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|--|-------------------------------------|--------------|
| CITY OF URBANA HUMAN RELATIONS DIVISION 400 SOUTH VINE ST. URBANA, ILLINOIS 61801 (217) 384-2455 (phone); 328-8288 (fax) hro@urbanaininois.us | Office Use Only (09/15) | |
| | Requested by: | Date: |
| | Approved by: | Date: |
| | Certification Date: | |
| | Certificate Expiration Date: | |

| | |
|--|---|
| EQUAL EMPLOYMENT OPPORTUNITY (E.E.O.) WORKFORCE STATISTICS FORM | |
| Please complete the sections below as instructed. Failure to properly complete this form may result in a delay or denial of eligibility to bid or do business with the City of Urbana. | |
| Section I. Identification | |
| 1. Company Name and Address: | |
| Name: Baker Tilly Virchow Krause, LLP | |
| d/b/a: | |
| Address: 205 North Michigan Avenue | |
| City/State/Zip: Chicago, IL 60601 | |
| Telephone Number(s) include area code: 612-876-4519 | |
| Check one of the following | |
| Corporation | Partnership <input checked="" type="checkbox"/> Individual Proprietorship Limited Liability Corp. |
| FEI Number: 39-0859910 | Social Security Number: |
| 2. Name and Address of the Company's Principal Office (answer only if not the same as above) | |
| Name: | |
| Address: | |
| City/State/Zip | |
| 3. Major activity of your company (product or service): professional services: accounting | |
| 4. Project on which your company is bidding: | |
| 5. City of Urbana contact staff assigned to contract: | |

SECTION II. Policies and Practices

| Description of EEO Policies and Practices | | YES | NO |
|---|--|-----|----|
| A. | Is it the Company's policy to recruit, hire, train, upgrade, promote and discipline persons without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual preference, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income ? | X | |
| B. | Has someone been assigned to develop procedures, which will assure that the EEO policy is implemented and enforced by managerial, administrative, and supervisory personnel? If so, please indicate the name and title of the official charged with this responsibility. Name: Mary Goldy Title: Sr. Manager HR Operations Telephone: 612-876-4519 Email: mary.goldy@bakertilly.com | | |
| C. | Does the company have a written Equal Employment Opportunity plan or statement? Note: If no, a copy of an E.E.O statement is enclosed. You must attach an EEO Statement in order to be considered eligible to do business with the City of Urbana. Questions? (217) 384-2455 or hro@city.urbana.il.us. | X | |
| D. | Has the company developed a written policy statement prohibiting Sexual Harassment? You must attach a copy of your company's Sexual Harassment Policy in order to be considered eligible to do business with the City of Urbana. | X | |
| E. | Have all recruitment sources been notified that the company will consider all qualified applicants without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual orientation, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income? | X | |
| F. | If advertising is used, does it specify that all qualified applicants will be considered for employment without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual orientation, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income? | X | |
| G. | Has the contractor notified all of its sub-contractors of their obligations to comply with the Equal Opportunity requirements either in writing, by inclusion in subcontracts or purchase orders? | X | |
| H. | Is the company a state certified minority/women owned business? If yes, please attach a copy of state certification. | | X |
| I. | Does the company have collective bargaining agreements with labor organizations? | | X |
| J. | If you answered yes to Question "I", have the labor organizations been notified of the company's responsibility to comply with the Equal Employment Opportunity requirements in all contracts with the City of Urbana? | | |
| K. | Does your company perform construction, rehabilitation, alteration, conversion, demolition or repair of buildings, highways or other improvements to real property? (If yes, please complete Table B.) | | X |
| L. | Are you currently seeking to renew an existing or expired Urbana EEO certification? (If yes, you need to complete Table C.) | X | |

SECTION III. Employment Information

IMPORTANT: Please complete the company workforce analysis on the bottom of this page. Use the number of employees as of the most recent payroll period. You must complete this form in its entirety, as instructed and submit your organization's (1) EEO Statement and (2) Sexual Harassment Policy in order to be eligible to do business with the City of Urbana. For detailed descriptions of the Job Classifications see attached descriptions. If minorities and females are currently under-represented in your workforce, please attach a copy of an explanation of your plan to recruit and hire qualified minorities and females.

