

**Conciliation Agreement  
Between the  
U.S. Department of Labor Office of Federal Contract Compliance Programs  
And  
Vectrus Systems Corporation  
700 Cannon Street, Bldg 1060  
Maxwell AFB, Alabama 36112**

**PART I: General Provisions**

1. This Agreement is between the U.S. Department of Labor, Office of Federal Contract Compliance Programs ("OFCCP") and Vectrus Systems Corporation-Maxwell BOS Program ("Vectrus").
2. The violation identified in this Agreement was found during a compliance evaluation of Vectrus which began on August 9, 2018 and was specified in a Notice of Violation that was issued on April 11, 2019. OFCCP alleges that Vectrus has violated Section 503 of the Rehabilitation Act of 1973, as amended, and its implementing regulations at 41 CFR Chapter 60 due to the specific violation cited in Part II below.
3. This Agreement does not constitute an admission by Vectrus of any violation of Section 503 of the Rehabilitation Act of 1973, as amended, and its implementing regulations.
4. The provisions of this Agreement will become part of Vectrus' Affirmative Action Program (AAP). Subject to the performance by Vectrus of all promises and representations contained herein and in its AAP, the named violation in regard to the compliance of Vectrus with all OFCCP programs will be deemed resolved. However, Vectrus is advised that the commitment contained in this Agreement do not preclude future determinations of noncompliance based on a finding that the commitments are not sufficient to achieve compliance.
5. Vectrus agrees that OFCCP may review compliance with this Agreement. As part of this review, OFCCP may require written reports, inspect the premises, interview witnesses, and examine and copy documents, as may be relevant to the matter under investigation and pertinent to Vectrus compliance. Vectrus shall permit access to its premises during normal business hours for these purposes.
6. Nothing herein is intended to relieve Vectrus from the obligation to comply with the requirements of Executive Order 11246, as amended; Section 503 of the Rehabilitation Act of 1973, as amended; and/or the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, (38 U.S.C. 4212), and their implementing regulations, or any other equal employment statute or executive order or its implementing regulations.
7. Vectrus agrees that there will be no retaliation of any kind against any beneficiary of this Agreement or against any person who has provided information or assistance, or who files a complaint, or who participates in any manner in any proceedings under Executive Order 11246,

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as amended; Section 503 of the Rehabilitation Act of 1973, as amended; and/or the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (38 U.S.C. 4212).

8. If at any time in the future, OFCCP believes that Vectrus has violated any portion of this Agreement during the term of this Agreement, Vectrus will be promptly notified of that fact in writing. This notification will include a statement of the facts and circumstances relied upon in forming that belief. In addition, the notification will provide Vectrus with 15 calendar days from receipt of the notification to respond in writing, except where OFCCP alleges that such a delay would result in irreparable injury.

Enforcement proceedings for violation of this Agreement may be initiated at any time after the 15-day period has elapsed or sooner, if irreparable injury is alleged, without issuing a Show Cause Notice.

Where OFCCP believes that Vectrus has violated this Conciliation Agreement, OFCCP may seek enforcement of this Agreement itself and shall not be required to present proof of the underlying violations resolved by this Agreement.

Liability for violation of this Agreement may subject Vectrus to sanctions set forth in 41 CFR 60-741.66 and/or other appropriate relief.

**PART II: Specific Provisions**

**VIOLATION:** During the period of January 1, 2017 through April 11, 2019, Vectrus failed to undertake appropriate outreach and positive recruitment activities that were reasonably designed to effectively recruit qualified individuals with disabilities, document these activities, assess their effectiveness, and document its review, in violation of 41 CFR 60-741.44(f). Specifically, on February 14, 2019, Vectrus provided information on its recruitment sources that indicated that it failed to undertake any outreach or recruitment activities designed to effectively recruit qualified individuals with disabilities during this period.

**REMEDY:** Vectrus will undertake appropriate external outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified individuals with disabilities, such as those described at 41 CFR 60-741.44(f)(2). Vectrus will annually review its outreach and recruitment activities, assess their effectiveness, and document this review, in accordance with 41 CFR 60-741.44(f)(3). Vectrus will document all activities it undertakes to comply with this section, in accordance with 41 CFR 60-741.44(f)(4). Vectrus will maintain a current Section 503 AAP prepared in accordance with the requirements of 41 CFR 60-741.40 through 60-741.45.

Examples of types of outreach and positive recruitment activities include, but are not limited to:

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- Entering into formal, written relationships with organizations to accomplish specified objectives, such as training, and/or referring job applicants with work experience or job skills that match or are related to existing and anticipated job vacancies;
- Creating internship programs for students with disabilities from local colleges and universities;
- Using the Workforce Recruitment Program (WRP) for students and graduates with disabilities to identify qualified temporary and permanent job candidates. See <http://wrp.jobs/employers/>;
- Participating in job fairs targeting qualified individuals with disabilities;
- Using local disability service organizations or other resources identified by the contractor's existing Employee Resource Group (ERG) on disability to recruit qualified temporary and permanent job candidates; and
- Identifying and recruiting students with disabilities studying in science, engineering, mathematics, computer science, and some fields of business for internships using American Association for the Advancement of Science (AAAS) Entry Point program. See <http://ehrweb01.aaas.org/entrypoint/>.

