

## NOTICE TO ALL EMPLOYEES AND APPLICANTS

It is the policy of Pepper Construction to recruit, hire, train and promote, into all job classifications, the most qualified persons without regard to race, color, national origin, sex, religion, age, disability, or veteran status. Also employment and promotional decisions will be based on valid job requirements and by utilizing reasonable standards.

Michelle Lieb, Vice President, Human Resources is the designated EEO Coordinator at the company. The EEO Coordinator's responsibility is to implement and to audit and monitor adherence to this policy.

Any employees or applicants with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or the EEO Coordinator. Employees and applicants can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion, or discrimination because they: (1) file a complaint with Pepper Construction or with federal, state, or local agencies; (2) assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute; (3) oppose any act or practice made unlawful by federal, state, or local law requiring equal employment opportunity or affirmative action; or (4) exercise any other employment right protected by federal, state, or local law or its implementing regulations.

The Affirmative Action Plan for Individuals with Disabilities and Veterans is on file in the Human Resources Office and is available for employee and applicant review between 8:00 a.m. and 5:00 p.m., Monday through Friday. Any employee or applicant who would like to review the Affirmative Action Plan for Individuals with Disabilities and Veterans should contact Michelle Lieb, Vice President, Human Resources, 847 381-2760.

David Pepper, Chairman and Chief Executive Officer of The Pepper Companies, is committed to all of the objectives of equal employment opportunity and expects the cooperation and participation of all employees of the company in achieving these objectives.



**POLICY NUMBER:** 03.17 (Complies with Federal Requirements)

**POLICY**

Equal Employment Opportunity Policy

**DEPARTMENT**

Human Resources

**EFFECTIVE DATE**

01/01/2012

Revision History

Revision #	Date	Reason for Changes
---	06/24/2010	Initial Policy
1	01/01/2011	Annual Update
2	01/01/2012	Annual Update

**1 – PURPOSE**

1.1 This policy defines the Pepper Construction Group (herein referred as the “Company” or “PCG”) policy related to the Company’s guidelines on preventing and addressing potential workplace harassment.

**2 – SCOPE**

2.1 This policy applies to Pepper Construction Group (herein referred to as “PCG” or “Company”) and to all Company employees; specifically this includes Pepper Construction Company (PCC), Pepper Construction Company of Indiana, LLC (PCCI), Pepper Construction Company of Ohio, LLC (PCCO), Pepper-Lawson Construction, LP (PLC) and Pepper Environmental Technologies (PET).

2.2 This policy applies to Company employees, subcontractors, independent contractors and suppliers.

**3 – RESPONSIBLE PARTY**

3.1 All employees.

## **4 – PROCEDURE**

- 4.1 It is the policy of the Company to recruit, hire, train and promote, into all job classifications, the most qualified persons without regard to race, color, national origin, religion, sex, disability, veteran status, age or any other basis protected by federal, state or local law.
- 4.2 Make employment and promotional decisions by utilizing reasonable standards based on the individual's qualifications as they relate to a particular job vacancy and to the furtherance of equal employment opportunity.
- 4.3 Ensure that all other personnel actions, including but not limited to, compensation, benefits, transfers, reductions in force, Company-sponsored training, education, tuition assistance, and social / recreation programs will be administered without regard to race, color, national origin, religion, sex, disability, veteran status, age or any other basis protected by federal, state or local law.
- 4.4 Reporting
- 4.4.1 The Head of Human Resources is the designated EEO Coordinator at the Company. The EEO Coordinator's responsibility is to implement and to monitor adherence to this policy. Employees should feel free to contact the Head of Human Resources should they experience any problems.
- 4.4.2 Any employees or applicants with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or the EEO Coordinator.
- 4.4.3 Employees and applicants can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion, or discrimination because they:
- File a complaint with Pepper Construction or with federal, state, or local agencies.
  - Assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute.
  - Oppose any act or practice made unlawful by federal, state, or local law requiring equal employment opportunity or affirmative action.
  - Exercise any other employment right protected by federal, state, or local law or its implementing regulations.

**5 – DEFINITIONS**

5.1 None

**6 – REFERENCES**

6.1 Title VII, Civil Rights of 1964 and Amendments

6.2 The Americans with Disabilities Act of 1990, Titles I and V

6.3 Uniformed Services Employment and Reemployment Rights Act of 2004 (USERRA)

6.4 Age Discrimination in Employment Act of 1967 (ADEA)

**7 – FORMS/ ATTACHMENTS**

7.1 None

**8 – COMPANY VARIATIONS**

8.1 None

**APPROVED BY:**

*Michelle K. Lieb*

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Michelle K. Lieb  
Vice President, Human Resources  
Pepper Construction Company

*J. David Pepper*

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J. David Pepper  
Chairman and CEO  
Pepper Construction Group, LLC