TABLE A – TOTAL CONTRACTOR/VENDOR WORKFORCE

| Job Categories | Overall Totals | | White (Not of Hispanic Origin) | | Black or African-American (Not of Hispanic Origin) | | Hispanic or Latino | | Asian or Pacific Islander | | American Indian or Alaskan Native | |
|--|----------------|-------------|--------------------------------|-------------|--|-----------|--------------------|-----------|---------------------------|-----------|-----------------------------------|----------|
| | M | F | M | F | M | F | M | F | M | F | M | F |
| Officials & Mgrs | 743 | 451 | 714 | 408 | 8 | 8 | 4 | 11 | 11 | 22 | 1 | 0 |
| Professionals | 623 | 569 | 546 | 498 | 18 | 17 | 18 | 9 | 34 | 33 | 2 | 0 |
| Technicians | N/A | | | | | | | | | | | |
| Sales Workers | N/A | | | | | | | | | | | |
| Office & Clerical | 114 | 431 | 90 | 350 | 8 | 31 | 5 | 10 | 5 | 21 | 0 | 1 |
| Craft Workers (Skilled) | N/A | | | | | | | | | | | |
| Operatives (Semi-Skilled) | N/A | | | | | | | | | | | |
| Laborers (Unskilled) | N/A | | | | | | | | | | | |
| Service Workers | N/A | | | | | | | | | | | |
| TOTAL | 1481 | 1451 | 1350 | 1256 | 34 | 56 | 27 | 30 | 50 | 76 | 3 | 1 |
| M = MALE, Column B is sum of Rows D, F, H, J and L. | | | | | | | | | | | | |
| F = FEMALE, Column C is sum of Rows E, G, I, K and M. | | | | | | | | | | | | |
| Note that we also capture two or more races as an ethnicity and totals reflect that choice | | | | | | | | | | | | |
| Date of Above Data: 3/1/2016 | | | | | | | | | | | | |

TABLE B* - EMPLOYEES TO BE ASSIGNED TO CITY OF URBANA CONTRACT

| Job Categories | TOTAL EMPLOYEES | | BLACK EMPLOYEES | | HISPANIC EMPLOYEES | | OTHER MINORITY EMPLOYEES | |
|---------------------------|-----------------|----------|-----------------|---|--------------------|---|--------------------------|----------|
| | M | F | M | F | M | F | M | F |
| Officials & Mgrs | 2 | | | | | | | |
| Professionals | 1 | 2 | | | | | | 1 |
| Technicians | | | | | | | | |
| Sales Workers | | | | | | | | |
| Office & Clerical | | | | | | | | |
| Craft Workers (Skilled) | | | | | | | | |
| Operatives (Semi-Skilled) | | | | | | | | |
| Laborers (Unskilled) | | | | | | | | |
| Service Workers | | | | | | | | |
| TOTAL | 3 | 2 | | | | | | 1 |

*Totals included in Table B should be a projection of numbers of persons to be employed in the performance of the City contract.

For Contractors: Data provided in Table B will be verified by worksite inspections.

TABLE C - WORKFORCE TURNOVER SINCE PREVIOUS EEO REPORT

| Job Categories | TOTAL EMPLOYEES SEPARATED | | MINORITY EMPLOYEES SEPARATED | | TOTAL EMPLOYEES HIRED | | MINORITY EMPLOYEES HIRED | |
|---------------------------|---------------------------|------------|------------------------------|-----------|-----------------------|------------|--------------------------|-----------|
| | M | F | M | F | M | F | M | F |
| Officials & Mgrs | 80 | 46 | 9 | 10 | 97 | 58 | 7 | 7 |
| Professionals | 116 | 109 | 17 | 22 | 234 | 173 | 34 | 32 |
| Technicians | | | | | | | | |
| Sales Workers | | | | | | | | |
| Office & Clerical | 2 | 48 | 0 | 9 | 7 | 81 | 0 | 9 |
| Craft Workers (Skilled) | | | | | | | | |
| Operatives (Semi-Skilled) | | | | | | | | |
| Laborers (Unskilled) | | | | | | | | |
| Service Workers | | | | | | | | |
| TOTAL | 198 | 203 | 26 | 41 | 338 | 312 | 41 | 48 |

SECTION IV. Certification

By signing below, the company certifies that it has answered all of the foregoing questions truthfully to the best of its knowledge and belief and agrees that it/he/she will comply and abide by the City of Urbana's Code of Ordinances (Section 2-119).

Mary Goldy
Signature

Mary Goldy Sr. Mgr HR operations
Printed Name and Title

mary.goldy@BakerTilly.com
E-mail Address

3/2/16
Date

SECTION V. Verification

Prior to submitting this form, please check the answers to the following questions to verify your completion of this form:

1. Did you fill in all of the appropriate boxes in the table in Section III, including the "TOTAL" row?

YES X

NO _____

2. Have you enclosed your company's EEO statement?

YES X

NO _____

3. Have you enclosed your company's Sexual Harassment policy?

YES X

NO _____

DEFINITIONS OF TERMS LISTED ON THE WORKFORCE STATISTICS FORM

(See previous Page)

DESCRIPTION OF RACE/ETHNIC CATEGORIES

Race /ethnic designations as used by the Department do not denote scientific definitions of anthropological origins. For the purposes of this report, an employee may be included in the group to which he or she appears to belong, identifies with, or is regarded in the community as belonging. However, no person should be counted in more than one race/ethnic group. The race/ethnic categories for this report are:

White (Not of Hispanic origin). All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

Black of African-American (Not of Hispanic origin). All persons having origins in any of the Black racial groups of Africa.

