

EQUAL EMPLOYMENT OPPORTUNITY AFFIRMATIVE ACTION PROGRAM

A. NAME AND ADDRESS OF CONTRACTOR

E.F. Wall & Associates, Inc. P.O. 259
Barre, VT 05641

B. STATEMENT OF EQUAL OPPORTUNITY POLICY

This Company's policy strongly emphasizes that no discrimination is to be made toward minority groups in regard to hiring of personnel, termination of employment. Layoffs and demotions. We also agree to take affirmative action to assure equal employment opportunity on the contract work without regard to race, color, religion, sex, national origin, veteran status, or the handicapped.

Equal Opportunity will exist with respect to basic salary, salary increase, fringe benefits, membership in associations and or organizations involving this Company, social activities, promotions, transfers and training programs. We also intend to take action on wages, conditions and personnel matters of every type, including sexual harassment, without regard to race, color, religion, sex, national origin, veteran status, or the handicapped.

All employees will have recourse to the staff member elected to the position of Equal Employment Opportunity Officer for this Company, to air grievances with respect to alleged discrimination or sexual harassment, and the Equal Employment Opportunity Officer shall investigate all such alleged discriminations and complaints, and resolve or take corrective action where necessary, and inform the complainant of all avenues of appeal. All complaints will be treated in a confidential manner.

C. EQUAL EMPLOYMENT OPPORTUNITY

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The Equal Employment Opportunity Officer appointed by this Company is Mr Robert P. Lord, Jr., who has been delegated the necessary authority to act on behalf of the Company in implementing this Company's policy with respect to Equal Employment Opportunity.

Mr Lord's duties will consist of the following:

- 1. To investigate all complaints and resolve or take corrective action where necessary, and inform the complainant of all avenues of appeal (in a confidential manner).
 - 2. To monitor wages Company-wide within each classification to guard against possible variances.
 - 3. To make every effort in locating, qualifying and increasing skills of minority employees and applicants.
 - 4. To make an effort to utilize subcontractors having an Equal Employment Opportunity Affirmative Action Program.
 - 5. To use best efforts to assure subcontractors' compliance.

D. COMPANY PERSONNEL

All personnel of this Company will be notified both by an oral conference and in writing of our policy with regard to Equal Employment Opportunities, and the officer delegated to insure its implementation. Periodic meetings with supervisory and personnel staff will be held before start of work to review the Company's policy and its implementation. These meetings to be held not less than every six months.

E. EMPLOYMENT

This Company's policy will also be brought to the attention of prospective employees and sources of emoloyees. It will be suggested that present employees be encouraged to refer minority group applicants by posting of notices and by discussion of procedures with them. Prospective applicants will read Equal Employment Opportunity Affirmative Action Program and sign their applications that they have read and understand this policy.

All new supervisory and personnel employees will be indoctrinated as to this Company's policy.

All Divisional Heads and Office Managers in charge of recruitment for this Company will be aware of this Company's methods of locating and hiring minority personnel, and when advertising for employees, advertisement shall carry the notation that we are 'AN EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER."

Recruitment will be conducted through public and private referral sources likely to yield qualified minority applications, including State employment agencies, schools and minority organizations.

Periodic inspections are to made to ensure that both conditions and facilities are not indicative of discriminatory treatment, and are free from sexual harassment.

F. TRAINING

This Company will make full use of on-the-job training programs available to use in any areas where are conducting business operations, and we will advise employees and applicants of these training programs when they are available.

Periodic reviews will be made of the training and promotion potential of all employees, and efforts made to encourage new and eligible employees as to the advantages of taking the courses offered to allow for further training and promotion.

G. SUBCONTRACTS

Our policy will be to identify, wherever feasible, with minority subcontractors, or subcontractors having meaningful representation of minorities, or who have an Equal Employment Opportunity Affirmative Action Program.

We also agree to abide by the requirement in items 4 and 6, United States Postal Service Representation and Certifications, not to award any subcontract equal or in excess of \$10,000, until the subcontractor has submitted an Equal Employment Opportunity statement, the statement has been approved by the United States Postal Services, and the subcontractor's approved EEO Affirmative Action statement has been incorporated into the subcontract as a contractual obligation of the subcontractor.

H. PROGRAM MONITORING

This Company will conduct periodic checks to ensure that the Equal Employment Opportunity program is being adhered to, with respect to our own Company and that of our subcontractors, covered by items 4 and 6, and the conditions and facilities do not indicate discriminatory treatment or sexual harassment.

I. RECORDS AND REPORTS

Records and reports will be kept at the Company's office to inspect progress of our Company's Equal Employment Opportunity Program, and we agree to submit a monthly report for the first three months after construction starts, and thereafter whenever such report is requested by an agency having jurisdiction, until the termination of the project. We agree to retain records for three years to be made available for Government inspection.

Mr Robert P. Lord, Jr. is to report the number of minority and non-minority employees in each classification on contract work to the United States Postal Service, State of Vermont, Veterans Administration, Economic Development Administration, or other organizations that we have a contract with, at the end of the first, second and third months, if an when required.