

<p align="center"> CITY OF URBANA HUMAN RELATIONS DIVISION 400 SOUTH VINE ST. URBANA, ILLINOIS 61801 (217) 384-2455 (phone); 328-8288 (fax) hro@urbanaillinois.us </p>	Office Use Only (09/15)	
	Requested by:	Date:
	Approved by:	Date:
	Certification	
	Date:	
	Certificate Expiration Date:	

EQUAL EMPLOYMENT OPPORTUNITY (E.E.O.) WORKFORCE STATISTICS FORM

Please complete the sections below as instructed. Failure to properly complete this form may result in a delay or denial of eligibility to bid or do business with the City of Urbana.

Section I. Identification

1. Company Name and Address:

Name: Michels Corporation

d/b/a:

Address: 817 West Main Street, PO Box 128

City/State/Zip: Brownsville, WI 53006

Telephone Number(s) include area code: (920) 583-3132

Check one of the following

Corporation	<input checked="" type="checkbox"/>	Partnership	<input type="checkbox"/>	Individual Proprietorship	<input type="checkbox"/>	Limited Liability Corp.	<input type="checkbox"/>
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FEI Number: 39-0970311 Social Security Number:

2. Name and Address of the Company's Principal Office (answer only if not the same as above)

Name:

Address:

City/State/Zip

3. Major activity of your company (product or service): Utility Construction Contractor

4. Project on which your company is bidding:

5. City of Urbana contact staff assigned to contract: Anthony Weck

SECTION II. Policies and Practices

Description of EEO Policies and Practices		YES	NO
A.	Is it the Company's policy to recruit, hire, train, upgrade, promote and discipline persons without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual preference, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income ?	X	
B.	Has someone been assigned to develop procedures, which will assure that the EEO policy is implemented and enforced by managerial, administrative, and supervisory personnel? If so, please indicate the name and title of the official charged with this responsibility. Name: <u>Karen Wuest</u> Title: <u>Vice President of Human Resources</u> Telephone: <u>920-924-4373</u> Email: <u>kwuest@michels.us</u>	X	
C.	Does the company have a written Equal Employment Opportunity plan or statement? Note: If no, a copy of an E.E.O statement is enclosed. You must attach an EEO Statement in order to be considered eligible to do business with the City of Urbana. Questions? (217) 384-2455 or hro@city.urbana.il.us.	X	
D.	Has the company developed a written policy statement prohibiting Sexual Harassment? You must attach a copy of your company's Sexual Harassment Policy in order to be considered eligible to do business with the City of Urbana.	X	
E.	Have all recruitment sources been notified that the company will consider all qualified applicants without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual orientation, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income?	X	
F.	If advertising is used, does it specify that all qualified applicants will be considered for employment without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual orientation, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income?	X	
G.	Has the contractor notified all of its sub-contractors of their obligations to comply with the Equal Opportunity requirements either in writing, by inclusion in subcontracts or purchase orders?	X	
H.	Is the company a state certified minority/women owned business? If yes, please attach a copy of state certification.		X
I.	Does the company have collective bargaining agreements with labor organizations?	X	
J.	If you answered yes to Question "I", have the labor organizations been notified of the company's responsibility to comply with the Equal Employment Opportunity requirements in all contracts with the City of Urbana?	X	
K.	Does your company perform construction, rehabilitation, alteration, conversion, demolition or repair of buildings, highways or other improvements to real property? (If yes, please complete Table B.)	X	
L.	Are you currently seeking to renew an existing or expired Urbana EEO certification? (If yes, you need to complete Table C.)	X	

SECTION III. Employment Information

IMPORTANT: Please complete the company workforce analysis on the bottom of this page. Use the number of employees as of the most recent payroll period. **You must complete this form in its entirety, as instructed and submit your organization's (1) EEO Statement and (2) Sexual Harassment Policy in order to be eligible to do business with the City of Urbana. For detailed descriptions of the Job Classifications see attached descriptions.** If minorities and females are currently under-represented in your workforce, please attach a copy of an explanation of your plan to recruit and hire qualified minorities and females.