Hispanic or Latino. All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

Asian or Pacific Islander. All persons having origins any of the original peoples of the Far East, Southeast Asia, the Indian Subcontinent, or the Pacific Islands. This area includes, for example, China, India, Japan, Korea, the Philippine Islands and Samoa.

American Indian or Alaskan Native. All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

DESCRIPTION OF JOB CATEGORIES

Each employee should be counted in only one job category. Select the category containing the jobs most similar to that performed by the employee. The jobs listed in each category are intended to provide an example, not a complete list, of all job titles falling into that category.

Officials and managers. Occupations requiring administrative and managerial personnel who set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special phases of firm's operations. Includes: officials, executives, middle management, plant managers, department managers, and superintendents, salaried supervisors who are members of management, purchasing agents and buyers, railroad conductors and yard masters, ship captains, mates and other officers farm operators and managers, and kindred workers.

Professionals. Occupations requiring either college graduation or experience of such kind and amount as to provide a comparable background. Includes: accountants and auditors, airplane pilots and navigators, architects, artists, chemists, designers, dietitians, editors, engineers, layers, librarians, mathematicians, natural scientist, registered professional nurses, personnel and labor relations specialist, physical scientist, physicians, social scientist, teachers, surveyors and kindred workers.

Technicians. Occupations requiring a combination of basic scientific knowledge and manual skill which can be obtained through 2 years of post high school education, such as is offered in many technical institutes and union colleges, or through equivalent on-the-job training. Include: computer programmers, drafters, engineering aides, junior engineers, mathematical aides, licensed, practical or vocational nurses, photographers, radio operators, scientific assistants, technical illustrators, technicians (medical, dental, electronic, physical science), and kindred workers.

Sales. Occupations engaging wholly or primarily in direct selling. Includes: advertising agents and sales workers, insurance agents and brokers, real estate agents, and brokers, stock and bond sales workers, demonstrators, sales workers and sales clerks, grocery clerks, and cashiers/checkers, and kindred workers.

Office and clerical. Includes all clerical-type work regardless of level of difficulty, where the activities are predominantly non manual though some manual work not directly involved with altering or transporting the products is included. Includes: bookkeepers, collectors (bills and accounts), messengers and office helpers, office machine operators (including computer), shipping and receiving clerks, stenographers, typists and secretaries, telegraph and telephone operators, legal assistants, and kindred workers.

Craft workers (skilled). Manual workers of relatively high skill level having a thorough and comprehensive knowledge of the processes involved in their work. Exercise considerable independent judgment and usually receive an extensive period of training. Includes: the building trades, hourly paid supervisors and lead operators who are not members of occupations, compositors and typesetters, electricians, engravers, painters (construction and maintenance), motion picture projectionists, pattern and model makers, stationary hand painters, coaters, bakers, decorating occupations, and kindred workers.

Operatives (semiskilled). Workers who operate machine or processing equipment or perform other factory-type duties of intermediate skill level which can be mastered in a few weeks and require only limited training. Includes: apprentices (auto service and stitchers, dryers, furnace workers, heaters, laundry and dry cleaning operatives, milliners, mine operatives and laborers, motor operators, oilers and greasers (except auto), painters (manufactured articles), photographic process workers, truck and tractor drivers, knitting, looping, taping and weaving machine operators, welders and flame cutters, electrical and electronic equipment assemblers, butchers and meatcutters, inspectors, testers and graders, handpackers and packagers, and kindred workers.

Laborers (unskilled). Workers in manual occupations which generally require no special training who perform elementary duties that may be learned in a few days and require the application of little or no independent judgment. Includes: garage laborers, car washers and greasers, groundskeepers and gardeners, farmworkers, stevedores, wood choppers, laborers performing lifting, digging, mixing, loading and pulling operation and kindred workers.

Service workers. Workers in both protective and nonprotective service occupations. Includes: Attendants (hospital and other institutions, professional and personal service, including nurses aides, and orderlies), barbers, charworkers and cleaners, cooks, counter and fountain workers, elevator operators, firefighters and fire protection, guards, doorkeepers, stewards, janitors, police officers and detectives, porters, waiters and waitresses, amusement and recreation facilities attendants, guides, ushers, public transportation attendants, and kindred workers.



Baker Tilly Virchow Krause, LLP
Affirmative Action Plan

205 North Michigan Avenue
Chicago, IL 60601

1301 West 22nd Street, Suite 400
Oak Brook, IL 60523

EEO Officer: Mary Goldy, Sr. Manager HR Operations

I have reviewed and approved this Affirmative Action Plan and will ensure that all necessary and appropriate steps are taken to ensure that this firm does provide equal employment opportunity to all employees and applicants.

