

	WORKFORCE AFFIRMATIVE ACTION PLAN (AAP)		DOC DATE / REV:	16AUG23 / 00
			COMPANY:	Speights Group LLC
			EIN:	88-2586281
			DUNS:	13-119-7454
			UEID:	TEPRRGLN9SG5
			CAGE:	9EEW0

Workforce Affirmative Action Plan (AAP)

Speights Group LLC is pleased to affirm its commitment to equal employment opportunity by incorporation of this Affirmative Action Plan (AAP). This AAP complies with US Department of Labor requirements according to the following laws and regulations:

Executive Order 11246	
29 USC §793	Rehabilitation Act of 1973
38 USC §4212	Vietnam Era Veterans' Readjustment Assistance Act of 1974
41 CFR Part 60-1	Obligations of Contractors and Subcontractors
41 CFR Part 60-2	Affirmative Action Programs
41 CFR Part 60-741	Affirmative Action and Nondiscrimination Obligations of Contractors and Subcontractors Regarding Individuals with Disabilities
FAR 52.222-25	Affirmative Action Compliance
FAR 52.222-26	Equal Opportunity
FAR 52.222-27	Affirmative Action Compliance for Construction

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ORGANIZATION

Speights Group LLC (hereafter, "SG") is a five-member partnership incorporated in the State of Texas, comprised of men, women, minorities and veterans. The company is located at 224 Medlar Drive, Indiana, PA 15701 and its Registered Agent is located at 341 Conestoga Trail, Waco, TX 76706.

SG is a general business contracting and consulting firm with expertise in operations and various support functions of multiple industries and occupational specialties, including but not limited to construction, disaster relief, aerospace & defense, oil & gas exploration and production, wind energy, mining and aggregate, metals and salvage, business mergers and acquisitions, real estate, engineering, maintenance & reliability, mechanical and electrical component manufacture, precision hydraulic systems, and imports & exports. The company is a registered federal vendor operating as a small business concern under the NAICS and PSC codes which represent these industries and more. As of the date of this document, SG has no employees and is pending certification as an Economically Disadvantaged Woman-Owned Small Business (EDWOSB) and HUBZone business concern with the US Small Business Administration (SBA).

DEFINITIONS USED IN THIS AAP

Individual with a Disability: any person who has a physical, sensory, or mental impairment which "materially" (Minnesota) or "substantially" (federal) limits one or more major life activities, or has a record of or is regarded as having such an impairment. "Individual with a Disability" does not include an alcohol or drug abuser whose current use of alcohol or drugs renders that individual a direct threat to property or the safety of others.

American Indian or Alaska Native - a person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.

Asian - A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

Black or African American - A person having origins in any of the black racial groups of Africa.

Hispanic or Latino - A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

Native Hawaiian or Other Pacific Islander - A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

White - A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Minority – Any person who identifies as being American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islander, or in any combination of these identifiers, or someone who identifies as White and as any of the other identifiers.

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Veteran – Any person who served in the US military and has been discharged under honorable conditions, or who is entitled to a qualifying campaign medal, or who has served on active duty in combat and was discharged under any condition other than dishonorable.

Job Groups: Although companies are not limited to using these broad job groups as the only means of analyzing their workforce, we use the following as guidelines:

Managers and Administrators: Administrative personnel set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special phases of an organization's operations. This category includes: officials, executives, middle management, plant managers, department managers, and superintendents, salaried supervisors who are members of management, purchasing agents, and buyers. Unless specifically listed under officials and managers or craft (skilled), first line supervisors, who engage in the same activities as the employees they supervise, should not be reported under this category.

Professionals and Technicians: Professionals are considered to be persons working in occupations requiring either college graduation or comparable work experience. Technicians are those whose work requires a combination of basic scientific knowledge and manual skills such as can be attained through two-year technical or community college degrees or equivalent on-the-job training.

Sales Workers: Occupations engaged wholly or primarily in direct selling. This includes: advertising agents and sales agents, insurance agents and brokers, real estate agents and brokers, sales agents and sales clerks, grocery clerks, cashiers/checkers.

