

S-3 Research LLC
Affirmative Action Plan (AAP)

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II. Policy Statement on Equal Employment Opportunity for Individuals with Disabilities [41 CFR 60-741.44(a)]

As the Chief Executive Officer of S-3 Research LLC (S-3), I am committed to the principles of affirmative action and equal employment opportunity for individuals with disabilities. Therefore, it is the policy of S-3 not to discriminate on the basis of disability and to take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels within the company. S-3 will ensure that all employment actions, including but not limited to recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, recall, termination, rates of pay, or other forms of compensation, will be administered without regard to disability. S-3 will also provide qualified applicants and employees with disabilities with needed reasonable accommodations, as required by law, and will ensure that all employment decisions are based only on valid job requirements.

S-3 prohibits harassment of employees and applicants on the basis of disability and will conduct training to try to prevent any harassment or discrimination before it occurs. S-3 also prohibits retaliation or punishment against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing regarding S-3's employment practices, or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for individuals with disabilities. Prohibited retaliation includes, but is not limited to harassment, intimidation, threats, coercion, or other adverse actions that might dissuade someone from asserting their rights.

In furtherance of S-3's policy regarding affirmative action and equal employment opportunity, S-3 has developed a written Affirmative Action Program (AAP) that sets forth the policies, practices, and procedures that S-3 is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified individuals with disabilities is accomplished. This AAP is available for inspection by any employee or applicant for employment upon request, during normal business hours, in S-3's Administrative Department office located at 9150 Chesapeake Dr, Suite #290, San Diego, CA 92123. Interested persons should contact the Human Resources Office at info@s-3.io for assistance.

In order to ensure equal employment opportunity and affirmative action throughout all levels of S-3, I have designated S-3's Director of Human Resources as the Equal Employment Opportunity (EEO) Officer for S-3. The EEO Officer will oversee the implementation of S-3's AAP and show where additional action is needed to meet S-3's objectives.

Timothy Mackey
April 20, 2021
S-3 Research LLC

III. Review of Personnel Processes [41 CFR 60-741.44(b)]

To comply with the requirement to “periodically review” its personnel processes, S-3 reviews its personnel processes annually to determine whether its present procedures assure careful, thorough, and systematic consideration of the qualifications of known individuals with disabilities. As part of this review, S-3 also ensures that its personnel processes do not stereotype individuals with disabilities in a manner that limits their access to all jobs for which they are qualified. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as to all training opportunities offered or made available to employees.

Based upon S-3’s most recent review of its personnel processes, S-3 has implemented the following modifications to its personnel processes to come into compliance:

1. Ensure accessibility of personnel processes.

S-3 will ensure that applicants and employees who are individuals with disabilities have equal access to all of its personnel processes. As part of our job application system, S-3 will ensure that human resources office contact information is prominently displayed to facilitate requests for reasonable accommodation from applicants with disabilities.

2. Invite all applicants to voluntarily self-identify as having a disability before an offer of employment is made.

On January 15, 2021, S-3 began inviting all applicants to voluntarily inform S-3 whether they are individuals with disabilities before an offer of employment is made in compliance with 41 CFR 61-741.42(a) using the form prescribed by OFCCP. S-3 provides the self-id form prescribed by OFCCP to all applicants along with S-3’s required paper application forms. Additionally, S-3 has modified its electronic application system and created a fillable copy of the required self-id form using the parameters outlined by OFCCP in its FAQs. S-3 also created a separate electronic file where it stores all self-id information separate from employment applications, personnel records, and employee medical files. S-3 also continues to invite applicants to voluntarily self-identify as individuals with disabilities after a job offer has been made, but before the applicant begins work, in compliance with 41 CFR 61- 741.42(b). S-3 uses the form prescribed by OFCCP to invite this post-offer self-identification, and stores all self-id responses in the separate electronic file created for this purpose.

3. Invite self-identification of disability from all S-3 employees every five years.

In compliance with 41 CFR 60-741.42(c), S-3 invited all of its current employees to voluntarily inform S-3 whether they are individuals with disabilities via an email sent on January 15, 2021, and will do so every five years thereafter. The email contained a link to the electronic self-id form and indicated to employees that paper self-id forms are available in S-3's human resources office. Employees were asked to reply by February 15, 2021. S-3 will also remind employees via email five years after the most recent invitation that they can voluntarily update their disability status with S-3 at any time. The next invitation will be sent to employees on January 15, 2026.

