URS CORPORATION

2014 AFFIRMATIVE ACTION PROGRAM

Cincinnati, OH 45202

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URS CORPORATION

525 VINE STREET SUITE 1800 CINCINNATI, OH 45202

EQUAL EMPLOYMENT OPPORTUNITY AFFIRMATIVE ACTION PROGRAMS

2014

Approved by: _____ Mary Sax RBU Human Resources Manager

EQUAL EMPLOYMENT OPPORTUNITY AFFIRMATIVE ACTION PROGRAM (AAP)

OF

URS CORPORATION CINCINNATI, OH (CINCI)

Federal Identification Number:	94-1716908
Inclusive Dates of the AAP:	JANUARY 1, 2014 – DECEMBER 31, 2014
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EQUAL EMPLOYMENT OPPORTUNITY AFFIRMATIVE ACTION PROGRAM

OF

URS CORPORATION

525 VINE STREET SUITE 1800 CINCINNATI, OH 45202

JANUARY 1, 2014 - DECEMBER 31, 2014

VOLUME 1

PROGRAM NARRATIVES

NOTICE: This material contains confidential and privileged commercial/financial information or proprietary trade secrets not generally available to the general public. Disclosure will be harmful to URS Corporation's competitive position.

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AFFIRMATIVE ACTION PROGRAM

INTRODUCTION

The following Affirmative Action Program ("AAP") has been developed in accordance with contract compliance regulations from the Federal Government's Executive Order 11246, pertaining to Affirmative Action Programs for Minorities and Women, The Rehabilitation Act of 1973 for Individuals with Disabilities, and the Vietnam Era Veterans Readjustment Assistance Act of 1974, and the Jobs for Veterans Act, both concerning protected veterans.

The scope of this Affirmative Action Program includes all departments of URS Corporation. This document:

- Specifies our equal employment policy along with a detailed description of how that policy is implemented;
- Identifies areas of minority and/or women concentration or under-representation;
- Establishes goals for specific areas of the workforce; and,
- Outlines the efforts that will be taken to ensure that the Affirmative Action Program is implemented.

URS Corporation, Cincinnati, OH (CINCI) Facts

URS Corporation offers a range of professional planning, engineering and architectural design, environmental, construction, and program and construction management services. We also provide system integration, operations and maintenance, management and a wide range of specialized technical services. We are organized into three business lines: Infrastructure & Environment ("IE"), Federal Services ("FS"), and Energy & Construction ("EC"). With an established presence in major cities in the Americas, Europe, the Middle East, and Asia-Pacific, we serve the U.S. federal government, state and local government agencies and private-industry clients, including Fortune 500 companies worldwide.

URS Corporation, Cincinnati, OH (CINCI) has an on-going commitment to the goals of equal opportunity and affirmative action programs. This document was developed to meet the needs of personnel in implementing the affirmative action program during the current program year.

CONFIDENTIALITY

This Affirmative Action Program contains confidential information that is subject to the provisions of 18 U.S.C. S1905. Chrysler Corp. v. Brown, 441, U.S. 281, 19 FEP 475 (1979).

Copies of this Affirmative Action Program and all related appendices, documents and supporting data are made available on loan to the U.S. Government upon the request of said government on the condition that the government hold them totally confidential and not release copies to any person whatsoever. This Affirmative Action Program and its appendices and other supporting documents contain much confidential information that may reveal, directly or indirectly, the organization's plans for business or geographical expansion or contraction. The company considers this Affirmative Action Program to be exempt from disclosure, reproduction and distribution under the Freedom of Information Act upon the grounds, among others, that such materials constitute: (1) personnel files, the disclosure of which would constitute a clearly unwarranted invasion of personnel 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 reproduction of which are exempt from disclosure under 5 U.S.C. 552(b) (7) (C); and as (4) matters specifically exempt from disclosure by statute, which are exempt 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 this AAP be kept confidential.

Specifically, the company does not consent to the release of any information whatsoever contained in this Affirmative Action Program under the Freedom of Information Act or otherwise. If the U.S. Government, or any agency or subdivision thereof, 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 Chief Executive Officer of the company 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 the company.

The company further requests that everyone who has any contact with this Affirmative Action Program, 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.

PROGRAM TERMINOLOGY

The terms "incumbency to availability analysis," "utilization," "problem area," and "adverse impact" or "goals," appearing in this Affirmative Action Program, are terms the company is required to use herein by government regulations. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance, although the company will use the terms in total good faith in connection with its Affirmative Action Program. Such usage does not necessarily signify that the company agrees that these terms are properly applied to any factual situation.

Whenever the term "placement goal" is used, the following two major principles should be applied: 1) Placement goals may not be rigid and inflexible quotas. Quotas are expressly forbidden. 2) In all employment decisions, the contractor must make selections in a nondiscriminatory manner. Placement goals do not provide the contractor with a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that person's race, color, religion, sex, or national origin (41 C.F.R. 60-2.16(e)).

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The intranet-posted version of this guidance is the document of record.

Title	Equal Opportunity Affirmative Action		
Document Type	Policies & Procedures	Doc. No.	030.010
Department	Human Resources	Effective Dt.	7/1/2012
Division	□ Corporate □	Revision No.	7
	☐ Energy & Construction		
	☐ Federal Services		
	☑ Infrastructure & Environment		
	☐ Oil & Gas		
Audience	[PPI Audience]		
Language	English		
Authorization	Chief Executive Officer		
Responsibility	Vice President Human Resources		

POLICY

The Company provides equal employment opportunity to all qualified employees and applicants for employment without regard to race, religious creed, color, religion, creed, sex, sexual orientation or preference, national origin, citizenship status, ancestry, age, marital status, medical condition, physical or mental disability, or protected veteran's status in all employment decisions, including but not limited to recruitment, hiring, compensation, training and apprenticeship, promotion, upgrading, demotion, downgrading, transfer, termination, and all other terms and conditions of employment.