Office and Clerical: All clerical work regardless of the level of difficulty in which activities are predominantly non-manual (though some manual work not directly involved with altering or transporting the products is included). This includes: bookkeepers, collectors, messengers, and office helpers, office machine operators, shipping and receiving clerks, stenographers, typists, secretaries, and telephone operators.

Skilled Crafts: Manual workers of a relatively high skill level who have a thorough and comprehensive knowledge of the process involved in their work. They exercise considerable independent judgment and usually receive an extensive period of training. This includes: building trades, hourly paid foremen and lead-workers who are not members of management, mechanics and repairmen, skilled machinery occupations, electricians. Exclude learners and helpers of craft workers (apprentices).

Operatives: (Semi-skilled): Workers who operate machines or processing equipment or perform other factory-type duties of an intermediate skill level which can be mastered in a few weeks and requires only limited training. This includes: apprentices, operatives, attendants, delivery and route drivers, truck and tractor drivers, dressmakers, weavers, welders. Include craft apprentices in such fields as auto mechanics, printing, metalwork, carpentry, plumbing and other building trades.

Laborers: (Unskilled): Workers in manual occupations which generally require no special training. They perform elementary duties which may be learned in a few days and which require the application of little or no independent

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judgment. This includes: garage laborers, car washers, gardeners, and lumber workers, laborers performing lifting, digging, mixing and loading.

Service Workers: Workers in both protective and no protective service occupations. This includes: attendants, clean-up workers, janitors, guards, police, fire fighters, waiters and waitresses.

Underutilization: Underutilization occurs in a job group if the number of women or people of color in a job group are less than what is expected based on the availability percentage data adopted for the analysis.


SG uses the “WHOLE-PERSON RULE” in determining underutilization. Declaration of underutilization does not indicate discrimination has occurred in a company; rather, it is an opportunity to enable a company to apply good faith efforts to ensure equal employment opportunities continually occur in the business. This is to affirm our policy of providing equal employment opportunities to all employees and applicants for employment in accordance with all applicable laws, directives, and regulations of federal, state, and local governing bodies or agencies.

Our organization will not discriminate against or harass any employee or applicant for employment because of race, color, creed, religion, national origin, sex, veteran status, disability, age, marital status, familial status, membership or activity in a local human rights commission, or status regarding public assistance. We will take affirmative steps to ensure that all our employment practices are free of discrimination. Such employment practices include, but are not limited to, the following: hiring, upgrading, demotion, transfer, recruitment or recruitment advertising, selection, layoff, disciplinary action, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship. We will give reasonable accommodation to applicants / employees with disabilities whenever possible.

We will evaluate the performance of management and supervisory personnel based on their involvement in achieving these Affirmative Action objectives as well as other established criteria. In addition, all employees are expected to perform their job responsibilities in a manner that supports equal employment opportunities.

I have appointed the above-named EEO Official to manage the Equal Employment Opportunity (EEO) program. This person’s responsibilities include monitoring all EEO activities and reporting the effectiveness of the business’ Affirmative Action program as required by law. I will receive and review reports on the progress of the program. Any employee or applicant may inspect our Affirmative Action Plan and information related to our EEO program during normal business hours. Please contact the EEO Official for further information.

Any employee or applicant for employment who believes they have been treated in a way that violates this policy should contact either the EEO Official or any other management representative, including me. We will take immediate action to investigate and address allegations of discrimination or harassment confidentially and promptly.