TABLE A – TOTAL CONTRACTOR/VENDOR WORKFORCE

Job Categories	Overall Totals		White (Not of Hispanic Origin)		Black or African-American (Not of Hispanic Origin)		Hispanic or Latino		Asian or Pacific Islander		American Indian or Alaskan Native	
	M	F	M	F	M	F	M	F	M	F	M	F
Officials & Mgrs	290	23	283	20	2	0	3	1	0	2	2	0
Professionals	217	41	205	40	2	0	5	1	2	0	3	0
Technicians	24	4	22	4	1	0	0	0	1	0	0	0
Sales Workers	5	6	5	6	0	0	0	0	0	0	0	0
Office & Clerical	67	141	63	133	1	4	1	3	2	0	0	1
Craft Workers (Skilled)	1672	19	1593	15	14	3	56	0	3	1	6	0
Operatives (Semi-Skilled)	351	9	326	9	5	0	13	0	1	0	6	0
Laborers (Unskilled)	1174	45	991	38	52	4	114	3	6	0	11	0
Service Workers	12	5	11	5	0	0	1	0	0	0	0	0
TOTAL	3812	29	3499	270	77	11	193	8	15	3	28	1
M = MALE. Column B is sum of Rows D, F, H, J and L. F = FEMALE. Column C is sum of Rows E, G, I, K and M.												
Date of above Data: <u>08/02/2015</u>												

TABLE B* - EMPLOYEES TO BE ASSIGNED TO CITY OF URBANA CONTRACT

Job Categories	TOTAL EMPLOYEES		BLACK EMPLOYEES		HISPANIC EMPLOYEES		OTHER MINORITY EMPLOYEES	
	M	F	M	F	M	F	M	F
Officials & Mgrs								
Professionals								
Technicians								
Sales Workers								
Office & Clerical								
Craft Workers (Skilled)								
Operatives (Semi-Skilled)								
Laborers (Unskilled)								
Service Workers								
TOTAL	0	0	0	0	0	0	0	0

*Totals included in Table B should be a projection of numbers of persons to be employed in the performance of the City contract.

For Contractors: Data provided in Table B will be verified by worksite inspections.

TABLE C - WORKFORCE TURNOVER SINCE PREVIOUS EEO REPORT

Job Categories	TOTAL EMPLOYEES SEPARATED		MINORITY EMPLOYEES SEPARATED		TOTAL EMPLOYEES HIRED		MINORITY EMPLOYEES HIRED	
	M	F	M	F	M	F	M	F
Officials & Mgrs	1	0	2	0				
Professionals	85	5	5	0				
Technicians	7	4	0	0				
Sales Workers	0	0	0	0				
Office & Clerical	6	16	1	1				
Craft Workers (Skilled)	208	0	11	1				
Operatives (Semi-Skilled)	5	0	2	0				
Laborers (Unskilled)	249	6	67	2				
Service Workers	0	2	0	2				
TOTAL	561	33	88	6				

SECTION IV. Certification

By signing below, the company certifies that it has answered all of the foregoing questions truthfully to the best of its knowledge and belief and agrees that it/he/she will comply and abide by the City of Urbana's Code of Ordinances (Section 2-119).

Karen Wuest
Signature

Karen Wuest, Vice President of HR
Printed Name and Title

kwuest@michels.us

E-mail Address

5/25/2016

Date

SECTION V. Verification

Prior to submitting this form, please check the answers to the following questions to verify your completion of this form:

1. Did you fill in all of the appropriate boxes in the table in Section III, including the "TOTAL" row?

YES _____ NO _____

2. Have you enclosed your company's EEO statement?

YES _____ NO _____

3. Have you enclosed your company's Sexual Harassment policy?

YES _____ NO _____

DEFINITIONS OF TERMS LISTED ON THE WORKFORCE STATISTICS FORM

(See previous Page)

DESCRIPTION OF RACE/ETHNIC CATEGORIES

Race /ethnic designations as used by the Department do not denote scientific definitions of anthropological origins. For the purposes of this report, an employee may be included in the group to which he or she appears to belong, identifies with, or is regarded in the community as belonging. However, no person should be counted in more than *one* race/ethnic group. The race/ethnic categories for this report are:

White (Not of Hispanic origin). All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

Black of African-American (Not of Hispanic origin). All persons having origins in any of the Black racial groups of Africa.

Hispanic or Latino. All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

Asian or Pacific Islander. All persons having origins any of the original peoples of the Far East, Southeast Asia, the Indian Subcontinent, or the Pacific Islands. This area includes, for example, China, India, Japan, Korea, the Philippine Islands and Samoa.

American Indian or Alaskan Native. All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

DESCRIPTION OF JOB CATEGORIES

Each employee should be counted in only one job category. Select the category containing the jobs most similar to that performed by the employee. The jobs listed in each category are intended to provide an example, not a complete list, of all job titles falling into that category.

Officials and managers. Occupations requiring administrative and managerial personnel who set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special phases of firm's operations. Includes: officials, executives, middle management, plant managers, department managers, and superintendents, salaried supervisors who are members of management, purchasing agents and buyers, railroad conductors and yard masters, ship captains, mates and other officers farm operators and managers, and kindred workers.

Professionals. Occupations requiring either college graduation or experience of such kind and amount as to provide a comparable background. Includes: accountants and auditors, airplane pilots and navigators, architects, artists, chemists, designers, dietitians, editors, engineers, layers, librarians, mathematicians, natural scientist, registered professional nurses, personnel and labor relations specialist, physical scientist, physicians, social scientist, teachers, surveyors and kindred workers.

