



EWHOWELL
CONSTRUCTION GROUP

It is the policy of EW Howell not to discriminate against any employee or applicant for employment because of race, creed, color, national origin, sex, age, handicap, marital status or sexual preference, disabled veteran/Vietnam era veteran. We shall take specific action not to discriminate in the promotion, recruitment, lay-off, upgrading, demotion, transfer, discharge, training or retraining, terms and conditions of employment or privileges of employment by reason of an individual's race, color, sex, age, religion, creed, national origin, disability, marital status, disabled veteran or Vietnam era veteran. It is Howell's policy to take affirmative action to seek out qualified minority group members and women and provide opportunity for minority group workers and women to become qualified for employment and advancement.

Howell has appointed an Equal Employment Opportunity Officer. They shall coordinate, administer and oversee the Company's Affirmative Action Program with respect to the following:

1. Development of policy statements, equal employment programs, recruitment strategy, internal and external communication techniques and programs. Howell solicits and relies upon the cooperation of the various unions to refer qualified minority and female craft workers in sufficient numbers to achieve the respective employment utilization goals. Howell will also solicit various outside recruitment sources to refer minority and female workers to us. Additionally, a current list of walk-in applicants is maintained at every job site indicating the name, address and telephone number of each individual. Any minorities and females identified will be referred to the respective trade unions for evaluation. If they have the appropriate qualifications, we ask that they be referred to our project. Notices are posted at every location communicating EW Howell's EEO policy.
2. Identification of problem areas. Howell will analyze reports generated indicating the representation of minorities and females within the workforce and compared to the employment goals outlined by contract. All problem areas shall be addressed and appropriate corrective efforts determined. All efforts shall be directed towards specific problems and will consider timing to coordinate with the appropriate activity for the respective projects.
3. EW Howell keeps all records necessary to show compliance with its equal employment opportunity obligations, including but not limited to reports showing the number of minority, non-minority and female group member employees in each work classification; the progress and efforts being made in locating, hiring, training, qualifying and upgrading protected group workers; progress and efforts being made in securing the services of minority and female group subcontractors. All records shall be retained for a period of three (3) years



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following the completion of the contract work and shall be available for inspection by authorized representatives of the State and Federal governments. EW Howell will submit all reports required by Executive Orders and appropriate State and Federal agencies and will permit access to its books, records for purposes of investigation to ascertain compliance with the rules, regulations and orders of the Secretary of Labor.

4. EW Howell uses training programs such as apprenticeship, and on-the-job training programs. Where reasonable, qualified minority and female students have been provided with on-the-job training coordinated with their educational activities. EW Howell also advises employees and applicants for employment of available training program opportunities and the requirements for entrance into such programs.
5. EW Howell has a liaison between the Company and minority organizations, women's organizations, advocate organizations for other protected groups and community action groups concerned with Affirmative Action. The liaison shall make a good faith effort on behalf of the Company to meet the designated goals set forth by the Office of Federal Contract Compliance Programs (OFCCP) for the utilization of qualified minorities and females in the various trade crafts on all construction projects during the time that EW Howell has a federally-assisted or direct federal construction contract.