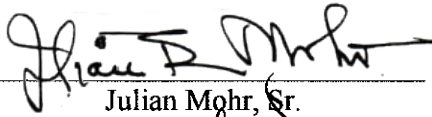


AFFIRMATIVE ACTION PLAN
INDIVIDUALS WITH DISABILITIES
AND
COVERED VETERANS & DISABLED VETERANS

MOMAR, INC.
1830 ELLSWORTH INDUSTRIAL DRIVE
ATLANTA, GA 30318

Revised and Updated Annually

November 1, 2013 – October 31, 2014

Approved by: 
Julian Mohr, Sr.
CEO

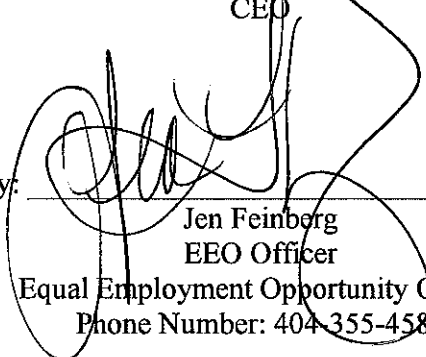
Approved by: 
Jen Feinberg
EEO Officer
Equal Employment Opportunity Officer
Phone Number: 404-355-4580

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Confidentiality Statement

This Affirmative Action Plan contains confidential information subject to the provisions of Title 18 U.S.C. §1905.

Momar, Inc. does not consent to the release of any confidential information whatsoever contained in the Affirmative Action Plan under the Freedom of Information Act or otherwise. If the Government, or any agency or division thereof, is considering a request for release of this Program under the Freedom of Information Act, we hereby request that the Government immediately notify Momar, Inc. of any and all Freedom of Information Act requests and any contemplated release of this Plan by the Government.

The Organization further requests that everyone who has any contact with this Affirmative Action Plan, or its supporting appendices, documents, and other data, treat such information as totally confidential and that such information not be released to any person whatsoever.

Statement of Purpose

This plan is written with the intention of meeting the requirements of a contractor's obligations with Section 503 of the Rehabilitation Act of 1973, as amended.

This plan is presented in recognition of the rights of employees and applicants for employment to be treated on a nondiscriminatory basis. The Organization recognizes its obligation to take affirmative action to employ and advance qualified disabled individuals. The Organization's purpose in adopting this Affirmative Action Plan is to utilize persons with disabilities to their full potential in all levels of the organization.

Affirmative Action Policy

It is the policy of Momar, Inc. not to discriminate against any employee or applicant for employment because he or she has a physical or mental disability in regard to any position for which the employee or applicant for employment is qualified. The Organization agrees to take affirmative action to employ, advance in employment, and otherwise treat qualified individuals without discrimination based upon their physical or mental disability in all employment practices including the following: employment, promotion, termination, compensation, demotion or transfer, recruiting, advertising, layoff or termination, and selection for training. In carrying out this Affirmative Action Program, the Organization will make a good faith effort to reasonably accommodate the physical or mental limitations of any employee or applicant for employment unless such accommodation would impose undue hardship on the conduct of the business.

An "individual with disabilities" is defined to be a person who:

- Has a physical or mental impairment which substantially limits one or more of his or her major life activities,

- Has a record of such impairment, or
- Is regarded as having such impairment.

For purposes of this definition, an individual with disabilities is substantially limited if he or she is likely to experience difficulty in securing, retaining, or advancing employment because of a disability.

The terms "handicapped" and "disabled" are intended to have the same meaning within this Plan.

The Equal Employment Opportunity Officer has the ultimate responsibility for ensuring that equal employment opportunity and affirmative action receive the high level of priority due this activity.

To carry out the letter as well as the spirit of our Equal Employment Opportunity / Affirmative Action Program, the Organization has appointed Jen Feinberg as the Equal Employment Opportunity Officer. She will spearhead the commitment to maximize equal employment opportunity and affirmative action at Momar, Inc. The EEO Officer has the full support of the CEO in carrying out these duties.

