities available for participation in career days, youth motivation programs, and similar activities in their communities.
9. Arranging for notification to its subcontractors, vendors and suppliers of the Company's affirmative action policy concerning people with disabilities and requesting that those subcontractors, vendors and suppliers who themselves are subject to the Rehabilitation Act take appropriate action on their part.
10. Taking positive steps to attract qualified individuals with disabilities not currently in the workforce who have requisite skills and can be recruited through affirmative action measures.
11. In making its hiring decisions, the Company will consider applicants with known disabilities for all available positions for which they may be qualified when the position(s) applied for is unavailable.
12. Including the affirmative action clause for people with disabilities as required by federal regulations on all non-exempt purchase orders and contracts of \$10,000 or more.

I. Internal Dissemination of Policy

In order to assure greater employee cooperation and participation in the Company's written AAP and EEO policy, the Company will develop internal procedures for communication of its obligation to engage in affirmative action effort to employee and advance in employment qualified individuals with disabilities. The internal dissemination of both this written AAP and the Company's EEO policy will be implemented in the following manner in order to foster understanding, acceptance, and support among the Company's executive, management, supervisory and other employees and to encourage such employees to take the necessary actions to aid the Company in meeting its affirmative action and EEO obligations.

1. Our policy will be included in the Company's policy manual.
2. The Company will publicize its policy in the Company newsletter, magazine, annual report and other media.
3. The Company will conduct special meetings with executive, management and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation. Michael Coughlin, Ph.D., Executive Director, will communicate the Company's commitment to its policy.
4. Employees and prospective employees will be periodically informed of the Company's commitment to engage in affirmative action to increase employment opportunities for qualified individuals with disabilities.
5. The Company will discuss its policy in employee orientation and management training programs.
6. The Company will include articles on accomplishments of workers with disabilities in company publications.
7. Employees will be notified of the Company's policy by posting it on appropriate bulletin boards. The Company will ensure that applicants and employees are informed of the contents of the EEO policy statement.
8. When employees are featured in employee handbooks or similar publications for employees, individuals with disabilities will be included.
9. This written AAP will be made available for inspection by employees or applicants upon their request.

J. Development and Execution of Affirmative Action Programs

The Company is committed to developing, executing, and maintaining an effective AAP. In order to make good faith efforts to assure an effective plan, it will utilize some or all of the following procedures as appropriate:

1. The Company will make available job specifications to members of management significantly involved in the recruitment, screening, selection and promotion process.

2. The Company will periodically evaluate the total selection process to make good faith efforts to ensure that persons with disabilities are not stereotyped in a manner that limits their access to jobs for which they are qualified.
3. Employees significantly involved in recruitment, selection, promotion, discipline and related personnel practices will be identified and made aware of the Company's equal employment and affirmative action obligations regarding people with disabilities.
4. The Company will endeavor to hold formal brief sessions with representatives from recruiting sources, which may involve site tours, explanations of current and future job openings, position descriptions, worker specifications, explanations of the Company's selection process, and recruitment literature; and will endeavor to make formal arrangements for referral of applicants, follow-up with sources, and feedback on the disposition of applicants.
5. The Company will endeavor to include qualified individuals with disabilities on the personnel relations staff.
6. The Company will make every good faith effort to make employees with disabilities available for participation in career days, youth motivation programs, and related community activities.
7. The Company will make every good faith effort to reach students with disabilities when recruiting at educational institutions.
8. The Company will make every good faith effort to participate in work-study programs with rehabilitation facilities and schools which specialize in training and educating disabled individuals.
9. The Company will use available resources to continue on-the-job training programs.

### III. Audit and Reporting Systems

The Company will design and implement an audit and reporting system that will:

1. Measure the effectiveness of the Company's affirmative action program.
2. Indicate any need for remedial action.
3. Determine the degree to which the Company's objectives have been attained.

4. Determine whether individuals with known disabilities have had the opportunity to participate in all Company sponsored educational, training, recreational and social activities.
5. Measure the Company's compliance with the specific obligations of its affirmative action program.
6. Where the affirmative action program is found to be deficient, undertake necessary action to bring the program into compliance.

