DAVENPORT BROTHERS CONSTRUCTION CO., INC.

Equal Employment Opportunity & Affirmative Action Compliance Policy

Federal Contractor / Major Project Prequalification Readiness Edition

Company	Davenport Brothers Construction Co., Inc.
Document Type	Full Written EEO & Affirmative Action Compliance Policy
Prepared For	EEOC readiness, contractor prequalification packages, and federal-contractor compliance review if applicable
EEO Officer	Mark Davenport
Effective Date	July 2026 / To be confirmed by Company management
Status	Company policy draft for management and legal review before adoption

This policy is intended to support equal employment opportunity, nondiscrimination, anti-harassment, anti-retaliation, reporting, recordkeeping, and federal-contractor readiness. It does not create quotas, preferences, set-asides, or unlawful workforce-balancing practices.

Approval and Controlled Document Notice

This Equal Employment Opportunity & Affirmative Action Compliance Policy is a Davenport Brothers Construction Co., Inc. controlled policy document. The policy shall be reviewed by Company management and legal counsel before final issuance and periodically thereafter. If any federal, state, local, customer, project, union, or contract requirement is more stringent than this policy, the Company will follow the stricter applicable requirement after appropriate review.

Role	Name / Title	Signature	Date
Authorized Company Officer	Mark Davenport		
EEO Officer	Mark Davenport		
Human Resources / Administration			
Legal / Compliance Review			

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1. Purpose

The purpose of this policy is to establish Davenport Brothers Construction Co., Inc. requirements for equal employment opportunity, nondiscrimination, anti-harassment, anti-retaliation, reasonable accommodation, complaint reporting, compliance documentation, and federal-contractor readiness where applicable.

This policy is intended to support compliance review by owners, general contractors, construction managers, lenders, insurers, customers, associations, and government agencies. It is also intended to support prequalification packages for major projects, including industrial, automotive, battery plant, data center, manufacturing, commercial, and public-sector work.

2. Scope

This policy applies to all Davenport Brothers Construction Co., Inc. employees, applicants, supervisors, managers, foremen, temporary workers, interns, subcontractors where contractually applicable, vendors, visitors, and any person involved in employment-related decisions or workplace conduct on Company business.

This policy applies to all employment practices, including recruitment, hiring, assignment, compensation, vacation time off and vacation pay administration, promotion, demotion, transfer, training, apprenticeship opportunities, layoff, recall, discipline, termination, and all other terms and conditions of employment.

3. Equal Employment Opportunity Policy Statement

Davenport Brothers Construction Co., Inc. is committed to providing equal employment opportunity to all qualified employees and applicants. Employment decisions shall be based on qualifications, merit, job-related requirements, safety, performance, attendance, experience, business needs, and other lawful factors.

The Company prohibits unlawful discrimination, harassment, retaliation, or unfair treatment based on any protected status under applicable federal, state, or local law. The Company will maintain a workplace where individuals are treated with dignity, fairness, respect, and professionalism.

The Company will not tolerate retaliation against any employee or applicant for reporting discrimination, harassment, or retaliation; requesting a reasonable accommodation; participating in an investigation; filing a charge or complaint; or opposing conduct believed in good faith to violate this policy.

4. Protected Status and Covered Employment Actions

Davenport Brothers prohibits unlawful discrimination against applicants, employees, and former employees based on protected status under applicable law. Protected categories may include race, color, religion, sex, pregnancy, sexual orientation, gender identity, national origin, age, disability, genetic information, military or veteran status, and any other status protected by federal, state, or local law.

Covered Employment Actions

- Recruitment, outreach, job advertisements, applicant screening, interviewing, and hiring.
- Job assignments, transfers, promotions, demotions, and advancement opportunities.
- Compensation, wage rates, vacation time off, vacation pay, and other lawful pay practices.
- Training, apprenticeship, certification, and development opportunities.
- Performance evaluations, discipline, layoff, recall, and termination.
- Workplace conduct, jobsite treatment, supervision, and access to tools, equipment, facilities, and opportunities.

5. Affirmative Action and Federal Contractor Readiness

Davenport Brothers Construction Co., Inc. will comply with all affirmative action and federal-contractor requirements that legally apply to the Company at the time of a contract, subcontract, grant, owner requirement, or government requirement. This policy is written to support readiness and review, but does not state that Davenport Brothers is currently subject to every federal contractor requirement listed here.

The Company will not use quotas, unlawful preferences, set-asides, or workforce balancing based on protected characteristics. Any outreach, recruitment, accommodation, or compliance activity shall be conducted in a lawful, job-related, nondiscriminatory, and merit-based manner.

Federal Contractor Readiness Addendum

- If Davenport Brothers becomes a covered federal contractor or subcontractor, the Company will review each contract clause and determine applicable obligations before certification.
- If Section 503 disability requirements apply, the Company will comply with applicable nondiscrimination, accommodation, posting, and affirmative action obligations for qualified individuals with disabilities.
- If VEVRAA protected veteran requirements apply, the Company will comply with applicable nondiscrimination, posting, outreach, and affirmative action obligations for protected veterans.
- If future OFCCP, EEOC, state, or owner requirements change, the EEO Officer will review the change and update this policy as needed.
- The Company will not continue, adopt, or certify compliance with rescinded federal requirements unless current law or contract language lawfully requires such action.