4. Modify applicant flow logs.

S-3 recognizes that it must collect applicant and hiring data to comply with the requirements of 41 CFR 60-741.44(k). In order to facilitate the accurate tracking of applicant and hiring data for individuals with disabilities, S-3 has modified its applicant flow logs accordingly. Applicant flow logs will be maintained confidentially.

IV. Review of Physical and Mental Job Qualification Standards [41 CFR 60-741.44(c)]

To comply with the requirement to “periodically review” its physical and mental job qualification standards, S-3 reviews the physical and mental job qualifications of each job opening before it is publicly posted to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities, they are related to the job(s) in question and consistent with business necessity and the safe performance of the job. S-3 also conducts a periodic review of all job qualification standards every three years (except for those job qualification standards that S-3 has reviewed within the previous twelve months) to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities, they are job-related and consistent with business necessity. The last review was completed on October 5, 2020.

Appropriately trained personnel conducted the review and identified no physical or mental job qualification requirements that are likely to screen out qualified individuals with disabilities. Nevertheless, to ensure our compliance, S-3 strives to use only job qualification standards that are job-related and consistent with business necessity. The review found all job qualification requirements to be job-related and consistent with business necessity.

S-3 will continue to review physical and mental job qualification requirements whenever a job vacancy will be filled through either hiring or promotion and will conduct a qualifications review whenever job duties change. No pre-employment physical examinations or medical questionnaires are used in S-3’s hiring process.

If at any time in the future, S-3 should inquire into an applicant’s physical or mental condition or should require the conduct of a medical examination, S-3 affirms that such inquiries or exams will be conducted in accordance with the Section 503 regulations and that information obtained as a result of the inquiry or exam will be kept confidential, except as otherwise provided for in the Section 503 regulations. The results of the examination or inquiry will only be used in accordance with Section 503 regulations.

V. Reasonable Accommodation [41 CFR 60-741.44(d)]

S-3 will continue its longstanding commitment to making reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities unless such accommodation would impose an undue hardship on the conduct of its business. S-3 also commits to engaging in an interactive process with the person requesting the accommodation (or their representative), as needed, to determine an appropriate accommodation. Undue hardship will be determined by assessing whether the requested accommodation, and any other potential accommodations, would cause significant difficulty or expense, as provided for in the Section 503 regulations.

When an employee with a known disability has significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the employee is confidentially notified of the performance problem and asked if the problem is related to the disability. If the employee indicates that the performance problems are related to his or her disability, the employee is asked if a reasonable accommodation is needed. S-3 will also ensure that all requests for reasonable accommodation and any medical or disability-related information provided to S-3 will be treated as confidential medical records and maintained in a separate medical file.

Because S-3 strives to be a model employer, it is currently drafting reasonable accommodation procedures using the optional guidance in Appendix B of 41 CFR Part 60-741.

VI. Anti-Harassment Procedures [41 CFR 60-741.44(e)]

Employees and applicants of S-3 will not be subject to harassment because of disability. Any employee or applicant who believes that they have been subject to harassment because of their disability should promptly contact a manager in their chain of command, or promptly contact the Director of Human Resources for assistance. Employees or applicants may also file a written complaint with the office of the Director of Human Resources.

Retaliation, including intimidation, threat, coercion, or discrimination, against an employee or applicant, because they have objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing, or have otherwise sought to obtain their legal rights under any Federal, State, or local EEO law regarding individuals with disabilities, is prohibited. Any employee or applicant who believes that he or she has been subject to retaliation should contact the Director of Human Resources for assistance.

This anti-harassment policy is communicated to all employees and managers annually via e-mail, most recently on October 13, 2020, and a notice is posted in the personnel office. Additionally, training is provided bi-annually on the identification and prevention of harassment based on disability to all of S-3's employees. Furthermore, S-3 monitors its environment for the presence of any forms of harassment, intimidation, or coercion and, where warranted, takes corrective action.

VII. External Dissemination of Policy [41 CFR 60-741.44(f)]

S-3 provides written notification of S-3's Equal Employment Opportunity and Affirmative Action policy regarding the employment of qualified individuals with disabilities to all current subcontractors, vendors, and suppliers and will continue to do so on an annual basis. S-3 will also provide such written notification to new subcontractors, vendors, and suppliers upon entering into a relationship with them.