Specifically, the EEO Officer is responsible for ensuring that the following activities are carried out:

- Keeping management up-to-date concerning new developments in the EEO field.
- Providing technical assistance in response to questions and concerns of employees and supervisors, and, as needed, acting as liaison with appropriate agencies.
- Coordinating investigations and making recommendations concerning any allegations of discrimination both internally and in connection with enforcement agencies.
- Conducting periodic audits and holding regular discussions with supervisors and managers to ensure that organization policy is implemented.
- Encouraging involvement with organizations and community action groups.
- Assisting in the identification of problem areas through review of policies and procedures and conducting periodic utilization studies.
- Reporting periodically to the Senior Official on the affirmative action effort.
- Developing education programs to provide managers and supervisors with pertinent equal employment opportunity information to assist them in their compliance efforts.

It is further the policy of the Organization that employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in, or may engage, in any of the following activities:

- Filing a complaint;
- Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) or any other Federal, State or local law requiring equal opportunity for disabled persons;
- Opposing any act or practice made unlawful by Section 503 or its implementing regulations in this part or any other Federal, State or local law requiring equal opportunity for disabled persons; or
- Exercising any other right protected by Section 503 or its implementing regulations in this part.

Consistent with Momar, Inc.'s non-discrimination policy, harassment in the workplace in any form is not tolerated. Harassment of any kind, including sexual harassment, whether physical, verbal, visual or written, is strictly prohibited. Improper interference with the ability of Momar, Inc.'s employees to perform their expected job duties is not tolerated. Examples of unlawful employee harassment include jokes, slurs, sexually explicit or racially derogatory material, in addition to commentary that would offend others on the basis of race, color, religion, sex, national origin, disability, age, marital status, citizen status, sexual orientation, genetics, status as a disabled veteran or veteran of the wars, including Vietnam, or any other non-job-related protected characteristic or feature. Furthermore, the use of the Organization's internet or e-mail system for the purposes of displaying or transmitting offensive material is strictly prohibited.

Sexual harassment may also include unwelcome sexual advances, offensive touching, requests for sexual favors, showing sexually suggestive or explicit photos or objects, and all other conduct of a sexual or otherwise offensive nature, especially when:

- Submission to or rejection of such conduct is used as a factor in employment decisions (e.g. hiring, evaluation, promotion) affecting such individual; or
- Such conduct has the purpose or effect of interfering unreasonably with an individual's employment or creating an intimidating, hostile, or offensive working environment.

Employees who violate this policy are subject to disciplinary action up to and including immediate termination from employment with Momar, Inc.

Employees who believe that they are being harassed or discriminated against in any manner prohibited by this policy are encouraged to bring the matter directly to the attention of a member of management or the Human Resources Department. Management must immediately report any discrimination/harassment complaint or observation to the Human Resources Department.

The Organization will conduct an investigation of any complaint of inappropriate discrimination or harassment, and will take prompt remedial action where necessary. Confidentiality will be maintained throughout the investigation to the extent practical and appropriate under the circumstances.

The Organization will not retaliate against employees who make complaints or participate in investigations about workplace harassment or other discrimination. Retaliation is a form of discrimination and is strictly prohibited.

Affirmative Action Plan Coverage

Applicants and employees who believe themselves covered under this Affirmative Action Program for disabled individuals may advise the Organization at any time that they wish to benefit under this program.

This information will be used solely for the purpose of affirmative action and proper job placement. This information will not be used to exclude or otherwise limit the employment opportunities of qualified disabled individuals.

The Equal Employment Opportunity Officer is responsible for implementation of the EEO policy within the Organization. Jen Feinberg has been assigned the day-to-day responsibility for implementing the policy regarding individuals with disabilities. She has management's support to carry out the following responsibilities:

- Developing policy statements, Affirmative Action Programs, and internal and external communication techniques.
- Discussing with managers, supervisors, and employees the policy regarding individuals with disabilities to make certain that it is being followed.
- Advising managers and supervisors that they are obligated to prevent harassment of employees placed through affirmative action efforts and that their work performance is being evaluated on the basis of their affirmative action efforts and results, as well as on other criteria.

