

Focus Healthcare Partners

Affirmative Action Plan and Equal Employment Opportunity

Affirmative Action Program

The purpose of this Affirmative Action Program is to provide a program which addresses the employment, advancement and the effective utilization of qualified minorities, women, persons with disabilities, covered veterans, other protected classes, and economically disadvantaged persons. This program is not to impose numerical minimums or standards, but is an effort to provide opportunities to these persons.

EEO Recruitment Strategies:

Strategy: Focus Healthcare Partners (“Focus”) will make a good faith effort to recruit a diverse group of employees and provide them opportunities in the senior housing industry. Focus will advertise positions through organizations that will provide information and access to underserved populations and provide Focus with a diverse recruitment base.

EEO Selection Strategies:

Strategy: Focus will utilize procedures, processes and techniques that are fair and do not have an adverse impact on minorities, women, disabled persons and other protected classes. Prospective employees will not be excluded from the hiring process due to race, color, religion, sex (including sexual harassment), national origin, disability, age (40 years old or more), military status, and veteran status.

EEO Placement/Orientation:

Strategy: Focus will provide newly hired employees with basic employment information immediately after employment commences. New employee position descriptions, fringe benefits information, policies, procedures and EEO are a few of the topics which will be covered. Employees will not be denied fringe benefits and/or opportunities for promotion based on race, color, religion, sex, national origin, disability, age (40 years old or more), military status and veteran status.

EEO Performance Evaluation:

Strategy: Focus will evaluate the performance of its employees on an annual and as needed basis. It will provide the necessary supervisory feedback to identify areas to be improved as well as to reinforce those activities that meet or exceed standards. Performance appraisals will be evaluated without regard to race, color, religion, sex, national origin, disability, age (40 years old or more), military status and veteran status.

EEO Professional Development Strategies:

Strategy: Focus will provide professional development opportunities to its employees including attendance to industry conferences, networking events, seminars and access to industry research, webinars and other educational tools. Professional development can increase the opportunity of advancement for qualified minorities, women, disabled persons and other protected classes.

EEO Discipline Strategies:

Strategy: Focus will set clear disciplinary standards and warn of consequences for non-compliance. Discipline will be designed to rehabilitate employees who fail to correct their behavior as well as justify the termination of those who do not. Focus will not mistreat or unfairly discipline an employee based on race, color, religion, sex, national origin, disability, age (40 years old or more), military status and veteran status.

EEO Separation Strategies/Exit Interviews:

Strategy: Focus will conduct exit interviews, at the option of the employee leaving the company, as a problem-solving tool to reveal potential issues contributing to employee turnover. Exit interviews can provide the organization with information about how to correct the causes of discontent and reduce the problem of employee turnover.

EEO Monitoring Strategies:

Strategy: Focus will ensure its Human Resources function understands this plan and will hold Human Resources Management accountable for the effectiveness of this plan.

Minority Business Enterprise Solicitation Strategies:

Strategy: Focus will make a good faith effort to solicit business from minority owned and/or controlled businesses (MBE's).

Equal Employment Opportunity

It is the policy of Focus Healthcare Partners and its affiliates to ensure equal employment opportunity in accordance with Ohio Revised Code 125.111 and all applicable federal regulations and guidelines. Employment discrimination against employees and applicants due to race, color, religion, sex (including sexual harassment), national origin, disability, age (40 years old and more), military status, or veteran status is illegal.

Focus Healthcare Partners and its affiliates managers and employees will comply with Illinois and Ohio state and federal equal employment laws, rules, regulations and guidelines. This policy statement will be disseminated to all employees, various recruitment sources and will be displayed at our business location. Any employees that deliberately violate this policy will be subject to disciplinary action.

Persons who believe Focus Healthcare Partners or its affiliates has discriminated against them may file a discrimination complaint with Tom Girard who is the EEO Representative. The EEO Representative has full authority to manage issues involving employment discrimination.

Point of contact to file allegations of discrimination:

Company's EEO Representative: Tom Girard

Location: 200 W Madison St, Suite 2650 Chicago, IL 60606

Phone Number: 312-281-9975

E-Mail Address: tgirard@focushp.com