 Signature of CEO/President or Board Chairperson

President

Title

Petra Speights

 First and Last Name (Please print)

08/16/2023

Date

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ASSIGNMENT OF RESPONSIBILITY FOR AFFIRMATIVE ACTION PROGRAM

Equal Employment Opportunity (EEO) Policy			
Business Name	Speights Group LLC	Date	08/16/2023
EEO Official, Name	Maria Vazquez	EEO Official, Title	Director of Continuous Improvement
EEO Official Phone Number	(432) 296-9007	EEO Official Email Address	08mevs@gmail.com

Maria Vazquez, Director of Continuous Improvement, is designated as the company's EEO manager and is tasked with monitoring all employment activity to ensure that our EEO/AA policies are being carried out. The EEO/AA manager has been given the necessary staffing and support from senior management to fulfill the duties of the position. These duties include, but are not limited to, the following:

1. Develop an EEO policy statement and Affirmative Action Plan ("AAP") that are consistent with the company's EEO policies and establish our affirmative action goals and objectives.
2. Develop and implement internal and external strategies for disseminating the company's AAP and EEO policies.
3. Conduct and/or coordinate EEO/AA training and orientation.
4. Ensure that our managers and supervisors understand it is their responsibility to take action to prevent the harassment of employees and applicants for employment.
5. Ensure that all minority, female, and disabled employees are provided equal opportunity as it relates to organization-sponsored training programs, recreational/social activities, benefit plans, pay and other working conditions.
6. Implement and maintain EEO audit, reporting, and record-keeping systems in order to measure the effectiveness of our Affirmative Action Plan/Program and to determine whether our goals and objectives have been attained.
7. Coordinate the implementation of necessary affirmative action to meet compliance requirements and goals.
8. Serve as liaison between our organization and relevant governmental enforcement agencies.

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9. Coordinate the recruitment and employment of women, people of color, and individuals with disabilities, and coordinate the recruitment and utilization of businesses owned by women, people of color, and individuals with disabilities.
10. Coordinate employee and company support of community action programs that may lead to the full employment of women, people of color, and individuals with disabilities.
11. Keep management informed of the latest developments in the area of EEO.

DISSEMINATION OF AFFIRMATIVE ACTION POLICY AND PLAN

A. Internal Dissemination

1. Our EEO policy statement is included in our employee handbooks.
2. We will publicize our EEO policy in any newsletters, magazines, annual reports, or other media the company utilizes.
3. We will schedule meetings with all employees to discuss the policy and explain individual employee responsibilities;
4. We will discuss the policy thoroughly during both employee orientation and management training programs;
5. If applicable, we will meet with union officials to provide notice of our EEO policy and ask for their cooperation in implementing the policy.
6. If applicable, we will include non-discrimination clauses in all of our union agreements and review all contractual provisions to ensure they are non-discriminatory.
7. We will publish articles in any company publications covering our EEO programs, progress reports, and the accomplishments of employees who are disabled individuals, female employees, veterans and employees of color.
8. Our EEO policy statement and non-discrimination posters will be permanently posted and conspicuously displayed in areas available to employees and applicants for employment.
9. When employees are featured in product or consumer advertising, employee handbooks, or similar publications, we will include images of male and female employees, employees of color, veterans and disabled employees.
10. We will communicate at least annually to employees the existence of our affirmative action program and make available the elements of its program as well as enable prospective employees to know and avail themselves of all of our program's benefits.

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11. All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes are carefully selected and trained to ensure that the goals and commitments in the company's affirmative action program are implemented.

B. External Dissemination

1. We will notify all recruiting sources of the company's EEO policy, stipulating that these sources actively recruit and refer women, people of color, disabled individuals* and veterans for all positions listed (*wherein reasonable accommodation may be made, depending on the required tasks for each position and type of disability of an applicant or potential applicant).
2. We will hold formal briefing sessions with representatives from recruiting sources. As an integral part of these briefings, we will include facility tours; clear and concise explanations of current and future job openings; position descriptions; worker specifications; explanations of the company's selection process; and, recruiting literature. We will make formal arrangements regarding applicant referrals, and follow-up with referral sources regarding the disposition of applicants.
3. Any disabled employees who wish to participate in career days, youth motivation programs, and related community activities will be given opportunity to do so.
4. Any recruiting efforts at schools will include specific outreach to disabled students.
5. We will make an effort to participate in work study programs with rehabilitation facilities and schools that specialize in the training or educating disabled individuals.
6. We will use all available resources to continue or establish on-the-job training programs.
7. We will incorporate the equal opportunity clause into all purchase orders, leases, and contracts.
8. We will send written notification of the company's EEO policy to all sub-contractors, vendors, and suppliers, and request cooperative action from them.
9. We will notify community agencies, community leaders, secondary schools, colleges, and organizations that promote women, people of color, and disabled individuals regarding the company's EEO policy.
10. When employees are featured in consumer or help wanted advertising, we will include images of male and female employees, employees of color, and disabled employees.
11. We will communicate the existence of our EEO policy to prospective employees and provide sufficient information to enable prospective employees to avail themselves of the policy's benefits.

