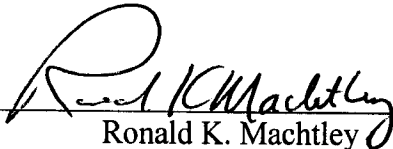


AFFIRMATIVE ACTION PLAN
FOR MINORITIES & WOMEN

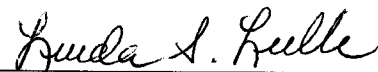
Bryant University

Smithfield, RI

July 1, 2011 - June 30, 2012



Ronald K. Machtley
President



Linda S. Lulli
Affirmative Action Officer

The following pages represent a summary of Bryant University's Affirmative Action Plans for Minorities and Women, and Individuals with Disabilities and Veterans. The complete Plans are on file with the Human Resources Department. All information in these Plans is confidential and may not be released to any third party without the written consent of Bryant University.

The following is a summary of Bryant's Affirmative Action Plan for Minorities and Women.

INTRODUCTION

In the following Affirmative Action Plan (AAP), Bryant University ("Bryant") reaffirms its commitment to establishing and implementing policies and procedures for affirmative action. These policies and procedures form the basis for its AAP objectives, as well as its compliance efforts with respect to all applicable government regulations pertaining to affirmative action and equal employment opportunity (EEO).

It is Bryant's intention, however, to approach the implementation of this Affirmative Action Plan, not with a narrow view toward simple compliance with government regulations, but with a broad commitment to the spirit and intention of Affirmative Action in order to make Equal Employment Opportunity a reality at Bryant.

The principal objectives of Bryant's AAP are:

1. To increase the employment opportunities of Minorities and Females at all levels and in all segments of Bryant's organization;
2. To establish meaningful relationships with appropriate recruitment sources, community organizations and educational institutions that will enable Bryant to achieve its Affirmative Action goals; and
3. To comply with both the letter and spirit of all applicable governmental laws and regulations relating to nondiscrimination and affirmative action in employment.

In both developing and implementing this Affirmative Action Plan, Bryant has been and will continue to be guided by its commitment to providing full and equal employment opportunity to all.

STATEMENT OF EEO/AA POLICY

It is the intention of Bryant to make all efforts reasonably possible to live up to its Equal Employment Opportunity Policy and the commitments made in this Affirmative Action Plan. This Plan has been prepared to accurately reflect this facility's current status, its actions to date, and its intentions for the future.

Overall responsibility for fulfillment of the Equal Employment Opportunity Policy and the Affirmative Action Plan is assigned to Linda S. Lulli, Associate Vice President of Human Resources. The Associate Vice President will periodically conduct analyses of all personnel actions to ensure that Bryant is living up to its stated intentions. The management of Bryant will be responsible for the ongoing monitoring of all personnel actions in their respective areas of supervision and will carry out the intentions of the Equal Employment Opportunity Policy and this Affirmative Action Plan to the fullest extent possible.

Bryant has established employment policies and practices that are non-discriminatory and are solely based upon factors that are job-related. Factors such as an individual's race, color, religion, sex, sexual

preference or orientation, gender identity or expression, national origin, age, ethnicity, disability, veteran or marital status are not job-related and play no part in Bryant's employment practices. Bryant's AAP is designed and established in order to promote affirmative action and provide equal employment opportunity, and to provide guidance to management with respect to Bryant's commitment to the full implementation of its EEO policy. The AAP is further designed to monitor and report on all related procedures, including but not limited to:

1. Recruiting, hiring, training, promoting, and transferring applicants and employees in job classifications without discrimination;
2. Basing decisions on employment so as to further the principle of equal employment opportunity;
3. Ensuring that no employee or applicant for employment is subject to harassment, intimidation, threats, coercion or discrimination for filing a complaint or assisting in an investigation, compliance review, or hearing related to any law requiring equal opportunity for covered individuals;
4. Ensuring that promotion and transfer decisions are in accord with principles of equal employment opportunity by imposing only valid, job-related requirements for such opportunities; and
5. Ensuring that all other personnel actions, such as compensation, benefits, transfers, layoffs, return from layoffs, university-sponsored training and educational assistance, and social and recreational programs, will be administered without discrimination.

