
**5182 S Saginaw Rd
Grand Blanc, MI 48507****Telephone 810-695-7516
Fax 810-695-7567****Affirmative Action Program for Equal Opportunity Compliance****Statement of Policy**

It is the policy of Action Traffic Maintenance, Inc. to further the provision of Equal Employment Opportunity to all persons without regard to their race, religion, sex, color, national origin, age or disability or any other protected characteristic under applicable law and promote an Equal Employment Opportunity through a positive continuing program, and to assure that all employees are treated equally without regard to their race, religion, sex, color, national origin, age or disability or any other protected characteristic under applicable law during their or prior to their employment. Such action shall include rates of pay, employment, upgrading, demotion, transfer, recruitment or recruitment advertising, layoff, or termination, including apprenticeship, pre-apprenticeship, and/or on-the-job training.

Responsibility for the Program

Michael Peake will carry out this program as the Equal Opportunity Officer. The EEO Officer is granted full authority to carry out the program and is given the responsibility to:

- Serve as liaison between the company and any minority, persons with disabilities, and/or women's organizations, government regulatory agencies, and other community groups
- Develop internal and external communication procedures, as well as policy statements
- Assure that legal information affecting Affirmative Action is brought to the attention of responsible officials of Action Traffic Maintenance, Inc.
- Assist management in collecting and analyzing employment data, setting goals and timetables, identifying problem areas, and developing programs to achieve goals. Such programs will include specific solutions to eliminate any possible discriminatory practices
- Implement and monitor internal audit and reporting systems to ensure program effectiveness and to determine where progress has been made and where further action is needed

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Dissemination of Policy

All personnel authorized to hire, supervise, promote, demote, and discharge employees, or who recommend such actions, will be made fully aware of, and will implement the company's Equal Employment Opportunity Policy. At the very minimum, the following actions will be taken to ensure that the above agreement will be met:

- The implementation of the company's Equal Opportunity Policy will be reviewed and explained at the safety meeting conducted annually. Attendance at these meetings will be mandatory for all personnel. Any employee not in attendance will be briefed on this information after the meeting by the EEO Officer or representative. A review of the EEO policy will also be reviewed once every six months.
- All new personnel office employees or supervisory employees will be given a complete briefing by the EEO Officer or other responsible company official within thirty days following their reporting for duty with the company. The new employees will be made aware of all Equal Opportunity Policies.
- The EEO Officer or an appropriate company official will instruct all employees engaged in the direct recruitment of employees of the methods followed by the company relative to the hiring of females as well as minority group employees
- In order to make the company's Equal Employment Opportunity policy known to all employees, prospective employees, and potential sources of employment (schools, employment agencies, labor unions, college placement officers, etc.), the company will take the following actions:
 - Notices, flyers, and posters stating the company's Equal Employment Opportunity Policy will be prominently displayed in areas readily accessible to employees, and potential employees
 - The company's Equal Employment Opportunity Policy, as well as the procedures to implement such policy, will be brought to the attention of employees at meetings, employee handbooks, and other appropriate means
 - Under Executive Order # 11246, or any other applicable State of Michigan Statute, the company will send each labor union or representative of workers with which it has a collective bargaining agreement, or other contract or understanding, a notice advising the labor union or worker's representative of its commitments

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Utilization Evaluations

Action Traffic Maintenance, Inc. has made an in-depth analysis of the composition of its workforce and the community workforce and computed goals for female and minority employees' utilization in the company to give form and content to the Affirmative Action obligation of Executive Order # 11246, as amended. Our objective is to eliminate any under-utilization of eligible female and minority members that may exist in the trades employed by the company. Our recruiting programs will be designed to achieve these goals.

The company has established a goal to hire female and qualified minorities in each trade employed by the proportion of the total work hours worked in

Recruitment

When advertising for employees, the company will include the notation "An Equal Opportunity Employer" of "EOE" in the advertisement. The company will insert all advertisements in newspapers or publications that have large circulations of minority and/or female subscribers in the area from which the company's workforce normally would be composed.

Unless precluded by a valid bargaining agreement, the company will conduct direct recruitment through public and private employee referral sources likely to yield qualified female and/or minority group applicants. This includes, but is not limited to, state employment agencies, schools, colleges, and minority group organizations. To meet this requirement, the company will identify potential sources of minority and women's group employees and establish with such identified sources procedures whereby minority and female group applicants may be referred to the company for consideration.

The company encourages its present employees to refer minority and female applicants for employment by posting appropriate notices or bulletins in areas accessible to all such employees or prospective employees.

