

Equal Employment Opportunity Policy Statement

Tooles Contracting Group has long recognized its responsibility to extend Equal Employment Opportunity to all individuals. The Company's Affirmative Action Program supports this policy with positive procedures and objectives to ensure fair employment practices.

Tooles Contracting Group and its subsidiaries continue to demonstrate and administer strong affirmative action program efforts throughout the entire organization. Our long-term commitment to provide equal opportunity to all persons, based on qualifications and merit, without regard to race, sex, color, national origin, ancestry, age, creed, religion, marital status, citizenship status, disability including veterans with disabilities and veterans of the Vietnam era, sexual orientation, gender identity or HIV status, has not and will not waver. Training, recruitment, promotions, benefits, compensation and all other factors involved in the equal treatment of employees and applicants are included in this Company-wide policy.

The utilization of minority- and women-owned business enterprises throughout the Company will continue to have high priority within our affirmative action programs. The Company is committed to the utilization of minority- and women-owned business enterprises to the fullest extent possible and feasible in all geographical locations. Our purchasing efforts are responsive to this commitment.

Tooles believes that providing equal employment opportunity is a fundamental responsibility. We also believe it is good business.

All employees are expected to adhere to the policy of equal opportunity for all. Tooles fully intends to implement not only the letter but also the spirit of the law. Tooles Contracting Group employees must comply with all federal, state, and local laws prohibiting discrimination in employment, including discrimination because of race, sex, color, national origin, ancestry, age, creed, religion, marital status, citizenship status, disability including veterans with disabilities and veterans of the Vietnam era, sexual orientation, gender identity or HIV status. The Company expects the organizations with whom it does business to share this commitment.

Both Company policy and governmental regulations forbid discrimination in recruiting, hiring, training, promotion, and all other terms and conditions of employment. Only the merit of the individual measured against objective job requirements shall be considered. Tooles Contracting Group recognizes that progress in Equal Employment Opportunity requires more than policy statements alone. The Company, therefore, will make every effort to implement the letter and spirit of the law.

Damon V. Tooles

President