6. EEO Officer Responsibilities

Mark Davenport is designated as the Company Equal Employment Opportunity Officer. The EEO Officer is responsible for coordinating implementation, monitoring, and review of this policy. The EEO Officer may delegate administrative tasks but remains responsible for oversight and escalation to Company management.

- Maintain this policy and coordinate annual review.
- Receive or coordinate receipt of EEO-related complaints and concerns.
- Ensure complaints are reviewed, investigated, and addressed promptly and as confidentially as practical.
- Support management in nondiscriminatory hiring, promotion, discipline, and termination practices.
- Coordinate reasonable accommodation requests and documentation as appropriate.
- Track required EEO postings, notices, and acknowledgements.
- Coordinate EEO-1, Section 503, VEVRAA, OFCCP, owner prequalification, or related reporting if applicable.
- Maintain EEO-related records according to Company retention requirements and applicable law.

7. Manager, Supervisor, and Foreman Responsibilities

Managers, supervisors, foremen, and persons with responsibility for hiring, work assignment, promotion, training, discipline, or termination shall support this policy and lead by example.

- Make employment decisions based on job-related criteria, qualifications, safety, attendance, performance, skill, and business needs.
- Avoid comments, conduct, or decisions that could be discriminatory, harassing, retaliatory, or inconsistent with this policy.
- Report complaints or observed policy violations promptly to the EEO Officer or Company management.

- Support reasonable accommodation discussions and respect confidentiality.
- Ensure subcontractors, vendors, and visitors comply with jobsite conduct expectations.
- Maintain documentation supporting hiring, discipline, evaluation, promotion, layoff, and termination decisions.

8. Recruitment, Hiring, Promotion, and Training Practices

Davenport Brothers will conduct recruitment, hiring, promotion, and training activities in a nondiscriminatory manner. Job criteria shall be tied to legitimate qualifications, job duties, safety requirements, availability, skill, experience, certification, licenses, performance, and business needs.

Recruitment and Job Posting

- Job postings shall avoid language that expresses unlawful preference or discourages applicants based on protected status.
- Recruitment sources should be selected to reach qualified applicants and support fair opportunity.
- Applicant screening criteria shall be job-related and consistently applied.
- Where apprenticeships, training, or development opportunities are offered, access shall be administered fairly and without unlawful discrimination.

Hiring and Promotion

- Hiring and promotion decisions shall be based on job-related qualifications, work history, licenses, certifications, skill, attendance, safety performance, customer/project requirements, and business needs.
- Interview questions shall relate to job requirements and shall not seek unlawful information.
- Selection decisions should be documented at a level appropriate for the position and project needs.
- The Company will provide equal opportunity for advancement consistent with qualifications, business needs, and performance.

9. Reasonable Accommodation Policy

Davenport Brothers will provide reasonable accommodations as required by applicable law for qualified individuals with disabilities, pregnancy-related conditions, sincerely held religious beliefs or practices, and other legally required circumstances, unless doing so would create an undue hardship or direct threat under applicable law.

- Employees or applicants requesting accommodation should notify the EEO Officer, supervisor, or Company management.
- The Company may request information needed to evaluate the accommodation request, consistent with applicable law.
- The Company will engage in an interactive process where required.
- Accommodation decisions will be made on a case-by-case basis considering the job, worksite, safety, project conditions, and applicable law.
- Retaliation for requesting accommodation is prohibited.

10. Anti-Harassment, Anti-Discrimination, and Anti-Retaliation

Davenport Brothers prohibits conduct that violates this policy, including unlawful harassment, discrimination, bullying tied to protected status, intimidation, slurs, offensive jokes, unwelcome sexual conduct, threats, retaliation, or other conduct that creates an unlawful hostile work environment.

Examples of Prohibited Conduct

- Unlawful slurs, jokes, insults, ridicule, symbols, graffiti, or comments related to protected status.

- Unwelcome sexual advances, requests for sexual favors, inappropriate touching, sexual comments, sexual images, or conduct of a sexual nature.
- Retaliation against an employee or applicant for reporting a concern, requesting accommodation, participating in an investigation, or opposing discrimination.
- Excluding, isolating, intimidating, disciplining, assigning work, or denying opportunities for reasons related to protected status.
- Allowing subcontractors, vendors, customers, or visitors to engage in conduct prohibited by this policy.

11. Complaint Reporting and Investigation Procedure

Employees and applicants are encouraged to report concerns as early as possible so Davenport Brothers can review and address issues. Reports may be made verbally or in writing to the EEO Officer, supervisor, project manager, Company ownership, or any member of management. Employees are not required to report to a person involved in the concern.