Vectrus has agreed to contact and meet with the following organization and individual as part of their outreach and recruitment activities. When meeting with the organization, Vectrus should discuss its jobs to assist the organization in referring qualified applicants for openings:

Anna Doeren-Taylor  
Business Relations Consultant, Read-Net  
Alabama Department of Rehabilitation Services  
560 South Lawrence Street  
Montgomery, AL 36014  
(334) 293-7156  
**(7)(C)** [@rehab.alabama.gov](mailto: @rehab.alabama.gov)

**Part III: Reporting**

1. Vectrus agrees to retain records pertinent to the violation cited in Part II above, and to the reports submitted in compliance with Paragraph 2, below. These records shall include data and information underlying the required reports, specifically, but not limited to all applications and personnel records. The records will be retained until the expiration of this Agreement or consistent with regulatory requirements, whichever is later.
2. Vectrus will submit **two reports**, as stated below to the following:

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(7)(C), (7)(E)

Compliance Officer  
OFCCP Birmingham District Office  
950 22nd Street N., Suite 660  
Birmingham, Alabama 35203

The **first report** shall be due August 30, 2019 and cover the period April 30, 2019 through July 31, 2019. The report shall contain the following:

1. A copy of your current Section 503 AAP prepared in accordance with the requirements of 41 CFR 60-741.40 through 60-741.45.
2. Documentation that Vectrus established, contacted, and held meeting(s) with recruitment representatives from organizations that target individuals with disabilities within 45 days of the date the District Director signed this agreement.

The **second report** shall be due February 29, 2020 and cover the period August 1, 2019 through January 31, 2020. The reports shall contain documentation showing the following:

1. A copy of your current Section 503 AAP prepared in accordance with the requirements of 41 CFR 60-741.40 through 60-741.45.
2. Documentation of the external outreach and positive recruitment activities used to recruit qualified individuals with disabilities.
3. Documentation that Vectrus conducted the required annual review of its outreach and recruitment activities to evaluate their effectiveness in identifying and recruiting qualified individuals with disabilities. Documentation must include each evaluation, the criteria used to evaluate effectiveness, including the data collected pursuant to 41 CFR 60-741.44(k), and whether each effort was effective.

**TERMINATION DATE:** This Agreement will expire 90 days after OFCCP receives the reports required in Part III above or on the date that the District Director gives notice to Vectrus that Vectrus has satisfied its reporting requirements, whichever occurs earlier, unless OFCCP notifies Vectrus in writing prior to the end of the 90-day period that Vectrus has not satisfied its reporting requirements pursuant to this Agreement.

**INTEGRATION CLAUSE:** This Agreement represents the full Agreement between Vectrus and OFCCP and this Agreement supersedes any other agreements, oral or written. In signing this Agreement, neither Vectrus nor OFCCP relies upon any promise, representation of fact or law, or other inducement that is not expressed in this Agreement. This Agreement may be modified only by written agreement of the Parties affected and may not be modified by any oral agreement.

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**PART IV: Signatures**

The person signing this Conciliation Agreement on behalf of Vectrus Systems Corporation-Maxwell BOS Program personally warrants that he is fully authorized to do so, and that Vectrus Systems Corporation-Maxwell BOS Program has entered into this Conciliation Agreement voluntarily and with full knowledge of the effect thereof and that execution of this Agreement is fully binding on Vectrus Systems Corporation-Maxwell BOS Program. This Conciliation Agreement is hereby executed by and between the Office of Federal Contract Compliance Programs and Vectrus Systems Corporation-Maxwell BOS Program.

Timothy Morris Digitally signed by Timothy Morris  
Date: 2019.04.26 12:20:38 -05'00'

**Timothy Morris**  
Maxwell Program Manager  
Vectrus Systems Corporation  
700 Cannon Street, Bldg. 1060  
Maxwell AFB, Alabama 36112

DATE: \_\_\_\_\_

**(6), (7)(C)**

**Christopher Williams**  
Assistant District Director -- Birmingham  
Office of Federal Contract Compliance  
Programs

DATE: 05/08/19

**(6), (7)(C), (7)(E)**

Compliance Officer - Birmingham  
Office of Federal Contract Compliance  
Programs

DATE: 5/8/19

**(6), (7)(C)**

**Alvin Q. Mitchell**  
District Director - Birmingham  
Office of Federal Contract Compliance  
Programs

DATE: 05/08/19