



Eagle Radio EEO Compliance Report

June 1, 2014

A PRIMER ON

EEO COMPLIANCE



ATTACHMENT A
(EEO PUBLIC FILE REPORT)

EEO PUBLIC FILE REPORT

For the 12-month Period Ending May 31, 2014

Prepared By: Keweenaw Bay Indian Community
(License/Permittee)

This report covers the following employment unit:

<u>Call Sign</u>	<u>Facility ID Number</u>	<u>Type of Station</u>	<u>Location City, State</u>	<u>LMA</u>
WCUP	36092	FM Station	Baraga, MI	
WGLI	38128	FM Station	Baraga, MI	

A. The following is a list of all vacancies for full-time jobs during the previous 12 months:

<u>Job Title</u>	<u>Date of Opening</u>	<u>Date Filled</u>
Internal Sales Specialist	06/06/2013	Open
Account Executive/Sales	06/06/2013	Open
Board Operator	06/06/2013	Open
Internal Sales Specialist	06/06/2013	Open
Board Operator	09/23/2013	NOT FILLED
Board Operator	10/24/2013	12/07/2014
Board Operator	02/10/2014	03/08/2014
Account Executive/Sales	06/06/2013	03/11/2014
Account Executive/Sales	06/06/2013	04/28/2014
Shopping Show Co-Host	06/13/2013	6/13/2013

B. During the previous 12 months, the following recruitment sources were contacted as vacancies for full-time jobs opened. Those with an asterisk (*) were organizations that requested to be contacted as job openings occurred:

	<u>Recruitment Source</u>	<u>Address</u>	<u>Person</u>	<u>Contact Telephone Number</u>
1.	Keweenaw Bay Indian Community	16429 Beartown Road Baraga, MI 49908	Hope Laramore Personnel Director	906-353-6623
2.	Tribal Employment Rights Office	16429 Beartown Road Baraga, MI 49908	Melissa Koepp TERO/Workforce Director	906-353-6623
3.	Michigan Works	Houghton, MI 49931	Gerry Michaelson	906-482-6916
4.	Michigan Works	Marquette, MI 49855		906-228-3075
5.	Eagle Radio	805B US 41 S. Baraga, MI 49908	Ed Janisse/ General Manager	906-353-9287
6.	L'Anse Sentinel	202 N. Main L'Anse, MI 49946	Barry Drue Advertising Manager	906-524-6194
7.	Mining Gazette	206 Shelden Houghton, MI 49931	Ray Gronveldt Account Executive	906-482-1500
8.	Mining Journal	249 W. Washington Marquette, MI 49855	Joe Drozd Account Executive	906-228-2500
9.	KBIC Web Site	16429 Beartown Road Baraga, MI 49908	Thomas Chosa IT Manager	906-353-6623
10.	Michigan Association Of Broadcasters	819 N. Washington Ave Lansing, MI 48906	mab@michmab.com	517-484-7444
11.	Ohio Center for Broadcasting	9000 Sweet Valley Drive Cleveland, OH 44125	Dan Smith	216-447-9117

B. The following is a list of the sources for full-time jobs shown in Section A above and the recruitment source which provided the hire for that position:

<u>Job Title</u>	<u>Recruitment Source</u>
Internal Sales Specialist	1,2,3,4,5,6,9
Account Executive/Sales	1,2,3,4,5,6,9
Board Operator	1,2,3,4,5,6,9,10, 11
Board Operator	1,2,3,4,5,6,9
Board Operator	1,2,3,4,5,6,9
Account Executive/Sales	1,2,3,4,5,6,9
Account Executive/Sales	1,2,3,4,5,6,9
Shopping Show Co-Host	1

. During the previous 12 months, there were a total of 13 people interviewed for vacancies for full-time positions. The following is a list of the total number of interviewees referred by each recruitment source shown in Section B above:

