

EMPLOYMENT

Equal Employment

It is the policy of Academy to provide equal employment opportunities to all qualified applicants and employees without regard to race, color, creed, gender, gender identity or expression, national origin or ancestry, age, religion, disability, sexual orientation, marital status, pregnancy, veteran status, membership in the uniformed services, arrest or conviction record, domestic violence victim status, genetic information, or any other basis protected by applicable federal, state, or local law (“protected characteristics”). To the extent required by law, the Company also provides equal employment opportunities to individuals regardless of any perception that an individual has a protected characteristic or associates with a person who has or is perceived as having a protected characteristic. Accordingly, the Company prohibits discrimination against any employee or any applicant for employment based on any protected characteristic. Consistent with this policy, the Company is committed to making employment decisions based on merit, qualifications, and other job-related criteria without regard to an individual’s protected characteristic(s). Academy will ensure and maintain a working environment free of harassment, intimidation and coercion at all locations and in all facilities at which the Academy employees are assigned to work. This policy of equal opportunity covers all aspects of the employment relationship, including (but not limited to) the recruitment and hiring process, promotion, corrective action, selection for training, compensation, transfer, layoff, termination, recall, use of all facilities, participation in all company-sponsored benefit plans and participation in all company-sponsored activities.

Employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of Michael Boyd. Michael Boyd has been appointed the Equal Employment Opportunity Officer (“EEOO”) and is responsible for planning and implementing our EEO Policy. Academy’s EEOO will distribute and review its EEO Policy with all employees at least once a year, post the policy statement and EEO posters on all company bulletin boards, and will maintain written documentation of these reviews and posting with a written record to identify the time, place, employees present, subject matter, and disposition of meeting. We will not allow any form of retaliation against employees who raise issues of equal employment opportunity in good faith. To ensure our workplace is free of artificial barriers, violation of this policy may result in disciplinary action, up to and including discharge.

Academy will discuss its EEO Policy Statement with Subcontractors with whom it anticipates doing business and will include the EEO Policy Statement in its subcontracts. Academy will document and maintain records of all bid solicitations and outreach efforts to and from Subcontractors, proposer associations and other business associations.

Academy will take action to ensure that the EEO Policy is implemented and maintain files documenting these efforts, with particular regard to: advertising, application procedures, compensation, demotion, employment, fringe benefits, job assignment, job classification, layoff, leave, promotion, recruitment, rehire, social activities, training, termination, transfer, upgrade, and working conditions.

Academy will maintain a current file of names, addresses and phone numbers of each walk-in applicant, including people of color, women, veterans, referrals from unions, recruitment sources, and/or community organizations with a description of the employment action taken.

Academy will maintain all employment selection process information with records of all tests and other selection criteria. Academy will develop and maintain documentation for on-the-job training opportunities or participate in training programs for all employees; establishes apprenticeship, trainee, and upgrade programs relevant to employment needs.

Academy conducts, annually, an inventory and evaluation of all employees for promotional opportunities and encourages all employees to seek and prepare appropriately for such opportunities; establish and document policies and procedures to ensure job classifications, work assignments, promotional tests, recruitment and other personnel practices do not have a discriminatory effect.

All current employees of Academy are requested to encourage qualified disabled persons, minorities, special disabled veterans, and military veterans to apply for employment.

It is the policy of Academy to continue to participate in voluntary associations, which assist in fulfilling one or more of its non-discrimination obligations.

Academy affirms that it will comply with all federal, state and local laws and regulations relating to equal employment opportunities and affirmative action. The Company shall continue to work cooperatively with government and community organizations to take affirmative action to ensure equal employment and advancement opportunities.

Disability Accommodations

In order to meet the requirements of applicable federal, state and local law, it is the policy of this Company to base all employment decisions on the ability of a person to perform the essential functions of a job and not the person's disability or limitations.

Further, it is the policy of this Company to endeavor to reasonably accommodate qualified individuals with known disabilities to enable them to perform the essential functions of their position, unless the accommodation would pose an undue hardship on the operations of our business. What constitutes a reasonable accommodation may depend on various factors, including but not limited to the nature of the individual's disability and the essential functions of the position. Any employee who needs assistance to perform his or her job duties because of a physical or mental condition should contact Michael Boyd, Kate Brewer or Jamie Wells.

