



POLICY NUMBER: 03.170

POLICY

Equal Opportunity Employer

DEPARTMENT

Human Resources

EFFECTIVE DATE

06/24/2010

Revision History

Revision #	Date	Reason for Changes
---	06/24/2010	Initial Policy
1	01/01/2020	Updates to signers & scope
2	10/1/2021	Updates to scope
3	1/1/2024	Updates to scope

1 – PURPOSE

1.1 This procedure defines the Pepper Construction Group (herein referred to as the “Company” or “PCG”) procedures related to being an Equal Opportunity Employer.

2 – SCOPE

2.1 This policy applies to Pepper Construction Group (herein referred to as “PCG” or “Company”) and to all Company employees; specifically this includes Pepper Construction Company (PCC), Pepper Construction Company of Indiana, LLC (PCCI), Pepper Construction Company of Ohio, LLC (PCCO), Pepper Construction Company of Wisconsin, LLC (PCCW), Pepper Environmental Technologies (PET), Pepper Energy LLC and 365 Equipment & Supply LLC.

3 – RESPONSIBLE PARTY

3.1 All employees and business partners working with and for the Company.

4 – POLICY

4.1 It is the policy of the Company to recruit, hire, train and promote, into all job classifications, the most qualified persons without regard to race, color, national origin, sex, religion, age, disability, protected veteran status, any other protected group status or non-job related characteristic as directed by law.

4.2 It is the policy of the Company to make employment and promotional decisions by utilizing reasonable standards based on the individual’s qualifications as they relate to a particular job vacancy and to the furtherance of equal employment opportunity.

4.3 It is the policy of the Company to ensure that all other personnel actions, such as compensation, benefits, transfers, reductions in force, company-sponsored training, education, tuition assistance, and social and recreation programs will be administered without regard to race, color, national origin, sex, religion, age, disability, protected veteran status, any other protected group status or non-job related characteristic as directed by law.

- 4.4 The Company Vice President of Human Resources is the designated EEO Coordinator for all Pepper Companies. The EEO Coordinator's responsibility is to implement and to monitor adherence to this policy. Employees should feel free to contact Human Resources should they experience any problems. Any employees or applicants with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or Human Resources.
- 4.5 Employees and applicants can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion, or discrimination because they: (1) file a complaint with Pepper Construction or with federal, state, or local agencies; (2) assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute; (3) oppose any act or practice made unlawful by federal, state, or local law requiring equal employment opportunity or affirmative action; or (4) exercise any other employment right protected by federal, state, or local law or its implementing regulations.

5 – DEFINITIONS

- 5.1 None

6 – REFERENCES

- 6.1 Title VII, Civil Rights of 1964 and Amendments
- 6.2 The Americans with Disabilities Act of 1990, Titles I and V
- 6.3 Uniformed Services Employment and Reemployment Rights Act of 1993 (USERRA)
- 6.4 Age Discrimination in Employment Act of 1967 (ADEA)

7 – FORMS/ATTACHMENTS

- 7.1 None

8 – COMPANY VARIATIONS

- 8.1 None

APPROVED BY:

Timothy F. Sullivan

Timothy F. Sullivan
General Counsel, Chief Compliance Officer
Pepper Construction Group

J. Stanley Pepper

J. Stanley Pepper
Chairman and Chief Executive Officer
The Pepper Companies