

Policy Statement - Equal Employment Opportunity

It is the policy of Link-Systems International, Inc. (LSI) not to discriminate against any employee or applicant for employment because he or she is a qualified woman, minority, individual with a disability, a disabled veteran, a newly separated veteran, a campaign veteran, or an armed forces service medal veteran (collectively known as “qualified individuals”). It is also the policy of LSI to take affirmative action to employ and to advance in employment, all persons regardless of their status as a qualified individual, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation and selection for training, including apprenticeship, at all levels of employment.

Employees of and applicants to LSI will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint, assisting in a review, investigation, or hearing or have otherwise sought to obtain their legal rights related to any Federal, State, or local law regarding Equal Employment Opportunity (EEO) for qualified individuals.

As President of LSI, I am committed to the principles of Affirmative Action and Equal Employment Opportunity. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company, I have selected the Personnel Manager as the EEO Manager for LSI. One of the Personnel Manager’s duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of LSI’s programs.

In furtherance of LSI’s policy regarding Affirmative Action and Equal Employment Opportunity, LSI has developed a written Affirmative Action Program which sets forth the policies, practices and procedures which LSI is committed to applying in order to ensure that its policy of non-discrimination and affirmative action for qualified individuals is accomplished. This Affirmative Action Program is available for inspection by any employee or applicant for employment upon request, during normal business hours, in the Administration Department. Interested persons should contact the Personnel Manager at 813-674-0660 for assistance.

Vincent T. Forese, President
Link-Systems International, Inc.
October 1, 2005

Review of Personnel Processes

LSI reviews annually its personnel processes to determine whether its present procedures assure careful, thorough and systematic consideration of the qualifications of known qualified individuals. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as all training opportunities offered or made available to employees.

In determining the qualifications of veterans, LSI limits its consideration of a qualified protected veteran's military record, including discharge papers, to only that portion of the record, which is relevant to the specific job qualifications for which the veteran is being considered.

Based upon LSI's review of its personnel processes, LSI will modify the personnel processes when necessary, and will include the development of new procedures in this Affirmative Action Program to ensure equal employment opportunity. To date, no modifications have been necessary.

**Review of Physical and Mental
Job Qualification Standards**

The physical and mental job qualifications of all jobs were reviewed during calendar year 2005 to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals, job qualifications are consistent with business necessity and the safe performance of the job.

No qualification requirements were identified which had a screening effect. All job qualification requirements were found to be job-related and consistent with business necessity and safety.

LSI will continue to review physical and mental job qualification requirements whenever a job is vacated and the company intends to fill it through either hiring or promotion and will conduct a qualifications review whenever job duties change.

No pre-employment physical examinations or questionnaires are used by LSI's hiring process.

If at any time in the future, LSI should inquire into an employee's physical or mental condition or should conduct a medical examination prior to a change in employment status, LSI affirms that information obtained as a result of the inquiry will be kept confidential, except as otherwise provided for in the Section 503 regulations. The results of the examination or inquiry will be used in accordance with the Section 503 Regulations.

Reasonable Accommodation To Physical and Mental Limitations

LSI commits to making a reasonable accommodation to the known physical and mental limitations of qualified individuals, unless such accommodation would impose an undue hardship on the conduct of its business. In determining the extent of its obligation, LSI will consider business necessity and financial costs and expenses, among other factors.

Harassment Prevention Procedures

Employees of and applicants to LSI will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint, assisting in a review, investigation, or hearing or have otherwise sought to obtain their legal rights related to any federal, state, or local law regarding EEO for qualified individuals. Any employees or applicants who feel that they have been subject to harassment, intimidation, threats, coercion, or discrimination because of their disability or status as a qualified protected veteran should contact the Personnel Manager at 813-674-0660 for assistance. This policy is communicated to all employees and supervisors annually; most recently on October 1, 2005, and a notice is posted in the personnel office.

**External Dissemination of Policy, Outreach and
Positive Recruitment**

All subcontractors, vendors and suppliers have been sent written notification of LSI's Equal Employment Opportunity and Affirmative Action policy regarding the employment of qualified individuals.

All recruiting sources, including State employment agencies, educational institutions and social service agencies have been informed of the company's policy concerning the employment of qualified individuals and have been advised to actively recruit and refer qualified persons for job opportunities.

LSI lists all suitable employment openings with the appropriate local office of the State Employment Service and maintains regular contact with the local Veterans Employment Representative. A copy of LSI's Affirmative Action Policy for qualified individuals is provided to the State Employment Service annually.

Formal briefing sessions are held with representatives from recruitment sources and placement agencies, which include facility tours, discussion of current and prospective position openings, job descriptions and required qualifications and explanations of LSI's selection procedures. Formal arrangements have been made to ensure that each recruitment source is provided with timely notice of job opportunities, to ensure that recruitment sources have an opportunity to refer qualified individuals.

LSI participates in local job fairs sponsored by support groups for qualified individuals.

The equal employment opportunity clause concerning the employment of qualified individuals are included in all nonexempt subcontracts and purchase orders.