RESPONSIBILITY FOR IMPLEMENTATION

Linda S. Lulli, Associate Vice President of Human Resources, has overall responsibility for developing, communicating, monitoring, and implementing Bryant's Affirmative Action Plans. This includes reviewing and directing the program, with emphasis on achieving results. With the assistance and cooperation of appropriate staff members, particularly Human Resources personnel, these responsibilities may include, but are not limited to:

1. Developing and modifying policy statements, Affirmative Action Plans, and internal and external communication methods.
2. Assisting in the identification of problem areas.
3. Developing, modifying, and maintaining written Affirmative Action Plans, in compliance with the rules and regulations of the Office of Federal Contract Compliance Programs.
4. Evaluating EEO and Affirmative Action progress at Bryant. This includes the establishment of goals and timetables that are reasonable, attainable and consistent with Bryant's commitments.
5. Assisting line management in arriving at solutions to problem areas.
6. Designing and implementing audit and reporting systems that will:
 - a. measure the effectiveness of Bryant's programs;
 - b. indicate any need for remedial action; and
 - c. determine the degree to which Bryant's goals and objectives have been attained.
7. Serving as Bryant's representative in its dealings with Federal and state EEO agencies.
8. Serving as a liaison between Bryant and Minority organizations, Female organizations, community action groups, and governmental agencies.

9. Keeping management informed of the latest developments in the Equal Employment Opportunity area.
10. Assisting in the investigation, handling, and disposition of employee complaints of discrimination and sexual harassment.

All Bryant managerial and supervisory personnel will have responsibility for and may be evaluated, at least in part, on their commitment to and participation in the success of this Plan. Their responsibilities may include, but are not limited to the following:

1. Assisting in the identification of problem areas and assisting in the establishment of Bryant's goals and objectives.
2. Actively participating with local Minority and Female organizations, community action groups, and community service programs.
3. Auditing training programs, hiring and promotion patterns to ensure that there are no impediments to the attainment of goals and objectives established in this Plan.
4. Holding periodic Equal Employment Opportunity discussions with employees to be certain that Bryant's policies are being followed.
5. Continually reviewing qualifications of all employees to ensure that Minorities and Females are given full opportunities for transfers and promotions.
6. Counseling all employees as to their career whenever requested or otherwise appropriate.
7. Ensuring by periodic audit that:
 - a. posters and notices are displayed;
 - b. all facilities are integrated, both in policy and use; and
 - c. Minority and Female employees are afforded a full opportunity and encouraged to participate in all Bryant-sponsored educational, training, recreational, and social activities.
8. Including as part of its management orientation and training an understanding that all managers' work performance may be evaluated, at least in part, on the basis of their Equal Employment Opportunity commitment and performance.
9. Understanding and communicating that responsibility for preventing harassment of employees is, in the first instance, that of the supervisor; and, that if such harassment occurs, it is the supervisor's responsibility to report such action to the appropriate personnel.

IDENTIFICATION OF PROBLEM AREAS

Bryant conducts in-depth analyses of its total employment process and of the composition of its workforce by Minority group status and sex to insure that there are no impediments to equal employment opportunity.

Additionally, Bryant conducts other detailed analyses of its total employment process to ensure that:

- Personnel activity (applicant flow, hires, promotions, terminations, and other personnel actions) and the overall selection process do not contain selection disparities between Minorities and non-Minorities or between Females and Males.
- Bryant's compensation system is free of race, ethnic or gender based disparities.

- Selection, recruitment, referral, and other personnel procedures do not result in disparities in the employment or advancement of Minorities or Females. In this regard, Bryant has reviewed all of its procedures and forms and is satisfied that none are causing or resulting in such disparities.

Other areas which Bryant evaluates for potential impact on the success of its Affirmative Action Plan include, but are not limited to:

- That application and pre-employment forms are in compliance with Federal and state regulations.
- That Bryant's policies are in compliance with Federal and state requirements.
- That Minorities or Females are neither excluded nor discouraged from participating in Bryant-sponsored activities or programs, such as training, relocation, and tuition re-imbusement.
- That Bryant's employees are aware of its commitment to Equal Employment Opportunity and Affirmative Action.
- That Bryant's outreach and recruitment sources are aware of its commitment to Equal Employment Opportunity and Affirmative Action, and that vendors, suppliers and subcontractors are notified of their responsibilities.

ACTION-ORIENTED PROGRAMS

Bryant continues to conduct detailed analyses of position descriptions to ensure that they accurately reflect position functions and are consistent for the same position within the facility and with similar jobs throughout the organization.

