

INTEROFFICE MEMORANDUM

Date: January 1, 2006
To: All Employees
From: Allen Ballew, CEO
Subject: Equal Employment Opportunity Policy
Affirmative Action Policy

INTENT

It has been and shall remain to be the policy of this company to provide equal and ample opportunity to all persons employed or seeking employment, promotion, and benefits.

Managers at all levels shall embrace this policy and restrain from real or apparent discrimination against any person due to their race, sex, creed, age, handicap, national origin, or any other discriminatory difference.

It is only incidental that equal employment opportunity is the law of our land, as the principals and managers of this firm shall answer to a higher authority.

AFFIRMATIVE ACTION STEPS

The following steps will be undertaken by the EEO officer of this firm to insure complete compliance:

1. The EEO officer shall maintain a file of the names and addresses of each minority and female referred to by any individual or organization and what action was taken with respect to each such referred individual, and if the individual was not hired, the reasons therefore.
2. The EEO officer shall internally disseminate the EEO policy by posting on all bulletin boards and on all jobsites, keep records or diaries that minorities and females are aware of the policy, discuss the policy regularly in staff meetings, and reaffirm this policy on a yearly basis.
3. The EEO officer shall monitor all personal activities to insure that the EEO policy is being carried out, including the evaluation of minorities and females for promotional opportunities on a quarterly basis and to encourage such employees to seek those opportunities.
4. The EEO officer shall prepare monthly workforce reports showing a breakdown of workforce by sex/race/craft and submit said reports to state and federal agencies along with reports from subcontractors. The EEO officer shall insure that all subcontractors are aware of their compliance requirements.
5. The EEO officer shall send written notice to recruiting sources requesting referrals of minorities and females to achieve goals on all projects. Copies of these

notices shall be kept on file. At the bottom of each notice shall be "Equal Employment Opportunity Employer". All purchase orders and subcontracts will include or make reference to the State/Federal EEO Covenant.

6. At the request/recommendation of the EEO officer, job level managers are to provide on the job training opportunities for minorities and females.

7. The EEO officer shall instruct project estimators to solicit bids from available minority and female subcontractors in the trades covered by the contract.

8. The EEO officer shall include in all advertisements for applicants the EEO "tagline" followed by the words "Male/Female".

9. The EEO officer shall set goals for trades. The following are goals until further notice.

- A. Carpenters - Minority 10% Female 6.9%
- B. Laborers - Minority 10% Female 6.9%
- C. Others - Minority 10% Female 6.9%

On projects with established goals, those goals shall supersede company goals.

10. The EEO officer shall instruct superintendents to insure that minorities and females are not discriminated against by other employees or others present on the jobsite.

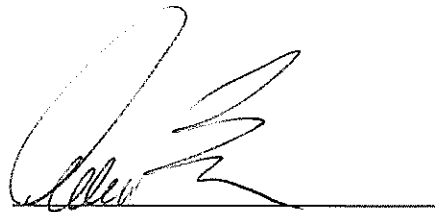
11. The EEO officer shall be the company's representative when meeting with state or federal compliance officers and shall provide information as requested by such agencies and shall cooperate with any audits or compliance reviews.

12. The EEO officer shall have full authority to take corrective action as necessary to fulfill the intent of this policy. This authority shall not be limited in any respect except for final review by the CEO of a termination recommendation of an employee accused of discriminatory practices, however, failure to comply with this policy shall be grounds for dismissal.

EEO OFFICER

This policy as stated shall be enforced or caused to be enforced by the EEO officer. The acting EEO officer is:

Donna Ballew, Vice President
14724 Pleasant Valley Road
P O Box 1647
Chillicothe, Ohio 45601
740-772-6041



Allen Ballew, President

TO: All Employees
FROM: **ALLEN BALLEW , ALLEN BALLEW GENERAL CONTRACTOR, INC**
DATE: **09/21/2007**
SUBJECT: Equal Employment Opportunity and Affirmative Action Policy Statement

It is the policy of the **ALLEN BALLEW GENERAL CONTRACTOR, INC** to ensure equal employment opportunity in accordance with the Ohio Revised Code 125.111 and all applicable federal regulations and guidelines. Employment discrimination against employees and applicants due to race, color, religion, sex (including sexual harassment), national origin, disability, age (40 years old or more), or veteran status is illegal.

