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#### **SECTION IV. EQUAL EMPLOYMENT OPPORTUNITY / NON-DISCRIMINATION POLICY**

- A. No person shall on the grounds of race, color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity conducted by ICC regardless of whether the program, activity or project is federally funded. If you have any questions concerning ICC's commitment and obligation in this regard, please contact the EEO Coordinator/Title VI Coordinator:

Caroline Martini  
ICC Group Inc  
carolinemartini@icceo.com  
630-450-7092

B. Equal Employment/Non-Discrimination

It is the policy of ICC Group Inc. to offer employment opportunities to all individuals regardless of race, color, religion, sex, age, national origin, mental or physical disability, sexual orientation, veteran status or any other category protected by governing local, state or federal law.

1. The Company has set goals in the hiring of minority and female employees; in this endeavor, we encourage our employees in recommending friends, relatives, acquaintances, etc. for employment with the Company.
2. The Company will take affirmative action to ensure that applicants are employed and that employees are treated during employment without regard to their race, age, color, religion, sex, national original, mental or physical disability, sexual orientation, veteran status or any other category protected by state or federal law. Such action will include, but not be limited to the following: employment, upgrading, demotion or transfer, recruitment, or recruitment advertising, layoffs or termination, rates of pay or other forms of compensation and selection for training.
3. The Company, being signatory to various local unions, will attempt, whenever possible, to work with the unions in securing employees without discrimination.
4. The Company certifies that it does not and will not maintain any segregated facilities. No employee will be denied access to adequate facilities based on sex, race, religion, color, age or national original, mental or physical disability, sexual orientation, veteran status or any other area protected by statute or federal law. The term "segregated facilities" means any waiting rooms, work areas, restrooms and washrooms, eating areas, parking lots or any other area where employees may gather, except where it is necessary to assure privacy between the sexes.
5. The Company certifies that it will ensure and maintain a working environment free of harassment, intimidation and coercion at all sites and in all facilities where employees are assigned to work. Any employee or applicant for employment who feels he or she has been

discriminated against is urged to report it to the EEO Officer who is currently the Vice President of Accounting & Finance, Caroline Martini. In the event the EEO Officer is the individual accused of the discrimination, the employee should report the incident directly to the Company President. Complaints involving harassment should be filed in accordance with the Company's Complaint Procedures in Sections F, G or H of this Policy.

C. Religious Discrimination and Accommodation Guidelines

The Company maintains a non-discrimination policy in employment and employment opportunities for all people regardless of religion, as noted above.

No employee or applicant will be discriminated against because of their religion, this includes but is not limited to employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination, rates of pay or other forms of compensation and selection for training including apprenticeship.

Whenever possible, where no undue hardship of the Company will prevent same, the Company will accommodate the religious observances and practices of our employees and prospective employees. If an employee requires a religious accommodation, the employee should contact the EEO Coordinator or Human Resources to initiate a request for accommodation and the interactive process.

D. Disabled Veterans and Veterans of the Vietnam Era Guidelines

The Company will not discriminate against employees or applicants for employment because he or she is a disabled veteran or Vietnam veteran in regard to any position for which the employee or applicant is qualified. It is the goal of the Company to take affirmative action in the hiring, advancing and to otherwise treat qualified disabled veterans and Vietnam era veterans without discrimination in all employment practices such as: employment, upgrading, demotion, transfer, recruitment, advertising, layoff or termination, rates of pay or other forms of compensation and selection for training including apprenticeship.

E. Disabled Workers Guidelines

The Company will not discriminate against qualified employees or employment applicants because of mental or physical disability in regard to any position for which the employee or applicant for employment and otherwise treat qualified disabled individuals without discrimination in all employment practices.

It is the policy of the Company to comply with all provisions of the Americans with Disabilities Act ("ADA") and corresponding state law. If an individual is qualified to perform the essential functions of the job, the Company will make reasonable accommodations as necessary for applicants and employees with disabilities, if such accommodations do not pose a threat to safety or cause an undue hardship to the Company. If an employee requires an accommodation, the employee should contact the EEO Coordinator or Human Resources to initiate a request for accommodation and the interactive process.