Bryant uses job performance criteria to ensure that its worker specifications are accurate and non-discriminatory. This includes an evaluation of education, experience, and skill requirements to ensure that those requirements do not constitute inadvertent discrimination. Where job requirements are found to screen out a disproportionate number of Minorities or Females, those requirements will be validated by the Human Resources department, in accordance with applicable regulations.

Job descriptions are made available to all members of management involved in the recruiting, screening, selection, promotion, and transfer process. Outside recruitment sources are provided with requisite job-related information; consequently, those recruiting sources are expected to recruit qualified persons on a non-discriminatory basis.

Bryant evaluates the total selection process to ensure freedom from bias, so that goals and objectives can be obtained. That evaluation includes:

- All personnel involved in the recruiting, screening, selection, promotion, transfer, disciplinary, and related processes are carefully selected and trained to ensure elimination of bias in all personnel actions. Training includes discussions and briefings on current EEO policies and regulations as a part of supervisory and management development programs and seminars.
- Bryant observes applicable requirements of the Uniform Guidelines on Employee Selection procedures.

- Selection techniques which may have the effect of discriminating against Minorities or Females will not be used. If data ever exists that suggests such unfair discrimination or exclusion of Minorities or Females, Bryant will analyze the procedure in question and eliminate it if it is not valid.

Techniques to improve recruitment and increase the flow of Minority and Female applicants may include:

- Contacts with Minority and Female organizations, including briefing sessions for and correspondence with representatives of Minority and Female organizations.
- Minority and Female employees, as well as all employees, are encouraged to refer qualified applicants.
- Females and Minorities are included on the Human Resources staff, whenever possible.
- Bryant provides a student internship program which may be used to reach Minorities and Females
- When recruiting brochures pictorially present work situations, both Minority and Female employees are included.

Bryant periodically reviews its promotion criteria and procedures to ensure that promotional decisions are made on a non-discriminatory basis. In an effort to maintain acceptable promotion rates for qualified Minorities and Females, Bryant may utilize the following procedures:

- Exempt and non-exempt jobs are posted in the facility.
- Bryant maintains records which include the academic, skill, and experience levels of individual employees, including Minority and Female employees.
- Bryant conducts formal employee evaluations and appropriate job training and cross-training programs.
- All worker specifications are job-related. Neither Minorities nor Females are required to possess higher qualifications than other candidates for any position.
- Career counseling takes place, including individual consultations and educational assistance. All employees are eligible to participate in Bryant's educational assistance program and in-house training programs. Employees are encouraged to participate in programs which are related to their present job and to jobs to which they might reasonably progress.

All facilities and Bryant-sponsored social and recreational activities and programs are always integrated, and all employees are encouraged to participate.

Appropriate consideration is given to Minorities and Females not currently in the workforce with requisite skills who can be recruited through affirmative action measures. Bryant uses such programs as flexible work hours, part-time hours, and temporary assignments to encourage their participation.

Internal Dissemination of Policy: Bryant communicates the existence of its Affirmative Action Plan, via various media, to its employees and to supervisory, managerial, and Human Resources personnel, and makes available to them, by a wide variety of means, such elements of the Plan and such other

information as will enable them to know of and take advantage of its benefits. Methods of internal dissemination may include all or some of the following:

- Bryant's Equal Opportunity and Affirmative Action Policy is made available to all managerial, supervisory, and other key personnel and periodic meetings are conducted with managerial and supervisory personnel to explain the background, purpose, and intention of the policy and individual responsibility for its implementation.
- Bryant publicizes its policy in meetings with employees, and by inclusion in its employee handbook, collective bargaining agreements, publication in its newsletter, catalogue, and on its website.
- The policy and individual employee's responsibilities as they relate to it are discussed at divisional meetings, individual sessions with managers, and at diversity awareness education sessions.
- Bryant may publish articles, from time-to-time, concerning its Equal Employment Opportunity programs and efforts, including new hire and promotion announcements.
- Official notices of Equal Employment Opportunity, Affirmative Action, and Bryant's policy are posted. As required, the following postings will be prominently displayed at each Bryant facility, in a location where they can be seen by both employees and applicants for employment:
 - EEO ("Equal Employment Opportunity is the Law") poster;
 - The Federal polygraph law poster;
 - The Federal minimum wage poster;
 - The Federal OSHA poster; and,
 - The "Family and Medical Leave Act" poster.
- When employees are featured in product or consumer advertising, employee handbooks, and similar publications, both Minorities and Females are pictured, as are non-Minorities and Males.

