

**INDIANA HARBOR BELT RAILROAD COMPANY'S
POLICY ON
EQUAL EMPLOYMENT OPPORTUNITY**

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APPROVED

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EQUAL EMPLOYMENT OPPORTUNITY

1.0 Purpose

- 1.1 To recognize and affirm that equal employment opportunity is a matter of law and is vital to the long-term, well-being of the economic and social systems of which the Indiana Harbor Belt Railroad Company is an integral part.
- 1.2 To define and establish responsibilities for undertaking positive, business oriented actions which will contribute to the attainment of equal employment opportunity for all individuals.

2.0 Scope

- 2.1 This policy applies to all Indiana Harbor Belt Railroad employees.
- 2.2 Discrimination complaint procedures are described in the Indiana Harbor Belt Railroad Company's policy on Internal Resolution of Discrimination Complaints.

3.0 General

- 3.1 The Indiana Harbor Belt Railroad Company seeks, in its own direct interest,
to attract for employment those individuals with abilities best suited to its needs and to make full use of their knowledge, skills, and potential for achievement. In so doing, the Indiana Harbor Belt Railroad Company recognizes and affirms that race, color, religion, sex, age, sexual orientation, or national origin do not measure or determine individual ability or potential. The Company further recognizes and affirms that qualified individuals with disabilities who, with or without reasonable accommodation, can perform the essential functions of a given position are rightfully entitled to be considered for such a position.

3.2 The Indiana Harbor Belt Railroad Company also acknowledges and accepts its obligations to comply with laws and regulations pertaining to the use of affirmative action programs to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, sex, or national origin. The Indiana Harbor Belt Railroad Company further acknowledges and accepts its obligations to take affirmative action to employ and to advance in employment individuals with physical or mental disabilities, disabled veterans, and Vietnam Era veterans.

4.0 Policy

It is the Indiana Harbor Belt Railroad Company's policy to:

- 4.1 Consider for employment, training, and promotion qualified persons in all job titles without regard to race, color, religion, sex, sexual orientation, national origin, age, or disability.
- 4.2 Ensure all personnel actions such as compensation, benefits, transfers, layoffs, return from layoff, company-sponsored training, education, and tuition assistance are administered without regard to race, color, religion, sex, sexual orientation, national origin, age, or disability.
- 4.3 Provide a non-discriminatory workplace environment in which all employees are treated with respect. The Indiana Harbor Belt Railroad Company policy expressly prohibits the use in the workplace of racial or sexual epithets and stereotypes, slang words or names, as well as any other language or actions which, by their nature or effect, degrade, insult, intimidate, or harass persons on the basis of race, color, religion, sex, sexual orientation, national origin, age, or disability.
- 4.4 Make reasonable accommodations, as appropriate, to the physical or mental limitations of otherwise qualified persons with a physical or mental disability.

4.5. Observe the spirit of the laws applying to equal employment and affirmative action, as well as complying with the letter of such laws. This policy will govern the development and implementation of affirmative action plans for the hiring and advancement of minorities and women, as well as for advancing the employment opportunities of individuals with handicaps, disabled veterans, and Vietnam Era veterans. In accordance with this policy, the Indiana Harbor Belt Railroad Company will cooperate fully with government agencies in compliance with anti-discrimination laws and regulations.

4.6. Ensure employment standards, procedures, and practices are maintained appropriate to the requirements of positions and consistent with the corporate objective of attracting individuals best suited to the Corporation's needs. Such standards, procedures, and practices will not exclude individuals on the basis of their race, color, religion, sex, sexual orientation, national origin, age, or physical/mental disability unrelated to job requirements.

4.7. Actively recruit minorities, females, and disabled individuals for positions of all types and at all levels within the Corporation.

4.8. Ensure the preparation of corporate affirmative action plans which provide for good faith implementation of programs and activities designed to correct ostensible deficiencies in the advancement of minorities and females as expeditiously as possible, consistent with available opportunities and resources.

4.9. Ensure all employees, including management and supervision, employee representatives, and recruitment sources are informed of the Indiana Harbor Belt Railroad Company's commitment to equal employment and affirmative action and their individual responsibilities for a discrimination-free work environment.

5.0 Responsibilities

5.1 Management and Supervisory Personnel

It is the responsibility of management and supervisory personnel to furnish full, enlightened support to the Equal Employment Opportunity Policy and to the Indiana Harbor Belt Railroad's Affirmative Action Program by:

- 5.1.1 Ensuring individuals for whom they have responsibility make employment and other personnel decisions without regard to race, color, religion, sex sexual orientation, national origin, age, or non-job related disability;
- 5.1.2 Ensuring employees for whom they have responsibility are aware of advancement opportunities and are encouraged to participate in training and other qualifying processes;
- 5.1.3 Aggressively pursuing the attainment of affirmative action goals;
- 5.1.4 Cooperating with government agencies during compliance reviews and complaint investigations;
- 5.1.5 Immediately seeking advice and counsel from the Personnel, Labor Relations, or Law Departments in the handling or correction of situations covered by this policy;
- 5.1.6 Taking positive action to ensure employees within their jurisdiction are not subject to harassment, mistreatment or intimidation by any other employee or manager based on race, color, religion, sex, age, sexual orientation, or national origin.

5.2 **Equal Employment Officer**

The Director of Labor Relations is designated Equal Employment Officer for the Corporation. The equal Employment Officer has the primary responsibility for implementing the Corporation's Equal Employment Policy. The duties of the Equal Employment Officer include:

- 5.2.1 Administration of the Equal Employment Policy;
- 5.2.2 Direction of affirmative action program development and implementation, to include recruitment of minority and women applicants, and support of community action programs designed to improve the employment

opportunities of minorities and women;

5.2.3 Monitoring and reporting the results of the Affirmative Action Program;

5.2.4 Establishment and maintenance of employment standards and practices which conform to equal employment opportunity requirements and are consistent with the Indiana Harbor Belt Railroad Company's objective of attracting and retaining the best qualified employees;

5.2.5 Representation of the Indiana Harbor Belt Railroad Company in contacts with outside agencies in matters relating to equal employment and affirmative action;

5.2.6 Ensuring the availability of the Internal Discrimination Complaint Process to all employees, as outlined on the Indiana Harbor Belt Railroad Company's policy on Internal Resolution of Discrimination Complaints;

5.2.7 Providing policy, process, and procedure guidance to managers and supervisors to assist in the advancement of equal employment and affirmative action initiatives and in the resolution of occurrences and complaints covered under this policy.

5.3 **Each Employee**

Each employee has a responsibility to:

5.3.1 Comply and actively support the Indiana Harbor Belt Railroad Company's Equal Employment Opportunity Policy;

5.3.2 Contribute to a work environment that is based on a mutual respect for fellow employees, and to value each individual for the unique resources

and

skills which each brings to the Indiana Harbor Belt Railroad Company;

5.3.3 Bring to supervision's attention any occurrences of apparent unlawful discrimination or potential discrimination involving the Indiana Harbor Belt Railroad Company's employees.