

Affirmative Action Plan for Innovaito LLC

Policy Statement

Innovaito LLC prohibits discrimination in all business activities, including hiring, contracting, and service provision, under Connecticut General Statutes §46a-60 and federal anti-discrimination laws. As a participant in Connecticut's economic ecosystem, the company affirms its commitment to:

1. **Equal Opportunity:** Ensuring fair access to employment and contracting opportunities regardless of race, gender, disability, or other protected characteristics.
2. **Supplier Diversity:** Prioritizing partnerships with Connecticut-certified Small Business Enterprises (SBEs), Minority Business Enterprises (MBEs), and Women-Owned Business Enterprises (WBEs) per §4a-60g.
3. **Transparency:** Maintaining records of outreach efforts and compliance measures for state review.

This policy applies to all future employees, subcontractors, and vendors engaged by Innovaito LLC.

Designation of Responsibility

Affirmative Action Officer

- **Name:** Dr. Dipanjan "DJ" Nag, Owner/President
- **Duties:**
 - Overseeing compliance with state and federal anti-discrimination laws.
 - Documenting outreach to diverse suppliers and subcontractors.
 - Investigating any internal discrimination complaints.

Executive Accountability

As the sole member, Dr. Dipanjan Nag retains ultimate responsibility for implementing this plan and ensuring alignment with Connecticut Commission on Human Rights and Opportunities (CHRO) guidelines.

Outreach & Recruitment Strategies

Supplier Diversity Program

Innovaito LLC will:

- **Solicit Certified Vendors:** Include CT-certified SBEs, MBEs, and WBEs in all subcontracting opportunities, adhering to §4a-60g.
- **Utilize State Resources:** Advertise procurement opportunities through the Connecticut Department of Administrative Services' Supplier Diversity Portal.
- **Document Efforts:** Maintain a log of solicitations sent to diverse suppliers, including responses and rationale for non-selection.

Future Hiring Practices

When expanding beyond a single member, Innovaito LLC will:

- Post job openings on the Connecticut Job Bank and minority-focused platforms (e.g., Identidad Latina, El Sol News).
 - Partner with local workforce development agencies to recruit underrepresented groups.
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Compliance Measures

Mandatory Postings

The following posters will be displayed in the office and on the company website:

1. **"Equal Employment Opportunity Is the Law"** (Federal EEOC).
2. **"Sexual Harassment Is Illegal"** (CHRO).
3. **"Discrimination Is Illegal"** (CHRO).

Recordkeeping

- **Retention Period:** Three years for all subcontractor solicitations, hiring records, and training materials.
- **Annual Review:** Assess outreach effectiveness and update goals every fiscal year.

Training

Upon hiring employees, Innovaito LLC will:

- Provide anti-discrimination training aligned with CHRO guidelines.
- Educate staff on reporting procedures for harassment or bias incidents.

Contract-Specific Requirements

For state contracts exceeding \$50,000, Innovaito LLC will:

1. **Include EEO Clauses:** Mandate subcontractors' compliance with §4a-60 and §46a-68c.
 2. **Collect Certifications:** Require MBE/WBE participation reports from subcontractors.
 3. **Submit Workforce Data:** File annual utilization reports if employee count reaches 50+.
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Certification Compliance

S Corporation Status

- Maintain IRS Form 2553 and corporate bylaws demonstrating compliance with S Corp requirements.

Supplier Diversity Documentation

- Retain certificates from CT-certified SBEs/MBEs/WBEs used as subcontractors.
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Exemptions & Future Amendments

Current Exemptions

As a single-member LLC, Innovaito LLC is exempt from:

- Formal workforce analyses under §46a-68-82.
- Biennial CHRO reporting requirements (§46a-68c).

Growth Contingencies

Upon hiring the first employee, Innovaito LLC will:

- Conduct a workforce availability analysis.
 - Develop hiring goals for underrepresented groups.
 - Implement upward mobility programs for career advancement.
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