Mary Goldy
Sr. Manager HR Operations

Date

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Statement of Confidentiality

This Affirmative Action Plan contains confidential information, which is subject to the provision of 18 U.S.C. 1905. *Chrysler Corp. v. Brown*, 19 FEB 475(1979).

Copies of this Affirmative Action Plan and all related appendices, documents and support data are made available on loan to the U.S. Government upon the request of the Government on the condition that the Government hold them totally confidential and not release copies to any person whatsoever. This Affirmative Action Plan and its appendices and other supporting documents contain much confidential information, which may reveal, directly or indirectly, Baker Tilly Virchow Krause, LLP's ("the firm") plans for business or geographical expansion or contraction. The firm considers this Affirmative Action Plan to be exempt from disclosure, reproduction and distribution under the Freedom of Information Act upon the grounds, among others, that such material constitutes 1) personnel files, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C. 552(b)(6); 2) confidential commercial or financial information which is exempt from disclosure under 5 U.S.C. 552(b)(4); 3) investigatory records compiled for law enforcement purposes, the production of which would constitute an unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C. 552(b)(7)(c); and as 4) matters specifically exempted from disclosure under 5 U.S.C. 552(b)(3). Notice is hereby given of a request pursuant to 41 C.F.R. 60-60.4(d) that portions of the Affirmative Action Plan be kept confidential.

No information contained in the Affirmative Action Plan is to be copied, removed from the premises, or released to other individuals without a prior notification to Baker Tilly Virchow Krause, LLP. Employees and applicants who receive permission to see relevant portions of the Affirmative Action Plan must treat the information contained therein as confidential and are not permitted to copy or remove information from the firm's premises.

The firm wishes to make it clear that it does not consent to the release of any information whatsoever contained in this Affirmative Action Plan under the Freedom of Information Act or otherwise. If the U.S. Government, or any agency or subdivision thereof, is considering breaching the conditions under which this Affirmative Action Plan was loaned to such Government, or is considering a request for release of this Plan under the Freedom of Information Act, request is hereby made that the Government immediately notify the Director, Compensation/Benefits/HRIS of this firm of any and all Freedom of Information Act requests received by the Government or any other contemplated release of this Plan by the Government which relates to information obtained by the Government from this firm.

The firm further requests that everyone who has any contact with this Affirmative Action Plan or its supporting appendices, documents and other data treat such information as totally confidential, and that such information not be released to any person whatsoever. Retention or disclosure of information relating to identifiable individuals may also violate the Privacy Act of 1974.

Any determination of underutilization in this Affirmative Action Plan is neither a finding nor an admission of discrimination.

General Propose of Affirmative Action Program

Our affirmative action program is a management tool designed to ensure equal employment opportunity. A central premise underlying affirmative action is that, absent discrimination, over time our workforce, generally, will reflect the gender, racial and ethnic profile of the labor pools from which we recruit and select. This affirmative action program contains a diagnostic component, which includes a number of quantitative analyses designed to evaluate the composition of our workforce as compared to the composition of the relevant labor pools.

This affirmative action program also includes action-oriented programs. If females and minorities are not being employed at a rate to be expected given their availability in the relevant labor pool, our affirmative action program includes specific practical steps designed to address this underutilization. Effective affirmative action programs also include internal auditing and reporting systems as a means of measuring our progress toward achieving the workforce that would be expected in the absence of discrimination.

Our affirmative action program also ensures equal employment opportunity by institutionalizing our commitment to equality in every aspect of the employment process. Therefore, as part of this affirmative action program, we will monitor and examine our employment decisions and compensation systems to evaluate the impact of those systems on females and minorities.

This program includes policies, practices, and procedures that we use to ensure that all qualified applicants and employees are receiving an equal opportunity for recruitment, selection, advancement, and every other term and privilege associated with employment. Affirmative action is a part of the way we regularly conduct our business. We believe that when affirmative action is approached from this perspective that there is a positive correlation between the presence of affirmative action and the absence of discrimination.

Description of Organization

Baker Tilly Virchow Krause, LLP is a public accounting and consulting firm. The Baker Tilly Virchow Krause, LLP culture is built on a fundamental understanding that we are in a people business. The people we hire and the way we work together are the foundation of our success and allow us to make a difference.

| | |
|--------------------------------------|---|
| Addresses | 205 North Michigan Avenue Chicago, IL 60601 |
| | 1201 West 22 nd Street, Suite 400 Oak Brook, IL 60523 |
| Facility EEO-1 Identification Number | AR83101 |
| Inclusive Dates of the AAP | June 1, 2014 to May 31, 2015 |
| EEO Officer | Mary Goldy Sr. Manager, HR Operations |
| Phone Number | 612.876.4519 |
| Executive's Name | Timothy Christen, Chief Executive Officer |
| NAIC # | 541211 |

Organizational Profile

Baker Tilly Virchow Krause, LLP is a public accounting firm with an office in Chicago, IL and Oak Brook, IL. The firm's practice is made up of five business units: Administration, Consulting, Greater Wisconsin RBU (audit and tax), Illinois RBU (audit and tax), and Tax Services.