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INTERNAL AUDIT AND REPORTING SYSTEMS

Our EEO manager has responsibility for implementing and monitoring our affirmative action programs. Department heads, managers, and supervisors are responsible for providing the EEO manager with information and/or statistical data as necessary to measure our good faith efforts to implement our programs. In addition, they are also responsible for submitting formal reports to the EEO Manager on a scheduled basis regarding the degree to which corporate or unit goals are achieved and timetables are met.

At least annually, internal audit reports will be prepared in table format and dated. Data collected for these reports will include applicant flow, new hires, promotions, transfers, and terminations (voluntary and involuntary) by job group. Figures for each personnel process must show a breakdown by sex, minority classification, and disability status. Reports will be disseminated to appropriate levels of management, and any problem areas will be addressed as promptly as possible.

We will preserve all audit data and other applicable documentation and information available as required by law to the Minnesota Department of Human Rights and other government agencies.

Also, once a year on or before the date of this AAP, we will publicly post a downloadable Annual EEO Compliance Report online, via link that is conspicuously posted on our company's website (<http://sg-ma.com>).

WORKFORCE ANALYSIS

Availability / Utilization / Underutilization Analysis

Because SG does not have employees at the time of this version of the AAP, there is no workforce analysis in place. We will follow the directions below at such time that an analysis may be made and is required.

The affirmative action plan must include a workforce analysis based on data that is no more than one year old, including a listing of each job title as it appears in payroll records, ranked from the lowest to the highest paid in each department. If there are separate work units or lines of progression within a department, a separate list must be provided for each work unit, or line, including unit supervisors.

GOALS AND TIMETABLES

Because no underutilization exists at present time, SG has no goals or timetables drawn from analysis. During this plan year, it is our goal to make a good faith effort to meet or exceed the availability percentage for women, veterans and people of color in all job groups, within our availability / utilization / underutilization analysis. We will continue good faith efforts to recruit and retain individuals with disabilities in all levels of our workforce. We will also make a good faith effort to meet EEO construction goals as prescribed for work with government agencies as a prime contractor or subcontractor.

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PROBLEM AREA IDENTIFICATION

SG commits to periodically conducting in-depth analyses of its total employment process to determine whether and where impediments to equal employment opportunity may exist. Such evaluations will include:

1. Workforce composition by job group: if we identify underutilization in our availability / utilization / underutilization analysis (AUUA), we will set SMART goals to remedy that underutilization. If we identify no underutilization in our workforce, we will continue to monitor our workforce composition to ensure that no problems arise.
2. Personnel activity: We will routinely conduct adverse impact analyses using the “Eighty Percent Test” or other statistical methods to analyze our personnel activities, including applicant flow, hires, promotions, terminations and other personnel actions, to determine if there are selection disparities between men and women, people of color, nonminority (and within specific racial groups, if appropriate), veteran or disabled and nondisabled applicants or employees. For tests that that may be used as a part of our selection process, we confirm they will be job-related and validated according to generally accepted standards. We have taken corrective action to remove any barriers to hiring or retaining women, people of color, or individuals with disabilities.
3. Compensation system: We will routinely review our compensation system, including rates of pay and bonuses, to determine whether there is any gender, race, ethnicity, or disability-based disparities / deficiencies. If any are identified, we will take prompt action to resolve them. In offering employment to individuals with disabilities, we will not reduce the amount of compensation offered because of any disability income, pension, or other benefit the applicant or employee receives or may be entitled to from another source.
4. Personnel procedures: We will routinely review all of our personnel procedures and processes, including selection, recruitment, referral, transfers and promotions, seniority provisions, apprenticeship programs, company-sponsored training programs and other company activities to determine if all employees or applicants are fairly considered.
5. Any other areas that might impact the success of our Affirmative Action Program: We will continually analyze any other areas that may impact our success, such as the accessibility of our facilities to the available workforce, the attitude of our current workforce towards EEO, proper posting of our EEO policy and required governmental posters, proper notification to and requirement of our subcontractors or vendors, and retention of records in accordance with applicable law. We will take prompt action to remedy any problems in these areas through training or other methods.