Sexual and Other Unlawful Harassment

The Company is committed to providing a workplace that is free from all forms of unlawful discrimination and harassment, including sexual harassment. Accordingly, the Company prohibits the harassment of its employees by other employees, vendors, contractors, clients and other third parties doing business with the Company on the basis of an individual's protected characteristic(s), including race, color, creed, gender, gender identity or expression, national origin or ancestry, age, religion, disability, sexual orientation, marital status, pregnancy, veteran status, membership in the uniformed services, arrest or conviction record, domestic violence victim status, genetic information, or any other basis protected by applicable federal, state, or local law. The Company also prohibits harassment based on the perception that an individual has a protected characteristic or is associated with a person who has or is perceived as having a protected characteristic. All employees are responsible for assuring that the workplace is free from harassment and discrimination of any nature and have an obligation to refrain from actions and/or conduct that could be construed as same. In addition, it is the responsibility of all employees to report instances of violations of this policy so that appropriate action may be taken in accordance with this policy. Any act of harassment or discrimination by anyone is a violation of this policy. Any employee's behavior that fits the definition of discrimination or harassment could result in disciplinary action up to and including dismissal. sexual harassment could also subject this Company and, in some cases an individual, to substantial civil penalties.

The Company's policy on sexual harassment is part of its overall efforts pursuant to federal, state and local laws, prohibiting unlawful discrimination and harassment based on any protected characteristic.

Each employee of this Company must refrain from sexual harassment in the workplace. No employee-male or female- should be subjected to unsolicited or unwelcome sexual overtures or conduct in the workplace. Furthermore, it is the responsibility of all supervisors and managers to make sure that the work environment is free from sexual harassment. All forms of discrimination and conduct which can be considered harassing, coercive or disruptive, or which create a hostile or offensive environment must be eliminated. Instances of sexual harassment must be investigated in a prompt and effective manner. The Company's corporate policy is modeled after the NYS 2019 Equal Rights, Equal Opportunity Laws.

All employees of the Company, particularly those in a supervisory or management capacity, are expected to become familiar with the contents of this policy and to abide by the requirements it establishes and attend an annual training.

Sexual harassment is defined as unwanted sexual advances, requests for sexual favors, or visual, verbal, or physical conduct of a sexual nature when: (1) submission of the conduct is made a term or condition of employment; or (2) submission to or rejection of the conduct is used as basis for employment decisions affecting the individual; or (3) the conduct has the purpose or effect of unreasonably interfering with the employees work performance or creating an intimidating, hostile, or offensive working environment. sexual harassment includes a variety of behaviors, including but not limited to:

- Unwanted sexual advances;
- Offering employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct such as leering, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, or posters;
- Verbal conduct such as making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about any employee's body or dress;
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, or suggestive or obscene letters, notes, or invitations;
- Physical conduct such as touching, assault, or impeding and/or blocking movements;

- Retaliation for reporting harassment or threatening to report harassment.
- Sexual harassment on the job is unlawful whether it involves coworker harassment, harassment by a manager, or harassment by persons doing business with or for the Company, such as clients, customers or vendors.

Complaint Procedure for all Equal Employment Opportunity Policy and Anti-Harassment Policy Complaints

Anyone who feels that he or she has been subjected to harassment or discrimination in violation of the Equal Employment Opportunity or Anti-Harassment policies should immediately provide a complaint, preferably written, to Michael Boyd, Kate Brewer and/or Jamie Wells. Your complaint should provide details of the incident or incidents, including dates of occurrences, names of the individual(s) involved and names of any witness(es) or other person who may be able to provide additional information. All employees should report conduct that they observe and in good faith believe to constitute harassment or discrimination in violation of these policies.

Every report of perceived harassment or discrimination will be promptly and thoroughly investigated and reviewed by Michael Boyd, Kate Brewer and/or Jamie Wells and depending on the circumstances, will be brought to the attention of Company Management. These matters will be handled with care, sensitivity, objectivity and confidentiality (to the fullest extent possible). If a complaint is either against one of these individuals or made by one of them, the other members will investigate and review the complaint. All employees must fully cooperate with any investigative procedure and failure to do so may lead to disciplinary action. Confidentiality will be maintained where appropriate but cannot be guaranteed.

No Retaliation

The Company strictly prohibits any type of retaliation against an individual who in good faith raises a complaint or concern regarding discrimination or harassment in violation of the Equal Employment Opportunity or Anti-Harassment policies, otherwise opposes discrimination or harassment in violation of these policies, reports a violation of this policy, participates in an investigation, files a charge or complaint of discrimination or harassment in violation of these policies with an appropriate government agency or court, participates in an investigation or proceeding related to discrimination or harassment in violation of these policies conducted by an appropriate government agency or court, or otherwise engages in protected activity under the law.