

EQUAL EMPLOYMENT OPPORTUNITY POLICY OF DAVID A. BRAMBLE, INC.

Equal Employment Opportunity

David A. Bramble, Inc. provides Equal Employment Opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, amnesty or status as a covered veteran in accordance with applicable federal, state and local laws. David A. Bramble, Inc. complies with applicable state and local laws governing nondiscrimination in employment in every location in which the Company has facilities. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

David A. Bramble, Inc. expressly prohibits any form of unlawful employee harassment based on race, color, religion, gender, sexual orientation, national origin, age, genetic information, disability or veteran status. Improper interference with the ability of David A. Bramble, Inc. employees to perform their expected job duties is absolutely not tolerated.

It is the specific responsibility of the Equal Employment Opportunity Officer to administer, monitor and enforce the Equal Employment Opportunity Policy of David A. Bramble, Inc. EEO requirements not to discriminate and to take affirmative action to assure equal opportunity as set forth under laws, executive orders (including Executive Order 11246), rules, regulations (28 CFR 35, 29 CFR 1630, 29 CFR 1625-1627, 41 CFR 60 and 49 CFR 27) and orders of the Secretary of Labor as modified by the SHA 10-03-12 provisions prescribed herein, and imposed pursuant to 23 U.S.C. 140 shall constitute the EEO and specific affirmative action standards for the contractor's project activities under certain contracts.

In some projects, the Company is contractually bound to take "Affirmative Action," which is when the Company shall take specific steps to eliminate discrimination and its effects, to ensure nondiscriminatory results and practices in the future, and to involve disadvantaged and minority business enterprises fully in contracts

and programs. Such Affirmative Action may vary by contract, but at minimum includes:

- Striving to achieve certain goals and timetables for minority and female participation, in percentage terms;
- Ensuring that the hours of minority and female employment and training must be substantially uniform, and in each trade;
- Making good faith efforts to employ minorities and women evenly on each of its projects;
- Ensuring and maintaining a working environment free of harassment, intimidation, and coercion at all sites, and in all facilities at which the Contractor's employees are assigned to work;
- Assigning, where possible, two or more women to each construction project;
- Ensuring that all foremen, superintendents, and other on-site supervisory personnel are aware of and carry out the Contractor's obligation to maintain such a working environment, with specific attention to minority or female individuals working at such sites or in such facilities;
- Developing on-the-job training opportunities and/or participating in training programs for the area which expressly include minorities and women, including upgrading programs and apprenticeship and trainee programs relevant to the contractor's employment needs, especially those programs funded or approved by the Department of Labor;
- Disseminating the Contractor's EEO policy by providing notice of the policy to training programs and requesting their cooperation in assisting the Contractor in meeting its EEO obligations;
- Disseminating the Contractor's EEO policy by including it in any policy in its Handbook;
- Disseminating the Contractor's EEO policy by publicizing it in the company newspaper, website, etc.;
- Disseminating the Contractor's EEO policy by specific review of the policy with all management personnel and with all minority and female employees at least once a year;
- Disseminating the Contractor's EEO policy by posting the company EEO policy on bulletin boards accessible to all employees

at each location where construction work is performed.

- Reviewing at least annually, the company's EEO Policy and affirmative action obligations with all employees having any responsibility for hiring, assignment, layoff, termination or other employment decisions including specific review of these items with on-site supervisory personnel such as Superintendents, 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.
- Disseminating the Contractor's EEO policy externally by including it in advertising in the news media and providing written notification to and discussing the Contractor's EEO policy with other Contractors and Subcontractors with whom the Contractor does or anticipates doing business.
- Directing its recruitment efforts to minority, female and community organizations, to schools with minority and female students and to minority and female recruitment and training organizations serving the Contractor's recruitment area and employment needs.
- Encouraging present minority and female employees to recruit other minority persons and women and, where reasonable, provide after school, summer and vacation employment to minority and female youth both on the site and in other areas of a Contractor's work force.
- Conducting, at least annually, an inventory and evaluation at least of all minority and female personnel for promotional opportunities and encourage these employees to seek or to prepare for, through appropriate training, etc., such opportunities.
- Ensuring that all facilities and company activities are nonsegregated except that separate or single-user toilet and necessary changing facilities shall be provided to assure privacy between the sexes.
- Conducting a review, at least annually, of all supervisors' adherence to and performance under the Contractor's EEO policies and affirmative action obligations.