ACTION-ORIENTED PROGRAMS

Measures to facilitate implementation of our Equal Employment Opportunity Policy and Affirmative Action Plan for women, veterans, people of color and individuals with disabilities will follow general best practices and be in compliance with all applicable federal, state, and regional laws and directives.

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Selection Process

We will evaluate our selection process using an adverse impact analysis to determine if our requirements screen out a disproportionate number of people of color, women, veterans or individuals with disabilities. All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes will be carefully selected and trained to ensure that there is a commitment to the AAP and its implementation.

Schedule for Review of Job Requirements: We will annually review all physical and mental job requirements to ensure that these requirements do not tend to screen out qualified individuals with disabilities. We will determine whether these requirements are job-related and are consistent with business necessity and the safe performance of the job, and we will remove any physical or mental requirements that do not meet these criteria. Any job descriptions or requirements changed after review will be distributed to all relevant employees, particularly those involved in the selection process and supervision of employees. Those involved in such selection process will be thoroughly trained to understand and comply with 'reasonable accommodation' criteria.

Pre-Employment Medical Examination: If we require medical examinations or inquiries as a part of our selection process, all exams or inquiries will be conducted after a conditional offer of employment. Only job-related medical examinations and inquiries will be conducted, and the results of these examinations or inquiries will not be used to screen out qualified individuals with disabilities. Information obtained in response to such inquiries or examinations will be kept confidential except that (a) supervisors and managers may be informed regarding restrictions on the work or duties of individuals with disabilities and regarding accommodations, (b) first aid and safety personnel may be informed, where and to the extent appropriate, if the condition might require emergency treatment, and (c) officials, employees, representatives, or agents of the government investigating compliance with human rights ordinances will be informed if they request such information.

Accommodations to Physical and Mental Limitations of Employees

We will make reasonable accommodations to the physical and mental limitations of an employee or applicant unless such an accommodation would impose an undue hardship on the conduct of the business.

Recruitment of Employees

1. All solicitation or advertisements for employees will state that applicants will receive consideration for employment regardless of their race, color, creed, religion, national origin, sex, disability, age, marital status, or status with regard to public assistance. When needed, to help address underutilization, help wanted advertising will also be placed in news media oriented towards people of color, women, and veterans. Copies of advertisements for employees will be kept on file for review by enforcement agencies.
2. When we place help-wanted advertisements, we will not indicate a preference, limitation, or specification based on sex, age, national origin, or other protected characteristic, unless that characteristic is a bona fide occupational qualification for a particular job. We will not allow any employment agency with which we work to express any such

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limitation on our behalf, and we will require that these agencies share our commitment to Equal Employment Opportunity.