As a government contractor, the Company is committed to complying with its obligations to Affirmative Action. Affirmative Action is a policy of inclusion rather than exclusion, having as its goal to attract and retain qualified individuals of either sex and of all races and ethnicities. We assess our program towards that goal by analyzing how representation of minorities and women at all levels in the organization compares with the sex, ethnic and racial composition of the qualified available workforce in the appropriate geographical area from which employees are drawn.

The Company, in compliance with the requirements of Executive Order 11246, as amended, and Executive Order Section 3C as amended, and the Rehabilitation Act, maintains a written affirmative action program in the local Human Resources Departments, portions of which are available to employees upon request.

PURPOSE

To provide equal employment opportunity to all persons without regard to their race, religious creed, color, religion, creed, sex, sexual orientation or preference, national origin, citizenship status, ancestry, age, height, weight, marital status, medical condition, physical or mental disability, or protected veteran's status, and to promote the full realization of equal employment opportunity through a positive continuing program that complies in spirit and letter with all federal, state and local non-discrimination and fair employment laws and directives.

Any employee who believes that he/she (or others) is being subjected to a working environment that is not free from discrimination, intimidation or harassment should contact his/her Human Resources Representative.

The intranet-posted version of this guidance is the document of record.

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RESPONSIBILITY

The Chief Executive Officer is responsible for ensuring that these Policies and Procedures are continuously implemented within the Company and that supervisors and others are apprised of the Company's strict prohibition against violations of these policies and procedures.

The Human Resources Representative shall report to the Vice President of Human Resources within 24 hours if the Company 1) receives an employment complaint filed by a local, state or federal agency, 2) is served with a civil suit filed on behalf of an employee or former employee, or 3) has knowledge of a serious personnel-related problem, including sexual harassment, that could lead to such a claim or suit.

DESIGNATION OF RESPONSIBILITY

(41 CFR 60-2.17(a))

- A) Management: Mary Sax, RBU Human Resources Manager, has overall responsibility for our Equal Opportunity Policy and Affirmative Action Program. It is her responsibility to ensure that these policies are effectively managed and that managers at all levels of the organization take part in their implementation.
- B) **EEO Official**: The company's EEO Official, Erin Emmer, Employment Counsel has been delegated the following responsibilities:
 - 1. Assist in implementing the company's policy on Equal Opportunity;
 - 2. Prepare and update annually the Affirmative Action Plan;
 - Prepare annually and submit the company's Standard Form 100 EEO-1 report to the EEOC/OFCCP Joint Reporting Committee, and the VETS-100 Form to the Department of Labor's Office of Veterans Employment & Training;
 - 4. Maintain a continuing audit of and documentation on the company's activity to identify possible problem areas to measure overall effectiveness of the plan implementation. Follow up with advice and recommendations where appropriate to ensure necessary actions are taken:
 - 5. Assist in resolving identified problem areas;
 - Report periodically to senior management, progress toward achieving affirmative action goals and objectives;
 - 7. Ensure that members of management are kept abreast of recent developments in the Equal Employment Opportunity area and applicable federal, state and local laws and regulations;
 - 8. Serve as liaison between the company and EEO enforcement agencies, as well as women and minorities organizations, and community based organizations;
 - Initiate internal and external communications regarding equal opportunity activities of the company.
- C) Management Responsibilities: In addition to responsibility for implementation of the Affirmative Action Program, managers have certain responsibilities and may be involved with the EEO Official in the following ways:
 - Assist in the "identification of problem areas" as may exist and in the establishment of Affirmative Action goals and objectives;

Designation of Responsibility (continued)

- 2. Assist in auditing training programs, hiring and promotional patterns and, as necessary, remove any impediments to our goals and objectives;
- Have regular discussions with their managers to assure our policies are being followed and that they understand their performance evaluation includes equal opportunity efforts and results, along with other criteria;
- 4. Review the qualifications of all employees to assure in the process that minorities and women are given full opportunities for promotion and transfer;
- 5. Provide job/career counseling to all employees;
- 6. Preview and assure that:
 - All required federal EEO posters are properly displayed;
 - The facility is desegregated and only locker rooms and restrooms are maintained separately by gender;
 - Minorities and women along with other employees may be encouraged to participate in company sponsored educational, training, recreational and social activities.
- All managers are responsible for taking action to prevent harassment and intimidation of employees.

ACTION ORIENTED PROGRAMS TO OBTAIN GOALS AND OBJECTIVES

(41 CFR 60-2.17(c))

In addition to our ongoing efforts, the company will focus on actions designed to enhance our Affirmative Action performance.

A) Internal Promotion and Transfer Systems: We rely upon an effective system for ensuring that employees have equal opportunity to advance in employment as opportunities occur. Because of the importance of these systems to our Affirmative Action Program, we have reviewed and clarified the responsibilities and methods used.

Following is a description of the system as we intend it to operate:

 Promotional Process: Vacancies are filled from within whenever possible either through promotions or transfers. Human Resources may search within the company for qualified candidates to promote into open positions.

"Promotable Employees" are identified in a number of ways, which may include but are not limited to:

- · Periodic review of the experience and background of employees;
- Review of education reimbursement applications;
- Discussions with employees regarding career growth and educational interests;
- · Recommendations from other managers; and
- · Review of wage and salary actions and performance evaluation information.
- Transfer System: It is our practice to make it possible for employees to request transfers to other departments within the company and grant transfers wherever possible to fit the needs and interests of both employees and the organization.

