



## **NOTICE FOR ALL EMPLOYEES & APPLICANTS**

### **OPERATING STATEMENT**

It is the policy of the Company to assure that applicants are employed, and that employees are treated equal during employment, without regard to their age, race, color, religion, national origin, sex, sexual orientation, gender identity or expression, pregnancy, disability, status as a protected veteran, genetic information, because of inquiry or discussion about or disclosure of compensation, and any other characteristic protected by applicable federal, state, and local law. Such action shall include employment, upgrading, demotion, or transfer; recruitment or recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship, pre-apprenticeship, or on-the-job training.

We encourage our employees to refer qualified and/or qualifiable minority and female applicants for employment.

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### **DESIGNATION OF EEO/AA OFFICER**

The Company has designated an EEO Officer. The EEO Officer has the responsibility to effectively administer and promote this Policy and is assigned adequate authority and responsibility to do so.

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### **TRAINING LETTER**

The Company has an approved informal training and promotion program available through various contractor associations and unions. We encourage your participation in these programs. Periodic random interviews will be conducted to assess the training needs of our employees.

At this time, our company offers training programs in the following job classifications/areas: Operating Engineers, Drivers, Laborers, and Mechanics in the states of Wisconsin, Michigan, Minnesota, and Iowa.

To be considered for our company's training program, a prospective trainee must be an employee in good standing and/or have supervisory approval. For further information, copies of outlines of individual job classifications/area training programs contact your EEO Officer.

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### **EEO OFFICER – Northland Constructors of Duluth**

EEO Officer: Jen Farrell  
Office Phone: (218)625-2290  
Direct Phone: (218)391-4967

EEO Officer: Emily Fish  
Office Phone: (608)783-6411  
Direct Phone: (608)779-6631

Address: 4843 Rice Lake Road Duluth, MN 55803



## **EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION POLICY STATEMENT**

The Company is an equal opportunity employer. This statement affirms the Company's policy of providing equal opportunity to all employees and applicants for employment in accordance with all applicable equal employment opportunity/affirmative action ("EEO/AA") laws, directives and regulations of federal, state, and local governing bodies or agencies thereof.

The Company will not discriminate against or harass any employee or applicant for employment because of age, race, color, religion, national origin, sex, sexual orientation, gender identity or expression, pregnancy, disability, status as a protected veteran, genetic information, because of inquiry or discussion about or disclosure of compensation, and any other characteristic protected by applicable federal, state, and local law. The Company will not tolerate harassment, intimidation, threats, coercion or retaliation against any employee or applicant for participating in activities related to the administration of laws requiring affirmative action and equal employment opportunity, for opposing any actions made unlawful by those laws, or for exercising any other rights protected by those laws.

The Company will take affirmative action to ensure that all employment practices are free of discrimination. Senior Management, including the Company's top U.S. executive, fully supports the Company's affirmative action program. The Company hires, upgrades, demotes and transfers persons in all job titles for which they are qualified without regard to disability, protected veteran status, or any other legally protected status, as required by law. It also recruits, advertises jobs, lays off, disciplines, terminates, pays, and selects for training, including apprenticeship, pre-apprenticeship, and/or on-the-job training, without regard to disability, protected veteran status or any other legally protected status. The Company bases employment decisions only on valid job requirements so as to further the principle of equal employment opportunity. The Company is committed to taking affirmative action to employ and advance qualified individuals with known disabilities and protected veterans at all levels, including the executive level, of the Company.

The Vietnam Era Veterans' Readjustment Assistance Act, as amended ("SECTION 4212"), and Section 503 of the Rehabilitation Act of 1973 ("Section 503") prohibit discrimination against and provide for affirmative action benefitting protected veterans and disabled individuals. The Company does not subject employees or applicants to harassment, intimidation, threats, coercion, discrimination, or retaliation because they have engaged in or may engage in filing a complaint, assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of SECTION 4212, Section 503 or any other federal, state, or local law requiring equal opportunity for individuals with disabilities or protected veterans, opposing any act or practice made unlawful by Section 503, SECTION 4212 or their implementing regulations, or any other federal, state, or local law requiring equal opportunity for individuals with disabilities and protected veterans, or exercising any other right protected by Section 503, SECTION 4212, or their implementing regulations. The Company makes reasonable accommodations for qualified protected veterans and individuals with known disabilities unless doing so would result in an undue hardship or direct threat to safety. Management also takes appropriate steps to provide reasonable accommodation upon request to employees whose religious beliefs or restrictions create a conflict with Company policies, practices, or procedures so long as doing so does not create an undue hardship. If an employee needs a reasonable accommodation, the employee should provide a written description of the employee's situation and needs to Human Resources and Human Resources will contact the employee to discuss the request.