- Assisting in the identification of problem areas in the implementation of Affirmative Action Programs for individuals with disabilities and in the development of solutions, paying particular attention to the accommodation requirements.
- Designing and implementing an audit and reporting system that will measure the effectiveness of the Organization's program, determining the degree to which objectives have been accomplished, and indicating the need for remedial action.
- Determining whether employees with a known disability have had an opportunity to participate in Organization-sponsored activities.
- Serving as a liaison between Momar, Inc. and responsible organizations concerned with employment opportunities for individuals with disabilities.
- Serving as a liaison between Momar, Inc. and enforcement agencies.

Communication of Policy

The Organization takes the following steps to disseminate information on the Organization's policy on employment of disabled individuals to recruiting sources, applicants, supervisory and management personnel, and other employees:

- The Organization's policy is contained in the Policy & Procedure Manual and distributed to all employees.
- The EEO Officer holds periodic meetings with management and supervisory personnel to discuss the Organization's policy.
- Prospective employees are informed of the Organization's commitment to increase employment opportunities for qualified individuals with disabilities.
- Employees are made aware of the Organization's policy through a written policy statement posted throughout the Organization's facilities.
- The Organization has informed recruiting sources of this policy.
- Written notification of the Organization's policy of affirmative action to increase employment opportunities for qualified individuals with disabilities is sent to subcontractors, vendors, and suppliers, requesting appropriate action on their part.

Recruitment

The State Employment Service will be informed of the Organization's policy of nondiscrimination and affirmative action.

Personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related employment processes are aware of the Organization's commitment to affirmative action.

Momar, Inc. recruits applicants for employment on the basis of their demonstrated abilities and competence.

This policy is discussed in employee orientation and management meetings.

Compensation

When offering employment or promotions to an individual with disabilities, the Organization will not consider disability income, pension income, or other benefits received by the applicant or employee as relevant to determination of his/her salary. No deductions from Organization pay will be made for any other income of that nature.

Policy of Nondiscrimination

The Organization does not discriminate against any applicant or employee because of physical or mental disability provided that the applicant or employee is qualified for the position. The Organization's commitment to equal employment opportunity includes, but is not limited to the following areas: hiring, upgrading, transfer, recruitment or recruitment advertising, layoff or termination, all forms of compensation, selection for training, education or tuition assistance, seniority, and leaves of absence.

The Organization will ensure that the physical and mental job qualification requirements are related to the specific job or jobs for which the person is being considered and are consistent with business necessity and safe performance of the job.

Proper Consideration of Qualifications

All applicants applying for employment with the organization are invited to voluntarily identify themselves as disabled and indicate any reasonable accommodation that can be made to enable them to perform a job that they would not otherwise be able to do.

If a disabled applicant or employee is not selected for employment, promotion, or training, the reason for the non-selection is documented and maintained in the personnel file or with the application.

Whenever an accommodation is made for the hire, promotion, or training of a disabled individual, a description of the accommodation is documented and kept with the personnel file or with the application.

Accommodation of Physical and Mental Limitations of Employees

Momar, Inc. will try to reasonably accommodate the physical and mental limitations of qualified, disabled applicants or employees so as to ensure that each one is afforded equal opportunity for employment and advancement. In determining the degree of accommodations that may be reasonably undertaken, business necessity and expenses will be considered with such other related factors as: efficiency, health and safety, the essential functions of each specific job, etc. Each decision regarding accommodations will be determined on an individual basis.

The Organization will consider the following types of accommodation:

- **Architectural Modifications:** curb accessibility, entrance door accessibility, ramps, distance from parking lot to building entrance, restroom facilities which accommodate wheelchairs.
- **Work Environment Modifications:** lowered or raised work surfaces, special lighting, rearranged shelves, and hand-free phones.
- **Job Task Modifications:** sequencing changes, functional arrangements.
- **Equipment Modifications:** telephone equipped with amplifiers, altered controls to accommodate left or right hand or foot operation.

