

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.

Additional information on how Academy protects employees against discrimination and harassment, and how harassment can be reported, is included in the separate Anti-Harassment Policy which can be found on the Shared Drive or obtained from Human Resources.

Employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of the Equal Employment Opportunity Officer ("EEOO") who 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 and the Company's culture of compliance means the Company hope employees will raise their hand whenever they observe a breach of Company policy. Violations 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.

Academy affirms that it will comply with all federal, state and local laws and regulations relating to equal employment opportunities. The Company shall continue to work cooperatively with government and community organizations 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 the EEO Officer or head of Human Relations.