External Dissemination of Policy: Bryant communicates to recruiting sources and other outside agencies, as well as prospective employees the existence of its Affirmative Action Plan and makes available to both current and prospective employees such elements of the Plan and such other information as will enable them to know of and take advantage of its benefits. This communication is conducted through a wide variety of means, including all or some of the following:

- Recruiting sources are informed orally or in writing of Bryant's policy and commitment to Equal Employment Opportunity and Affirmative Action, stipulating that these sources actively recruit and refer qualified Minorities and Females for all positions listed. Bryant provides listings of outreach resources to internal recruiters, and to appropriate management personnel.
- All purchase orders, leases, contracts, subcontracts, etc., covered by or subject to Executive Order 11246 incorporate the Equal Employment Opportunity clause.
- Bryant informs outside interested parties, some of which include Minority and Female organizations, community agencies, community leaders, secondary schools, colleges, and

universities, including historically Black and Hispanic colleges and universities, state Employment Service offices, and other such organizations, of Bryant's Equal Employment Opportunity policy and Affirmative Action Plan.

- Bryant recruits prospective employees through multiple sources, including use of an on-line application service available through the Internet. Included on the Bryant internet website is a statement of the university's commitment to equal employment opportunity and affirmative action.
- Should employees be pictured in consumer or help wanted advertising, both Minorities and Females will be shown, as well as non-Minorities and Males.

Support of Action Programs: Bryant is committed to the support of action programs by, among other things:

- Encouraging supervisory employees, Human Resources Department employees, and Minority and Female employees to participate in programs which encourage the upward mobility, training, and hiring of qualified Minorities and Females.
- Supporting high school, vocational, and university training programs designed to enable Minority and Female graduates of these institutions to compete in the open employment market on a more equitable basis and to become employees at Bryant.
- Publicizing achievements of Minority and Female employees in university newsletters and/or by posting on university bulletin boards.
- Supporting programs developed by organizations concerned with employment opportunities for Minorities and Females.
- Encouraging managerial, supervisory, Human Resources, as well as Minority and Female employees to serve on appropriate employment councils, community boards, and other similar organizations.

Sex Discrimination: Bryant's Human Resources policies and practices comply with sex discrimination guidelines.

1. Recruitment and Advertising:

- Bryant recruits employees of both sexes for all jobs.
- There are no jobs, at present, where sex is a bona fide occupational qualification.
- Advertisements for employment in newspapers and other media do not express a sex preference.
- No advertisement will be listed as "Male" or "Female".

2. Job Policies and Practices:

- Employees of both sexes have equal opportunity to obtain any available job that they may be qualified to perform.
- Written personnel policies relating to this subject area expressly indicate that there shall be no discrimination against employees on account of sex.
- Written policies and practices assure appropriate physical facilities to both sexes.
- No Female applicant is denied the right to any job that she is qualified to perform in reliance upon state "female protective laws".

- There are no differences for Male and Female employees on the basis of sex in any retirement age policies.
3. Marriage and Childcare Responsibilities:
 - No distinction is made between married and unmarried persons, whether Male or Female.
 - Employment is not denied to Females with young children.
 - Females are not penalized in their conditions of employment because of time required away from work on account of child bearing.
 - Child bearing is considered justification for medical, family, or personal leaves of absence, respectively.
 4. Equal Pay:
 - There are no distinctions based upon sex in employment opportunities, wages, hours, or other conditions of employment.
 - Wage schedules are not related to or based on the sex of the employees.
 - When jobs require substantially equal skill, effort, and responsibility and are performed under similar working conditions, wage scales are the same.
 - In the area of employer-employee contributions for insurance and other fringe benefits, these guidelines are observed.
 5. Seniority:
 - Seniority lines and lists are determined, whenever necessary, without regard to sex.
 6. Affirmative Action:
 - Bryant is taking affirmative action to recruit Females to apply for jobs that are traditionally male-dominated or in which placement goals have been established for Females.
 - No distinctions based on sex are made in any employee or management training programs. Both sexes have equal access to all training programs.

