



Chautauqua, Cattaraugus, Allegany & Steuben Counties
Southern Tier Extension Railroad Authority
Center for Regional Excellence, 4039 Route 219, Suite 200, Salamanca, New York 14779
TEL (716) 945-5301 FAX (716) 945-5550 TDD (716) 945-5301

"This institution is an equal opportunity organization"

Terry Everetts, Chairman
Richard Zink, Chief Executive Officer

EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION POLICY

1. Statement of Policy

The aim of this policy is to communicate the commitment of STERA to the promotion of equality of opportunity in all operations and governance activities of STERA, and the commitment of STERA to pursue a policy of affirmative action in all of its operations and governance activities.

It is STERA's policy to provide employment equality to all, irrespective of:

- Gender
- Marital or civil partnership status
- Having or not having dependants
- Religious belief or political opinion
- Race (including color, nationality, ethnic or national origins)
- Disability
- Sexual orientation
- Age

STERA is opposed to all forms of unlawful and unfair discrimination. All job applicants, employees and others who work for or have dealings with STERA will be treated fairly and will not be discriminated against on any of the above grounds. STERA will make decisions about recruitment, selection, promotion, training, or any other benefit, or about contractual awards or selection for working with or doing business with STERA objectively and without unlawful discrimination.

Additionally, it is STERA's policy to undertake affirmative or positive action to promote achievement by those are members of groups who historically have been discriminated against or otherwise disenfranchised, including those discriminated against because of:

- Gender
- Marital or civil partnership status
- Having or not having dependants
- Religious belief or political opinion
- Race (including color, nationality, ethnic or national origins)
- Disability
- Sexual orientation
- Age

2. Applicability of Policy

This policy applies to all applicants for employment, all employees, all those seeking to enter into a business relationship with STERA, and all those who have been selected by STERA for entering into a business relationship with STERA.

3. Equal Opportunity and Affirmative Action Commitments

STERA is committed to:

- Complying with all applicable New York State and Federal laws and regulations pertaining to equal opportunity, affirmative action, protection of civil rights, and anti-discrimination
- Promoting equality of opportunity for all persons
- Taking lawful affirmative or positive action, where appropriate
- Preventing occurrences of unlawful direct discrimination, indirect discrimination, harassment and victimization
- Promoting a good and harmonious working environment in which all persons are treated with respect
- Regarding all breaches of equal opportunities policy as misconduct which could lead to disciplinary proceedings or termination of contractual or other agreements with STERA

4. Implementation of This Policy

The Chief Executive Officer has specific responsibility for the effective implementation of this policy. Each member of the STERA Board of Directors also has responsibilities to conform his or her activities with respect to the Authority to this policy. All STERA employees, contractual service providers, agents of STERA, and others doing business with STERA also must abide by this policy and help create the equality and affirmative action environment which is its objective.

In order to implement this policy STERA shall:

- Communicate the policy to employees, job applicants, contract service providers, agents, and others seeking to and/or selected to do business with STERA
- Incorporate specific and appropriate duties in respect of implementing this policy into job descriptions and work objectives of all employees
- Incorporate specific and appropriate language in respect of implementing this policy into all written contracts and agreements with contract service providers, agents, and others selected to do business with STERA
- Provide equality training and/or guidance as appropriate
- Ensure that those who are involved in assessing candidates for recruitment or promotion will be trained in non-discriminatory and affirmative action selection techniques
- Incorporate equal opportunities and affirmative action notices into general communications practices (e.g., newsletters, internet communications, web site, Annual Reports, etc.)
- Obtain commitments from other persons or organizations such as contract service providers, agents, and others selected to do business with STERA that they too will comply with this policy in their dealings with STERA
- Ensure that adequate resources are made available to fulfill the objectives of this policy

Violations of this policy by a Board member, corporate officer, or employee may result in disciplinary action, removal from his or her position or office, and/or dismissal as appropriate.

Violations of this policy by a contract service provider, agent, or other selected to do business with STERA may result in the termination of any and all contracts and agreements to do business with STERA.

5. Monitoring and Review

STERA's Governance Committee shall annually monitor and review this policy for effectiveness and statutory compliance, shall annually evaluate the effectiveness of its implementation in all STERA governance activities and all STERA operations, and shall annually provide a report to the STERA Board detailing its findings regarding (a) the effectiveness and statutory compliance of this policy, (b) the effectiveness of the implementation of this policy in

all STERA governance activities and all STERA operations, and (c) any recommendation regarding changes in this policy and in the implementation of this policy through corporate governance and operating activities.

6. Complaints

Those who believe that they have been dealt with in a manner inconsistent with this policy may contact the STERA Chief Executive Officer or any STERA Board Officer and provide a written statement describing the violation of this policy. STERA will respond seriously and promptly to any and all such complaints in a manner that preserves as much as possible the complainant's interest in confidentiality, investigating the merits of any such complaints, communicating the results of such investigations, taking appropriate actions in cases of violations of this policy, and communicating the actions taken to the complaining party.

**This Policy was approved and adopted on March 8, 2011
by the Board of Directors of the
Southern Tier Extension Railroad Authority.**

Thomas M. Barnes

Name

Corporate Secretary

Office

March 9, 2015

Date