



AFFIRMATIVE ACTION POLICY FOR INDIVIDUALS WITH DISABILITIES AND COVERED VETERANS

It is the policy of the Companies not to discriminate against any employee or applicant for employment because of physical or mental disability, or protected veteran status, in regard to any position for which the employee or applicant for employment is qualified. It is the policy of the Companies to afford equal employment opportunity to all qualified persons without regard for race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sexual orientation, or gender identity), age, individual disability, national origin, protected veteran status, marital status, genetic information, or any characteristic protected by law.

Federal regulation prohibits discrimination against (1) qualified protected veterans and (2) qualified individuals on the basis of disability. Section 503 of the Rehabilitation Act of 1973, as amended, requires that federal contractors take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels of employment, including the executive level.

As government contractors, the Companies will take affirmative action to employ, and advance in employment, qualified protected veterans and individuals with disabilities covered under Section 402 of the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA), as amended, and its implementing regulations, Executive Order 12985 that pertains to Armed Forces Service Medal recipients, and Section 503 of the Rehabilitation Act, as amended, and its implementing regulations (collectively referred to as "the Acts" for the purposes of this policy). The Companies agree to take affirmative action to uphold work hour utilization goals for qualified individuals as defined in the Acts for certain job groups and/or overall workforce benchmarking in accordance with the Acts.

Equal employment opportunity applies to all aspects of the employment process including, but not limited to, the following: hiring, placement, transfer, promotion, demotion, recruitment, employment advertising, treatment during employment, pay rates or other forms of compensation, training (including apprenticeship and/or on-the job training), layoff, and termination.

Employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in: (1) filing a complaint; (2) assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of these Acts, or any other federal, state or local law requiring equal opportunity for disabled persons or covered veterans; (3) opposing any act or practice made unlawful by the Acts, or any other federal, state or local law requiring equal opportunity for disabled persons or covered veterans; or (4) exercising any other right protected by the Acts, or any other federal, state, or local law requiring equal opportunity for disabled persons or covered veterans.

This policy has the full support of the Co-Chief Executive Officers, the Corporate EEO Officer, and the respective Company Presidents, as listed below:

PJ Dick: Eric Pascucci

Trumbull Corporation: Mark Gentile

The Lindy Group (and affiliates): Vince Tutino

Gulisek Construction: Clayton Stahl

This Affirmative Action Policy is available to any employee or applicant for employment upon request. This policy is also posted in conspicuous public places under the control of the Companies, such as construction site public bulletin boards. To view this policy or the Companies' Section 503/VEVRAA Affirmative Action Program during normal business hours, contact the Corporate EEO Officer at 412.807.2358 for assistance.