Employees can request a transfer in the following ways:

- Directly filing for a position with Human Resources.
- Through their immediate manager, who forwards their request to Human Resources.

Action Oriented Programs (continued)

Employees requesting consideration for transfer may be contacted by Human Resources to determine the reason for the request. Particular attention may be paid to requests of minorities and women to ensure that their requests do not stem from any discriminatory problem in their current position.

- B) Positions are reviewed on an on-going basis for validity of the qualification requirements. The process for review is as follows:
 - 1. Open positions are reviewed with Human Resources, as a usual procedure;
 - 2. Obvious corrections to job titles, duties, qualification statements, and position are made;
 - The amended position may be reviewed with the hiring manager for concurrence on position requirements.

The foregoing process is also used in establishing new positions. The validity of qualification requirements is also checked by Human Resources as requisitions are received from hiring managers.

- C) Other Action Oriented Programs: The following additional action oriented programs aid in the implementation of our Affirmative Action Program. (Note: These actions are not intended to reflect that a problem exists, or is identified, nor do they correct unidentified problems.)
 - Personnel procedures and actions will be monitored by Human Resources to support equal opportunity and affirmative action.
 - Contact will be initiated and regularly reinforced with community organizations that specialize in the training, placement, and support of women, minorities, veterans and people with disabilities.
 - 3. A primary function of managers is the periodic review of an employee's performance to ensure that they understand and can carry out the duties and requirements of their assignments; to commend employees for superior performance and to assist employees in their efforts to improve and advance in their careers.
- **D)** Formal Performance Review Program: This process is designed to review an employee's total performance for the period since their last review. Job performance is compared to standards and discussed with the employee. A summary of the review, including the employee's accomplishments, development needs and other performance information is placed in the employee's personnel file.

Human Resources is responsible to review Performance Appraisals and provide assistance as may be needed to increase manager's effectiveness to guide, motivate and assist employees with their development.

- E) Action-oriented programs are being developed and implemented in the following areas as they are related to any problem areas identified in this Affirmative Action Program:
 - (1) Workforce Analyses (by organizational profile and job groups);
 - (2) Employment Selection Processes (including: hires, promotions, terminations, applications for employment);
 - (3) Personnel Recordkeeping Procedures and Systems;
 - (4) Recruiting Efforts (for Minorities and Women); and
 - (5) Compensation Analyses.

INTERNAL AUDIT AND REPORTING SYSTEM

(41 CFR 60-2.17(d))

To reach our Affirmative Action Goals and Objectives, the company will develop a systematic approach to monitoring and measuring the results of its Program. The EEO/AAP Audit and Reporting System will be implemented as follows:

A) Monitoring of Internal Reports:

The following company reports will be generated and monitored on a regular basis by our designated EEO Official:

- 1. Applicant Tracking, which will include:
 - Name, race and sex of each applicant, where possible, as designated by the company;
 - Referral source;
 - Job applied for;
 - Disposition of the application;
 - Self-identification
- Employment Activity Reports: Our Human Resources System records employee hires, transfers, promotions, and terminations, and these actions will be analyzed on a regular basis to ensure that our policy of nondiscrimination is carried out.

B) Additional Internal Auditing and Reporting Procedures:

- 1. The EEO official will present to its senior management a report of AAP Performance to Plan, including a review of placements into each AAP job group and possible problem areas.
- 2. AAP report results will then be reviewed with appropriate levels of management.

C) Internal Compliance Review:

We will conduct reviews, at least annually, to audit minority and women AAP progress and performance; identify any problem areas that may exist; and conduct an analysis for adverse impact.

AAP For Individuals with Disabilities

(Section 503 of The Rehabilitation Act of 1973)

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SECTION I

EQUAL EMPLOYMENT POLICY (41 CFR 60-741.44(a))

URS Corporation, Cincinnati, OH (CINCI) undertakes affirmative action as described, to recruit, hire, train and promote, qualified individuals with disabilities and ensure that all personnel actions, including compensation, are administered without regard to a person's disability; and that employment decisions are based only on valid job requirements. In offering employment or promotions to individuals with disabilities, URS Corporation, Cincinnati, OH (CINCI) will also ensure that the compensation offered is not reduced based upon any other income related to disability-related income or benefits.

It is company policy that employees and applicants are not subjected to harassment, intimidation, threats, coercion or discrimination merely because they filed a complaint or participated in an investigation requiring equal employment opportunity for disabled individuals.

To ensure equal employment opportunity and fair treatment, URS Corporation, Cincinnati, OH (CINCI) will periodically measure the effectiveness of its overall affirmative action program efforts. Our Vice President, Human Resources, is assigned overall responsibility for the implementation of our affirmative action program.

SECTION II

REVIEW OF PERSONNEL PROCESSES (41 CFR 60-741.44(b))

URS Corporation, Cincinnati, OH (CINCI) will ensure that its personnel processes provide a thorough and systematic consideration of the job qualifications of applicants and employees with known disabilities for job vacancies filled through hiring or promotion and for all training opportunities.

In addition, URS Corporation, Cincinnati, OH (CINCI) will ensure that its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. The company ensures that its personnel processes do not stereotype disabled persons in a manner which limits their access to all jobs for which they are qualified. The company periodically reviews such processes and makes any necessary modifications to ensure that these obligations are carried out. A description of the review and any necessary modifications to personnel processes or development of new processes shall be included in any affirmative action programs required under this part. The contractor will design procedures that facilitate a review of the implementation of this requirement by the contractor and the Government.

SECTION III

PHYSICAL AND MENTAL QUALIFICATIONS (41 CFR 60-741.44(c))

URS Corporation, Cincinnati, OH (CINCI) will ensure that to the extent qualifications may screen out qualified individuals with disabilities, they are job-related for the position in question and consistent with business necessity.