<u>Recruitment Source</u>		<u>Total No. of Interviewees</u>	
1	NOT INDICATED	0	Internal Sales Specialist
2	NOT INDICATED	1	Account Executive/Sales
3	EAGLE RADIO	0	Board Operator
4	EAGLE RADIO	2	Board Operator
5	KBIC	2	Board Operator
6	EAGLE RADIO	1	Account Executive/Sales
7	EAGLE RADIO	1	Account Executive/Sales
8	EAGLE RADIO	1	Shopping Show Co-Host

E. During the last 12 months, the station employment unit engaged in the following (menu option) initiatives (provide full details, including an explanation if not such initiatives were conducted during the period involved):

Prong 3 Menu Option

Prong 1 Position announcements distributed to 11 referral sources listed in Section B of this report. Position announcements also distributed to representatives and/or career offices of 8 colleges, and 24 Tribal/Inter-Tribal organizations.

Prong 2 Michigan Works, Tribal Employment Rights Office, local college Career Development offices, see item #1.

Prong 3 L'Anse Area Schools Career Fair organized by Frank Taddeucci Business Teacher at L'Anse Area Schools invited Eagle Radio to be represented at the Career Fair on November 8, 2013 from 11am to 3pm with students arriving to visit each table starting at Noon.

Our Sales Manager John Preston arrived at 11am and called in the following remote broadcast interview to the stations for air:

Taxidermy: Jim Ballor – 2 minute interview regarding careers in taxidermy

Indian Country Sports: Steve Koski – 2 minute interview regarding careers in recreational sports equipment and small business ownership

WLUC TV 6 – Shawn Householder – 2 minute interview regarding careers in Broadcast television specifically about the schooling required to become a meteorologist

Edward Jones – Mike Ostermeyer – 2 minute interview regarding careers in financial services

John also called in a series of three more 2 minute interviews of L’Anse High School Students regarding their specific career interests and which career table they visited. After the live remotes to the studios, then set up the broadcasting head sets and invited students to converse with me through the sport mix while I answered their questions about careers in radio broadcasting.

John signed approximately 100 student cards as evidence to their teachers that they discussed a broadcasting career with Eagle Radio.

This year’s career fair has tripled in size since the first one three years ago.

Our membership in the Michigan Association of Broadcasters supports their job bank and information disseminated about careers in broadcasting. *(menu item 6)*

Our upper-level job postings are listed on the MAB job bank when they become available. *(menu item 12)*

Outreach through Michigan Works, Tribal Employment Rights Office. *(menu item 6)*

Advertisement and assisted in recruitment of a number of job postings for Board Operator, Account Executive/Sales, Internal Sales Specialist. *(menu item 6)*

FCC Form 396

Exhibit 3 – Narrative Statement

It is the policy of The Keweenaw Bay Indian Community and WCUP / WGLI Eagle Radio to provide equal employment opportunity to all qualified individuals without regard to their race, color, religion, national origin, age, sex, marital status, disability, military status, citizenship, or any other legally protected status in accordance with applicable local, state, and federal law.

WCUP / WGLI Eagle Radio widely disseminates information on each of our vacancies to outlets which will reach a diverse audience of qualified individuals. All applications are carefully reviewed by the of The Keweenaw Bay Indian Community Human Resources Department for information that could reveal age, race, religion, national origin, color, marital status, disability, military status, or citizenship before the applications are provided to search committee members. For each vacancy at WCUP / WGLI Eagle Radio Stations, a search committee

composed of a mix of Station personnel at different levels of authority is convened to review applications and choose applicants to interview. Interviews are performed both in a group setting and individually.

Once hired, The Keweenaw Bay Indian Community Human Resources Department and WCUP / WGLI Eagle Radio Stations provide professional development and advancement opportunities to its employees by allowing them the opportunity to attend classes at The Keweenaw Bay Ojibwa Community College, which is owned by the Keweenaw Bay Indian Community. The Keweenaw Bay Indian Community Human Resources Department focuses on excellence in job performance, responsiveness to The Keweenaw Bay Indian Communities Strategic Plan along with the communities' goals and vision. The Keweenaw Bay Indian Community Human Resources Department provides new and/or continuing refresher Management training sessions in all aspects of Safety, Administrative, Employee and Professional development. WCUP / WGLI Eagle Radio also provide career counseling and coaching to station staff.