IV. Review of Personnel Processes

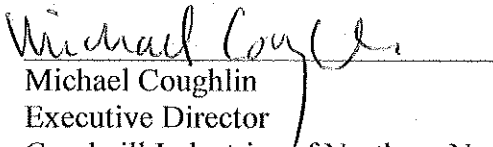
The Company will ensure that its personnel processes provide for careful, thorough and systematic consideration of the job qualifications of the applicants and employees with known disabilities for job vacancies filled whether by hiring or promotion, and for all training opportunities.

The Company will ensure that its personnel processes do not stereotype disabled persons in a manner which limits their access to all jobs for which they are qualified.

The Company will periodically review its personnel processes and make any necessary modifications to ensure that its obligations under this written AAP are carried out. The Company will design procedures that facilitate a review of the implementation of this requirement.

The Company encourages the use of an internal review procedure whereby employees who are disabled can raise any issues or claims that may arise during the course of their employment. The Company maintains an "open-door" policy and encourages employees to discuss such issues or claims. The existence and availability of this internal procedure is communication to all employees. All such matters may be brought to the attention of the Affirmative Action Administrator.

Plan Year: July 1, 2008 – June 30, 2009

  
Michael Coughlin  
Executive Director  
Goodwill Industries of Northern New England

## EXHIBIT A

### **INVITATION TO SELF-IDENTIFY FOR EMPLOYEES AND APPLICANTS**

Invitation for Voluntary Inclusion in the Affirmative Action Program for individuals with Disabilities, Special Disabled Veterans of the Vietnam Era (to be utilized with applicants only after an offer of employment has been made).

It is the policy of Goodwill Industries of Northern New England (the "Company") to recruit, select and employ qualified individuals with disabilities; special disabled veterans and veterans of the Vietnam era. The Company is a government contractor subject to Section 503 of the Rehabilitation Act of 1973 and section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974.

In accordance with these laws, the Company has developed affirmative action programs to employ and advance in employment qualified individuals with disabilities, special disabled veterans and veterans of the Vietnam era. The Company will, where appropriate, consider reasonable accommodations for qualified individuals with disabilities. If you are an individual with a disability, a special disabled veteran, or a veteran of the Vietnam era and would like to be considered under our affirmative action programs, please complete the sections below. Appropriate definitions of these terms are provided below for your convenience.

If you are an individual with a disability or a special disabled veteran, you may choose to tell us about (1) any special methods, skills, and procedures which qualify you for positions within the Company so that you can be considered for any positions of that kind, and (2) the reasonable accommodations which we could make which would enable you to perform the job properly and safely, including special equipment or other accommodations.

Providing this information is voluntary. Refusal to provide this information will not subject any individual to adverse treatment by the Company. The information provided will be kept in strict confidence, except that (a) necessary management and supervisory personnel may be informed in order to ensure proper placement and to provide reasonable job accommodations, (b) first aid and safety personnel may be informed to the extent appropriate, if the condition might require emergency treatment, and (c) government officials investigating affirmative action program compliance may be informed pursuant to the above cited laws and the Americans with Disabilities Act. For post-offer applicants: if you choose not to self-identify at this time, you may do so at any time during your employment.

To be included in our Affirmative Action Program, please check the appropriate box/boxes and provide your name in order to be identified as:

\_\_\_ An individual with a Disability. (An “individual with a disability” is defined as a person who (1) has a physical or mental impairment which substantially limits one or more of his or her major life activities, (2) has a record of such impairment, or (3) is regarded as having such an impairment.)

\_\_\_ A Special Disabled veteran. (A “special disabled veteran” is defined to be a veteran who is entitled to disability compensation under laws administered by the Veterans Administration for a disability (1) rated at 30% or more, (2) rated at 10% or 20% in the case of a veteran who has been determined under section 1506 to have a serious disability or a person who was discharged or released from active duty because of a service-oriented disability.)

\_\_\_ A Veteran of the Vietnam Era. (A “veteran of the Vietnam era” is defined as a person who (1) served on active duty for a period of more than 180 days, any part of which occurred between August 5, 1964 and May 7, 1975, and who (a) was discharged or released there from with other than a dishonorable discharge, or (b) was discharged or released from active duty for a service-connected disability if any part of his or her active duty was performed between August 5, 1964 and May 7, 1975.)

Name: \_\_\_\_\_

Program/Dept/Store: \_\_\_\_\_

Employee #: \_\_\_\_\_ Date: \_\_\_\_\_