3. When possible, all positions for which we post or advertise externally will be listed with state workforce centers, America's Job Bank, and / or similar governmental agencies.
4. When possible, we will request local and state agencies to refer qualified individuals with disabilities for employment consideration under our affirmative action plan.
5. As necessary to ensure that potential candidates are aware of job openings, we will contact community organizations focused on the employment of women, people of color, individuals with disabilities and veterans (including state vocational rehabilitation agencies or facilities, sheltered workshops, college placement offices, education agencies, veteran service organizations or labor organizations).
6. We will keep documentation of all contacts made and responses received, in connection with paragraphs 4 and 5 above, whether formal or informal. We will make every effort to give these agencies a reasonable* amount of time to locate and refer applicants (striving for one month prior to the closing date for receipt of applicants).
7. We will carry out active recruiting programs at relevant technical schools and colleges, where applicable.
8. We will encourage existing employees of color, veteran, female and disabled employees to recruit additional candidates for employment opportunities.
9. Consideration of people of color and women not currently in the workforce: We will take additional steps to encourage the employment of women, people of color, veterans and individuals with disabilities who are not currently in the workforce, such as providing part-time employment, internships, or summer employment programs.

Training Programs

Employees who are people of color, female, veteran, and individuals with disabilities will be afforded full opportunity and will be encouraged to participate in all organization sponsored educational and training programs. We will seek the inclusion of qualified people of color, female, veteran and disabled employees in any apprenticeship program in which we participate.

Promotion Process

Our promotion process will be developed and documented, and only legitimate qualifications will be considered in our promotion decisions. We will conduct adverse impact analyses to ensure that women, people of color, veterans and employees with disabilities are promoted at rates substantially similar to men, non-people of color, non-veterans and individuals without disabilities.

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Termination Process

We will use progressive discipline before terminating employees, if situationally appropriate. All employees will be made thoroughly aware of our discipline process, including 'instantly terminable' actions. We will conduct adverse impact analyses to ensure that veterans, women, people of color, and employees with disabilities do not leave our company at rates substantially dissimilar to those of who are not so characterized.

Religion and National Origin Discrimination and Accommodation for Religious Observance and Practice

As a part of our commitment to Equal Employment Opportunity for all, we have made a specific effort to ensure that national origin and religion are not factors in recruitment, selection, promotion, transfer, termination, or participation in training. The following activities will be undertaken to ensure religion and national origin are not used as a basis for employment decisions:

1. Recruitment resources are informed of our commitment to provide equal employment opportunity without regard to national origin or religion.
2. Our employees are informed of our policy and their duty to provide equal opportunity without regard to national origin or religion.
3. Employment practices exist and are reviewed to ensure that we implement equal employment opportunity without regard to national origin or religion.
4. The religious observances and practices of our employees are accommodated, except where the requested accommodation would cause undue hardship on the conduct of our business.
5. We will not discriminate against any qualified applicant or employee because of race, color, creed, disability, age, sex, marital status, veteran status, or status with regard to public assistance in implementing the policy concerning non-discrimination based on national origin or religion.
6. SG is a partnership formed of family members whose religious views do not support or affirm LGBTQ pride. Per federal requirements and the general civility to which all people are entitled, we will not discriminate against any qualified applicant or employee based on sexual orientation or gender identity. SG respects the individual views and beliefs of all people, and neither the company nor its members or employees will treat another person unprofessionally or disrespectfully; however, SG strongly asserts that it will not be used as a platform by any employee to assert gay pride, nor will it engage in business that is in direct support of an LGBTQ agenda.

Sex Discrimination Guidelines

We incorporate the following commitments into this AAP to ensure that all laws related to the prohibition of discrimination based on sex are followed:

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1. Employment opportunities and conditions of employment are not related to the sex of any applicant or employee. Salaries are not related to or based upon sex.
2. Women are encouraged to attend all training or development programs to facilitate their opportunities for promotion, and to apply for all positions for which they are qualified.
3. We do not deny employment to women or men with young children and do not penalize, in conditions of employment, women or men who require time away from work for parental leave.
4. Appropriate physical facilities are provided to both sexes.

Prevention of Harassment and Discrimination

Our company has developed policies prohibiting the harassment of or discrimination against any employee because of any characteristic protected under civil rights laws. Senior management will distribute these policies routinely to current employees and incorporate these policies as a part of new employee orientation. Employees are made aware of contact persons to report any violation of these policies.