Name of Respondent: Hope E. Laramore

Signed:

Typed Name: Hope E. Laramore

Title: Personnel Director, Keweenaw Bay Indian Community

Date: 5-31-2014

Telephone No. 906-353-6623, ext.4176

ATTACHMENT B
(EEO REPORT FORM - INTERNAL USE)

EEO REPORT FORM

Information for Applicants for EAGLE RADIO

Dear Applicant:

We sincerely appreciate your interest in employment with Eagle Radio, owned and operated by the Keweenaw Bay Indian Community.

The Federal Communications Commission requires broadcast licensees to keep records and file reports regarding employment applications and inquires of resume's received.

To assist us in fulfilling that requirement, would you please take a moment to fill out the brief questionnaire below and return it to us. This information is voluntary and is strictly for our required posting purposes. It has no bearing whatsoever on your qualifications for employment and will not result in any adverse personnel action against you. THIS INFORMATION WILL NOT BE ATTACHED TO YOUR APPLICATION FOR EMPLOYMENT OR RESUME AND WILL NOT BE AVAILABLE TO THOSE EMPLOYEES WHO WILL BE CONSIDERING YOU FOR EMPLOYMENT.

We would appreciate your assistance. If this form has been mailed to you, a self-addressed return envelope is enclosed for your convenience.

Please fill out this portion and return to us. Thank you.

Please print or type.

Name: _____

Address: _____

Position sought: _____

Referred by: _____

This information is for required Federal Communications Commission reporting purposes and has no bearing on your qualifications for employment

ATTACHMENT C
(HIRINGS FORM)

HIRINGS FORM

Date: 06/13/2013

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title Shopping Show Co-Host FCC Job Category _____

Person Hired JA Date Hired 6/13/2013

Referral Source EAGLE RADIO

Other Applicants Considered (List all applicants for this opening and use additional sheet if necessary).

- 1. _____ Referral Source _____
- 2. _____ Referral Source _____
- 3. _____ Referral Source _____
- 4. _____ Referral Source _____
- 5. _____ Referral Source _____
- 6. _____ Referral Source _____
- 7. _____ Referral Source _____
- 8. _____ Referral Source _____
- 9. _____ Referral Source _____
- 10. _____ Referral Source _____
- 11. _____ Referral Source _____
- 12. _____ Referral Source _____

Other Referral Sources Contacted TERO ; KBIC ;
_____; _____;

HIRINGS FORM

Date: 06/06/2013 -05/31/2014

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title Account Executive/Sales FCC Job Category _____

Person Hired NO HIRE Date Hired N/A

Referral Source N/A

Other Applicants Considered (List all applicants for this opening and use additional sheet if necessary).

14. JE Referral Source TERO

15. JT Referral Source Michigan Works

16. JE Referral Source Michigan Works

17. WSS Referral Source KBIC

18. BF Referral Source Michigan Works

19. LR Referral Source Michigan Works

20. KW Referral Source Michigan Works

21. _____ Referral Source _____

22. _____ Referral Source _____

23. _____ Referral Source _____

24. _____ Referral Source _____

25. _____ Referral Source _____

26. _____ Referral Source _____

Other Referral Sources Contacted TERO ; KBIC Website ; RAB; MAB

L'Anse Sentinel ; Mining Gazette ; List of 40 recruitment sources.

HIRINGS FORM

Date: 10/24/2013 - 11/27/2013

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title Board Operator FCC Job Category _____

Person Hired CB & MU Date Hired 12/07/2013

Referral Source KBIC

Other Applicants Considered (List all applicants for this opening and use additional sheet if necessary).