Whenever physical or mental job qualifications are applied to the selection of an applicant or employee, to the extent that qualification standards may screen out qualified individuals with disabilities, the standards will be related to the specific job or jobs for which the individual is being considered, consistent with business necessity.

The company may determine that an individual poses a direct threat to the health or safety of themselves or others in the workplace and use this information as a defense to allegations of discrimination.

In the event a medical examination is required to qualify for a job, the results of such an examination will be used only in accordance with the provisions of this Plan. We will inquire into an individual's physical or mental condition or conduct a medical examination only when it is necessary to evaluate the individual for his or her present job or one for which the individual is being considered. In any event, all information obtained will be kept confidential except as may be expressly waived in writing by the employee or under the following conditions:

- Supervisors and managers may be informed regarding work or duty restrictions of the individual and regarding needed reasonable accommodations;
- First Aid and Safety personnel may be informed, to the extent appropriate, if the condition requires emergency treatment; and,
- Government officials engaged in enforcing the Rehabilitation Act, VEVRAA, or the Americans with Disabilities Act (ADA) may be informed.

SECTION IV

REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS OF EMPLOYEES (41 CFR 60-741.44(d))

URS Corporation, Cincinnati, OH (CINCI) will make reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability unless it can be shown that the accommodation would impose an undue hardship on the operation of the business. In determining the extent of the accommodation to be made, business necessity and financial costs may be considered.

When appropriate, if an employee with a known disability is having significant difficulty performing his or her job and discussion relates the performance problem to a known disability, the company may confidentially discuss whether the employee is in need of a reasonable accommodation to address the problem.

Information on individuals with disabilities will be kept confidential except in the following situations:

- Supervisors and managers may be informed regarding restrictions to the work or duties of the individual and regarding needed reasonable accommodations;
- First Aid and Safety personnel may be informed where and to the extent appropriate, if the condition might require emergency treatment; and
- Government Officials engaged in enforcing the Rehabilitation Act, VEVRAA, and the ADA may be informed.

SECTION V

HARASSMENT (41 CFR 60-741.44(e))

URS Corporation, Cincinnati, OH (CINCI) will ensure that people with disabilities are not harassed because of known physical or mental limitations.

SECTION VI

EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND POSITIVE RECRUITMENT (41 CFR 60-741.44(f))

We have reviewed our employment practices to determine whether our personnel programs provide effective affirmative action for employment and advancement of qualified individuals with disabilities. As appropriate, we will undertake to do one or more of the following:

- a) Enlist the assistance and support of recruiting sources (including State Employment Agencies, State vocational rehabilitation agencies or facilities, sheltered workshops, college placement offices, State education agencies, and organizations of and for individuals with disabilities) to provide meaningful employment opportunities for qualified individuals with disabilities.
- b) Establish contact with appropriate social service agencies, organizations of and for individuals with disabilities and vocational rehabilitation agencies or facilities, for such purposes as advice, technical assistance, and referral of potential employees.
- c) Include individuals with disabilities when employees are featured in consumer, promotion, or employment advertising. Individuals with disabilities can participate in career days, youth motivation programs and related activities in the community.
- d) Send written notification of our EEO policy to subcontractors, vendors and suppliers, requesting appropriate action on their part.
- e) Consider applicants with known disabilities for other available positions for which they may be qualified when the position(s) applied for is unavailable.
- f) Take positive steps to consider qualified individuals with disabilities not currently in the workforce who have the requisite skills and can be recruited through affirmative action efforts.

SECTION VII

INTERNAL DISSEMINATION OF POLICY (41 CFR 60-741.44(g))

To ensure greater employee participation in our affirmative action program, URS Corporation, Cincinnati, OH (CINCI) has developed internal procedures to engage in efforts to employ and advance in employment, qualified individuals with disabilities. We may undertake the following activities in an effort to foster understanding, acceptance and support among managers and employees:

- a) Include the company policy on equal employment opportunity in our Employee Handbook;
- b) Discuss the EEO policy in employee orientation and management training programs.
- c) Communicate our company policy regarding non-harassment of individuals with disabilities.

SECTION VIII

AUDIT AND REPORTING SYSTEM (41 CFR 60-741.44(h))

URS Corporation, Cincinnati, OH (CINCI) will develop an audit and reporting system that measures the effectiveness of the affirmative action program. The system, when fully implemented, will include the following elements:

- (a) The degree to which affirmative action objectives have been attained.
- (b) Whether individuals with known disabilities have had the opportunity to participate in company sponsored educational, training, recreational and social activities.
- (c) Measures the company's compliance with specific affirmative action program obligations.
- (d) Where an affirmative action program element is found to be deficient, the company will undertake necessary actions to bring the program into compliance.

SECTION IX

RECORDKEEPING (41 CFR 60-741.80))

Generally speaking, personnel or employment records made or kept will be preserved for a period of at least two years from the date of the record or the personnel action involved, whichever occurs later. Records include, but are not limited to:

- Records relating to reasonable accommodations;
- The results of physical examinations;
- Job advertisements and postings; applications and resumes;
- Tests and test results; interview notes; and other records having to do with hiring, assignment, promotion, demotion, transfer, lay-off, or termination, rates of pay or other terms of compensation, and selection for training programs;
- In the case of involuntary terminations, personnel records shall be kept for a period of two years from the date of the terminations;
- Where a complaint of discrimination has been filed, a compliance review initiated, or an
 enforcement action has commenced, all personnel records relevant to the situation shall be
 preserved until final disposition of the action.