S-3, if applicable, will inform its recruiting sources, including State employment agencies, educational institutions, and social service agencies, of the company's policy concerning the employment of qualified individuals with disabilities and will notify them of employment opportunities as they become available.

S-3 will include the equal opportunity clause concerning the employment of qualified individuals with disabilities in all non-exempt subcontracts and purchase orders.

VIII. Outreach and Positive Recruitment [41 CFR 60-741.44(f)]

S-3 will begin assessing its outreach and recruitment efforts annually, using the above stated evaluation criteria, starting in 2015 and will document such assessment for inclusion in S-3's 2016 AAP. This will include an assessment of the effectiveness of each individual effort, as well as an assessment of the effectiveness of the totality of our efforts for the year. Because S-3 currently has limited applicant and hiring data for individuals with disabilities, which it began collecting June 1, 2014, we can only perform a limited assessment of the effectiveness of our outreach and recruitment efforts at this time. Starting in 2015, S-3 will have more complete data from which to perform a comprehensive assessment of whether our efforts are effective in recruiting individuals with disabilities into it's workforce. S-3 documents all of its outreach and recruitment efforts and maintains these documents, including the written assessments of the effectiveness of these efforts, for three years, in accordance with 41 CFR 60-741.44(f)(

IX. Internal Dissemination of Policy [41 CFR 60-741.44(g)]

S-3 has developed internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities. S-3's procedures are designed to foster understanding, acceptance, and support among all employees and to encourage them to help S-3 meet this obligation.

S-3 makes copies of its AAP available for inspection to any employee or applicant upon request. S-3 also incorporates the company's affirmative action and equal employment opportunity policies into the S-3 Human Resources Manual and updates this manual as needed. The policies are emailed to all employees annually. Additionally, S-3's affirmative action policy and EEO poster are placed on bulletin boards located throughout S-3's facilities and office work areas, and electronic versions of these notices are posted and clearly labeled on S-3's company-wide intranet.

S-3 managers and supervisors are provided with affirmative action and EEO training upon taking their management roles and are briefed annually on these policies. The last such management briefing was held on March 18, 2021.

X. Responsibility for Implementation of AAP [41 CFR 60- 741.44(i)]

The Director of Human Resources has been designated to direct the activities of the affirmative action program. The Director has the full support of the Chief Executive Officer and has the responsibility for designing and ensuring the effective implementation of S-3's AAP. These responsibilities include, but are not limited to:

1. The development of the AAP for individuals with disabilities, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
 2. Reviewing all personnel actions, policies, and procedures to ensure compliance with S-3's affirmative action obligations;
 3. Reviewing the qualifications of all applicants and employees considered/eligible for hiring, promotion, transfer, or layoff/reduction in force to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, or layoff/reduction in force occur;
 4. Developing solutions for any identified problem areas;
 5. Monitoring the effectiveness of the program on a continuing basis;
 6. Keeping the CEO informed of equal opportunity progress and problems within the company;
 7. Providing supervisors with copies of the AAP and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for the implementation of the program;
1. Reviewing the company's AAP for individuals with disabilities with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
 2. Assisting in ensuring that the career development of employees with disabilities is equal to that of other employees;
 3. Auditing the contents of company bulletin boards to ensure that required information is posted and up-to-date;
 4. Serving as a liaison between S-3 and enforcement agencies; and
 5. Serving as a liaison between S-3 and outreach and recruitment sources for individuals with disabilities.

XI. EEO and Affirmative Action Training [41 CFR 60-741.44(j)]

Managers, supervisors, and human resources staff involved in recruiting, screening, selection, promotion, disciplinary, and other related employment processes receive annual training regarding S-3's AAP and their role in its implementation.

During the annual training, managers and supervisors are advised of their responsibilities under S-3's AAP for individuals with disabilities and of their obligations to:

- Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
- Ensure qualified applicants and employees with disabilities are treated in a nondiscriminatory manner in all employment practices, including when making selection decisions, such as for hire, promotion, training or to receive awards or bonuses;
- Provide reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities unless such accommodation would impose an undue hardship on the conduct of its business;
- Maintain confidentiality of any disability-related information obtained regarding any applicant or employee; and
- Ensure that nondiscrimination is adhered to in all personnel activities.