

## **General EEO Policy**

It is the policy and practice of Southern Stone Communications to offer equal employment opportunities ("EEO") to all qualified persons; that no person shall be discriminated against in employment because of race, color, age, religion, national origin, gender, marital status, disability, except when the disability is a *bona fide* occupational disqualification, veteran status, citizenship, or any other characteristic protected by applicable federal, state or local law; and that positive recruitment, job design and other reasonable measures will be pursued to ensure genuine equality of opportunity ("EEO Policy").

Southern Stone Communication's EEO Policy applies to all areas of employment, including recruitment, hiring, training and development, promotion, seniority practices, transfer, termination, layoff, compensation, benefits and all other terms, conditions, responsibilities and privileges of employment. Southern Stone Communications will not tolerate any form of discrimination based on any of the aforementioned factors.

In support of Southern Stone Communication's commitment to ensuring equal employment opportunities for all applicants, Southern Stone Communications has established a recruitment program which includes wide dissemination of notices of all full-time job vacancies are to be filled through internal promotion, or on a temporary or emergency basis.

All internal promotions will be fulfilled without discrimination based on race, color, age, religion, national origin, gender, marital status, disability, except when the disability is a *bona fide* occupational disqualification, veteran status, citizenship, or any other characteristic protected by applicable federal, state or local law.

## **General EEO Guidelines**

Management of Southern Stone Communications has the responsibility for overseeing that its EEO Policy is fulfilled. The General Manager of the Radio Stations is responsible to ensure that the EEO Policy is fulfilled. The General Manager will exercise his/her reasonable efforts to ensure that:

- Employees, applicants, employee organizations, and recruitment sources are informed of Southern Stone Communication's EEO Policy;
- An internal program is maintained to ensure that no employment discrimination based on race, color, age, religion, national origin, gender, marital status, disability, except when the disability is a *bona fide* occupational disqualification, veteran status, citizenship, or any other characteristic protected by applicable federal, state or local law exists within Southern Stone Communications.
- Review on a regular basis, and no less often than annually, Southern Stone Communication's procedures to effectively ensure fulfillment of its EEO Policy. At the time any full-time position is filled the General Manager is charged with the obligation of reviewing the effectiveness of the process and recruitment sources which contributed to the hiring decisions, and determine that all relevant records have been properly maintained.

## **EEO Program Procedures**

### ***Recruitment Program***

Southern Stone Communications will apply all of its recruitment procedures to every opening for a full-time position, *i.e.* employment which requires working thirty (30) or more hours per week, except that recruitment procedures may not be used for jobs to be filled by internal promotion, for temporary employees to be hired for a period of time six (6) months or less, for part-time employees, for interns, or in the event of exceptional or emergency circumstances necessitating immediate hiring. Southern Stone Communications will apply its recruitment procedures to fill a temporary position or an intern position being converted into a permanent position.

As defined above, a description of every full-time job opening will be circulated to the recruitment sources and contacts set forth herein in the following "Recruitment Sources" and all applicants will be asked to complete an employment application consistent with the sample form included herein. Employment notices will be directed to every recruitment source on the list as soon as practical after the decision has been made to fill a full-time opening, and by the fastest means reasonably available. The job description will include a description of the Southern Stone Communication's EEO Policy.

Southern Stone Communications requests race, gender, and ethnicity information from each full-time applicant. Southern Stone Communications will not require the submission of this information as a requirement for consideration for employment. Each applicant's race, gender and ethnicity information will be removed from the employment application and retained for record keeping and reporting requirements, but will not be presented to the employment decision-makers so that such information cannot influence the hiring process.

At the conclusion of each hiring process, management will review the effectiveness of the process by examination of the process by which the qualifications of applicants were considered, the effectiveness of the recruitment sources in providing a flow of applicants, and the records described below, in order to ensure that the EEO Policy of Southern Stone Communications is being fulfilled. This analysis must include a review of the recruitment sources used by Southern Stone Communications, as well as the race, ethnicity, and gender of the applicants who sought employment with the station as a result of Southern Stone Communication's recruitment efforts. Recruitment sources and procedures will be deleted, added or modified if, in the reasonable judgment of the General Manager, that such change serves to further promote the EEO Policy or make the process more inclusive.

### **Recordkeeping**

Southern Stone Communications maintains a recordkeeping system for each Radio Station, and for its corporate offices, to maintain EEO information sufficient to fulfill its EEO Policy and to comply with required recordkeeping and reporting requirements. Each broadcast station/group and cable television subsidiary, and its corporate offices, maintain records of:

- Every full-time job vacancy filled;
- The title of full-time job vacancy filled;
- All recruitment sources used to fill each full-time job vacancy filled, noting name, address, contact person, and telephone number of such sources;
- Copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing or advertising job vacancies;
- The recruitment source, gender, race and ethnic origin of each applicant for every full-time job vacancy filled. Southern Stone communications will maintain as much of this information as applicants voluntarily disclose.