Recordkeeping requirements apply only to records made or kept on or after August 29, 1996.

SECTION X

RESPONSIBILITY FOR IMPLEMENTING THE AAP (41 CFR 60-741.44(i))

URS Corporation, Cincinnati, OH (CINCI) has assigned responsibility for implementation of the affirmative action program and its activities to an officer of the company. Our RBU Human Resources Manager's identity will appear on all internal and external communications regarding the company's affirmative action program. She will be given the necessary management support, staff and other resources to manage and implement the program.

SECTION XI

TRAINING (41 CFR 70-741.44(j))

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes will be trained to ensure that the commitments in the company's affirmative action program are implemented.

SECTION XII

AVAILABILITY OF THE AFFIRMATIVE ACTION PROGRAM (41 CFR 60-741.41)

A copy of this Affirmative Action Program is available to employees or applicants for employment, upon request to any member of Human Resources or management. The location and hours during which copies of the AAP may be obtained are posted at each site, as appropriate.

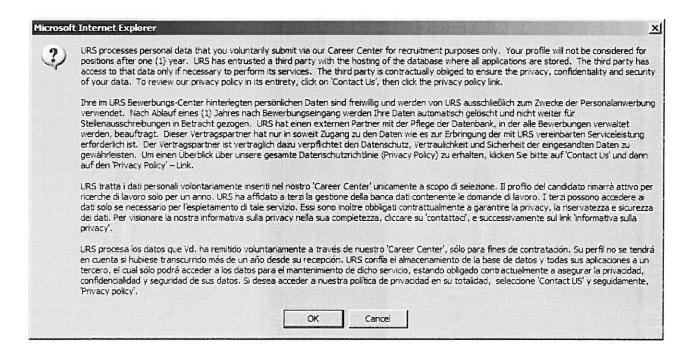
SECTION XIII

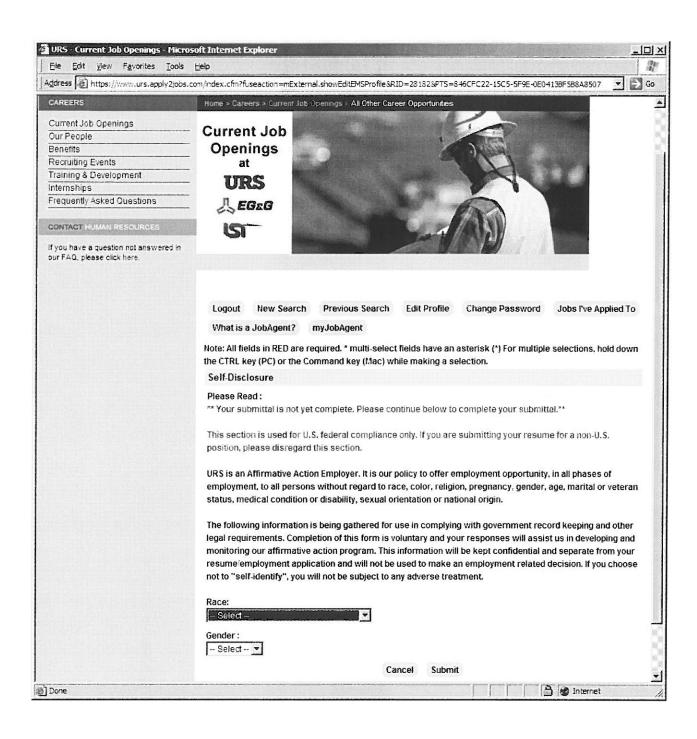
INVITATION TO SELF-IDENTIFY (41 CFR 60-741.42)

As required, URS Corporation, Cincinnati, OH (CINCI) will, after making an offer of employment to an applicant and before the applicant begins his or her employment, notify each applicant that he or she may self-identify his or her disability and request an accommodation.

The notice states that the information being requested is voluntary and will be kept confidential and that refusal to provide it will not subject the applicant to any adverse treatment and that the information will only be used in accordance with obligations in the regulations.

A separate file will be kept on individuals who self-identify. This information will be provided to Government representatives upon request.





DEFINITIONS (41 CFR 60-741.2)

Government Contract - means any agreement or modification between any contracting agency and any person for the purchase, sale or use of personal property or non-personal services (including construction). The term government contract does not include agreements in which the parties stand in the relationship of employer and employee, and federally assisted contracts.

Contracting Agency - means any department, agency, establishment or instrumentality of the United States, including any wholly owned government corporation, which enters into contracts.

Contractor - means a prime contractor or subcontractor holding a contract in excess of \$10,000.

Individual with a disability - means any person who:

- (a) has a physical or mental impairment which substantially limits one or more of such person's major life activities;
- (b) has a record of such an impairment; or
- (c) is regarded as having such an impairment.

"Substantially limits" - means (a) unable to perform a major life activity that the average person in the general population can perform, or (b) significantly restricted as to the condition, manner or duration under which an individual can perform a particular major life activity as compared to the condition, manner, or duration under which the average person can perform that same major life activity. The following factors should be considered in determining whether an individual is substantially limited in a major life activity:

- (1) The nature and severity of the impairment;
- (2) The duration or expected duration of the impairment; and
- (3) The permanent or long-term impact or the expected impact of or resulting from an impairment.

Qualified individual with a disability - means an individual with a disability who satisfies the requisite skill, experience, education and other job-related requirements of the employment position such individual holds or desires, and who, with or without reasonable accommodation can perform the essential functions of such position.

Essential functions - means fundamental job duties of the employment position the individual with a disability holds or desires. The term *essential functions* does not include the marginal functions of the position.