Development and Execution of Affirmative Action Programs

The Organization is committed to developing, executing, and maintaining an effective Affirmative Action Plan. In order to ensure this result, the Organization will use the following procedures:

- The Affirmative Action Plan for individuals with disabilities is made available to current and prospective employees.
- The total selection process including training and promotion is reviewed on an on-going basis to ensure freedom from bias regarding individuals with disabilities that limit their access to all jobs for which they are qualified.
- Approved position specifications are made available to all members of management involved in the recruiting, screening, selection, and promotion process. Pertinent information is also distributed to all recruiting sources.

- All employees significantly involved in recruitment, selection, promotion, disciplinary and related personnel practices are carefully selected and trained to ensure that the commitments in the Affirmative Action Plan are implemented.
- State Employment Services and other recruiting sources are encouraged to refer qualified individuals with disabilities.
- Include the affirmative action clause in covered government contracts and subcontracts.

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The Organization further requests that everyone who has any contact with this Affirmative Action Plan, or its supporting appendices, documents, and other data, treat such information as totally confidential and that such information not be released to any person whatsoever.

Statement of Purpose

This plan is written with the intention of meeting the requirements of a contractor's obligations with Section 402, Vietnam Era Veterans Readjustment Act of 1974, as amended.

The plan is presented in recognition of the rights of employees and applicants for employment to be treated on a nondiscriminatory basis. The Organization recognizes its obligation to take affirmative action to employ and advance qualified Covered Veterans and Disabled Veterans. The purpose in adopting this Affirmative Action Plan is to utilize Covered Veterans and Disabled Veterans to their full potential in all levels of the organization.

Affirmative Action Policy

It is the policy of the Organization not to discriminate against any employee or applicant for employment because he or she is a Covered Veterans and Disabled Veterans in regard to any position for which the employee or applicant for employment is qualified. The Organization agrees to take affirmative action to employ, advance in employment, and otherwise treat qualified individuals without discrimination based upon their disability or veteran's status in all employment practices including the following: employment, promotion, termination, compensation, demotion or transfer, recruiting, advertising, layoff or termination, and selection for training. In carrying out this Affirmative Action Program, Momar, Inc. will make a good faith effort to reasonably accommodate the physical or mental limitations of any employee or applicant for employment unless such accommodation would impose undue hardship on the conduct of the business.

Affirmative Action Plan Coverage

Applicants and employees who believe themselves covered under this Affirmative Action Program for Covered Veterans and Disabled Veterans may advise the Organization at any time that they wish to benefit under this program.

This information will be used solely for the purpose of affirmative action and proper job placement. This information will not be used to exclude or otherwise limit the employment opportunities of qualified Covered Veterans and Disabled Veterans.

The Equal Employment Opportunity Officer is responsible for implementation of the EEO policy within the Organization. Jen Feinberg has been assigned the day-to-day responsibility for implementing the policy regarding Covered Veterans and Disabled Veterans. She has management's support to carry out the following responsibilities:

- Developing policy statements, Affirmative Action Programs, and internal and external communications regarding affirmative action for these protected classes.
- Discussing with managers, supervisors, and employees the policy regarding Covered Veterans and Disabled Veterans to make certain that it is being followed.
- Advising managers and supervisors that they are obligated to prevent harassment of employees placed through affirmative action efforts and that their work performance is being evaluated on the basis of their affirmative action efforts and results, as well as on other criteria.
- Assisting in the identification of problem areas in the implementation of Affirmative Action Programs for Covered Veterans and Disabled Veterans, and the development of solutions, paying particular attention to the accommodation requirements.
- Designing and implementing an audit and reporting system that will:
 - Measure the effectiveness of the Organization's program and determine the degree to which objectives have been accomplished.
 - Indicate the need for remedial action.
- Determining whether known Covered Veterans and Disabled Veterans have had an opportunity to participate in the Organization-sponsored activities.
- Serving as liaison between Momar, Inc. and responsible organizations concerned with employment opportunities for Covered Veterans and Disabled Veterans.
- Serving as liaison between Momar, Inc. and enforcement agencies.

