



SITE DEVELOPMENT + PLUMBING

4425 Entrepot Boulevard  
Tallahassee FL 32310  
Phone: 850-656-1211  
Fax: 850-877-1699

**EQUAL EMPLOYMENT OPPORTUNITY  
AFFIRMATIVE ACTION POLICY AND PLAN**

**EEO/AA POLICY AND PLAN**

**EEO/AA POLICY STATEMENT**

It is the policy of Dowdy Corporation to ensure that all employees are treated fairly and are not subject to working in an environment that violates any federal and/or state laws, such as:

Title VII of the Civil Rights Act of 1964 (as amended), the Age Discrimination in Employment Act of 1967 (ADEA), Executive Order 11246, 41 CFR 60, 29 CFR 1625-1627, Title 23 USC Section 140, the Americans with Disabilities Act of 1990 (ADA) and 2008 (ADAAA), the Lilly Ledbetter Fair Pay Act of 2009, the Genetic Information Nondiscrimination Act of 2008 (GINA), and the Florida Civil Rights Act of 1992, and the Vietnam Era Veteran Readjustment Assistance Act of 1974 (VEVRAA) (29 U.S.C. 793) prohibit discrimination in employment based on race, color, religion, gender, national origin, age, disability, marital status, veteran or military status, or any other legally protected status. Sexual harassment of employees and applicants is a form of discrimination. Any act of unlawful discrimination by an employee will lead to disciplinary or administrative action, up to and including dismissal.

Dowdy, to further promote these values within its workforce, also established a Grievance Resolution Internal Procedure (GRIP) Policy. When a complaint is made, the complaint is heard by the EEO Officer and the grievant receives a prompt response to the complaint. Any employee (grievant) who utilizes this procedure may do so without fear of retaliation. This additional policy further emphasizes to employees that Dowdy will not tolerate any form of discrimination within the workplace and will assure its employees are held to these standards.

It is the policy of Dowdy Corporation to ensure that each employee and applicant are given fair consideration in employment, recruitment, hiring, promotion, demotion, and termination. All employment decisions will be based on objective, job-related criteria designed to evaluate an individual's knowledge, skills, and abilities needed to perform the essential duties of the required job.

Dowdy prohibits retaliation against, coercion, or intimidation of any individual who has complained about unlawful discrimination, filed a charge of unlawful discrimination, or participated in an employment discrimination investigation or lawsuit. Action will be taken against any employee found to have committed these acts.

Any person who feels he or she is a victim of discrimination should file a complaint with Dowdy's EEO Officer (or designated individual) should forward claims of discrimination via fax, mail to Human Resources, 4425 Entrepot Boulevard, Tallahassee, FL 32310, Phone (850) 656-1211, Fax (850) 877-1699, or emailed to HR@teamdowdy.com.

Jennifer Lewis, Corporate Secretary  
Printed Name and Title of EEO/AA Officer

  
Signature of EEO Officer

## **EEO OFFICER DUTIES**

It is the policy of Dowdy to always maintain an Equal Employment Officer (EEO) position within the company. The name and contact information for the EEO Officer will be communicated within this policy and will be communicated within the company. The EEO Officer is Dowdy's Corporate Secretary or his/her designee.

It is the responsibility of the EEO Officer to effectively administer and promote an active program to ensure Equal Employment Opportunity and Affirmative Action (EEO/AA). The EEO Officer will coordinate all EEO/AA efforts within Dowdy to include its corporate officers, and all company managers such as Project Managers, Superintendents, and other individuals in the position of hiring employees.

## **EEO/AA PLAN**

It is the policy of Dowdy to ensure that there are no forms of discrimination based on race, color, religion, gender, national origin, age, disability, marital status, veteran or military status, or any other legally protected status, in hiring, job placement, promotion, demotion, or transfer. In addition, Dowdy will ensure there are no discriminatory practices in recruitment, advertising, solicitation for employment, rates of pay, or other forms of compensation, selection or training to include apprenticeship programs, layoff or termination, or treatment during employment. Dowdy has affirmative action obligations in the hiring of minorities to include women, disabled, and veteran applicants.

Dowdy ensures that all employment decisions are merit based to avoid discrimination against any person because of their race, color, religion, gender, national origin, age, disability, marital status, veteran or military status, or any other legally protected status. All members of the contractor's staff who are authorized to hire, supervise, promote, and discharge employees, or who recommend such action, or who are substantially involved in such action, will be made fully cognizant of, and will implement, the contractor's EEO policy and contractual responsibilities to provide EEO in each grade and classification of employment. To ensure that the above agreement will be met, the following actions will be taken at a minimum:

- Hold periodic meetings of supervisory and personnel office employees before the start of work and then not less than once every six months, at which time the contractor's EEO policy and its implementation will be reviewed and explained. The meetings will be conducted by the EEO Officer and or Human Resources Manager.
- All new supervisory or personnel office employees will be given a thorough indoctrination by the EEO Officer and or Human Resources Manager, covering all major aspects of the contractor's EEO obligations within 30 days following their reporting for duty with the contractor.