The firm's approach to client service brings the breadth of our experience, knowledge and resources together and merges solid financial know-how with broad-reaching business expertise.

Equal Employment Opportunity / Affirmative Action Policy

It is the policy of Baker Tilly Virchow Krause, LLP not to discriminate against or harass any employee or applicant for employment because of age, race, citizenship status, national origin, ancestry, height, weight, color, religion, creed, sex, sexual orientation, marital status, arrest and conviction record, physical and mental disability, handicap, pregnancy, childbirth, genetic information, honesty testing, membership in a local human rights commission, status with regard to public assistance, military service, unfavorable discharge from military service, use or nonuse of lawful products off the employer's premises during nonworking hours and any other classification proscribed under local, state or federal law.

The firm will take affirmative action to ensure that all employment practices are free of such discrimination. Such employment practices include, but are not limited to, the following: recruitment, recruitment advertising, selection, hiring, promotion, demotion, transfer, layoff, disciplinary action, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship. The firm will provide reasonable accommodation to applicants and employees with disabilities.

Mary Goldy, Sr. Manager HR Operations, has been appointed Equal Employment Opportunity Officer and is responsible for planning and implementing the Affirmative Action Plan as well as for day-to-day monitoring of affirmative action related decisions and activities. Other responsibilities include monitoring all equal employment opportunity activities and reporting the effectiveness of the Affirmative Action Plan, as required by federal, state and local agencies. The Equal Employment Opportunity Officer will receive and review reports on the progress of the plan. Any employee or applicant may inspect the Affirmative Action Plan during normal business hours by contacting the Equal Employment Opportunity Officer.

All employees who are responsible for hiring and promoting and for the development and implementation of programs or activities are charged with supporting this plan. They shall provide leadership in implementing affirmative action goals and initiatives.

The firm will evaluate the performance of management and supervisory employees on the basis of their involvement in achieving these affirmative action objectives as well as other established criteria. In addition, all other employees are expected to perform their job responsibilities in a manner that supports equal employment opportunity for all.

If any employee or applicant for employment believes he or she has been treated in a way that violates this policy, he or she should contact Mary Goldy or any other representative of management. Responsible parties will investigate allegations of discrimination or harassment as confidentially and promptly as possible, and the firm will take appropriate action in response to these investigations.

Baker Tilly Virchow Krause, LLP shall comply with all federal state and local regulations and laws relating to equal employment opportunities and affirmative action. The firm shall continue to work cooperatively with government and community organizations to take affirmative action to ensure equal employment and advancement opportunities.

Dissemination of Equal Employment Opportunity / Affirmative Action Policy and Affirmative Action Plan

Internal Dissemination

1. Our policy statement and non-discrimination posters are permanently posted and conspicuously displayed in areas available to employees and applicants for employment.
2. Our EEO/AA policy statement is communicated to our employees in the same manner that other major personnel policies or decisions are communicated.
3. Our EEO/AA policy is included in our employee handbook.
4. Our EEO/AA policy is made available to all employees, including full-time, part-time and seasonal/temporary employees.
5. We review our EEO/AA policy at least once a year.

External Dissemination

1. As needed, we notify all subcontractors, vendors, and suppliers of our EEO/AA policy and project goals, requiring supporting action on their part.
2. We notify all recruitment sources and employment agencies of our EEO/AA policy, and we encourage them to assist us in achieving our affirmative action objectives by actively recruiting and referring women, minorities, and people with disabilities.
3. We include the statement "Equal Opportunity Employer" or "Affirmative Action Employer" on our firm's recruitment/careers website.

Goals and Timetables

During this plan year, it is our goal to meet or exceed the availability percentage for minorities and women in all job groups, as identified in Appendix J. We will make good faith efforts to achieve the availability percentages for minorities or women in any job group where underutilization is identified by our analysis.

We will continue our efforts to recruit and retain individuals with disabilities and protected veterans in all levels of our workforce.

Anti-Harassment Policy

Baker Tilly Virchow Krause, LLP strives to maintain a work environment free from sexual or other discriminatory harassment among our employees. The firm is responsible for ensuring that all employees are allowed to perform their roles in an environment free from harassment of any kind. Employees are encouraged and should feel comfortable coming forward with allegations of harassment without fear of retaliation or negative job impact. Therefore, ALL complaints of harassment will be investigated and treated equally. Discipline for violating the Baker Tilly Virchow Krause, LLP anti-harassment policy may include termination of employment. This policy not only applies during normal working hours, but also to all work-related social functions, whether on or off Baker Tilly Virchow Krause, LLP premises, and to all business-related engagements and travel.

