



EQUAL EMPLOYMENT OPPORTUNITY POLICY

It is the policy of Russo Corporation to assure that applicants and employees are treated during recruitment and employment, without regard to their race, religion, sex, color, national origin, age or disability. 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, and/or on-the-job training.

Affirmative action will be taken to ensure that all personnel actions, including hiring, compensation, benefits, transfers, reductions in force, recall, training, education, tuition assistance, social and recreational programs. This policy is based on the principles of equal employment opportunity as required by Executive Order 11246, as amended, Section 503 of the Rehabilitation Act of 1973, as amended, and the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (38 U.S.C. 4212), 29 CFR 1625-1627, Title 23 USC Section 140, Title VI of the Civil Rights Act of 1964, as amended, and related regulations including 49 CFR Parts 21, 26, and 27; and 23 CFR Parts 200, 230, and 633.

While this document is not an employment contract between Russo Corporation and its employees, we view the principle of equal employment opportunity as a vital element in the employment, promotion, and training processes.

Further, Russo Corporation will not subject any employees or applicants to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities:

- a. Filing a complaint;
- b. Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of section 503 of the Rehabilitation Act of 1973, as amended (section 503), the Vietnam Era Veterans' Readjustment Assistance Act 1974, as amended (VEVRAA) or any other Federal, State, or local law requiring equal employment opportunity;
- c. Opposing any act or practice made unlawful by Section 503, VEVRAA or their implementing regulations or any other Federal, State or local law requiring equal opportunity for disabled persons, disabled veterans, other covered veterans, or any member of a covered classification; or
- d. Exercising any other right protected by Section 503, VEVRAA or their implementing regulations.

In developing our affirmative action program, we commit to the following activities:

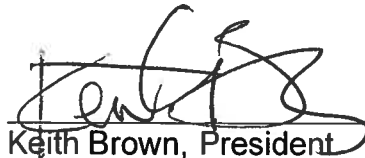
1. Recruiting, hiring, training, and promoting individuals in all job classifications without regard to race, color, religion, sex, sexual orientation, gender identity national origin, citizenship, age (40 years of age or over), disability, protected veteran status, genetic information or any other characteristic protected by law.
2. Coordination of all personnel activities, including promotions, compensation, benefits, transfers, terminations, training, and education, to ensure active compliance with the policy and affirmative action plan, as applicable with the respective Collective Bargaining Agreements.
3. Training and guidance to management employees at all levels, with respect to the application of the policy.
4. Maintaining the necessary records to allow periodic evaluation of the affirmative action program.
5. Assigning Tim Bozeman, Vice President (205-923-4434), the role of Equal Employment Opportunity Officer for Russo Corporation. Any questions or comments will be addressed and any complaints regarding the implementation or interpretation of the policy or affirmative action plan will be promptly and thoroughly investigated and should be brought to his attention immediately.
6. Encourage all current employees to appropriately refer qualified minorities, females, veterans, and persons with disabilities for employment, and request their referrals apply directly at the respective union halls or in accordance with posted job openings.
7. Encourage all minorities, females, veterans, and disabled employees to participate in any and all available union training programs or other available training programs for employment advancement when available.
8. Post all State and Federal employment posters and policies on the jobsite and company bulletin boards, and in areas where applicants and employees can readily access.

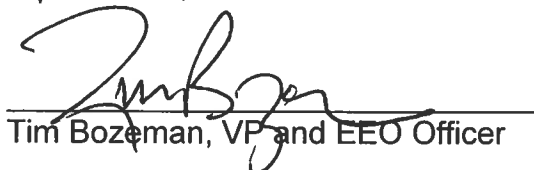
PAY TRANSPARENCY POLICY STATEMENT: Russo Corporation will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.

We personally believe in and strongly support the policy of equal employment opportunity and expect all management employees to assist in the implementation of the affirmative action plan. Additionally, every employee is responsible for informing us of any employment practice or decision which he or she feels conflicts with this policy.

January 1, 2020
Date

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Date


Keith Brown, President


Tim Bozeman, VP and EEO Officer