

JPC Group, Inc.
EEO / Affirmative Action Policy

It is the policy and employment practice of JPC Group, Inc, (JPC) that there will be no discrimination on the basis of race, gender, age, religion, creed, national origin, disability, marital status, disabled veteran/Vietnam era veteran or citizenship status, in the recruiting of applicants for employment or in the hiring of employees. Further, that there will be no discrimination in the promotion, upgrading, transfer, demotion, discharge, training or retraining under programs to which the company subscribes compensation, terms and conditions of employment or privileges of employment by reason of an individual's race, color, gender, age, religion, creed, national origin, disability, marital status, disabled veteran/Vietnam era veteran or citizenship status. JPC will take a proactive approach in seeking out qualified minority group members and women and providing opportunity for minority group workers and women to become qualified for employment and advancement.

Responsibility for Implementation

JPC's Equal Employment Opportunity Officer (EEO) shall be Gregory Petrongolo. His address is 228 Blackwood-Barnsboro Rd., Blackwood, NJ, 856-232-0400. He shall coordinate and administer the company's Affirmative Action Program and shall have the full support of top management relative thereto. This responsibility includes the development of policy statements, affirmative action programs, internal and external communication, recruiting strategy, design and implementation of reporting systems, identification of problem areas, liaison with compliance agencies and other organizations, informing management of EEO/AA developments, and assuring that facilities are not segregated

The EEO shall investigate any complaint of discrimination and if he finds such to be true, shall institute all necessary procedures to help alleviate such discrimination. He shall at least annually review the company's Affirmative Action Program and shall initiate and establish, as necessary, changes to assure that the program does help fulfill the company's obligation to establish a workable Affirmative Action Program.

All management and supervisory personnel bear responsibility for and will assist the EEO Officer and his subordinates in helping to the implement of JPC's Affirmative Action Program.

Instructing and Informing

JPC's EEO Officer shall inform and instruct supervisory employees of the company's policy of Equal Employment Opportunity with regard to hiring, promotion, demotion, counseling and termination of employees. The EEO Officer shall obtain the supervisory employee's commitment to help follow and enforce the Equal Employment Opportunity Program within the area over which he has supervisory authority. The company EEO Officer shall at least annually review with the supervisors their responsibility to follow an Affirmative Action Program. The Company shall, twice annually, hold a meeting to provide opportunity for the company's EEO Officer or his designated representative to review and instruct supervisory employees in their responsibilities under the contractor's Affirmative Action Program.

Communication

JPC communicates its EEO policy through advertisements in industry trade publications, minority and veteran publications and advertisements for job openings. Letters are sent to the various trade unions, with which JPC participates in a collective bargaining agreement, advising them of our EEO policy and soliciting their cooperation through the referral of qualified minority and female workers to our projects. JPC management personnel also communicate this policy through conversations with union officials and other relevant third parties.

Minority and Female Utilization

JPC will make a good faith effort to meet the designated goals set forth by the Office of Federal Contract Compliance Programs (OFCCP) for the utilization of qualified minorities and females in the various trade crafts on all construction projects during the time that JPC has a federally-assisted or direct federal construction contract. This commitment is not intended and shall not be used to discriminate against any qualified applicant or employee. As confirmed by the OFCCP, goals are numerical objectives or targets and not inflexible, unlawful quotas. The term “minority” shall mean Black, Hispanic, Asian and Pacific Islander, American Indian, and Alaskan Native, as defined in greater detail in federal regulation 41 CFR 60-4.

Monitoring Review and Analysis

JPC will monitor all personnel practices and employment related activities to ensure that they do not have a discriminatory effect and review the performance of supervisory personnel to help support adherence to the EEO policy. As part of its affirmative action program, JPC will analyze reports generated indicating the representation of minorities and females within our workforce. This analysis will consider the degree of minority and female representation therein as compared to the employment goals stipulated by contract.

Any problem areas identified, will be addressed with area supervisory personnel and appropriate corrective efforts determined. Corrective efforts will be directed toward specific problems and will consider timing to coordinate with the appropriate activity for the respective area, i.e. hiring.

Recruitment

As a participant in collective bargaining agreements with the unions referring qualified skill/craft workers to our projects, JPC solicits and relies upon the cooperation of various unions to refer qualified minority and female craft workers in sufficient numbers to help achieve certain employment utilization goals and provide for minority and female participation in the construction workforce.