- All personnel who are engaged in direct recruitment for the project will be instructed by the EEO Officer and or Human Resources Manager in the contractor's procedures for locating and hiring minorities and women.
- Notices and posters setting forth the contractor's EEO policy will be placed in areas readily accessible to employees, applicants for employment and potential employees.
- The contractor's EEO policy and the procedures to implement such policy will be brought to the attention of employees by means of meetings, employee handbooks, or other appropriate means.

Dowdy ensures it will take specific affirmative actions to ensure equal opportunity. Dowdy will not develop any method to discriminate against any person based upon their race, color, religion, gender, national origin, age, disability, marital status, veteran or military status, or any other legally protected status.

It is the policy of Dowdy to assure that applicants are employed, and that employees are treated during employment, without regard to race, color, religion, gender, national origin, age, disability, marital status, veteran or military status, or any other legally protected status. Compliance with this policy and plan is based upon company efforts to achieve maximum results from our actions and these actions will be documented fully. Dowdy has implemented affirmative action steps as depicted below:

- Dowdy will ensure and maintain a working environment which is free from harassment, intimidation, and coercion and in all jobsites in which Dowdy employees are assigned to work. Dowdy jobsite superintendents and Project Managers, and any other on-site supervisory personnel are aware of and will carry out the company's obligations to maintain such a working environment.
- All vacant positions will be posted on the company website. All individuals are encouraged to apply, and only qualified candidates will be interviewed. Selection of candidates for interview will be based upon the individual's knowledge, skills, and abilities. Application forms completed by applicants do not possess any indicators to potentially screen out qualified candidates based upon race, color, religion, gender, national origin, age, disability, marital status, veteran or military status, or any other legally protected status. All advertisements will bear the notation "An Equal Opportunity Employer".
- Dowdy currently employs a large workforce of individuals who are classified as minorities and the company intends to promote employees based upon merit without regard to race, color, religion, gender, national origin, age, disability, marital status, veteran or military status, or any other legally protected status.
- Dowdy will ensure all employees are familiar with the requirements for and comply with the Americans with Disabilities Act (ADA) and all rules and regulations established. Dowdy will provide reasonable accommodation in all employment activities unless to do so would cause an undue hardship.

- Dowdy maintains all applications for employment for a period of one (1) year. When vacancies become available, Dowdy refers to these previously submitted applications to select qualified candidates for interview.
- Interviews for employees are conducted using an “interview panel”. Applicants are scored according to answers provided by the applicant and then applicants with the highest score are selected for the position.
- Interview packets from applicants who scored below the hiring threshold, will be maintained for a period of 1 year. These interview packets are available for review until either; (1) the applicant is hired (2) or has met date for destruction.
- Dowdy has developed an apprenticeship program and provides on-the-job training opportunities for the advancement of minorities and women. Application to the apprenticeship program is non-biased and based upon:
  - Applicant submitting a written application to the apprenticeship program.
  - Length of employment with Dowdy
  - Applicant’s work history with length of service in the industry
- Employees selected for enrollment in Dowdy’s apprenticeship program must agree to the terms of the program to include steady participating in classwork, hands-on training, and satisfactorily completing all assignments. Employees enrolled in the apprenticeship program may voluntarily withdraw at any time; however, new applicants will only be selected on an annual basis. The cost is paid for by the company without any obligation on the part of the employee for reimbursement.
- Notice of Dowdy’s EEO policy will be displayed on bulletin boards within the company headquarters and accessible to all employees. Copies of the policy will be made available upon requested.
- Dissemination of the company EEO policy notice by providing notice to the unions and training programs and requesting their cooperation in assisting Dowdy in meeting our EEO obligations; including it in any policy manual and collective bargaining agreement; by publicizing it in as required; by specific review of the policy with all management personnel and with all minority and female employees at least once a year; and by posting the company EEO policy on bulletin boards accessible to all employees at each location where construction work is performed.
- Review, at least annually, Dowdy’s EEO policy and affirmative action obligations under these specifications with all employees having any responsibility for hiring, assignment, layoff, termination, or other employment decisions including specific review of these items with onsite supervisory personnel such as Project Managers, Superintendents, and designated site foremen, etc., prior to the initiation of construction work at any job site. A written record shall be made and maintained identifying the time and place of these meetings, persons attending, subject matter discussed and disposition of the subject matter.