Harassment

Harassment is defined as any unwanted, deliberate or repeated unsolicited comments, gestures, graphic materials, physical contact or solicitation of favors which is based upon the equal employment criteria and is used as a condition of employment, interferes with work performance, or creates an intimidating, hostile or offensive working environment. Harassment is illegal if it is based upon sex, age, disability, national origin, religion, sexual orientation, record of arrest or conviction, or other prohibited basis which is not job-related. Sexual harassment is defined by the Equal Employment Opportunity Commission as follows: "Harassment on the basis of sex is a violation of Sec. 703 of Title VII. Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitute sexual harassment when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating a hostile or offensive work environment." Sexual harassment also includes same-sex harassment. Discrimination and harassment absolutely will not be tolerated. Harassment undermines the rights and dignity of individual employees, infringes upon mutual respect in working relationships and causes serious harm to the productivity, efficiency and stability of our operations.

Complaint Process

An employee who feels s/he is being harassed is encouraged to inform the offending person that his/her conduct is unwelcome and should stop immediately. Further, s/he should report said harassment to any manager, partner and/or regional managing partner (RMP). The immediate supervisor or RMP will communicate with Human Resources that there is a harassment complaint and detail the nature of the complaint. If the employee is uncomfortable or unable to discuss their complaint with the immediate supervisor and/or RMP, s/he should address the complaint directly to Human Resources.

Investigation Process

A thorough investigation conducted by Human Resources will follow ANY complaint of harassment. The investigation will include: interviews of the affected employee and the alleged harasser, as well as interviews of any relevant witnesses, including those chosen by the affected employee and the alleged harasser. Management and Human Resources will

make every effort to keep the complaint confidential; however, it may be necessary to share information with other appropriate employees as part of the investigation.

Prompt Action

If the investigation reveals that harassment did occur, Baker Tilly Virchow Krause, LLP will implement prompt and appropriate corrective action. What type of action constitutes appropriate action will be determined on a case-by-case basis. However, employees are advised that harassment of any type may lead to termination of employment with Baker Tilly Virchow Krause, LLP.

Dissemination of Anti-Harassment Policy

Internal Dissemination

1. Our anti-harassment policy is permanently posted and conspicuously displayed in areas available to employees and applicants for employment.
2. Our anti-harassment policy is communicated to our employees in the same manner that other major personnel policies or decisions are communicated.
3. Our anti-harassment policy is included in our employee handbook.
4. Our anti-harassment policy is made available to all employees, including full-time, part-time and seasonal/temporary employees.
5. We review our anti-harassment policy at least once a year.

Responsibility for Implementation of EEO/AA

Responsibilities of the Equal Employment Opportunity Officer:

The Sr. Manager of HR Operations has the responsibility of designing and ensuring the effective implementation of Baker Tilly Virchow Krause, LLP's Affirmative Action Plan (AAP). These responsibilities include, but are not limited to, the following:

1. Developing Equal Employment Opportunity (EEO) policy statements, affirmative action programs and internal and external communication procedures;
2. Assisting in the identification of EEO/AA problem areas;
3. Assisting management in arriving at effective solutions to EEO/AA problems;
4. Designing and implementing an internal audit and reporting system that:
 - a. Measures the effectiveness of Baker Tilly Virchow Krause, LLP's program;
 - b. Determines the degree to which AAP goals and objectives are met; and
 - c. Identifies the need for remedial action;
5. Keeping Baker Tilly Virchow Krause, LLP's Chief Executive Officer informed of equal opportunity progress and reporting potential problem areas within the firm through periodic reports;
6. Reviewing the firm's AAP for qualified minorities and women with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
7. Auditing the contents of the firm's bulletin board to ensure compliance information is posted and up-to-date; and
8. Serving as liaison between Baker Tilly Virchow Krause, LLP and enforcement agencies.

Responsibilities of Managers and Supervisors:

It is the responsibility of all managerial and supervisory staff to implement Baker Tilly Virchow Krause, LLP's AAP. These responsibilities include, but are not limited to:

1. Assisting in the identification of problem areas, formulating solutions, and establishing goals and objectives when necessary;
2. 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; and
3. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance or his or her duties and responsibilities.