1. CB Referral Source KBIC

2. MU Referral Source KBIC

3. NT Referral Source Michigan Works

4. GBG Referral Source Michigan Works

5. MA Referral Source KBIC

6. EH Referral Source KBIC

7. JE Referral Source Michigan Works

8. WSS Referral Source L'Anse Sentinel

9. CM Referral Source L'Anse Sentinel

10. _____ Referral Source _____

11. _____ Referral Source _____

12. _____ Referral Source _____

13. _____ Referral Source _____

Other Referral Sources Contacted TERO ; KBIC Website ; RAB; MAB
L'Anse Sentinel ; Mining Gazette ; List of 40 recruitment sources.

HIRINGS FORM

Date: 02/10/2014 - 02-25-2014

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title Board Operator FCC Job Category _____

Person Hired JS Date Hired 3/8/2014

Referral Source KBIC

Other Applicants Considered (List all applicants for this opening and use additional sheet if necessary).

1. BK Referral Source NOT INDICATED

2 JS Referral Source TERO

3 NS Referral Source KBIC

4 BL Referral Source TERO

5 _____ Referral Source _____

6 _____ Referral Source _____

7 _____ Referral Source _____

8 _____ Referral Source _____

9 _____ Referral Source _____

10 _____ Referral Source _____

11 _____ Referral Source _____

12 _____ Referral Source _____

13 _____ Referral Source _____

Other Referral Sources Contacted TERO ; KBIC Website ; RAB; MAB

L'Anse Sentinel ; Mining Gazette ; List of 40 recruitment sources.

HIRINGS FORM

Date: 06/06/2013 -05/31/2014

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title Account Executive/Sales FCC Job Category _____

Person Hired JH Date Hired 3/11/2014

Referral Source Eagle Radio

Other Applicants Considered (List all applicants for this opening and use additional sheet if necessary).

27. JE Referral Source TERO

28. JT Referral Source Michigan Works

29. JE Referral Source Michigan Works

30. WSS Referral Source KBIC

31. BF Referral Source Michigan Works

32. LR Referral Source Michigan Works

33. KW Referral Source Michigan Works

34. JH Referral Source Eagle Radio

35. _____ Referral Source _____

36. _____ Referral Source _____

37. _____ Referral Source _____

38. _____ Referral Source _____

39. _____ Referral Source _____

Other Referral Sources Contacted TERO ; KBIC Website ; RAB; MAB

L'Anse Sentinel ; Mining Gazette ; List of 40 recruitment sources.

HIRINGS FORM

Date: 06/06/2013 -05/31/2014

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title Account Executive/Sales FCC Job Category _____

Person Hired AS Date Hired 04/28/2014

Referral Source Eagle Radio

Other Applicants Considered (List all applicants for this opening and use additional sheet if necessary).

40. JE Referral Source TERO

41. JT Referral Source Michigan Works

42. JE Referral Source Michigan Works

43. WSS Referral Source KBIC

44. BF Referral Source Michigan Works

45. LR Referral Source Michigan Works

46. KW Referral Source Michigan Works

47. AS Referral Source Eagle Radio

48. _____ Referral Source _____

49. _____ Referral Source _____

50. _____ Referral Source _____

51. _____ Referral Source _____

52. _____ Referral Source _____

Other Referral Sources Contacted TERO ; KBIC Website ; RAB; MAB

L'Anse Sentinel ; Mining Gazette ; List of 40 recruitment sources.