Reasonable accommodation - means (a) modifications or adjustments to a job application process that enable a qualified applicant with a disability to be considered for the position such applicant desires, or, (b) modifications or adjustments to the work environment or to the manner or circumstances under which the position held or desired is customarily performed, that enable a qualified individual with a disability to perform the essential functions of the position, or (c) modifications or adjustments that enable the employee with a disability to enjoy equal benefits and privileges of employment as are enjoyed by the company's other similarly situated employees without disabilities.

Definitions (continued)

Undue hardship - means, with respect to the provision of an accommodation, significant difficulty or expense incurred by the company, when considered in light of the following factors: (a) the nature and net cost of the accommodation needed; (b) the overall financial resources of the facility involved in the provision of the reasonable accommodation; (c) the overall financial resources of the company, the size of the business and the number, type and location of its facilities; (d) the type of operation of the company; (e) the impact of the accommodation upon the operation of the facility, including the impact on the ability of other employees to perform their duties and the impact on the facilities ability to conduct business.

Direct threat - means a significant risk of substantial harm to the health or safety of the individual or others that cannot be eliminated or reduced by reasonable accommodation. The determination that an individual with a disability poses a "direct threat" shall be based on an individualized assessment of the individual's present ability to perform safely the essential functions of the job. This assessment shall be based upon reasonable medical judgment that relies on the most current medical knowledge and/or on the best available objective evidence. In determining whether an individual would pose a 'direct threat' the factors to be considered include: (a) the duration of the risk; (b) the nature and severity of the potential harm; (c) the likelihood that the potential harm will occur; and (d) the imminence of the potential harm.

EQUAL OPPORTUNITY CLAUSE (41 CFR 60-741.5)

Equal Opportunity for Workers with Disabilities

- 1. URS Corporation, Cincinnati, OH (CINCI) will not discriminate against any employee or applicant for employment because of physical or mental disability in regard to any position for which the employee or applicant for employment is qualified. The contractor agrees to take affirmative action to employ, advance in employment and otherwise treat qualified individuals with disabilities without discrimination based on their physical or mental disability in all employment practices, including the following:
 - Recruitment, advertising, and job application procedures;
 - ii. Hiring, upgrading, promotion, award of tenure, demotion, transfer, layoff and rehiring;
 - iii. Rates of pay or any other form of compensation and changes in compensation;
 - iv. Job assignments, job classifications, organizational structures, position descriptions, lines of progression, and seniority lists;
 - Leaves of absence, sick leave, or any other leave;
 - vi. Fringe benefits available by virtue of employment, whether or not administered by the contractor;
 - vii. Selection and financial support for training including apprenticeship, professional meetings, conferences, and other related activities, and selection for leaves of absence to pursue training;
 - viii. Activities sponsored by the contractor including social or recreational programs; and
 - ix. Any other term, condition, or privilege of employment.
- 2. The contractor agrees to comply with the rules, regulations, and relevant orders of the Secretary of Labor issued pursuant to the act.
- 3. In the event of the contractor's noncompliance with the requirements of this clause, actions for noncompliance may be taken in accordance with the rules, regulations, and relevant orders of the Secretary of Labor issued pursuant to Section 503 of the Rehabilitation Act of 1973.
- 4. The contractor agrees to post in conspicuous places, available to employees and applicants for employment, notices in a form to be prescribed by the Deputy Assistant Secretary for Federal Contract Compliance Programs, provided by or through the contracting officer. Such notices shall state the rights of applicants and employees as well as the contractor's obligation under the law to take affirmative action to employ and advance in employment qualified employees and applicants with disabilities.

The contractor must ensure that applicants and employees with disabilities are informed of the contents of the notice (e.g., the contractor may have the notice read to a visually disabled individual, or may lower the posted notice so that it might be read by a person in a wheelchair).

- 5. The contractor will notify each labor organization or representative of workers with which it has a collective bargaining agreement or other contract understanding that the contractor is bound by the terms of section 503 of the Rehabilitation Act of 1973, as amended, and is committed to take affirmative action to employ and advance in employment individuals with physical or mental disabilities.
- 6. The contractor will include the provisions of this clause in every subcontract or purchase order in excess of \$10,000, unless exempted by the rules, regulations, or orders of the Secretary issued pursuant to section 503 of the Rehabilitation Act, as amended, so that such provisions will be binding upon each subcontractor or vendor. The contractor will take such action with respect to any subcontract or purchase order as the Deputy Assistant Secretary for Federal Contract Compliance Programs may direct to enforce such provisions, including action for noncompliance.

AAP for Protected Veterans

(Vietnam Era Veterans' Readjustment Assistance Act of 1974 (41 CFR PART 60-250), and Jobs for Veterans Act (41 CFR Part 60-300)

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SECTION I

INTRODUCTION

The following Affirmative Action Program has been prepared by URS Corporation, Cincinnati, OH (CINCI) to implement the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, and the Jobs for Veterans Act. These Acts require Government contractors and subcontractors to take affirmative action to employ and advance in employment the following categories of "protected veterans"; qualified special disabled veterans, veterans of the Vietnam era, recently separated veterans, other protected veterans, disabled veterans, and Armed Forces service medal veterans.

The most recent revisions of the regulations implementing the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA) were effective January 3, 2006. The regulations implementing the Jobs for Veterans Act (JVA) were effective September 7, 2007.

SECTION II

STATEMENT OF POLICY (60-250.44(a)); (60-300.44(a))

URS Corporation, Cincinnati, OH (CINCI) takes affirmative action as described in this Program to recruit, hire, train, and promote protected veterans under the Veterans' Acts. The company will ensure that its personnel actions are administered without regard to an individual's veteran status or disability and that employment decisions are based on valid job requirements.