- Disseminate Dowdy's EEO policy externally by including it in any advertising in the news media, specifically including minority and female news media, and providing written notification to and discussing the company EEO policy with other contractors and subcontractors with whom the company does or anticipates doing business.
- Direct Dowdy's recruitment efforts, both oral and written, to minority, female, and community organizations, to schools with minority and female students and to female recruitment and training organizations serving our recruitment area and employment needs. Not later than one month prior to the date for the acceptance of applications for apprenticeship or other training by any recruitment source, we shall send written notification to organizations such as the above, describing the openings, screening procedures, and tests to be used in the selection process.
- Dowdy encourages present minority and female employees to recruit other minority persons and women, where reasonable, provide after school, summer and vacation employment to minority and female youth, both on the site and in other areas of our workforce.
- Validate all test and other selection requirements where there is an obligation to do so under 40 CFR Part 60-3.
- Conduct at least annually, an inventory and evaluation of all minority and female personnel for promotional opportunities and encourage these employees to prepare for, through appropriate training, etc., such opportunities.
- Ensure that seniority practices, job classifications, work assignments and other personnel practices, do not have a discriminatory affect by continually monitoring all personnel and employment related activities to ensure that the EEO policy and company obligations under these specifications are being carried out.
- Ensure that all facilities and company activities are non-segregated except that separate or single-user toilets and necessary changing facilities shall be provided to assure privacy between the genders.
- Document and maintain a record of all solicitations of offers for subcontracts from minority and female construction contractors and suppliers, including circulation of solicitations to minority and female contractor associations and other business associations.
- Conduct a review, at least annually, of all supervisors' adherence to and performance under the company EEO policies and affirmative action obligations.

## **RECORDS**

Dowdy will keep records to monitor all employment related activity to ensure that Dowdy's EEO policy is being carried out. Records shall at least include for each employee the name, address,

telephone numbers, construction trade, union affiliation if any, employee identification number when assigned, social security number, race, gender, status (e.g., mechanic, apprentice, trainee, helper, or laborer), dates and changes in status, hours worked per week in the indicated trade, rate of pay, and locations at which the work was performed.

Dowdy will keep all records necessary to document compliance with the EEO requirements. Such records will be retained for a period of three (3) years following the date of the final payment to the contractor for all contract work and shall be available at reasonable times and places for inspection by authorized representatives of the contracting agency and the Federal Highway Administration (FHWA).

**MINIMUM WAGES**

Dowdy will pay all employees unconditionally and not less often than once per week and without subsequent deduction or rebate of any account (except payroll deduction as permitted under the Copeland Act 29 CFR Part 3), the full amount of wages and bona fide fringe benefits (or cash equivalents) due at the time of payment computed at rates not less than those contained in the wage determination of the Secretary of Labor.

**REPORTING OF COMPLAINTS**

If at any time, anyone feels he or she has been discriminated against because of gender, race, religion, color, age, national origin, disabilities or Vietnam Era and Social Disabled Veteran status, they should report this matter to Dowdy’s EEO Officer whose name and contact information is communicated along with this policy.

Dowdy’s EEO Officer will investigate all complaints of alleged discrimination made to the company in connection with its contractual obligations. The EEO Officer will attempt to resolve such complaints, corrective actions to be taken and will then follow up on actions taken and their effort. If the investigation indicates that the discrimination may affect persons other than the complainant, such corrective actions shall include such other persons. Upon completion of each investigation, the EEO Officer will inform every complainant of all his or her avenues of appeal. The addresses shown below are such avenues for appeals:

<p><b>Dowdy EEO Officer</b> Jennifer Lewis (or designee) 4425 Entrepot Boulevard Tallahassee, FL 32310  (850) 656-1211</p>	<p><b>Florida Commission on Human Relations (FCHR)</b> 4075 Esplanade Way, #110 Tallahassee, FL 32399  (850) 488-7082</p>
<p><b>U.S. Department of Labor, Regional Director</b> Office of Federal Contract Compliance 61 Forsyth Street SW, Room 7B-75 Atlanta, GA 30303  (404) 562-2424</p>	<p><b>U.S. Federal Highway Administration</b> 545 John Knox Road, Suite 200 Tallahassee, FL 32303  (850) 942-9650</p>

<b>U.S. Equal Employment Opportunity Commission (EEOC)</b> Miami District Office 100 SE 2 <sup>nd</sup> Street, Suite 1500 Miami, FL 33131  (800) 669-4000	<b>U.S. Equal Employment Opportunity Commission (EEOC)</b> Tampa District Office 501 East Polk Street, Suite 1000 Tampa, FL 33602  (800) 669-4000
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