ATTACHMENT D

APPLICANT INTERVIEWS

<u>Position</u>	<u>Name of Applicant</u>	<u>Date Job Posted</u>	<u>Responded/ Interviewed</u>	<u>Referral Source</u>	<u>Disposition</u>
INTERNAL SALES SPECIALIST	WSS MSS	6/6/2013	NO INTV NO INTV	KBIC KBIC	NO HIRE NO HIRE
ACCOUNT EXECUTIVE/SALES	JE JT JE WSS BF LR KW	6/6/2013	NO INTV NO INTV NO INTV NO INTV NO INTV NO INTV NO INTV	TERO MICH WORKS MICH WORKS KBIC MICH WORKS MICH WORKS MICH WORKS	NO HIRE NO HIRE NO HIRE NO HIRE NO HIRE NO HIRE NO HIRE
BOARD OPERATOR	JA CS EL AC VR	06/06/2013	NO INTV NO INTV NO INTV NO INTV NO INTV	NOT INDICATED MICH WORKS MICH WORKS NOT INDICATED NOT INDICATED	NO HIRE NO HIRE NO HIRE NO HIRE NO HIRE
BOARD OPERATOR	CB MU NT GBG MA EH JE WSS CM	10/24/2013	INTV INTV NO INTV NO INTV NO INTV NO INTV NO INTV NO INTV NO INTV	KBIC KBIC MICH WORKS MICH WORKS KBIC KBIC MICH WORKS L'Anse Sentinel L'Anse Sentinel	HIRED 12/7/2013 HIRED 12/7/2013 NO HIRE NO HIRE NO HIRE NO HIRE NO HIRE NO HIRE NO HIRE
BOARD OPERATOR	BK JS NS BL	02/10/2014	INTV INTV NO INTV NO INTV	NOT INDICATED TERO KBIC TERO	DECLINED HIRE 3/8/2014 NO HIRE NO HIRE
ACCOUNT EXECUTIVE/SALES	JE JT JE WSS BF LR KW JH	06/06/2013	NO INTV NO INTV NO INTV NO INTV NO INTV NO INTV NO INTV INTV	TERO MICH WORKS MICH WORKS KBIC MICH WORKS MICH WORKS MICH WORKS EAGLE RADIO	NO HIRE NO HIRE NO HIRE NO HIRE NO HIRE NO HIRE NO HIRE HIRE 3/11/2014
ACCOUNT EXECUTIVE/SALES	WSS BF LR KW AS	06/06/2013	NO INTV NO INTV NO INTV NO INTV INTV	KBIC MICH WORKS MICH WORKS MICH WORKS EAGLE RADIO	NO HIRE NO HIRE NO HIRE NO HIRE HIRE 4/28/2014

Shopping Show Co-Host	JA	6/13/2013	NO INTV	EAGLE RADIO	HIRE 6/13/2013
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ATTACHMENT E
(NEW HIRE REPORT)

NEW HIRE EEO REPORT

Person Hired: JA

Date: 06/13/2014 Position: Shopping Show Co-Host

Status: Active Full-Time: _____ Part-Time: X

Date Job Posted 06/13/2013

Applicants Interviewed:

Total Number: 1

CHECK AND LIST RECRUITMENT SOURCES USED FOR THIS POSITION

 Newspaper (Specify) _____

X Recruitment Organizations (Specify) Eagle Radio, KBIC

X Referral from Employees Radio Employees

 Recruitment Educational Institutions (Specify) _____

 Internal Applicants

IF AN OFFER WAS MADE TO ANOTHER CANDIDATE WHO TURNED DOWN THE POSITION, PLEASE INDICATE BELOW:

Name: N/A

Name: N/A

LIST BELOW ALL REFERENCES CHECKED ON THE PERSON HIRED:

Name	Organization/Company
<u>EJ</u>	<u>FORMER EMPLOYER</u>
<u>JP</u>	<u>FORMER CO-WORKER</u>
<u>JW</u>	<u>FORMER CO-WORKER</u>

Prepared By: HEL Date: 06/13/2013

Reviewed By: HEL Date: 06/13/2013

NEW HIRE EEO REPORT

Person Hired: AS

Date: 04/28/2014 Position: Account Executive/Sales

Status: Active Full-Time: X Part-Time: _____

Date Job Posted 06/06/2013 - 05-31-2014

Applicants Interviewed:

Total Number: 1

CHECK AND LIST RECRUITMENT SOURCES USED FOR THIS POSITION

X Newspaper (Specify) L'Anse Sentinel; Mining Gazette

X Recruitment Organizations (Specify) Eagle Radio, KBIC Website

X Referral from Employees EAGLE RADIO

_____ Recruitment Educational Institutions (Specify) _____

_____ Internal Applicants

IF AN OFFER WAS MADE TO ANOTHER CANDIDATE WHO TURNED DOWN THE POSITION, PLEASE INDICATE BELOW:

