

L.N. Curtis & sons Affirmative Action Plan, effective June 1, 2014

Exhibit C – Reasonable Accommodation Policy and Procedures

L.N. Curtis & Sons is committed to providing reasonable accommodations to qualified individuals with known disabilities to enable them to perform the essential functions of the position held or desired, or to enable them to participate in the application process, or enable them to enjoy equal benefits and privileges of employment as are enjoyed by employees without disabilities. To obtain a reasonable accommodation, an applicant or employee should inform L.N. Curtis & Sons of the existence of a disability, the disability-related limitation(s) or workplace barrier(s) that need to be accommodated, and, if known, the desired reasonable accommodation. If the need for accommodation is not obvious, or if additional information is needed, L.N. Curtis & Sons may initiate an interactive process with the individual requesting the accommodation.

A request for reasonable accommodation may be oral or written. There is no specific language that must be used by the requester to request an accommodation. Requests for reasonable accommodation may be made by an applicant, employee, or by a third party on behalf of an applicant or employee.

All requests should be submitted to the Human Resources Department, to the employee's supervisor, or to Carol B. Sueoka, as the Affirmative Action Officer for this Program.

Carol B. Sueoka has been designated as the official responsible for the implementation of the reasonable accommodation procedures. Carol B. Sueoka has the authority, resources, support, and access to top management that is needed to ensure the effective implementation of the reasonable accommodation procedures. Carol B. Sueoka will work with the Human Resources Department in responding to requests for reasonable accommodation, and supervisors must report any requests for reasonable accommodation to Carol B. Sueoka or to the Human Resources Department, so that L.N. Curtis & Sons may keep appropriate records of such records in accordance with the regulations implementing the Section 503 of the Rehabilitation Act of 1973, as amended.

Written confirmation of the receipt of a request for reasonable accommodation will be provided to the requester, either by letter or email. The written confirmation will include the date the accommodation request was received, and will be signed by the authorized decision maker or his or her designee.

L.N. Curtis & Sons may request and review medical documentation in support of a request for reasonable accommodation. Documentation will be requested if the disability and need for accommodation is not obvious, where sufficient information regarding the disability and need for accommodation has not been provided, to confirm that a reasonable accommodation is medically appropriate, or to identify alternative accommodations that may be sufficient. Any request for medical documentation will be specific and limited to documentation of the individual's disability, its expected duration, the functional limitations for which reasonable accommodation is sought, and information about medically appropriate accommodations. Submission of medical documentation is not required when the disability for which a reasonable accommodation is sought is known or readily observable and the need for and nature of the necessary accommodation is known or obvious.

In instances of a recurring need for an accommodation (e.g., a hearing impaired employee's need for a sign language interpreter for meetings), the requester is not required to repeatedly submit their request for accommodation each time the accommodation is needed, where the original medical certification stated the recurring need. In the absence of a reasonable belief that the individual's recurring need for the accommodation has changed, the employee's accommodation will be provided, unless the accommodation poses an undue hardship.

Requests for accommodation will be processed as expeditiously as possible. Oral requests for reasonable

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accommodation will be considered received on the date they are initially made, even if a reasonable accommodation request form that has not been completed. Requests for reasonable accommodation will be processed within a reasonable period of time, depending upon the specific circumstances. In general, if supporting medical documentation is not needed, the time frame will not be longer than 10 business days. If supporting medical documentation is needed, or if special equipment must be ordered, the time frame will generally not exceed 30 calendar days, unless there are extenuating circumstances beyond the control of L.N. Curtis & Sons. If L.N. Curtis & Sons's processing of an accommodation request will exceed established time frames, a written notice will be provided to the requester. The notice will include the reason(s) for the delay and a projected date of response. The notice will be dated and signed by the authorized decision maker or his or her designee.

Applicants are invited to request any reasonable accommodation needed to participate fully in the application process. All applicants are provided with contact information for L.N. Curtis & Sons staff able to assist the applicant, or his or her representative, in making a request for accommodation. Reasonable accommodation requests by or on behalf of an applicant are processed expeditiously, using time frames tailored to the application process.

Requests for accommodation will be considered on a case-by-case basis. Any denial or refusal to provide a requested reasonable accommodation will be provided in writing. The written denial will include the reason for the denial and be dated and signed by the authorized decision maker or his or her designee. A requested accommodation may be rejected if, for example, it would impose an undue hardship on the company, or if it would not be sufficient (or not necessary) to enable the employee to perform the essential functions or the job. Any appeals or requests for reconsideration should be completed in the format specified on the written denial notification.

All requests for reasonable accommodation, related documentation (such as request confirmation receipts, requests for additional information, and decisions regarding accommodation requests), and any medical or disability-related information provided to the contractor will be treated as confidential medical records and maintained in a separate medical file.

L.N. Curtis & Sons's written reasonable accommodation procedures are disseminated to all employees. Notice of the reasonable accommodation procedures are also included in the employee handbook that is disseminated to all employees. Notice of the reasonable accommodation procedures are provided to employees who work off-site in the same manner that notice of other work-related matters is ordinarily provided to these employees.

L.N. Curtis & Sons will provide annual training for its supervisors and managers regarding the implementation of the reasonable accommodation procedures. Training will also be provided whenever significant changes are made to the reasonable accommodation procedures. Training regarding the reasonable accommodation procedures may be provided in conjunction with other required equal employment opportunity or affirmative action training.

L.N. Curtis & Sons anticipates that this policy will result in a reasonable accommodation request and review procedure that allows for greater participation in the workforce for individuals with disabilities and retention and placement of qualified individuals.