The Company encourages its supervisors, forepersons and employees to refer qualified/qualifiable women, minorities, protected veterans, and individuals with a disability. The Company will use its best efforts to afford minority and female business enterprises with maximum practicable opportunity to participate in the performance of subcontracts for projects that this Company engages in, to the extent applicable.

The Company fully supports incorporation of nondiscrimination and affirmative action rules and regulations into covered contracts, subcontracts and subcontractor policies and any purchase orders or supply agreements, as may be appropriate.

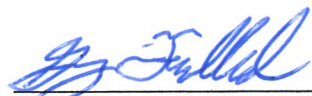
The Company will evaluate the performance of its management and supervisory personnel on the basis of their involvement in achieving these EEO/AA objectives as well as other established criteria. Any employee of the Company, or subcontractor to this Company, who does not comply with the EEO/AA policies and procedures as set forth in the EEO/AA Program and this policy will be subject to disciplinary action. Any covered subcontractor not complying with all applicable EEO/AA laws, directives and regulations of the federal, state, and local governing bodies or agencies thereof will be subject to appropriate legal sanctions as determined by the Office of Federal Contract Compliance Programs (OFCCP) or other similar agency.

The Company has appointed an EEO Officer to manage the EEO/AA Program. The EEO Officer responsibilities will include implementation, monitoring and enforcement of the EEO/AA Program. The EEO Officer obtains information as may be required to establish that this policy is being carried out at all levels of executive, management, and supervisory personnel. The EEO Officer periodically reviews the Affirmative Action Program to ensure its effectiveness, the need for any remedial action, the degree to which the Company's objectives have been attained, whether known individuals with disabilities and qualified protected veterans have had the opportunity to participate in all Company-sponsored educational, training, recreational, and social activities, measure the Company's compliance with the affirmative action program's specific obligations, document the actions taken to comply with these obligations, retain these documents as employment records, and undertake necessary action to bring the program into compliance if any part is believed to be in need of improvement.

The EEO Officer works with all levels of executive, management, and supervisory personnel to ensure that the Affirmative Action Program is implemented in all day-to-day decisions concerning recruitment, job placement, promotions, and other personnel actions. The EEO Officer carries out or where necessary recommends such innovations in the Company's practices as may be required to ensure that the specific provisions and the spirit of this policy are being implemented. The EEO Officer provides executive management with a report, no less than once annually, measuring the effectiveness of the Affirmative Action Program.

If any employee or applicant for employment believes he/she may have been subjected to conduct or statements in violation of this policy, please contact your EEO Officer. The EEO Officer is responsible for ensuring that the complaint is investigated and resolved in an appropriate fashion.

The EEO/AA Program is available for review by applicants and employees during normal business hours, Monday through Friday. Appointments should be made with the EEO Officer.



Senior Manager Signature

1-7-25

Date



EEO Officer Signature

Date

**EEO OFFICER – Northland Constructors**

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A DIVISION OF MATHY CONSTRUCTION CO. • DULUTH, MN

## DISCRIMINATION AND HARASSMENT POLICY STATEMENT

The Company is committed to maintaining a work environment in which all employees are treated with respect and dignity. Each employee has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, the Company expects that all relationships among employees will be business-like and free of bias, prejudice, intimidation, and harassment. The Company has developed this policy to ensure that all of its employees can work in an environment free from harassment, discrimination, or retaliation. The Company will make every reasonable effort to ensure that all concerned are familiar with these policies and are aware that any complaint regarding violation of such policies will be investigated and resolved accordingly.

### 1. Harassment Defined

Prohibited harassment includes verbal or physical conduct that relates to another person's age, race, color, religion, national origin, sex, sexual orientation, gender identity or expression, pregnancy, disability, status as a protected veteran, genetic information, inquiry or discussion about or disclosure of compensation, and any other reason prohibited by applicable law, and that:

- has the purpose or effect of creating an intimidating, hostile, or offensive work environment;
- has the purpose or effect of unreasonably interfering with an employee's work performance; or
- affects an employee's employment opportunities or compensation.

Prohibited harassment may include, among other things, telling racist or sexist jokes or making offensive or derogatory remarks about another person's race, ancestry, national origin, age, sexual preference, disability, or any other legally protected basis.

### 2. Sexual Harassment Defined

Unwelcome advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment and are prohibited, where:

- a. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; or
- b. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- c. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexually harassing conduct may include, among other things, use of suggestive sexual comments or jokes; sexual remarks about a person's body, clothing, or sexual activities; patting, pinching, or other offensive touching; or displays of sexually suggestive pictures or objects. Sexually harassing conduct may also include unwelcome sexual advances or passes.