ALLEN BALLEW GENERAL CONTRACTOR, INC managers and employees will comply with state and federal equal employment laws, rules, regulations and guidelines. This policy statement will be disseminated to all employees, various recruitment sources and will be displayed on all construction job sites and business locations. Any employees that deliberately violate this policy will be subject to disciplinary action.

Persons who believe **ALLEN BALLEW GENERAL CONTRACTOR, INC** has discriminated against them in employment may file a discrimination complaint with **DONNA BALLEW**. The EEO Representative has full authority to manage issues involving employment discrimination.

Point of contact to file allegations of discrimination:

Company's EEO Representative: **DONNA BALLEW**
Location: **P O BOX 1647**
CHILLICOTHE, OH 45601
Phone Number: **740-772-6041**
E-Mail Address: **donna@abgc.com**

State of Ohio

AFFIRMATIVE ACTION PROGRAM

The purpose of the Affirmative Action sample is to provide an acceptable program which addresses employment and the effective utilization of economically disadvantaged persons. This program is not to impose numerical minimums or standards, however, by adopting this program demonstrates a good faith effort to improve the equality of all citizens of the state of Ohio.

EEO Recruitment Strategies

Strategy: ALLEN BALLEW GENERAL CONTRACTOR, INC will make a good faith effort to recruit a diverse group of employees and provide equal opportunity for minorities, women and disabled persons to become competitive in state contracting opportunities. ALLEN BALLEW GENERAL CONTRACTOR, INC will advertise positions in media outlets that will provide information and access to the underserved populations.

EEO Selection Strategies

Strategy: ALLEN BALLEW GENERAL CONTRACTOR, INC will utilize procedures, processes and techniques that are fair and do not have an adverse impact on minorities, women or disabled persons. Perspective employees will not be excluded from the hiring process due to race, color, religion, sex (including sexual harassment), national origin, disability, age (40 years old or more), or veteran status.

EEO Placement/Orientation

Strategy: ALLEN BALLEW GENERAL CONTRACTOR, INC will provide newly hired employees with basic employment information during the first couple weeks on the job. New employee position descriptions, fringe benefits information, policies, procedures, and EEO are a few of the topics, which should be covered. Employees will not be denied fringe benefits and or opportunities for promotion based on race, color, religion, sex (including sexual harassment), national origin, disability, age (40 years old or more), or veteran status.

EEO Performance Evaluation

Strategy: ALLEN BALLEW GENERAL CONTRACTOR, INC will evaluate the performance of their employees on an annual basis. It should provide the necessary supervisory feedback to identify areas to be improved as well as to reinforce those activities that meet or exceed standards. Performance appraisal will be evaluated without regard to race, color, religion, sex (including sexual harassment), national origin, disability, age (40 years old or more), or veteran status.

EEO Training Strategies

Strategy: ALLEN BALLEW GENERAL CONTRACTOR, INC will attempt to diversify workforce by utilizing training and apprenticeship programs with diverse participants. Training and apprenticeship programs can increase the number of qualified minorities, women, disabled persons and veterans available for job placement.

EEO Discipline Strategies

Strategy: ALLEN BALLEW GENERAL CONTRACTOR, INC will set clear disciplinary standards and warn of consequences for non-compliance. Discipline will be designed to rehabilitate employees who choose to correct their behavior as well as justify the termination of those who do not. The employer will not mistreat or unfairly discipline an employee based on race, color, religion, sex (including sexual harassment), national origin, disability, age (40 years old or more), or veteran status.

EEO Separation Strategies/Exit Interviews

Strategy: ALLEN BALLEW GENERAL CONTRACTOR, INC will conduct exit interviews as a problem-solving tool in an attempt to reveal employee turnover. Exit interviews can provide the organization with information about how to correct the causes of discontent and reduce the costly problem of employee turnover.

EEO Monitoring Strategies

Strategy: ALLEN BALLEW GENERAL CONTRACTOR, INC will ensure Human Resources managers and supervisors understand this plan and hold managers and supervisors accountable for the effective implementation of this plan.

Minority Business Enterprise Solicitation Strategies

Strategy: ALLEN BALLEW GENERAL CONTRACTOR, INC will make a good faith effort to solicit business from certified minority owned businesses (MBE). ALLEN BALLEW GENERAL CONTRACTOR, INC will utilize the State of Ohio, Equal Opportunity Division's webpage to access certified MBEs. <http://das.ohio.gov/Eod/MBESearch/index.asp>