Name: N/A

Name: N/A

LIST BELOW ALL REFERENCES CHECKED ON THE PERSON HIRED:

Name Organization/Company

RS SUPERVISOR

MB Adjunct Instructor

KF Friend

Prepared By: HEL Date: 4/23/2014

Reviewed By: HEL Date: 4/23/2014

NEW HIRE EEO REPORT

Person Hired: JS

Date: 03/08/2014 Position: Board Operator

Status: Active Full-Time: _____ Part-Time: X

Date Job Posted 02/10/2014 - 02/25/2014

Applicants Interviewed:

Total Number: 2

CHECK AND LIST RECRUITMENT SOURCES USED FOR THIS POSITION

X Newspaper (Specify) L'Anse Sentinel; Mining Gazette

X Recruitment Organizations (Specify) KBIC Website; Monster; MICH WORKS

X Referral from Employees EAGLE RADIO

X Recruitment Educational Institutions (Specify) MAB

 Internal Applicants

IF AN OFFER WAS MADE TO ANOTHER CANDIDATE WHO TURNED DOWN THE POSITION, PLEASE INDICATE BELOW:

Name: BK

Name: N/A

LIST BELOW ALL REFERENCES CHECKED ON THE PERSON HIRED:

Name	Organization/Company

Prepared By: HEL Date: 03/05/2014

Reviewed By: HEL Date: 03/05/2014

ATTACHMENT F
(LIST OF RECRUITMENT SOURCES)

LIST OF RECRUITMENT SOURCES
Date list last reviewed: 05/20/2014

1	Barry Drue	1-906-524-6197	L'Anse Sentinel
2	Ray Gronveldt	1-906-482-2726	Mining Gazette
3	Gerry Michaelson	1-906-482-5711	Michigan Works
4	MQT MI Works	1-906-228-4372	Michigan Works
5	Joe Drozd	1-906-228-3273	Mining Journal
6	Bad River Tribe	1-715-682-7118	Human Resources
7	Bay de Noc Community College	1-906-786-6555	Human Resources
8	Bay de Noc Community College	1-906-217-1623	Employment Services
9	Bay Mills Indian Community	1-906-248-3876	Human Resources
10	Forest County Potawatomi	1-715-478-7215	Human Resources
11	Finlandia University	1-906-487-7567	Career Services
12	GLIFWC	1-715-682-9294	Main Office
13	Grand Traverse Band	1-231-534-7904	Human Resources
14	Gun Lake Tribe	1-616-681-8836	Human Resources
15	Hannahville Government	1-906-466-0307	Human Resources
16	Ho-Chunk Nation	1-715-284-7582	Human Resources
17	Inter-Tribal Council	1-906-253-1893	Human Resources
18	Lac Courte Oreilles Tribe	1-715-634-4797	Human Resources
19	Lac du Flambeau Tribe	1-715-588-9131	Human Resources
20	Lac Vieux Desert	1-906-358-4913	Human Resources
21	Lake Superior State University	1-906-635-2111	Human Resources
22	Lake Superior State University	1-906-635-7564	Career Services
23	Little River Band of Ottawa	1-231-398-9101	Human Resources
24	Little Traverse Bay	1-231-242-1565	Human Resources
25	NMU Center Native American Studies	1-906-227-1396	
26	Michigan Tech University	1-906-487-3220	Human Resources
27	Michigan Tech Career Center	1-906-487-3101	Career Services
28	MICWA	1-517-393-0838	
29	Northern Michigan University	1-906-227-2807	Career Services
30	Nottawaseppi Huron Potawatomi	1-269-729-4650	Human Resources
31	Oneida Career Center	1-920-496-7879	Career Services
32	Pokagon Band of Potawatomi	1-269-782-6682	Human Resources
33	Sault Tribe	1-906-635-4918	Human Resources
34	Sag Chips	1-989-775-5601 1-715-478-7662	Human Resources
35	Sokaogon Chippewa Tribe		Human Resources
36	St. Croix Tribe	1-715-349-7483	Human Resources
37	Stockbridge Munsee Tribe	1-715-793-4380	Human Resources
	Broadcasting Only		
38	Ohio Center for Broadcasting	1-303-937-0386	
39	Michigan Association of Broadcasters	1-517-484-5810	www.michMAB.com
40	Media Line	1-831-648-5204	www.MediaLine.com
	Specs Howard School of Broadcast Arts		