Unions

The company will use its best efforts to obtain the cooperation of the unions with which it has contracted relations to increase female and minority group opportunities within the unions, and to effect referrals by such unions of female and minority group employees. Action by the company, either directly or through its associations acting as his agent, will include the procedures set forth below:

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- Use its best efforts to develop, in cooperation with its unions, joint training programs aimed toward qualifying more female and minority group members for membership in the unions and increasing the skills of female and minority group employees so that they qualify for higher-paying employment
- Use its best efforts to incorporate an Equal Employment Opportunity clause into all union agreements to the end that such unions will contractually bound to refer applicants without regard to their race, religion, sex, color, national origin, age or disability, or any other protected characteristic under applicable law.
- In the event a union is unable to refer applicants as requested by the company within the time limit set forth in the union agreements, the company will, through its recruitment procedures, fill the employment vacancies without regard to their race, religion, sex, color, national origin, age or disability or any other protected characteristic under applicable law, making full efforts to obtain qualified women, and minority groups.

Subcontracting

The company will use its best efforts to utilize DBE, MBE, WBE, and HBO subcontractors or subcontractors' women and minority group representation among their employees and to assure subcontractor compliance with their Equal Opportunity obligations.

Records and Reports

The company will keep records that are necessary to determine compliance with its Equal Opportunity obligations. The records kept by the company will include:

- The number of person minority and non-minority group members employed in each work classification
- The efforts being made in cooperation with unions to increase female and minority group employment opportunities
- The efforts being made in locating, hiring, training, qualifying, and upgrading minority group employees
- The progress and effort being made in securing the services of DBE, MBE, WBE, and HBO subcontractors or subcontractors with meaningful minority group representation among their employees

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Personnel Actions

Wages, employee benefits, and working conditions will be established and administered, and personnel action of every type (hiring, promotions, transfer, demotion, lay-off, and termination) will be taken, without regard to race, religion, sex, color, national origin, age or disability or any other protected characteristic under applicable law. The following are the procedures to be followed:

- Supervisory personnel will conduct periodic inspections of project sites to ensure that working conditions and employee facilities do not indicate discriminatory treatment of project site personnel
- Periodic evaluations of the spread of wages paid within each classification to determine any evidence of discriminatory wage practices
- Periodic in-depth reviews of selected personnel actions to determine whether there is evidence of discrimination. If such evidence is found, the company will take prompt corrective actions. If the review indicates that the discrimination may extend beyond the actions reviewed, such corrective action shall include all affected persons
- All complaints of alleged discrimination will be investigated promptly by the company with its obligations under its contracts and will attempt to resolve such complaints and will take appropriate corrective action if determined necessary. If the investigation indicates that the discrimination may affect persons other than the complainant, such corrective action shall include other persons as well. Upon completion of each investigation, the company will inform every complainant of all his or her avenues of appeal

Training and Promotion

The company will assist in locating, qualifying, and increasing the skills of minority group employees, females, and any applicants for employment.

As permissible under Federal and State regulations, and consistent with its manpower requirements, the company will make full use of training programs (i.e., pre-apprenticeship, apprenticeship, and/or on-the-job training programs) for the geographical area of the contract performance.

The company will advise employees and applicants for employment of available training programs and entrance requirements of each. A periodic review of the training and promotion potential of female, as well as minority group employees, will encourage eligible employees to apply for such training and promotion.

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All records shall be available at reasonable times and places for inspection by authorized representatives of State and Federal governments. Records will be retained for a period of three (3) years following completion of contract work. We will retain the following information in accordance with FHWA-1273:

- (1) The number and work hours of minority and non-minority group members and women employed in each work classification on the project.
- (2) The progress and efforts being made in cooperation with unions, when applicable, to increase employment opportunities for minorities and women; and
- (3) The progress and efforts being made in locating, hiring, training, qualifying, and upgrading minorities and women.

The company will submit all reports required by Executive Order # 11246 to appropriate State and Federal agencies and will permit access to its books, records, and accounts by the appropriate governmental agency 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.

Other Work

The company 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 Federal and Non-federal construction work.

Assistance in Compliance

The company agrees that it will assist and cooperate actively with the appropriate governmental agencies and the Secretary of Labor in obtaining the compliance of contractors and subcontractors with the Equal Opportunity clause and the rules, regulations, and relevant orders of the Secretary of Labor and will furnish such information as they may require for the supervision of such compliance.

Refusal to Deal with Debarred or Ineligible Contractors of Subcontractors

The company agrees that it will refrain from entering a contract or contract modifications subject of Executive Order # 11246 with a contractor or subcontractor debarred from or who has not demonstrated eligibility for Federal contracts or Federal assisted construction contracts pursuant to the Executive Order.

Executed this 14th day of April, 2022


Michael Peake
EEO Officer

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