### 3. Persons Whose Conduct is Covered

Unlawful discrimination and harassment is prohibited whether it is committed by managers, supervisors, co-workers, or non-employees, including vendors, suppliers and customers.

NORTHLAND CONSTRUCTORS OF DULUTH | 4843 Rice Road, Duluth, MN 55803

Phone: 218.722.8170 | Fax: 218.722.8170 | northlandconstructors.com | EOE, including disability/vets



#### 4. Complaint Procedure

- a. **Employees** who become aware of or are subject to any prohibited discrimination or harassment are strongly encouraged to immediately notify Warren Hawkrige. Warren Hawkrige can be reached at his office, 920 10<sup>th</sup> Avenue North, Onalaska, WI 54650, at (608) 779-6305. The Company requires that all complaints be put in writing and signed by the complainant. This helps ensure that all complaints are thoroughly investigated. Forms are available at the office at 4843 Rice Road, Duluth, MN 55803. If the complainant has filed a complaint with the supervisor and Warren Hawkrige has not contacted the complainant within five (5) business days following the complaint, the complainant should contact Warren Hawkrige. If the complainant feels that the Company did not resolve the complaint, he or she has the right to notify the appropriate State and Federal compliance agency. The addresses and telephone numbers for the different State and Federal compliance agencies can be located on company wage boards.
- b. **Supervisors** who become aware of any incidents or alleged incidents of discrimination or harassment must report the complaint within twenty-four (24) hours to Warren Hawkrige. The Company requires that all complaints be put in writing. This helps ensure that all complaints are thoroughly investigated. Supervisors may not try to resolve allegations of such behavior on their own. Any supervisor who fails to report allegations of discrimination or harassment may be subject to discipline, up to and including discharge.
- c. **The Company** will thoroughly investigate allegations of prohibited discrimination or harassment and aims to complete all such investigations within five (5) business days from receipt of the written complaint. However, in certain circumstances, additional time may be required. Based upon its investigation, the Company will take immediate and appropriate action. Any employee found to have unlawfully discriminated against or harassed another employee will be subject to appropriate discipline, up to and including discharge. Immediate and appropriate steps will also be taken if any non-employee (such as vendor, supplier or customer) is found to have unlawfully discriminated against or harassed any employee of the Company. Timely responses indicating the outcome of the investigation will be communicated to all parties concerned.
- d. **Confidentiality and Non-retaliation.** Reports of prohibited discrimination or harassment will be kept confidential to the extent possible, consistent with the need for a thorough investigation. No form of reprisal or retaliation will be taken against any complainant or individual because they participated in an investigation. The Company encourages you to report any incident of prohibited discrimination or harassment.

#### 5. Implementation

The Company expects your cooperation in making these policies work. The Company's intent in preparing, implementing, and distributing these policies is to help ensure compliance with applicable federal, state and local laws. This policy is not intended to impose any contractual obligations on the Company, any of its employees, or their representatives. Any questions you have about this policy should be directed to Warren Hawkrige at telephone number (608) 779-6305.

## STATE AND FEDERAL GOVERNMENT COMPLIANCE AGENCIES

Employee or applicant complaints may be filed directly with the following agencies:

### FEDERAL

#### U.S. Department of Justice

Office of Justice Programs  
Office for Civil Rights  
999 N. Capitol Street NE  
Washington, D.C. 20531  
(202) 514-2000

*Note: Complaints must be filed within 180 days of the alleged discrimination or within 180 days after the complainant becomes aware of the alleged incident.*

#### Equal Employment Opportunity Commission

Washington D.C. Office  
131 M Street NE  
Washington, DC 20002  
(800) 669-4000

*Note: Complaints must be filed within 180 days of the alleged discrimination or within 180 days after the complainant becomes aware of the alleged incident.*

#### U. S. Dept. of Labor, Office of Federal Contract Compliance Programs (OFCCP)

Washington D.C. Office  
200 Constitution Avenue, NW, Room C3325  
Washington, DC 20210  
(866) 487-2365

*Note: Complaints must be filed within 180 days of the alleged discrimination or within 180 days after the complainant becomes aware of the alleged incident*

### MINNESOTA

#### Minnesota Equal Rights Division

MN Department of Human Rights  
540 Fairview Avenue North #201  
St. Paul, MN 55104  
(651) 539-1100  
(800) 657-4592

*Note: Complaints must be filed within (1) year from the date of alleged incident.*

#### US Equal Employment Opportunity Commission- Minneapolis District Office

Towle Building  
330 South Second Avenue, Suite 720  
Minneapolis, MN 55401-2224  
(612) 552-7306  
(612) 564-4707(fax)

*Note: Complaints must be filed within 180 days of the alleged discrimination or within 180 days after the complainant becomes aware of the alleged incident.*