Internal Dissemination of Policy

Copies of our affirmative action programs will be made available for inspection to any employee or applicant upon request to promote understanding, acceptance and support. Policies are re-emphasized to managers and supervisors annually.

LSI's Affirmative Action policy and the EEO poster are posted on bulletin boards located throughout our facilities and office work areas.

All applicants who believe they are a qualified individual with a disability, as defined in Section 503 of the Rehabilitation Act of 1973, as amended, or who are a qualified protected veteran under the equal employment opportunity provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, have been invited to identify themselves if they wish to benefit under this affirmative action program. Such invitation has been posted on bulletin boards throughout the facility and work areas. Employees may self-identify at anytime.

All employees are advised annually of the company's policy and encouraged to aid in LSI's affirmative action efforts to ensure a fair and effective program.

Briefing sessions are conducted annually for managers and supervisors to review the applicable regulations and to discuss such affirmative action measures as training and reasonable accommodation. The last such meeting was held on October 1, 2005.

When making internal Equal Opportunity audits, implementation of this affirmative action program will be reviewed.

This facility's Personnel Manager has attended State-sponsored workshops, which stressed the use of vocational rehabilitation agencies in hiring qualified individuals with disabilities and qualified special disabled veterans and reasonable accommodation.

Articles (and pictures) regarding accomplishments of employees who are qualified individuals with disabilities and qualified protected veterans shall be included in Company and/or facility publications.

At least once a year the policy is distributed to all employees.

Internal Audit and Reporting Systems

The Personnel Manager has the responsibility for developing and preparing the formal documents of the AAP. The Personnel Manager is responsible for the effective implementation of the AAP; however, responsibility is likewise vested with each department manager and supervisor. LSI's audit and reporting system is designed to:

- * Measure the effectiveness of the AAP/EEO program;
- * Document personnel activities;
- * Identify problem areas where remedial action is needed; and
- * Determine the degree to which LSI's AAP goals and objectives have been obtained.

The following activities are reviewed at least annually to ensure freedom from stereotyping qualified individuals with disabilities and qualified protected veterans in any manner, including that which may limit their access to any job for which they are qualified:

- * Recruitment, advertising, and job application procedures;
- * Hiring, promotion, upgrading, award of tenure, layoff, recall from layoff;
- * Rates of pay and any other forms of compensation including fringe benefits;
- * Job assignments, job classifications, job descriptions, and seniority lists;
- * Sick leave, leaves or absence, or any other leave;
- * Training, apprenticeships, attendance at professional meetings and conferences; and
- * Any other term, condition, or privilege of employment.

LSI's audit system includes a quarterly report documenting LSI's efforts to achieve its EEO/AAP responsibilities. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. If problem areas arise, the manager or supervisor is to report problem areas immediately to the Personnel Manager. During quarterly reporting, the following occurs:

1. The Personnel Manager will discuss any problems relating to significant rejection ratios, EEO charges, etc., with the General Manager; and
2. The Personnel Manager will report the status of the LSI's AAP goals and objectives to the General Manager. The Personnel Manager will recommend remedial actions for the effective implementation of the AAP.

Responsibility for Implementation of AAP

Responsibilities of the Equal Employment Opportunity Manager

In furtherance of LSI's commitment to Affirmative Action and Equal Employment Opportunity for qualified individuals, the Personnel Manager has the responsibility for designing and ensuring effective implementation of LSI's AAP. These responsibilities include, but are not limited to:

1. The development of the AAP for individuals with disabilities and protected veterans, 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 LSI's affirmative action obligations;
3. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer and termination actions occur;
4. Assisting in the identification of problem areas and the development of solutions to those problems;
5. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit- and reporting-system that measures the effectiveness of the program;
6. Keeping the General Manager of LSI informed of equal opportunity progress and problems within the company through quarterly reports;
7. Providing department managers with a copy of the Affirmative Action Program for Qualified Individuals and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
8. Reviewing the company's AAP for qualified individuals with disabilities and qualified protected veterans with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
9. Auditing the contents of company bulletin boards annually to ensure that compliance information is posted and is up-to-date;
10. Serving as liaison between LSI and enforcement agencies; and
11. Serving as liaison between LSI and organizations for qualified individuals.

Responsibilities of Managers and Supervisors

Managers and supervisors are advised annually of their responsibilities under the company's AAP for qualified woman, minorities, individuals with disabilities and qualified protected veterans and of their obligations to:

1. Review the company's Affirmative Action policy for qualified individuals with subordinate managers and supervisors to ensure that they are aware of the policy and understand their obligation to comply with it in all personnel actions;
2. Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
3. Review the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hire, promotion, transfer, and termination actions occur; and
4. Review all employees' performance to ensure that non-discrimination is adhered to in all personnel activities.

Training to Ensure AAP Implementation

Training is provided to all personnel involved in the recruitment, screening, hiring, promotion, disciplinary and related employment processes, to ensure that the commitments made in LSI's AAP are implemented. Training sessions were most recently conducted on October 1, 2005.