F. Internal Complaint Procedure

Any person who believes that he or she as a member of a protected class, has been discriminated against based on race, color, national origin, sex, sexual orientation, gender identity, age, disability, religion, low income status, or Limited English Proficiency in violation of the Civil Rights Act of

1964, as amended and its related statutes, regulations and directives, Section 504 of the Vocational Rehabilitation Act of 1973, Americans with Disabilities Act of 1990, as amended, the Civil Rights Restoration Act of 1987, as amended, and any other Federal nondiscrimination statute may submit a complaint. A complaint may also be submitted by a representative on behalf of such a person.

1. Reporting a Complaint: Make a report of any suspected violation of this policy to the EEO Officer. The report may be made initially either orally or in writing, but reports made orally must be reduced to writing before an investigation can be initiated and a resolution achieved. Complaint forms may be obtained from the EEO Officer, Human Resources or online at <https://www.icceo.com/diversity-inclusion>. If the complaint involves the EEO Officer, then the report of any suspected violation of this policy may be made to the Company President. The EEO Officer is identified below:

Caroline Martini  
ICC Group Inc  
carolinemartini@icceo.com  
630-450-7092

2. Investigation of the Complaint: It is the policy of ICC to conduct a prompt and impartial investigation of all allegations of discrimination and to take prompt effective corrective action when a claim of discrimination is substantiated. Within 60 days of the receipt of the complaint the company will conduct an investigation of the allegation based on the information provided. Additional time may be required due to the nature or complexity of the allegations. In the event of a violation of this policy is determined, the EEO Officer will determine the appropriate remedial action. At the conclusion of the investigation, the EEO Officer will advise the complaining party, in writing, of the outcome of the investigation.
3. Confidentiality: Every effort shall be made to keep all matters related to the investigation and various reports confidential, including the identity of the Complainant except to the extent necessary to conduct the investigation.
4. Time Frame for Reporting Complaints: The Company encourages prompt reporting of complaints so that rapid response and appropriate action may be taken. Thus, all complaints should be reported within 180 days (six months) of the alleged incident. Delayed reporting of complaints will not, in and of itself, preclude the Company from taking remedial action.
5. Anti-Retaliation: It is unlawful for an employer to retaliate against an employee for filing a complaint of discrimination or harassment or otherwise engaging in or participating in an investigation under this policy.

G. External Complaint Procedures – Illinois Employees

The Company hopes that any incident of harassment can be resolved through the internal procedures outlined above. However, these procedures do not deny the right of any individual to file a formal complaint with any government agency or affect an individual's right to seek private counsel for any complaint alleging discrimination. In Illinois:

The IDHR may be conducted as follows:

Chicago: (312) 814-6200  
Chicago TDD: (312) 263-1579  
Springfield: (217) 785-5100  
Springfield TDD: (217) 785-5125

The EEOC may be conducted as follows:

Chicago: (312) 353-2713  
Chicago TDD: (312) 353-2421  
F: Chicago: (800) 669-4000  
F: Chicago TDD: (800) 669-6820

H. External Complaint Procedures – Indiana Employees

The Company hopes that any incident of harassment can be resolved through the internal procedures outlined above. However, these procedures do not deny the right of any individual to file a formal complaint with any government agency or affect an individual's right to seek private counsel for any complaint alleging discrimination. In Indiana:

Indiana Department of Transportation  
Equity Initiative Services  
100 N. Senate, Room N750  
Indianapolis, IN 46204  
Phone: (317) 914-2832

Indianapolis District EEOC Office  
101 West Ohio Street, Ste 1900  
Indianapolis, IN 46204  
Phone: (800) 669-4000  
Fax: (317) 226-7953  
TTY: 1 (800) 669-6820

Indiana Civil Rights Commission  
100 N. Senate Ave., Room N103  
Indianapolis, IN 46204  
Toll Free: 1 (800) 628-2909  
Phone: (317) 232-2600  
Fax: (317) 232-6560  
Hearing Impaired: 1 (800) 743-3336