

AFFIRMATIVE ACTION PLAN

**For Employment of Vietnam Era and
Special Disabled Veterans**

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 veterans (in accordance with its obligations arising under) the Vietnam Era Veterans’ Readjustment Assistance ACT of 1974, as amended, (“VEVRA”), 38 U.S.C. §4211 et seq., specifically 28 U.S.C. §4212 and its implementing regulations (41 C.F.R. Part 60-250). 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 applications 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.

I. EEO Policy Statement and Reaffirmation

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.

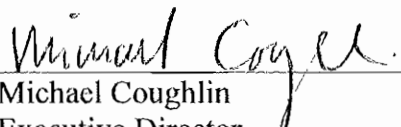
Effective implementation and continuing administration of this policy will be the direct responsibility of this office. Goodwill Industries of Northern New England’s Employment Manager has been appointed as Affirmative Action Administrator with responsibilities to maintain and implement our Affirmative 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

II. Responsibility for Affirmative Action

Affirmative action for veterans of the Vietnam era and special disabled veterans (hereinafter collectively referred to as “covered veterans”) 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 covered veterans. In carrying out this responsibility, he/she or designated staff members will:

1. Develop policy statements, affirmative action programs and internal and external communication techniques.
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 covered veteran employees have had the opportunity to participate in Company sponsored, educational, training, recreational and social activities.
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 covered veterans, and encourage the active involvement by Company representatives in the community service programs of local organizations of and for covered veterans to the extent possible.
5. Periodically keep management informed of the latest developments in the affirmative action area pertaining to covered veterans.
6. Ensure that the facility is in compliance with the relevant laws and regulations concerning covered veterans.

III. Implementation of Affirmative Action

- A. Invitation to Covered Veteran Applicants and Employees

All applicants and employees who believe themselves to be covered by VEVRA and who wish to identify themselves as covered veterans 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.

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 covered veteran 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. Where applicable, records will be maintained regarding each known covered veteran employee or applicant containing a statement of reasons why they may have been rejected for promotion, training or employment, and including a comparison of the covered veteran(s) and the person(s) selected, along with a description of the accommodations considered.
2. Such records will also contain a description of any accommodations made which have permitted a covered veteran employee or applicant to be placed in a job.
3. In determining the qualifications of a covered veteran, only that portion of his/her military record, including discharge papers, relevant to the specified job qualifications required will be considered.

C. Physical and Mental Qualifications

Physical and mental job qualifications will be reviewed to ensure that to the extent they screen out qualified special disabled veterans, 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 post-offer pre-employment and post-employment medical examinations. Where medical examinations are given to those indicating they are special disabled veterans, the dissemination of the results will be used only in accordance with applicable federal regulations.

E. Reasonable Accommodation

A review and inspection of the facilities will be made to determine if and where reasonable accommodations for special disabled veterans may be made. In addition, the results of such an accommodation review will be considered with respect to employment decisions involving special disabled veteran employees 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 covered veteran applicants and employees will not be reduced because of any disability income, pension or other benefit the covered veteran applicant or employee may receive from other sources.

G. 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 covered veterans. Positive outreach and recruitment activities such as those described below will be instituted.

1. The Company will communicate internally to its employees its obligation to take affirmative action to employ qualified covered veterans and will do so in a manner which will ensure understanding, acceptance and support.
2. The Affirmative Action Administrator will periodically review personnel procedures in an effort to assure that this AAP is being implemented.
3. The Company will inform employees and prospective employees of its commitment to make good faith efforts to increase the employment opportunities for qualified covered veterans.
4. The Company will contact recruiting sources such as the local veteran's employment representative and the Veterans Administration Regional Office, to assist it in recruiting qualified covered veterans generally, and especially those qualified individuals not currently in the work force.
5. The Company will establish meaningful contacts with appropriate veterans service organizations and similar groups for the purpose of

obtaining advice, technical assistance and the referral of qualified covered veterans.

6. The Affirmative Action Administrator will periodically review employment records to determine the availability of known promotable and transferable qualified covered veterans in order to make good faith efforts to determine whether their potential skills are being fully utilized or developed.
7. The Affirmative Action Administrator will arrange for notification to its vendors and suppliers of its affirmative action policy concerning covered veterans and will request that those vendors who themselves are subject to VEVRA take appropriate action on their part.
8. All non-exempt purchase orders and contracts of \$10,000 or more shall include the affirmative action clause for covered veterans as required by federal regulations.
9. All job openings, with the exception of executive and top management positions, positions that will be filled from within the Company's organization, and positions lasting three days or less, will be listed with the appropriate state employment service.
10. Whenever employees are pictured in consumer, promotional or help-wanted advertising, the Company will endeavor to include covered veterans.

H. Internal Dissemination of Policy

The internal dissemination of both this written AAP and the Company's EEO policy will be implemented in the following manner:

1. Employees will be notified of the Company's policy by posting it on appropriate bulletin boards and by inclusion in appropriate employee orientation materials.
2. The policy, its intent, and the individual responsibilities arising thereunder will be periodically communicated and explained to management personnel.
3. The policy, its intent, and the individual responsibilities arising thereunder will from time to time be communicated and explained to other appropriate Company personnel.
4. This AAP will be made available for inspection by employees or applicants upon their request.

5. Our policy will be included in our Company newsletter.
6. Our policy will be included in our personnel handbook.

I. 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 covered veterans 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 covered veterans.
4. The Company will inform representatives of various recruiting sources both when openings occur and the specific job requirements involved, and request that they refer qualified covered veterans.
5. The Company will make good faith efforts to reach covered veterans when recruiting at educational institutions.

IV. Internal Review Procedure

The Company encourages the use of an internal review procedure whereby employees who are covered veterans can raise any issues or claim 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 communicated to all employees. All such matters may be brought to the attention of the Affirmative Action Administrator. See Exhibit A.

V. Monitoring and Reporting

It is the responsibility of the Affirmative Action Administrator periodically to monitor employment and personnel practices and make good faith efforts to assure compliance with applicable regulations and adherence to the Company's policy pertaining to covered veterans; to report specific problems, if any, to appropriate management; and to measure the effectiveness of the Company's AAP.

Records of known covered veteran applicants will be maintained for a two-year period, and significant personnel actions involving known covered veteran employees will be individually maintained as a part of their record for the duration of their employment.

Periodically, a report will be made to senior management concerning significant personnel actions involving known covered veteran applicants and employees. Such report will also include a description of any formal complaints alleging discrimination on the basis of veteran status.

The Company will comply with all other applicable reporting requirements including filing the "Vets-100" report on an annual basis, pursuant to 41 C.R.F. §61-250 et seq.

This Affirmative Action Plan will be updated annually.

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: _____

Date: _____