- And any other measure needed to ensure compliance with the Standard federal Equal Employment Opportunity Construction Contract Specifications (Executive Order 11246).

Americans with Disabilities Act & the ADA Amendment Act

It is the policy of David A. Bramble, Inc. to comply with all federal and state laws, including the provisions of the Americans with Disabilities Act of 1990 (as amended), concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is our Company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions, and privileges of employment.

The Company will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation, and/or if the accommodation creates an undue hardship to David A. Bramble, Inc.

Anti-Harassment Policy

We do not tolerate harassment of any of our employees, customers or clients, vendors, or suppliers. Any form of harassment that violates federal, state or local law, including, but not limited to harassment related to an individual's race, religion, color, sex, creed, national origin, ancestry, citizenship status, uniformed service member status, marital status, pregnancy, age, medical condition (cancer related or HIV/AIDS related), or disability is a violation of this policy and will be treated as a disciplinary matter. For these purposes the term "harassment," includes slurs and any other offensive remarks, jokes, other verbal, graphic, or physical conduct.

In addition to the above listed conduct, "sexual harassment" can also include the following examples of unacceptable behavior:

- unwanted sexual advances
- offering an employment benefit (such as a raise or promotion or assistance with one's career) in exchange for sexual favors, or threatening an employment detriment (such as termination, demotion, or disciplinary action) for an employee's failure to engage in sexual activity
- visual conduct, such as leering, making sexual gestures, displaying of sexually

suggestive objects or pictures, cartoons or posters

- verbal sexual advances, propositions or requests
- verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene letters, notes or invitations
- physical conduct, such as touching, assault, impeding or blocking movements

If you have any questions about what constitutes harassing behavior, ask your supervisor or another management official.

Violation of this policy will subject an employee to disciplinary action, up to and including immediate discharge.

If you feel that you are being harassed by another employee, you should immediately notify your supervisor. If you do not feel that the matter can be discussed with your supervisor, you should contact the Human Resources Department to discuss your complaint. You may be assured that you will not be penalized in any way for reporting a harassment problem.

All complaints of harassment which are reported to management will be investigated as promptly as possible and corrective action will be taken where warranted. The Company prohibits employees from hindering our own internal investigations and our internal complaint procedure. All complaints of harassment which are reported to management will be treated with as much confidentiality as possible, consistent with the need to conduct an adequate investigation.

Your notification of the problem is essential to us. We cannot help resolve a harassment problem unless we know about it. Therefore, it is your responsibility to bring those kinds of problems to our attention so that we can take whatever steps are necessary to correct the problem.

Workplace Bullying

David A. Bramble, Inc. defines bullying as "repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment." It should go without saying that all employees will be treated with dignity and respect.

The purpose of this policy is to communicate to all employees, including supervisors, managers and executives, that the Company will not tolerate bullying behavior. Employees found in violation of this policy will be disciplined up to and including termination.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant and will not be given consideration when meting out discipline. As in sexual harassment, it is the effect of the behavior upon the individual that is important. David A. Bramble, Inc. considers the following types of behavior examples of bullying:

- Verbal bullying: Slandering, ridiculing, or maligning a person or his/her family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks. This includes such actions on social media against an employee.
- Physical bullying: Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault; damage to a person's work area or property.
- Gesture bullying: Nonverbal threatening gestures or glances that convey threatening messages.
- Exclusion: Socially or physically excluding or disregarding a person in work-related activities.

The Equal Employment Opportunity Officers for David A. Bramble, Inc., and this project specifically are **Megan B. Owings as EEO Officer and Millie Clough as Assistant EEO Officer.**

Their address is:

705 Morgnec Road
P.O. Box 419
Chestertown, MD 21620
410-778-3023

Signed:


Megan B. Owings, President

Date: 05/30/2025