Updated 05/20/2014

Attachment F)

ATTACHMENT H
(MODEL SEXUAL HARASSMENT STATEMENT)

SEXUAL HARASSMENT POLICY STATEMENT

Statement of Philosophy

The Company is proud of its tradition of a collegial work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere which promotes equal opportunities and prohibits discriminatory practices, including sexual harassment. At the Company, sexual harassment, whether verbal, physical or environmental, is unacceptable and will not be tolerated.

Definition of Sexual Harassment

For purposes of this policy, sexual harassment is defined as unwelcome or unwanted conduct of a sexual nature (verbal or physical) when; 1) submission to or rejection of this conduct by an individual is used as a factor in decisions affecting hiring, evaluation, promotion, or other aspects of employment; or 2) this conduct substantially interferes with an individual's employment or creates an intimidating, hostile or offensive work environment.

Examples of sexual harassment include, but are not limited to: unwanted sexual advances; demands for sexual favors in exchange for favorable treatment or continued employment; repeated sexual jokes; flirtations, advances or propositions; verbal abuse of a sexual nature; graphic, verbal commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling, touching, pinching, assault, coerced sexual acts or suggestive insulting, obscene comments or gestures; display in the workplace of sexual suggestive objects or pictures.

This behavior is unacceptable in the workplace itself and in other work-related settings such as business trips and business-related social events.

Individuals Covered Under the Policy

This policy covers all employees (professionals, assistants, support staff) and officers and owners. The Company will not tolerate, condone or allow sexual harassment, whether engaged in by fellow employees, supervisors, associates, officers or by outside clients, consultants, contractors or other non-employees who conduct business with the Company. The Company encourages reporting of all incidents of sexual harassment, regardless of who the offender may be.

Reporting a Complaint

Any employee who believes that the actions or words of any Company officer, fellow employee, or other person described above constitutes harassment should report the offending action to your immediate supervisor, or to one of the officers appointed to handle sexual harassment complaints, as soon as possible. Currently, the officers appointed to handle sexual harassment complaints are *Edmund Janisse, Eagle Radio General Manager* and *Hope E. Laramore, Personnel Director*.

Investigating a Complaint

All complaints will be investigated by two officers or supervisors or by a single officer and an outside attorney retained by the Company. The investigating officer(s) will generally include at least one of the officers appointed by the Company to handle sexual discrimination complaints. In

the interest of impartiality, the officer who receives the complaint may, if warranted, as the Company to appoint a different officer or officers to investigate the complaint.

The investigating officers will question both sides thoroughly and will interview all witnesses identified by either side. All respondents will be asked to document their responses and the investigating officers will attempt wherever possible to verify the accuracy of responses. In addition, all participants in the investigation will be informed that their cooperation and confidentiality are required.

Investigations will be conducted as discreetly as possible and information about the complaint and the investigation will be considered confidential.

Resolving a Complaint

Once the investigation is completed, the investigating officers will evaluate the evidence and decide in a timely manner whether the alleged conduct occurred and whether the conduct violated the Company's sexual harassment policy. In accordance with this decision, the investigating officers will recommend to the Company proper remedial action.

Proper remedial action includes both disciplinary action when warranted and other actions designed to prevent further occurrences of sexual harassment. Employees found to have engaged in the harassment of other employees will be subject to appropriate disciplinary action, depending on the circumstances, up to and including termination.

A written report of the findings of the investigation and any remedial actions to be taken will be provided to both sides.

Retaliation against any employee for filing a complaint or participating in an investigation is strictly prohibited.