ANTI-HARASSMENT POLICY

As a part of our commitment to equal opportunity, SG has adopted an anti-harassment policy. Any employee who engages in harassment on the basis of race, color, creed, religion, national origin, sex, sexual orientation, marital status, veteran status, disability, age, status with regard to public assistance, membership or activity in a local human rights commission, or other legally protected characteristics; any employee who permits employees under his / her supervision to engage in such harassment; or any employee who retaliates or permits retaliation against an employee who reports such harassment is guilty of misconduct and shall be subject to remedial action which may include the imposition of discipline or termination of employment.

Examples of harassment may include derogatory comments regarding a person's race, color, religion, or other protected characteristics, sexually explicit or other offensive images (whether printed or displayed on a computer), and jokes that are based on stereotypes of particular races, sexual orientations, ages, religions, or other protected characteristics.

Sexual Harassment is prohibited and includes any unwelcome sexual advance, request for sexual favor and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made, either explicitly or implicitly, as a term or condition of employment;
- Submission to or rejection of such conduct is used as a factor in any employment decision affecting any individual; or

Such conduct has the purpose or effect of unreasonably interfering with any employee's work performance or creating an intimidating, hostile or offensive working environment.

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Although the intent of the person engaging in the conduct may be harmless or even friendly, it is the perception of the conduct by the recipient that is relevant to whether the conduct is harassment. Given the difficulty of judging whether the conduct is welcome or unwelcome in particular situations, the company prohibits all employees from engaging in any conduct of a sexual nature or amounting to harassment based on any protected category in the work setting. Additionally, SG forbids the use of any self-deprecating remarks, actions, nicknames, etc., by any employee.

This policy applies to everyone in the organization as well as senior management. No retaliation or intimidation directed towards anyone who makes a complaint will be tolerated.

If you believe you have been a victim of harassment, take the following steps:

- (1) Discuss the matter with your supervisor or manager.
- (2) If reasonable resolution does not occur within a reasonable time after a discussion with your supervisor or manager, immediately take your concern to the next-level manager, director, or company executive.
- (3) Anonymous communication may be sent at any time to any member of management, though preferably the company's EEO Manager for single-point traceability and timely resolution. The EEO Manager for SG is Maria Vazquez, and her contact information is listed in an earlier section of this AAP.

The company will investigate and attempt to resolve your complaint promptly. If, for any reason, you believe this has not occurred within a reasonable period of time, refer the matter to a member of senior management up to and including the CEO of Speights Group LLC.

PROBLEM RESOLUTION POLICY

In any organization, dissatisfaction may arise because an employee does not know, understand, or agree with certain policy interpretations or management decisions. Such dissatisfactions are commonly referred to as grievances. At Speights Group, we believe that if any employee has a grievance concerning his/her wages, hours of work, or other terms or conditions of employment, the matter should receive attention from management.

An employee who feels aggrieved is urged to take the matter up immediately with his/her supervisor. Your supervisor is required to investigate your grievance and provide you with a response or decision within a reasonable period of time. This investigation may consist of, but is not limited to, gathering information from other employees involved, reviewing company policy, and any other action necessary to understand the matter completely.

If you are not satisfied with the response/decision from your immediate supervisor, you are encouraged to notify the next level of management in writing. This next level of supervision will have a reasonable period of time in which to investigate the matter and respond to you in writing.

	WORKFORCE AFFIRMATIVE ACTION PLAN (AAP)	DOC DATE / REV:	16AUG23 / 00
		COMPANY: EIN: DUNS: UEID: CAGE:	Speights Group LLC 88-2586281 13-119-7454 TEPRRGLN9SG5 9EEW0

If, after these steps are taken, you believe inadequate action has been taken to resolve your complaint, contact the company's EEO Manager. It is the policy of this organization to respond to any and all complaints, and to take immediate and necessary actions to resolve the issue.

There will be no adverse action taken against a complaining employee as a result of making the complaint, regardless of the outcome of the investigation.

If you have a problem which is more specifically addressed by the Anti-Harassment Policy, please follow the procedure described in the Anti-Harassment Policy section.