Identification of Problem Areas

| Areas of Concern | Corrective Actions |
|--|--|
| <ul style="list-style-type: none"> > Women are underutilized where external hiring and promotional opportunities occurred. <ul style="list-style-type: none"> > 35.34% in job group 1A Executives, Partners and Principals > 19.41% in job group 2A Business Professionals - Advanced > 31.55% in job group 2B Business Professionals – Entry | <ul style="list-style-type: none"> > Provide recruitment staff talking points and GROW brochure to better communicate the commitment to women through GROW@ Baker Tilly (Growth & Retention of Women at Baker Tilly Virchow Krause, LLP) for use in recruiting discussions. > Ensure representation of women in recruiting efforts, including on campus and throughout the selection process. > Work with marketing staff to update GROW@ Baker Tilly program on firm website to include GROW focused video and more testimonials. > Include a higher percentage of women in video and photographic representation of recruitment advertising > Ensure that all promotions are reviewed for potential bias issues. |
| <ul style="list-style-type: none"> > Minorities are underutilized where external hiring and promotional opportunities occurred. <ul style="list-style-type: none"> > 13.73% in job group 1C Managers > 11.64% in job group 2A Business Professionals - Advanced > 10.19% in job group 2B Business Professionals - Entry | <ul style="list-style-type: none"> > Continue campus recruiting efforts to include higher minority-enrollment campuses. > Actively partner with minority organizations to promote career opportunities and attend minority recruitment events. > Increase the use of minorities in recruiting efforts, including on campus and the selection process. > Implement new formalized diversity initiative (SOAR). > Ensure that all promotions are reviewed for potential bias issues. |

Action-Oriented Programs

Selection Process

We will evaluate our selection process using an adverse impact analysis to determine if our requirements screen out a disproportionate number of minorities, women, or people with disabilities. All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes will be carefully selected and trained to ensure that there is a commitment to the affirmative action plan and its implementation.

Schedule for Review of Job Requirements: We will periodically review all physical and mental job requirements to ensure that these requirements do not tend to screen out qualified individuals with disabilities. We will determine whether these requirements are job-related and are consistent with business necessity and the safe performance of the job, and we will remove any physical or mental requirements that do not meet these criteria. Any job descriptions or requirements changed after review will be distributed to all relevant employees, particularly those involved in the selection process and supervision of employees.

Pre-Employment Medical Examination: If we require medical examinations or inquiries as a part of our selection process, all exams or inquiries will be conducted after a conditional offer of employment. Only job-related medical examinations and inquiries will be conducted, and the results of these examinations or inquiries will not be used to screen out qualified individuals with disabilities. Information obtained in response to such inquiries or examinations will be kept confidential except that (a) supervisors and managers may be informed regarding restrictions on the work or duties of individuals with disabilities and regarding accommodations, (b) first aid and safety personnel may be informed, where and to the extent appropriate, if the condition might require emergency treatment, and (c) officials, employees, representatives, or agents of local human rights agencies investigating compliance with the act or local human rights ordinances will be informed if they request such information.

Accommodations to Physical and Mental Limitations of Employees

We will make reasonable accommodations to the physical and mental limitations of an employee or applicant unless such an accommodation would impose an undue hardship on the conduct of the business.

Recruitment of Employees

1. All solicitation or advertisements for employees will state that applicants will receive consideration for employment regardless of their age, race, citizenship status, national origin, ancestry, height, weight, color, religion, creed, sex, sexual orientation, marital status, arrest record, misdemeanor arrest record, conviction record, physical disability, mental disability, handicap, pregnancy, childbirth, genetic testing, predisposing genetic characteristics, honesty testing, membership in a local human rights commission, status with regard to public assistance, military service, unfavorable discharge from military service and use or nonuse of lawful products off the employer's premises during nonworking hours. When needed, to help address underutilization, help wanted

advertising will also be placed in news media oriented towards women or minorities. Copies of advertisements for employees will be kept on file for review by enforcement agencies.

2. When we place help-wanted advertisements, we will not indicate a preference, limitation, or specification based on race, color, sex, age, national origin, or other protected characteristic, unless that characteristic is a bona fide occupational qualification for a particular job. We will not allow any employment agency with which we work to express any such limitation on our behalf, and we will require that these agencies share our commitment to EEO.
3. All positions for which we post or advertise externally will be listed with the state employment service where the job is to be located, similar governmental agencies, and other agencies as required by our clients.
4. As necessary to ensure that potential candidates are aware of job openings, we will contact community organizations focused on the employment of minorities, women, people with disabilities, and protected veterans (including state vocational rehabilitation agencies or facilities, sheltered workshops, college placement offices, education agencies, or labor organizations). We will keep documentation of all contacts made and responses received, whether formal or informal. We will make every effort to give these agencies a reasonable amount of time to locate and refer applicants.
5. We will carry out active recruiting programs at relevant technical schools and colleges, where applicable.
6. We will encourage present minority, female, disabled employees, and veterans to recruit other employees.
7. Consideration of minorities and women not currently in the workforce: We will take additional steps to encourage the employment of minorities, women, people with disabilities, and protected veterans who are not currently in the workforce, such as providing part-time employment, internships, or summer employment.

