



## **EQUAL EMPLOYMENT OPPORTUNITY POLICY:**

In its recruitment, hiring and promotion of Employees, White Ash Broadcasting, Inc (WAB) is committed to a policy of promoting equal employment opportunity. WAB prohibits discrimination and harassment, and conducts a program to exclude all unlawful forms of prejudice and discrimination in personnel policies, practices, and working conditions.

To make this policy effective and to ensure compliance with the Rules and Regulations of the Federal Communications Commission and the California Department of Fair Employment and Housing, the Equal Employment Opportunity Policy contains the following elements:

### **I. General Policy**

White Ash Broadcasting, Inc. (WAB) is committed to a policy and practice of promoting equal employment opportunity, in accordance with state and federal law, without regard to race, color, national origin, nationality, ancestry, religion, sex, (including pregnancy, childbirth, and related medical conditions), sexual orientation, gender identity, gender expression, genetic information, age, handicap, marital status, medical condition, AIDS/HIV, political activities or affiliations, military or veteran status, status as a victim of domestic violence, assault, or stalking or any other classes that may be defined by federal law, state law, or local ordinance. KVPR prohibits discrimination or harassment based on these classifications and conducts a continuing program to exclude all unlawful forms of prejudice and discrimination in our personnel policies, practices, and working conditions.

It is our policy to communicate our equal employment policy and employment needs to sources of qualified applicants from diverse backgrounds as described above, and to solicit their recruitment assistance on a basis. It is our policy to conduct a program to exclude all unlawful forms of prejudice or discrimination based upon the classes identified above from our personnel policies and practices and working conditions. To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have developed an Equal Employment Opportunity Program which includes the following elements:

### **II. Responsibility for Implementation**

The General Manager is responsible for the overall administration and implementation of our Equal Employment Opportunity Program. It is also the responsibility of all persons making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program are adhered to and that no person is discriminated against in employment based on any of the classes identified above. It is our policy to ensure a positive application and vigorous enforcement of our policies and to review and control managerial and supervisory performance in the administration of our equal employment opportunity policies.

### **III. Policy Dissemination**

It is our policy to disseminate our equal employment opportunity policies to job applicants, Employees, and those with whom we regularly do business. To assure compliance with this requirement, we:

- 1) Post notices in our offices informing Employees, and applicants for employment, of their equal employment opportunity rights, that we are an equal employment opportunity employer; that discrimination based on any of the classes identified above is prohibited; and that they have the right to notify an appropriate local, State or Federal agency if they believe they have been discriminated against;
- 2) Place a notice in bold type on our employment application informing prospective employees that discrimination based on any of the classes identified above is prohibited and that they may notify an appropriate local, State or Federal agency if they believe they have been discriminated against.

### **IV. Recruitment**

It is our policy to conduct a meaningful program of recruitment involving broad outreach in recruitment to all qualified job candidates. To assure compliance with this requirement, we:

- 1) Widely disseminate information about each full-time job opening in our operation to recruitment sources for the purpose of obtaining referrals for the available position and otherwise comply with Federal Communications Commission requirements applicable to the recruitment/outreach process;
- 2) Communicate to recruitment sources that we are an equal employment opportunity employer;
- 3) Analyze our recruitment program on an ongoing basis to ensure that it is effective in achieving broad outreach to potential applicants, and address any problems found as a result of our analysis.

## **V. Promotion and Advancement**

It is our policy to offer promotions of employees in a nondiscriminatory fashion without regard to any of the classes identified above, to positions of greater responsibility. To assure compliance with this requirement, we:

- 1) Instruct those who make decisions on placement and promotion that all Employees are to be considered without discrimination, and that there should be ongoing review to ensure compliance with this requirement;
- 2) Give all Employees equal opportunity for positions which lead to higher positions. Inquire as to the interests and skills of lower-paid Employees with respect to any of the higher paid positions, followed by assistance, counseling, and effective measures to enable Employees with interest and potential to qualify themselves for such positions;
- 3) Provide opportunity to perform overtime work on a nondiscriminatory basis.

## **VI. Analysis of Equal Employment Opportunity Efforts**

It is our policy to analyze the results of the measures undertaken by us to recruit, hire, and promote individuals and to identify and evaluate any difficulties encountered in implementing our equal employment opportunity program with the goal of improving our program to the extent necessary. To assure compliance with this requirement, we periodically analyze measures taken to:

- 1) Disseminate the station's equal employment opportunity program to job applicants and employees;
- 2) Review seniority practices to ensure that such practices are nondiscriminatory;
- 3) Examine rates of pay and fringe benefits for Employees having the same duties, and eliminate any inequities based upon the classes identified above;
- 4) Utilize media for recruitment purposes in a manner that will contain no indication, either explicit or implicit, of a preference for one race, national origin, color, religion, age, or sex discrimination, or any of the other classes listed above;
- 5) Ensure that promotions to positions of greater responsibility are made in a nondiscriminatory manner;
- 6) Where union agreements exist, cooperate with the union or unions in the development of programs to assure all persons equal opportunity for employment, irrespective of the classes listed above, and include an effective nondiscrimination clause in new or renegotiated union agreements; and
- 7) Avoid the use of selection techniques or tests that have the effect of discriminating against any person based on any of the classes listed above.

*Revised February 23, 2024*