



Eagle Radio EEO Compliance Report

June 1, 2015

A PRIMER ON

EEO COMPLIANCE



ATTACHMENT A
(EEO PUBLIC FILE REPORT)

EEO PUBLIC FILE REPORT

For the 12-month Period Ending May 31, 2015

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	06/01/2014	Open
Account Executive/Sales	06/01/2014	Open
Board Operator	06/01/2014	Open
Board Operator	08/03/2014	08/18/2014
Internal Sales Specialist	09/01/2014	09/15/2014

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/Debra Picciano 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
Internal Sales Specialist	1,2,3,4,5,6,9

. 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	3	Internal Sales Specialist
2	NOT INDICATED	1	Account Executive/Sales
3	EAGLE RADIO	0	Board Operator
4	KBIC	2	Board Operator
5	EAGLE RADIO	2	Account Executive/Sales

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 N/A

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.

Report on the Keweenaw Job Fair

Sponsored by: Michigan Works Collegiate Entrepreneurs Organization

Date: April 7, 2015

Location: in the Finlandia University, Finnish American Heritage Center, Quincy Street, Hancock, MI.

Eagle Radio was the only radio represented at this fair. Eagle Radio did remote broadcasts 2 breaks an hour for 3 hours to let our listeners know that there were 32 different businesses present at the job fair that were taking application for hire for part time, seasonal, and full time work. I interviewed Superior National Bank, Garden View Assisted Living, Cypress Manor, Somero, Inc., L'Anse Manufacturing, ReMax/Douglass, The Pines Resort, McClain State Park and Van Riper State Park on air about their positions. I also did two breaks, opening and closing alone to inform the listeners about

all the details of the fair. Between remote, I spoke with 3 people who were interested in working for Eagle Radio. I referred them to the kbic-nsn.gov website personnel page and told them to complete an application by downloading the application and submitting it to the personnel department at the K.B.I.C Tribal Center on Beartown Road in Baraga. I have noted that the attendance at the Keweenaw Job Fair was down this year from last year. In discussion with the organizers, the attendance issue may be due to the new location. Last year it was in the Juitla Center on Michigan Avenue in Hancock.
Respectfully submitted,

John Preston, Sales Manager.

L'Anse Career Fair
L'Anse High School Gymnasium
November 25, 2014

Eagle Radio was invited back again for the 4th year in a row to participate in the Career Fair that L'Anse High School puts on for its students

I was one of over 60 different businesses and organizations that had a table at the Career Fair. The Career Fair hours were from 1pm to 3pm and hundreds of students attended the Fair.

I did 2 remote breaks per hour for a total of 6 on Eagle Radio. I interviewed 4 students who were interested in a career in radio.

TV6 had the table next to mine and aired footage of my student interviews in their evening newscast.

Respectfully submitted,

John Preston, Sales Manager

Name of Respondent: Hope E. Laramore

Signed:

Typed Name: Hope E. Laramore

Title: Personnel Director, Keweenaw Bay Indian Community

Date: 5-31-2015

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: 06/01/2014 - Open Continuous

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title Internal Sales Specialist 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).

- | | | | |
|-----|------------|-----------------|-------------|
| 1. | <u>WSS</u> | Referral Source | <u>KBIC</u> |
| 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 | _____ |
| 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: 06/01/2014 -Open Continuous

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title Account Executive/Sales FCC Job Category _____

Person Hired KC Date Hired 04/27/2015

Referral Source N/A

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

14. KC Referral Source KBIC

15. TK Referral Source Michigan Works

16. KM Referral Source Michigan Works

17. KW Referral Source KBIC

18. _____ Referral Source _____

19. _____ Referral Source _____

20. _____ Referral Source _____

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: 06/01/2014 -Open Continuous

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title Board Operator FCC Job Category _____

Person Hired N/A Date Hired N/A

Referral Source N/A

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

- 1. JA Referral Source NOT INDICATED
- 2. CS Referral Source Michigan Works
- 3. EL Referral Source Michigan Works
- 4. AC Referral Source NOT INDICATED
- 5. _____ Referral Source _____
- 6. _____ Referral Source _____
- 7. _____ Referral Source _____
- 8. _____ Referral Source _____
- 9. _____ Referral Source _____
- 10. _____ Referral Source _____

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

HIRINGS FORM

Date: 08/03/2014- 08/18/2014

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title Board Operator FCC Job Category

Person Hired N/A Date Hired N/A

Referral Source N/A

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

11. JA Referral Source NOT INDICATED

12. CS Referral Source Michigan Works

13. EL Referral Source Michigan Works

14. AC Referral Source NOT INDICATED

15. Referral Source

16. Referral Source

17. Referral Source

18. Referral Source

19. Referral Source

20. Referral Source

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

HIRINGS FORM

Date: 09/01/2014 - 09/15/2014

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title Internal Sales Specialist FCC Job Category _____

Person Hired N/A Date Hired N/A

Referral Source N/A

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

1. MSS Referral Source KBIC

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 _____

13 _____ 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)

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	06/01/2014	NO INTV	KBIC	NO HIRE
ACCOUNT EXECUTIVE/SALES	KC KT KM KW	06/01/2014	INTV NO INTV NO INTV NO INTV	KBIC MICH WORKS MICH WORKS KBIC	HIRE NO HIRE NO HIRE NO HIRE
BOARD OPERATOR	JA CS EL AC	06/01/2014	NO INTV NO INTV NO INTV NO INTV	NOT INDICATED MICH WORKS MICH WORKS NOT INDICATED	NO HIRE NO HIRE NO HIRE NO HIRE
BOARD OPERATOR	JA CS EL AC	08/03/2014	NO INTV NO INTV NO INTV NO INTV	NOT INDICATED MICH WORKS MICH WORKS NOT INDICATED	NO HIRE NO HIRE NO HIRE NO HIRE
INTERNAL SALES SPECIALIST	MSS	06/01/2014	NO INTV	KBIC	NO HIRE

ATTACHMENT E
(NEW HIRE REPORT)

NEW HIRE EEO REPORT

Person Hired: SL

Date: 09/05/2014 Position: Account Executive/Sales

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

Date Job Posted 06/01/2014 - Open Continuous

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) 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

AT Friend

PY Friend

JH Friend

Prepared By: HEL Date: 9/4/2014

Reviewed By: HEL Date: 9/4/2014

NEW HIRE EEO REPORT

Person Hired: NK

Date: 10/01/2014 Position: Account Executive/Sales

Status: Inactive Full-Time: X Part-Time:

Date Job Posted 06/01/2014 - Open Continuous

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) 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
------	----------------------

TS	Supervisor
----	------------

KP	Co-Worker
----	-----------

WC	Pastor
----	--------

Prepared By: HEL Date: 9/4/2014

Reviewed By: HEL Date: 9/4/2014

NEW HIRE EEO REPORT

Person Hired: KC

Date: 04/27/2015 Position: Account Executive/Sales

Status: Inactive Full-Time: X Part-Time:

Date Job Posted 06/01/2014 - Open Continuous

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
------	----------------------

DG	Co-Worker
----	-----------

IS	Co-Worker
----	-----------

CB	Co-Worker
----	-----------

Prepared By: HEL Date: 3/18/2015

Reviewed By: HEL Date: 3/18/2015

**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.