Training Programs

Minority, female, and disabled employees will be afforded a full opportunity and will be encouraged to participate in all organization sponsored educational and training programs. We will seek the inclusion of qualified minority, female, and disabled employees in any internship program in which we participate.

Promotion Process

Our promotion process has been developed and documented and only legitimate qualifications are considered in our promotion decisions. We conduct adverse impact analyses to ensure that women, minorities, and employees with disabilities are promoted at rates substantially similar to those of men, non-minorities, and employees without disabilities.

Termination Process

We use progressive discipline before terminating employees, where appropriate. We conduct adverse impact analyses to ensure that women, minorities, and employees with disabilities do not leave our firm at rates substantially dissimilar to those of men, non-minorities, and employees without disabilities.

Religion and National Origin Discrimination and Accommodation for Religious Observance and Practice

As a part of our commitment to Equal Employment Opportunity for all, we have made a specific effort to ensure that national origin and religion are not factors in recruitment, selection, promotion, transfer, termination, or participation in training. The following activities are undertaken to ensure religion and national origin are not used as a basis for employment decisions:

1. Recruitment resources are informed of our commitment to provide equal employment opportunity without regard to national origin or religion.
2. Our employees are informed of our policy and their duty to provide equal opportunity without regard to national origin or religion.
3. Employment practices exist and are reviewed to ensure that we implement equal employment opportunity without regard to national origin or religion.
4. The religious observances and practices of our employees are accommodated, except where the requested accommodation would cause undue hardship on the conduct of our business.
5. We do not discriminate against any qualified applicant or employee because of race, color, creed, disability, age, sex, sexual orientation, marital status, or status with regard to public assistance, national origin, religion or any other classification proscribed under local, state or federal law.

Sex Discrimination Guidelines

We incorporate the following commitments into this AAP to ensure that all laws related to the prohibition of discrimination based on sex are followed:

1. Employment opportunities and conditions of employment are not related to the sex of any applicant or employee. Salaries are not related to or based upon sex.
2. Women are encouraged to attend all training programs that can facilitate their chances for promotion, and to apply for all positions for which they are qualified.
3. We do not deny employment to women or men with young children and do not penalize, in conditions of employment, women or men who require time away from work for child bearing.
4. Appropriate physical facilities are provided to both sexes.

Prevention of Harassment and Discrimination

Our firm has developed policies prohibiting the harassment of or discrimination against any employee because of any characteristic protected under civil rights laws. We distribute these policies periodically to current employees and incorporate these policies as a part of new employee orientation. Employees are aware of contact persons to report any violation of these policies.

Internal Audit and Reporting System

The Sr. Manager of HR Operations has the responsibility for developing and preparing the formal documents of the AAP. The Sr. Manager of HR Operations is responsible for the effective implementation of the AAP; however, responsibility is likewise vested with each department manager and supervisor. Baker Tilly Virchow Krause, LLP's audit and reporting system is designed to:

- Measure the effectiveness of the EEO/AA program;
- Document personnel activities;
- Identify problem areas where remedial action is needed; and
- Determine the degree to which Baker Tilly Virchow Krause, LLP's AAP goals and objectives have been obtained.

The following personnel activities are reviewed to ensure nondiscrimination and equal employment opportunity for all individuals without regard to their race, color, gender, national origin, religion or any other classification proscribed under local, state or federal law:

- Recruitment, advertising, and job application procedures;
- Hiring, promotion, and transfer;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications, job descriptions, and seniority lists;
- Leaves of absence of any type;
- Training, attendance at professional meetings and conferences; and
- Any other term, condition, or privilege of employment.

The following documents are maintained as a component of Baker Tilly Virchow Krause, LLP's internal audit process:

1. An applicant flow log showing the name, race, sex, date of application, job title, interview status and the action taken for all individuals applying for job opportunities;
2. Summary data of external job offers and hires, promotions, resignations, terminations, and layoffs by job group and by sex and minority group identification;
3. Summary data of applicant flow by identifying, at least, total applicants, total minority applicants, and total female applicants for each position;
4. Maintenance of employment applications (as required by law); and
5. Records pertaining to Baker Tilly Virchow Krause, LLP's compensation system.

Baker Tilly Virchow Krause, LLP's audit system includes an annual report documenting Baker Tilly Virchow Krause, LLP's efforts to achieve its EEO/AA 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 Director, Compensation/Benefits/HRIS. During periodic reporting, the following occurs:

1. The Sr. Manager HR Operations will discuss any problems relating to significant rejection ratios, EEO charges, etc., with the Chief Executive Officer; and
2. The Sr. Manager HR Operations will report the status of Baker Tilly Virchow Krause, LLP's AAP goals and objectives to the Chief Executive Officer. The Sr. Manager HR Operations will recommend remedial actions for the effective implementation of the AAP.