



Swank Associated Companies, Inc.

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Ronald J. Hags

EEO Officer

Monday, November 21, 2005

EQUAL EMPLOYMENT POLICY

It is the policy of Swank Associated Companies, Inc., to offer equal opportunity for employment to all qualified persons without regard to a person's race, color, creed, sex, age, veteran status, or national origin. It is the intention of the Company, through the adoption and implementation of this policy, to insure full and complete compliance with the Civil Rights Act of 1964, Executive Order No. 11246, and any other Federal or State Equal Employment Opportunity Order or applicable regulations. It shall be the obligation of all those who share on the management of the Company to implement the terms of this policy to insure that the Company is at all times in full and complete compliance with both the letter and spirit of all Equal Opportunity concepts.

AFFIRMATIVE ACTION PROGRAM

The company's Equal Opportunity and Affirmative Action Program includes, but is not limited to, the following actions:

1. To insure that this policy is effectively carried out, Ronald J. Hags has been appointed as the Equal Employment Opportunity Officer. His duties are to insure that the policies of this Company are administered and adhered to as outlined by the Affirmative Action Policy. This official will coordinate his efforts and program with that of other company department heads and supervisory personnel. He shall regularly make reports to the president of this Company and outline what progress and/or recommendations should be made for additional affirmative action.

It shall be the duty of this officer to remain well versed on federal, state, and local rules and regulations concerning Equal Employment Opportunities and Affirmative Action Programs.

2. Our EEO officer will handle all complaints concerning the policy and affirmative action stated herein.

It shall be the duty of this EEO officer to administer all aspects of affirmative action programming and to ascertain that the following steps will be taken to assure equal opportunity in employment.

- a. Require that all advertisements for personnel contain a notation stating that this company is an "Equal Opportunity Employer" and that all advertisements be inserted in newspapers having a large general circulation in the area and amount the minority groups. In Western Pennsylvania area, the Pittsburgh Post Gazette, The New Pittsburgh, Couriers, and any other minority news media found to exist in the areas in which we are working.
 - b. Unless we are precluded by our various bargaining agreements, this company will conduct systematic and direct recruitment through public and private referral sources likely to yield qualified minority group applicants.
3. Company Personnel Staff:
This policy assures that all supervisory personnel have been notified as to their duties in regards to fair employment policies. New applicable regulations and programs will be reviewed with our staff through various meetings, and inter-office communication articles.

This company has advised all members of its staff who are authorized to hire, supervise, promote, transfer, and discharge employees, or to recommend such action, of our policy on equal employment, and of their responsibilities regarding the Company's obligation to this policy.

It has been and will continue to be the policy of this firm to advise all of our employees of the Company policy and that nay decisions pertaining to hiring, training or upgrading are based solely on the individual's own ability to perform the work required. All employees receive

copies of our policy statement and intent through one or all of the following channels of communication: meetings, paycheck stuffers, bulletin boards, and Company reports.

Present employees are also urged to contact and refer qualified minority workers to the Company personnel officer for present and future labor needs.

This Company will continue to assure that wages, working conditions, employee benefits, and all other aspects of the employment will continue to be determined and administered on a nondiscriminatory basis. Our EEO Officer will periodically review the wage and employee benefits and working conditions to ascertain that they are being administered on a nondiscriminatory basis.

It is the policy of this Company to assure that all upgrading, promotions, transfers, demotions, layoffs, and terminations of employment will be made without regard to race, color, creed, sex, age, veteran status, or national origin. All information relating to this paragraph will be recorded on the employee's work record. We also assure that layoff of employees due to lack of work shall be based on need, work performance, work ability, and as stipulated in our various labor agreements.

4. Subcontractors:

It is the policy of this Company to require all subcontractors to adhere to the Affirmative Action guide lines established by this Company and that each subcontractor submitting bids will be pre-qualified under the Equal employment Opportunity guide lines established by the Pennsylvania Department of Transportation.

Bids will be solicited from all qualified subcontracting firms, regardless of the race, color, creed, or national origin in the area in which we are working will be encouraged to submit bids on our projects.

Our Company EEO Officer will make periodic reviews of our subcontractors to insure this policy is adhered to.

5. Conferences and Report:

We hereby agree to submit (when required and notified by appropriate agencies) at a pre-construction conference the following breakdown, except where breakdowns are not required for the classes of workers which the contractor has an individual or multi-organization approved affirmative action program.

- a. A breakdown on current total work force showing classes of workmen and minority group representation on current work projects.
- b. An estimated breakdown of the work force by classes of workers and minority group representation that could be obtained for this project.

It is finally agreed that this company will submit all reports, progress statements, etc., as requested and directed by the Department of Transportation and the Federal Highway Administration.



Ronald J. Hags
EEO Officer