Religion and National Origin Discrimination: Bryant's Human Resources policies and practices comply with religion and national origin discrimination guidelines.

1. Bryant does not discriminate against employees or applicants for employment because of their religion or national origin. Affirmative action is taken to ensure that applicants are employed, and that employees are treated during employment, without regard to their religion or national origin.
2. Members of religious and ethnic groups are receiving fair consideration for job opportunities. Both internal and external communications include Bryant's commitments to non-discrimination and equal opportunity.
3. Bryant makes reasonable accommodations to the religious observances and practices of employees and applicants for employment. Bryant allows employees to take time off from work for religious holidays through its annual holiday schedule, which includes a personal day as well as vacation time.

INTERNAL AUDIT AND REPORTING SYSTEMS

Bryant has developed and implemented an auditing system by which it periodically measures the effectiveness of its total affirmative action program in order to insure its success.

Records of Personnel Activity: Bryant monitors and maintains records of all personnel activity, including applicants, referrals, offers, hires, promotions, transfers, terminations, compensation and training in order to ensure that its non-discriminatory policy is carried out.

Bryant audits and evaluates all aspects of the selection process, including job descriptions, position titles, worker specifications, application forms, interview procedures, test administration, referral procedures, training, promotion procedures, final selection processes, and similar activities, to insure that they do not result in disparities in the employment or advancement of Minorities or Females.

Bryant has established and has in place compensation policies and systems which are applied fairly and equitably, ensuring that there is no discrimination in pay based on gender, race, or ethnicity.

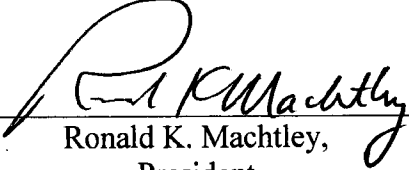
Bryant monitors performance toward equal employment opportunity objectives on a regular basis, by periodically measuring its utilization of Minorities and Females in each Job Group, with particular attention to progress toward goals when and where established. The results of this monitoring and Bryant's progress toward goals will be evaluated by Human Resources and communicated to and reviewed with top management, both at the University and the Department level, through regular discussions. To ensure the effectiveness of the program, Human Resources will communicate with and advise top management of its recommendations to improve and enhance Bryant's performance.

AFFIRMATIVE ACTION PLAN
FOR VETERANS AND
INDIVIDUALS WITH DISABILITIES

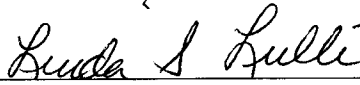
Bryant University

Smithfield, RI

July 1, 2011 - June 30, 2012



Ronald K. Machtley,
President



Linda S. Lulli,
Affirmative Action Officer

The following is a summary of Bryant's Affirmative Action Plan for Veterans and Individuals with Disabilities.

GENERAL REQUIREMENTS

Bryant shall make all efforts reasonably feasible to take affirmative action to employ and advance in employment qualified Individuals with Disabilities and Veterans, at all levels of employment, including the executive level, at this facility. This Plan has been prepared to accurately reflect Bryant's current status, its actions to date, and its intentions for the future.

Overall responsibility for fulfillment of the Equal Employment Opportunity Policy and this Affirmative Action Plan is assigned to Linda S. Lulli, Bryant's Associate Vice President of Human Resources, with assistance from local Human Resources staff. Bryant's Associate Vice President of Human Resources will periodically conduct analyses of all personnel actions to ensure that Bryant is living up to its stated intentions. The management of Bryant will be responsible for the ongoing monitoring of all personnel actions in their respective areas of supervision and will carry out the intentions of the Equal Employment Opportunity Policy and this Affirmative Action Plan to the fullest extent possible.

As used in this Affirmative Action Plan, the terms "Individuals With Disabilities", "Veterans", "physically and mentally disabled employees and/or applicants for employment", and other similar terms are intended to be interchangeable with and to encompass the terms "handicapped individuals and veterans" and "physically and mentally handicapped persons, veterans, employees and/or applicants for employment" and other similar terms.

DEFINITIONS

"Individuals With Disabilities" means persons who:

1. have a physical or mental impairment which substantially limits one or more of such person's major life activities;
2. have a record of such impairment; or
3. are regarded as having such impairment.