Investigation Process

- The Company will review reported concerns promptly and as confidentially as practical.
- The Company may interview the complaining party, witnesses, supervisors, and persons involved.
- Employees are expected to cooperate honestly in investigations.
- The Company will take corrective action when warranted, which may include coaching, training, discipline, reassignment, removal from project, termination, or other appropriate action.
- The Company prohibits retaliation against anyone who makes a good-faith report or participates in an investigation.

12. Recordkeeping, EEO-1, and Compliance Review

Davenport Brothers will maintain employment records necessary to support equal employment opportunity, complaint review, accommodation review, hiring, promotion, discipline, termination, and compliance reporting where applicable.

EEO-1 and Reporting Readiness

- The Company will annually review whether it is required to file an EEO-1 Component 1 report or any other employment compliance report.
- If required to file, the Company will gather workforce information by job category and other required reporting fields in accordance with then-current EEOC instructions.
- The Company will protect the confidentiality of employee demographic, medical, accommodation, and complaint records consistent with applicable law.
- EEO records shall be retained according to Company retention policy and applicable federal, state, local, contract, and project requirements.

13. Subcontractor, Vendor, and Job Posting Requirements

Davenport Brothers expects subcontractors, suppliers, vendors, consultants, and visitors to comply with applicable equal opportunity, nondiscrimination, anti-harassment, and anti-retaliation requirements while working with or for the Company.

- Subcontractors shall comply with applicable EEO laws and customer/project requirements.
- Subcontracts and purchase orders may include EEO, nondiscrimination, anti-harassment, and flow-down requirements where applicable.
- Required EEO or labor law posters shall be posted at Company offices or project sites where legally or contractually required.

- Recruiters, staffing agencies, and labor sources shall be instructed to refer qualified applicants without unlawful discrimination.
- Job advertisements shall include equal opportunity language where appropriate.

14. Training, Communication, and Annual Review

This policy shall be communicated to employees and managers and made available for employees to review. The EEO Officer shall coordinate review of this policy at least annually and when major legal, contract, customer, or operational changes occur.

- Managers, supervisors, and foremen should receive periodic reminders regarding equal employment opportunity obligations.
- New employees should receive access to this policy during onboarding or employee handbook orientation.
- Complaint reporting procedures shall be explained clearly so employees know how to raise concerns.
- The policy shall be reviewed before use in federal contractor certifications, EEO-1 reporting, OFCCP matters, owner prequalification, or major customer submissions.

15. Corrective Action and Enforcement

Violation of this policy may result in corrective action up to and including termination of employment, removal from a project, termination of subcontractor access, or other action permitted by law and contract. The Company will determine corrective action based on the seriousness of the conduct, risk to employees or the Company, prior conduct, investigation findings, project/customer requirements, and applicable law.

Appendix A - Employee and Applicant Notice

Davenport Brothers Construction Co., Inc. is an equal employment opportunity employer. The Company prohibits unlawful discrimination, harassment, and retaliation. Employees and applicants who believe they have been subjected to conduct inconsistent with this policy should report the concern to Mark Davenport, EEO Officer, or to Company management. Retaliation for reporting concerns, requesting accommodation, or participating in an investigation is prohibited.

Appendix B - EEO Complaint Intake Form

Field	Entry
Date received	
Name of person reporting concern	
Contact information	
Project / location	
Person(s) involved	
Description of concern	
Witnesses / documents / photos	
Immediate action taken	
Assigned investigator / reviewer	
Findings / resolution	
Corrective action / follow-up	
Date closed	

Appendix C - Annual Compliance Checklist

Review item	Complete	Notes
Policy reviewed by management	[ ]	
Legal/compliance review completed if needed	[ ]	
EEO Officer confirmed	[ ]	
EEO complaint process communicated	[ ]	
Required postings verified	[ ]	
Recruiting and job posting language reviewed	[ ]	
Subcontractor EEO flow-down	[ ]	

Review item	Complete	Notes
reviewed		
Accommodation process reviewed	[ ]	
EEO-1 filing threshold reviewed	[ ]	
Federal contractor / Section 503 / VEVRAA applicability reviewed	[ ]	
Training or toolbox communication completed	[ ]	
Records retention reviewed	[ ]	

Appendix D - Reference Basis

This policy was prepared from Davenport Brothers Construction Co., Inc. source EEO language and current public agency guidance for equal employment opportunity and federal-contractor readiness. The policy should be reviewed by legal counsel before final adoption, especially before federal contractor certification, EEO-1 filing, OFCCP-related submissions, or owner/customer compliance packages.

Topic	Reference basis
Original Davenport Brothers source	Original Davenport Brothers Equal Employment Opportunity Statement designating Mark Davenport as EEO Officer.
EEOC protected status and retaliation	EEOC guidance on who is protected from employment discrimination and prohibited employment practices.
EEO-1 readiness	EEOC EEO data collection guidance and employer reporting thresholds.
OFCCP / federal contractor readiness	U.S. Department of Labor OFCCP guidance regarding Executive Order 14173, rescission of Executive Order 11246, and continuing Section 503 / VEVRAA program areas as applicable.
Policy design principle	Merit-based, nondiscriminatory employment practices without quotas or unlawful workforce balancing.