Communication of Policy

The Organization takes the following steps to disseminate information on the Organization's policy on employment of Covered Veterans and Disabled Veterans to recruiting sources, vendors, subcontractors, applicants, supervisory and management personnel, and other employees:

- The Organization's policy is contained in the Policy & Procedure Manual and is distributed to all employees.
- The EEO Officer holds periodic meetings with all management and supervisory personnel to discuss the Organization's policy.
- Employees are made aware of the Organization's policy through a written policy statement posted throughout the Organization's facilities.
- Bulletin boards bear the appropriate federal and state EEO posters.
- Recruitment sources are informed of the Organization's Equal Employment Opportunity Policy and are requested to recruit and refer in a manner that represents the Organization's policy.
- An Equal Employment Opportunity clause is included in all purchase orders.

Recruitment

When hiring opportunities occur, Momar, Inc. requests that employment agencies and other sources refer qualified Covered Veterans and Disabled Veterans for consideration.

Recruiting sources have been informed of the Organization's policy of nondiscrimination and affirmative action.

Personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related employment processes are aware of the Organization's commitment to affirmative action.

The Organization recruits applicants for employment on the basis of demonstrated ability and competence.

Sources likely to yield qualified Covered Veterans and Disabled Veterans as applicants are identified and included in our recruiting efforts. All open positions are posted with the local State Employment Services office except executive and top management positions, positions that will be filled from within the Organization, and positions lasting three (3) days or less.

The policy is discussed in employee orientation and management meetings.

Compensation

When offering employment or promotions to Covered Veterans and Disabled Veterans, the Organization will not consider disability income, pension income, or other benefits received by the applicant or employee as relevant to determination of his/her salary. No deduction from Organization pay will be made for any other income of that nature.

Policy of Nondiscrimination

The Organization does not discriminate against any applicant or employee because of disability or veteran status, provided the applicant or employee is qualified for the position. The Organization's commitment to equal employment opportunity includes, but is not limited to, the following areas: hiring, upgrading, transfer, recruitment or recruitment advertising, layoff or termination, all forms of compensation, selection for training, education or tuition assistance, seniority, and leaves of absence.

Momar, Inc. will ensure the physical and mental job qualification requirements are related to the specific job or jobs for which the person is being considered and are consistent with business necessity and safe performance of the job.

Proper Consideration of Qualifications

All applicants applying for employment with the Organization will be invited to voluntarily identify themselves as Covered Veterans and Disabled Veterans and to indicate any reasonable accommodation that can be made to enable them to perform a job that they would not otherwise be able to do.

Whenever Covered Veterans and Disabled Veterans are considered for employment, the employment applications are annotated to identify positions for which they are considered.

If a Covered Veterans and Disabled Veterans is not selected for employment, promotion, or training, the reason for the non-selection is documented and maintained in the personnel file or with the application.

Whenever an accommodation is made for the hire, promotion, or training of a disabled individual, a description of the accommodation is documented and kept with the personnel file or with the application.

Accommodation of Physical and Mental Limitations of Employees

Momar, Inc. is prepared to make reasonable accommodations to the physical and mental limitations of a disabled veteran unless such accommodation would impose an undue hardship on the conduct of our business. The extent to which accommodations will be made will be a function of several factors including business necessity and cost.

Development and Execution of Affirmative Action Programs

The Organization is committed to developing, executing, and maintaining an effective Affirmative Action Plan. To ensure this result, the Organization uses the following procedures:

- The Affirmative Action Plan for Covered Veterans and Disabled Veterans is made available to current and prospective employees. They are invited to declare their veteran's status and their desire to be covered under the provisions of the plan.
- The total selection process is reviewed on an on-going basis to ensure freedom from bias regarding Covered Veterans and Disabled Veterans which might otherwise limit their access to all jobs for which they are qualified.
- Approved position specifications are made available to all members of management involved in the recruiting, screening, selection, and promotion process. Pertinent information is also distributed to all recruiting sources.
- All employees significantly involved in recruitment, selection, promotion, disciplinary, and related personnel practices will be carefully selected and trained to ensure that the commitments in the Affirmative Action Plan are implemented.
- State Employment Services and other recruiting sources are encouraged to refer qualified Covered Veterans and Disabled Veterans.
- The affirmative action clause is included in covered government contracts and sub-contracts.

Momar, Inc. will meet its annual obligation to file a VETS-100 reporting form showing the number of veterans in our workforce.