"Qualified Individuals With Disabilities" means individuals with disabilities who are capable of performing the essential functions of a particular job with or without reasonable accommodation to his/her disability.

"Substantially Limits" means that the disabled individual is likely to experience difficulty in securing, retaining, or advancing in employment because of a real or perceived disability.

"Disabled Veteran" means (1) a veteran who is entitled to disability compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by Department of Veterans Affairs for a disability, or (2) a person who was discharged or released from active duty because of a service-connected disability. This includes veterans formerly identified as "Special Disabled Veterans."

“Qualified Disabled Veteran” means a disabled veteran who satisfies the requisite skill, experience, education and other job-related requirements of the employment position such veteran holds or desires, and who, with or without reasonable accommodation, can perform the essential functions of such position.

“Other Protected Veteran” means a person who served on active duty at any point between December 7, 1941 and April 28, 1952; or in a campaign or expedition for which a campaign badge has been authorized, under laws administered by the Department of Defense.

“Recently Separated Veteran” means any veteran during the three-year period beginning on the date of such veteran’s discharge or release from active duty.

“Armed Forces Service Medal Veteran” means any veteran who participated in a military operation for which an Armed Forces Service Medal was awarded.

POLICY STATEMENT

Bryant will not discriminate against any employee or applicant for employment because of that person's status as an Individual with Disabilities, Disabled Veteran, Other Protected Veteran, Recently Separated Veteran, or Armed Forces Service Medal Veteran, with respect to any position for which the person is qualified. Bryant will take affirmative action to employ, advance in employment, and otherwise treat qualified Individuals with Disabilities, Recently Separated Veterans, Other Protected Veterans, and Armed Forces Service Medal Veterans, without discrimination based on their physical or mental disability, or veteran status, in all employment practices, which include, but are not limited to:

- Advertising, recruiting, hiring, training, promoting, upgrading, and transferring applicants or employees;
- Ensuring that all employment decisions are based only on valid job requirements;
- Basing decisions on employment so as to further the principle of equal employment opportunity;
- Ensuring that promotion and transfer decisions are in accord with principles of equal employment opportunity by imposing only valid, job-related requirements for such opportunities; and
- Ensuring that all other personnel actions, such as rates of pay and other forms of compensation, benefits, layoffs, return from layoffs, terminations, Bryant-sponsored training and educational assistance, and social and recreational programs, will be administered without discrimination.

REVIEW OF PERSONNEL PROCESSES

Bryant has reviewed its personnel processes to determine that its present procedures assure careful, thorough, and systematic consideration of the job qualifications of known employees and applicants with disabilities, Disabled Veterans, Recently Separated Veterans, Other Protected Veterans, and Armed Forces Service Medal Veterans, for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. Bryant will ensure that personnel processes do not stereotype disabled individuals in a manner which limits their access to all jobs for which they are qualified.

ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS OF EMPLOYEES

Bryant recognizes its obligation and does make a reasonable accommodation to the known physical and mental limitations of an otherwise-qualified individual with a disability, unless Bryant is able to demonstrate that such an accommodation would impose an undue hardship on the conduct of its business. In determining the extent to which an accommodation might be made, Bryant considers the following factors, among others: business necessity, and financial cost and expense.

If an employee with a known disability has significant difficulty performing a job and it is reasonable to conclude that the performance problem may be related to the known disability, Bryant may confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability; if the employee responds affirmatively, Bryant may inquire whether the employee is in need of a reasonable accommodation.

HARASSMENT

It is the policy of Bryant to promote a workplace in which all employees are treated with dignity and respect and that is free from all forms of harassment, including harassment on the basis of disability. Any form of harassment of employees which occurs in the workplace, or in other settings in which employees may find themselves in connection with their employment, is prohibited by this policy and will not be tolerated by Bryant. This policy also prohibits retaliation against any employee who complains of conduct that may violate this policy or against any employee who cooperates or assists with an investigation of any such complaint.

Any employee who feels that he/she has been subjected to any harassment on the part of a supervisor or manager, another employee, a customer or vendor should bring the matter to the attention of either his/her immediate supervisor or the Associate Vice President of Human Resources.

Bryant will promptly and fairly investigate any complaint of harassment. If inappropriate conduct is found to have occurred, it will act promptly to eliminate such conduct and, where appropriate, impose disciplinary action on the person(s) responsible for such conduct, up to and including possible termination from employment.