To ensure equal opportunity, our RBU Human Resources Manager has overall responsibility for this Affirmative Action Program. She has delegated responsibility for program implementation and will monitor program performance and report to senior management on a regular basis.

It is also company policy that employees and applicants will not be subjected to harassment of any kind because they participated in an investigation requiring equal employment opportunity, or filed a complaint alleging unfair treatment.

SECTION III

REVIEW OF PERSONNEL PROCESSES

(60-250.44(b)); (60-300.44(b))

URS Corporation, Cincinnati, OH (CINCI) will review personnel processes on a regular basis to determine whether they assure careful, thorough and systematic consideration of the job qualifications of Protected veterans, applicants and employees for vacancies filled through hiring or promotion, and for training opportunities offered or available.

In determining the qualifications of Protected veterans, the company considers only those portions of military records, including discharge papers, relevant to specific qualifications for the job for which veterans are being considered. URS Corporation, Cincinnati, OH (CINCI) will also ensure that its selection processes are not designed to stereotype protected veterans in a manner that may limit access to jobs for which they are qualified. In offering employment or promotions to Protected veterans, we will not reduce the amount of compensation offered because of any disability income, pension, or other benefit he or she received from another source.

SECTION IV

PHYSICAL AND MENTAL QUALIFICATIONS (60-250.44(c)); (60-300.44(c))

URS Corporation, Cincinnati, OH (CINCI) will develop a schedule and maintain a regular review of physical and mental job qualifications to ensure that, to the extent qualification standards screen out qualified disabled veterans, they are job-related for the position in question and consistent with business necessity.

In addition:

- (1) When physical or mental qualifications are applied to the employment, promotion, demotion or training process and the standards do screen out qualified disabled veterans, the standards must then be related to the specific job (or jobs) for which the individual was considered, consistent with business necessity. URS Corporation, Cincinnati, OH (CINCI) understands that it will have the responsibility to demonstrate, through documentation or other non-discriminatory means, that it has met this requirement.
- (2) URS Corporation, Cincinnati, OH (CINCI) may use as a defense that the individual poses a direct threat to the health or safety of themselves or others in the workplace.

SECTION V

REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS

(60-250.44(d)); (60-300.44(d))

As a matter of non-discrimination, URS Corporation, Cincinnati, OH (CINCI) will make reasonable accommodation to the known physical or mental limitations of an otherwise qualified disabled veteran unless we can show that the accommodation(s) would impose an undue hardship on the operation of our business

As a matter of affirmative action, when an employee who is a disabled veteran has significant difficulty performing his or her job, and it can reasonably be concluded that a performance problem is related to their disability, the company *may* inquire whether the problem is, in fact, related to the individual's disability. If the individual responds in the affirmative, URS Corporation, Cincinnati, OH (CINCI) may then move to confidentially inquire whether the individual is in need of a reasonable accommodation.

SECTION VI

HARASSMENT (60-250.44(e)); (60-300.44(e))

URS Corporation, Cincinnati, OH (CINCI) has developed and implemented procedures to ensure that its employees are not harassed because of their status as Protected veterans.

SECTION VII

EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND POSITIVE RECRUITMENT

(60-250.44(f)); (60-300.44(f))

URS Corporation, Cincinnati, OH (CINCI) will undertake appropriate outreach and positive recruitment activities to recruit Protected veterans, consistent with our employment needs and resources. The scope of URS Corporation's efforts may include, but is not limited to, the following:

- 1. Listing employment openings with the state workforce agency job bank or with the local employment service delivery system where the opening occurs;
- 2. In making hiring decisions, the company may consider applicants who are known Protected veterans for all available positions when a position applied for is unavailable.

SECTION VIII

INTERNAL DISSEMINATION OF POLICY

(60-250.44(g)); (60-300.44(g))

To ensure greater employee cooperation and participation, URS Corporation, Cincinnati, OH (CINCI) will develop internal communication procedures for our affirmative action efforts to employ and advance in employment Protected veterans. These procedures will be designed to promote understanding, acceptance and support among our managers and other employees to take actions necessary to aid in meeting our obligations. The scope of our efforts will depend upon many circumstances, such as the size of the company, our resources, and the extent to which our existing practices have been effective. The following are some actions contemplated:

- Include the EEO policy in our Employee Handbook;
- Discuss the company's EEO policy in employee orientation and management training sessions;

SECTION IX

AUDIT AND REPORTING SYSTEM

(60-250.44(h)); (60-300.44(h))

URS Corporation, Cincinnati, OH (CINCI) will design and develop an audit and reporting system to measure the effectiveness of our affirmative action efforts, including any need for remedial action. When fully implemented, the system will:

- (1) Determine the degree to which company objectives have been met;
- (2) Determine whether Protected veterans, have had the opportunity to participate in company-sponsored educational, training, recreational and social activities;
- (3) Measure company compliance with affirmative action obligations; and,
- (4) Where Affirmative Action Program efforts and results have been ineffective, develop necessary actions to bring the program into compliance.

SECTION X

RESPONSIBILITY FOR IMPLEMENTATION

(60-250.44(i)); (60-300.44(i))

Our RBU Human Resources Manager is responsible for implementation of this Affirmative Action Program. She will be given all the necessary management support, staff, and other resources to manage and implement the Affirmative Action Program for Protected veterans.

SECTION XI

TRAINING (60-250.44(j)); (60-300.44(j))

All personnel involved in the recruitment, screening, selection, promotion, disciplinary and other related processes, will be trained in their affirmative action responsibilities and URS Corporation's obligations, to ensure that the commitments stated in this Program are implemented.