In order to assist the various trade unions in their efforts to increase the representation of their minority and female members, and as part of JPC’s efforts to expand the pool of qualified minority and female workers in the various trade/skill categories, we may also solicit various outside recruitment sources to refer minority and female workers to us. A current list of walk-in applicants is maintained indicating the name, address and telephone number of each individual. Any minorities and females so identified will be referred to any appropriate trade unions for evaluation as to skill level and qualifications. If they have the appropriate qualifications, we may ask that they be referred to our project. The record maintained includes reference to the disposition of each individual applicant.

In solicitations for referral and advertisements for non-union job opportunities, JPC utilizes the notation “Equal Opportunity Employer”.

Additionally, all present minority and female employees are encouraged to recruit other minority and female persons.

Training and Promotion

Consistent with its requirements and as permissible under regulation, JPC will make use of training programs such as pre-apprenticeship, apprenticeship, and on-the-job training programs. Where reasonable, qualified minority and female students will be provided with on the job training in coordination with their educational activities. To the extent possible, JPC will advise employees and applicants for employment of available training

program opportunities and the requirements for entrance into such programs. JPC will periodically review the training and promotion potential of minority and female employees and will encourage eligible employees to apply for such training and promotion.

Unions

JPC will use its best efforts to obtain the cooperation of any unions with which it has collective bargaining relationships to increase minority and female opportunities within the unions, and to effect the referral of qualified minority and female workers by such unions.

JPC will encourage the incorporation of an equal employment opportunity clause into any union agreements stating that such unions are bound contractually to refer applicants without regard to race, color, religion, sex, national origin, or disability.

When a union with which JPC has a collective bargaining agreement is unable to refer qualified minority or female workers to a project within a reasonable time, JPC will use its best efforts to recruit minority and female applicants from outside recruitment sources for referral to the respective union for evaluation of skill level and qualifications and, if qualified, referral to our project when job opportunities exist in the particular trade / skill category.

JPC will provide immediate written notification to Office of Federal Contract Compliance when a union fails to refer a minority or female applicant which JPC has sent to the union or when JPC has other information that the union referral process has impeded its efforts to help meet its obligations.

Records and Reports

JPC will keep such records as are necessary to determine compliance with its equal employment opportunity obligations. The records kept will utilize the appropriate forms designed to help indicate:

- The number of minority, non-minority and female group member employees in each work classification.

All such records will be retained for a period of three (3) years following completion of the contract work for a particular project and shall be available for inspection by authorized representatives of the State and Federal governments. JPC reserves the right to require these representatives to evidence proper credentials.

JPC will submit all reports required by Executive Order 11246 and appropriate state and federal agencies, and will permit access to its books, records, and accounts by appropriate governmental agencies and the Secretary of Labor for purposes of investigation to ascertain compliance with the rules, regulations and orders of the Secretary of Labor promulgated pursuant to Executive Order 11246.

Co-incident Other Work

JPC agrees that it will be bound by the Equal Opportunity Clause required by Executive Order 11246 with respect to its own employment practices when it participates in construction work which is not federally funded, during a period of time that it may also has a federally assisted or direct federal contract.

Subcontracting

JPC agrees that it will use its best effort to utilize qualified Disadvantaged Business Enterprises as subcontractors, suppliers and vendors to help in compliance with various federal regulations. Appropriate documentation will be maintained to record solicitations of offers.

Assistance in Compliance

JPC agrees that it will assist and cooperate actively with the appropriate governmental agencies and the Secretary of Labor in helping to obtain the compliance of contractors and subcontractors with the Equal Opportunity Clause and the rules, regulations, and relevant orders of the Secretary of Labor.

Non-Segregated Facilities

All employee facilities provided by JPC shall be non-segregated. These include, but are not limited to, rest areas, parking lots and all other such common facilities. Toilets and changing facilities will offer privacy to both males and females.

Post-Award Compliance

It is understood that the OFCCP may review our employment practices as well as those of any subcontractors employed during our performance of a federally -assisted or direct federal contract. If the goals established for the employment of minorities and females are not being met, JPC shall be given an opportunity to demonstrate that it has made appropriate good faith efforts in helping to meet its commitment.

Debarred or Ineligible Contractors or Subcontractors

JPC agrees that it will refrain from entering into any contract or contract modifications subject to Executive Order 11246 with a contractor or subcontractor debarred from or who is not otherwise eligible for federally assisted or direct federal construction contracts pursuant to Executive Order 11246.