

DOAN/PYRAMID, LLC

EEO POLICY & AFFIRMATIVE ACTION STATEMENT



DOAN PYRAMID ELECTRIC submits the following plan to assure compliance with Executive Order #11246 and to reaffirm our Policy whereby in the hiring of qualified employees for the performance of work under this contract, we shall not discriminate against any person by reasons of race, creed, color, national origin, sex or age.

We further agree to initiate and continue a program of Affirmative Action to make known to all the Equal Opportunities are available with our Company on the basis of utilization of their capabilities, and to strive for advancement on that basis.

It is the policy of DOAN PYRAMID ELECTRIC to review the EEO Policy and Affirmative Action obligations annually, if not more frequently with all employees having any responsibility of hiring, assignment, layoff, termination or other employment decisions. This includes specific review of these items with on Site supervisory personnel.

Reviews are conducted at least annually, on all supervisors adherence to and performance under the EEO policy and Affirmative Action obligations.

The Equal Employment Opportunity Officer is Aldona Nagy and she can be reached at our office at (216) 587-9510.

RESPONSIBILITIES FOR IMPLEMENTATION

Ms. Aldona Nagy, Equal Employment Opportunity Officer is responsible for the full implementation of this Program. She will implement and monitor all Equal Opportunity activities and maintain a record of the Company's progress.

Any and all discrimination complaints will be investigated by Ms. Aldona Nagy. Corrective action will be taken and all affected parties notified of their avenues of appeal.

To make sure discriminatory practices are non-existent, the EEO Officer will continually monitor all facilities and personnel activities to ensure that the Company's EEO Policy is being carried out and are non-segregated.

SPECIFIC AFFIRMATIVE ACTIONS STEPS:

DOAN PYRAMID ELECTRIC will implement, when necessary, any or all increasing minority manpower and female utilization regardless of race, creed, color, national origin, sex or age:

Recruitment

1. Notify community organizations that our Company has employment opportunities available and to maintain records of the organizations responses.
2. Maintain a file of the names and addresses of each minority and female applicant referred to us and what action was taken with respect to each such referred applicant. If the applicant was not employed by us or was not sent to the union hiring hall (if applicable) for referral, our file shall document this and the reasons therefore.
3. Make specific and constant personnel recruitment efforts, both written and oral, directly to all minority recruitment organizations and minority training organizations within our Company's recruitment area.
4. Make specific efforts to encourage present minority and female employees to recruit their friends and relatives.

5. Make every effort to promote after—school, summer and Vacation employment to minority youths and females.

6. Notify the Office of Contract Compliance promptly when the union or unions with whom we have a collective bargaining agreement have not referred to us a qualified minority requested by us, or when we have other information that the union referral process has impeded us in our efforts to meet our goals (if applicable).

Training

1. Participate in training programs in the *area*, especially those funded by the Department of Labor.

2. Develop on the job training opportunities and participate and assist in any association or employer group training programs relevant to our employee needs consistent with our adopted goals and timetables. Employees will be notified of all available training programs.

3. DOAN PYRAMID ELECTRIC's training program is done through

Local Union

No. 38 in which all our employees are allowed to participate including minorities and females. All opportunities for training are available to our employees when needed.

4. There are at least annual evaluation done of at least all minority and female personnel for promotional opportunities when the opportunities to encourage employees to seek or prepare for such opportunities when the opportunities become available.

Promotion

1. Evaluate continually minority and female personnel for promotion opportunities.
2. Make sure that all seniority practices, job classifications, etc., do not have a discriminatory effect.
3. Validate all man specifications, selection requirement tests, etc.

Demotion, Layoffs and Terminations

All demotions, layoffs and terminations will be cleared through the Equal Employment Opportunity Officer. No employee's status shall be altered without careful consideration for DOAN PYRAMID ELECTRIC's contractual obligations and the Company's long H term interest in our employees and Equal Employment Opportunity.

Treatment During Employment:

DOAN PYRAMID ELECTRIC will not discriminate against or intimidate any employee hired for the performance of this work on account of race, creed, color, natural origin, sex, or age.

This Policy will be adhered to by all employees of DOAN PYRAMID ELECTRIC

Minority and Sub—Contractor Utilization

Bids will be solicited for subcontract from qualified and interested minority contractors.