SECTION XII

RECORDKEEPING AND ACCESS TO RECORDS (60-250.80 & 60-250.81); (60-300.80 & 60-300.81)

- (a) Recordkeeping General Requirements. All personnel or employment records made or kept by URS Corporation, Cincinnati, OH (CINCI) will be preserved for a period of two years from the date of the making of the record or the personnel action involved, whichever occurs later. Such records include, but are not limited to: records relating to requests for reasonable accommodation; the results of any physical examination; job advertisements and postings; applications and resumes; tests and test results; interview notes; records having to do with hiring assignment, promotion, demotion, transfer, layoff or termination, rates of pay or other terms of compensation; and selection for training or apprenticeship.
- (b) Access to Records. URS Corporation, Cincinnati, OH (CINCI) will permit access, during normal business hours, to our places of business for the purpose of conducting on-site compliance evaluations and complaint investigations and inspecting and copying such documents as may be relevant to the matter under investigation.

SECTION XIII

AVAILABILITY OF THE AFFIRMATIVE ACTION PLAN (60-250.41); (60-300.41)

This Affirmative Action Program is available for inspection to URS Corporation, Cincinnati, OH (CINCI) employees or applicants for employment upon request. The location and hours during which the Program may be viewed shall be posted at each office.

SECTION XIV

INVITATION TO SELF-IDENTIFY (41 CFR 60-250.42)

As required, URS Corporation, Cincinnati, OH (CINCI) will, after making an offer of employment to an applicant and before the applicant begins his or her employment, invite them to inform the company whether the applicant believes that he or she may be covered under the affirmative action program for Protected Veterans.

The invitation to self-identify will state that a request to benefit under the affirmative action program may be made immediately, or any time in the future. The invitation will summarize relevant portions of the affirmative action program and state that the information being requested is voluntary and will be kept confidential and that refusal to provide it will not subject the applicant to any adverse treatment and that the information will only be used in accordance with obligations in the regulations.

A separate file will be kept on individuals who self-identify. This information will be provided to Government representatives upon request.

DEFINITIONS

(60-250.2); (60-300.2)

- (a) Equal Opportunity Clause means the contract provisions set forth in 41 CFR PART 60-250.5, and 41 CFR PART 60-300.5, Equal Opportunity Clause.
- (b) Contract means any Government contract or subcontract.
- (c) Government Contract means any agreement or modification thereof between any contracting agency and any person for the purchase, sale or use of personal property or non-personal services.
- (d) Contracting Agency means any department, agency; establishment or instrumentality of the United States, including any wholly owned Government corporation, which enters into contracts.
- (e) Contractor means a prime contractor or subcontractor holding a contract of \$25,000 or more under VEVRAA, and \$100,000 or more under JVA.
- (f) Prime contractor means any person holding a contract of \$25,000 or more subject to VEVRAA, and \$100,000 or more subject to JVA.
- (g) Subcontractor means any person holding a subcontract of \$25,000 or more subject to VEVRAA, and \$100,000 or more subject to JVA.
- (h) Disabled Veteran means a veteran of the U.S. military, ground, naval or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or a person who was discharged or released from active duty because of a service-connected disability.
- (i) Special Disabled Veteran means a veteran who is entitled to compensation under laws administered by the Department of Veterans Affairs for a disability: (A) rated at 30 percent or more; or (B) rated at 10 to 20 percent in the case of a veteran who has been determined under 38 U.S.C. 3106 to have a serious employment handicap; or (ii) a person who was discharged or released from active duty because of a service-connected disability.
- (j) Qualified Special Disabled Veteran means a special disabled veteran who satisfies the requisite skills, 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.
- (k) Veteran of the Vietnam era means a person who: (1) served on active duty for a period of more than 180 days and was discharged or released therefrom with other than a dishonorable discharge, if any part of such active duty occurred: (I) in the Republic of Vietnam between February 28, 1961 and May 7, 1975, or (ii) Between August 5, 1964 and May 7, 1975, in all other cases; or (2) was discharged from active duty for a service-connected disability if any part of such active duty was performed: (I) in the Republic of Vietnam between February 28, 1961 and May 7, 1975; or (ii) Between August 5, 1964 and May 7, 1975, in all other cases.
- (I) Other Protected Veteran means a veteran who served on active duty in the U.S. military, ground, naval or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the Department of Defense.
- (m) 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 in the U.S. military, ground, naval or air service.

Definitions (continued)

- (n) Armed Forces Service Medal Veteran means any veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985 (61 FR 1209).
- (o) Essential Functions means fundamental job duties of the employment position the disabled veteran holds or desires. Essential functions do not include the marginal functions of the position.
- (p) Reasonable accommodation means (I) modifications or adjustments to a job application process that enable a qualified applicant who is a disabled veteran to be considered for the position the applicant desires; or (ii) modifications or adjustments to the work environment, or to the manner or circumstances under which the position held or desired is customarily performed, that enable a qualified disabled veteran to perform the essential functions of that position..
- Undue hardship means with respect to the provision of an 'accommodation,' significant difficulty or expense incurred by a Contractor, when considered in light of the factors such as: the nature and net cost of the accommodation needed, the overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation, the number of persons employed at such facility and the effect on expenses and resources; the overall financial resources of the contractor, the type of operation or operations of the contractor, or the impact of the accommodation upon the operation of the facility.

EQUAL OPPORTUNITY CLAUSE

(60-250.5); (60-300.5)

Each contracting agency and each contractor shall include the Equal Opportunity Clause in each of its covered Government contracts or subcontracts (and modifications, renewals, or extensions, if not included in the original contract).

It is not necessary that the Equal Opportunity Clause be quoted verbatim in the contract. The Clause may be made a part of the contract by citation to 41 CFR 60-250.5(a), and 41 CFR 60-300.5(a).