STATE EQUAL EMPLOYMENT OPPORTUNITY COVENANT

DOAN PYRAMID ELECTRIC pledges to honor fully the eight (8) provisions listed under the Department of Public Works' Rules and Regulations on Equal Employment Opportunity. We further wish to affirm that we include these eight (8) provisions physically.

In every subcontract or purchase order, so that such provisions will be binding upon each subcontractor or vendor. The covenant is as follows:

During the performance of this contract, DOAN PYRAMID ELECTRIC agrees as follows:

1. DOAN PYRAMID ELECTRIC will not discriminate against any employee of applicant for employment because of race, color, religion, national origin, ancestry or sex. The contractor will take affirmative action to ensure that the applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, national origin, ancestry or sex. Such action shall include, but is not limited to the following: employment, upgrading, demotion or transfer, recruitment advertising, layoff or termination, rates or pay or other forms of compensation, and selection of training, including apprenticeship. DOAN PYRAMID ELECTRIC agrees to post in conspicuous places, available to employees and applicants for employment, notices to be provided by the contracting officer setting for the provisions of this nondiscrimination clause.

2. DOAN PYRAMID ELECTRIC will, in all solicitations or advertisements for employees placed by or on behalf of DOAN PYRAMID ELECTRIC state that all qualified applicants will receive consideration for employment without regard to race, color, religion, national origin, ancestry, or sex.

3. DOAN PYRAMID ELECTRIC will send to each labor union (if applicable) or representative of workers with which has had a collective bargaining agreement or other contract understanding, a notice, to be provided by the contracting officer, advising the labor union or workers' representative of the contractor's commitments under Section 202 of the Director of Department of Public Works' Rules and Regulations on Equal Employment Opportunity (hereinafter referred to as "DPW Regulation of EEO") and shall post copies in conspicuous places available to employees and applicants for employment.

4. DOAN PYRAMID ELECTRIC will comply with all provisions of the DPW Regulation of EEO, and the implementing rules, regulations and applicable orders of the State Equal Employment Opportunity Coordinator.

5. DOAN PYRAMID ELECTRIC agrees that we will fully cooperate with the State Equal Employment Opportunity Coordinator, with any other Official or agency of the State of Federal Government which seeks to eliminate Unlawful employment discrimination, and with all other State and Federal efforts to assure equal employment practices under this and directions from the State of Ohio and/or of its officials and agencies in this regard, both before and during performance.

6. Full cooperation as expressed in clause (5) above shall include, but not limited to, being a witness and permitting employees to be witnesses and complainants in any proceeding involving questions of unlawful employment practices, furnishing all information and reports required by the DPW Regulation of EEO and by the rules, regulations and orders of the State Equal Employment Opportunity Coordinator for purpose of investigation to ascertain compliance with such rules, regulations and orders.

7. In the event of DOAN PYRAMID ELECTRIC's non—compliance with

the non—discrimination clauses of this contract or with any such rules, regulations and orders, this contract may be cancelled, terminated or suspended in whole or in part and DOAN PYRAMID ELECTRIC may be declared ineligible for further State Contracts in accordance with procedures authorized in the DPW Regulation of EEO, and such other sanctions may be imposed and remedies instituted as provided in said Regulation or by rule, regulation or order of the State Equal Employment Opportunity Coordinator or as otherwise provided by law.

8. DOAN PYRAMID ELECTRIC will include the provisions of Paragraphs (1) through (8) in every subcontract or purchase order unless exempted by rules, regulations or orders of the State Equal Employment Opportunity Coordinator issued pursuant to Section 204 of the DPW Regulation on EEO, so that such provisions will be binding on each subcontract or purchase order Contracting Agency may direct as a means of enforcing such provisions including sanctions for noncompliance provided, however, that in the event DOAN PYRAMID ELECTRIC becomes involved *in*, or threatened with, litigation with a subcontractor, vendor or other party as a result of such direction by the contracting agency, DOAN PYRAMID ELECTRIC may request the State of Ohio to enter into such litigation to protect the interest of the State.

CONCLUSION

DOAN PYRAMID ELECTRIC hereby adopts this Program of Equal Employment Opportunity to all persons in an effort to stimulate the economy and to recognize the needs of minority groups and women to be treated equally. With this understanding,

DOAN PYRAMID ELECTRIC will make every effort to promote and ensure Equal Employment Opportunity to all.

Michael Forlani

President