Technicians. Occupations requiring a combination of basic scientific knowledge and manual skill which can be obtained through 2 years of post high school education, such as is offered in many technical institutes and union colleges, or through equivalent on-the-job training. Include: computer programmers, drafters, engineering aides, junior engineers, mathematical aides, licensed, practical or vocational nurses, photographers, radio operators, scientific assistants, technical illustrators, technicians (medical, dental, electronic, physical science), and kindred workers.

Sales. Occupations engaging wholly or primarily in direct selling. Includes: advertising agents and sales workers, insurance agents and brokers, real estate agents, and brokers, stock and bond sales workers, demonstrators, sales workers and sales clerks, grocery clerks, and cashiers/checkers, and kindred workers.

Office and clerical. Includes all clerical-type work regardless of level of difficulty, where the activities are predominantly non manual though some manual work not directly involved with altering or transporting the products is included. Includes: bookkeepers, collectors (bills and accounts), messengers and office helpers, office machine operators (including computer), shipping and receiving clerks, stenographers, typists and secretaries, telegraph and telephone operators, legal assistants, and kindred workers.

Craft workers (skilled). Manual workers of relatively high skill level having a thorough and comprehensive knowledge of the processes involved in their work. Exercise considerable independent judgment and usually receive an extensive period of training. Includes: the building trades, hourly paid supervisors and lead operators who are not members of occupations, compositors and typesetters, electricians, engravers, painters (construction and maintenance), motion picture projectionists, pattern and model makers, stationary hand painters, coaters, bakers, decorating occupations, and kindred workers.

Operatives (semiskilled). Workers who operate machine or processing equipment or perform other factory-type duties of intermediate skill level which can be mastered in a few weeks and require only limited training. Includes: apprentices (auto service and stitchers, dryers, furnace workers, heaters, laundry and dry cleaning operatives, milliners, mine operatives and laborers, motor operators, oilers and greasers (except auto), painters (manufactured articles), photographic process workers, truck and tractor drivers, knitting, looping, taping and weaving machine operators, welders and flame cutters, electrical and electronic equipment assemblers, butchers and meatcutters, inspectors, testers and graders, handpackers and packagers, and kindred workers.

Laborers (unskilled). Workers in manual occupations which generally require no special training who perform elementary duties that may be learned in a few days and require the application of little or no independent judgment. Includes: garage laborers, car washers and greasers, groundskeepers and gardeners, farmworkers, stevedores, wood choppers, laborers performing lifting, digging, mixing, loading and pulling operation and kindred workers.

Service workers. Workers in both protective and nonprotective service occupations. Includes: Attendants (hospital and other institutions, professional and personal service, including nurses aides, and orderlies), barbers, charworkers and cleaners, cooks, counter and fountain workers, elevator operators, firefighters and fire protection, guards, doorkeepers, stewards, janitors, police officers and detectives, porters, waiters and waitresses, amusement and recreation facilities attendants, guides, ushers, public transportation attendants, and kindred workers.

EQUAL EMPLOYMENT OPPORTUNITY STATEMENT

Michels Corporation

Company Name

This is to state that it is the policy of Michels Corporation to act in accordance with all local, state and federal Equal Employment Opportunity guidelines and procedures. This policy is in accordance with the Civil Rights Act of 1964, Equal Employment Act of 1972, and all other applicable laws. Michels Corporation also strives to assure compliance with the Illinois Fair Employment Practices Act, the Illinois Human Rights Act, City of Urbana Human Rights Ordinance and all other laws pertaining to equal employment opportunity.

Michels Corporation's Policy includes recruiting, hiring, training, upgrading, promoting, and disciplining without regard to any of the protected classes found in local, state or federal E.E.O laws. Michels Corporation has developed procedures to assure this policy is understood and carried out by managerial, administrative, and supervisory personnel.

ASSIGNMENT OF RESPONSIBILITY: Michels Corporation has undertaken a positive E.E.O Program to effectively implement and enforce this policy at all times. The EEO officer or person designated for monitoring the company's E.E.O. Program is: Karen Wuest

PROCEDURES FOR DISSEMINATION OF POLICY: A copy of this statement is posted in the main office at Brownsville, WI and copies of the policy are available to employees, vendors and/or subcontractors.

UTILIZATION ANALYSIS: Michels Corporation will monitor its workforce and job classifications. It will analyze availability and under-utilization and respond accordingly. Michels Corporation will attempt to advertise job vacancies in places where minorities and females may more likely become aware of the job openings.

GOALS AND TIMETABLES: Michels Corporation will identify those areas within its workforce in which minorities and women are being under-utilized and set up a system of goals and timetables for correcting the deficiencies.

SYSTEM FOR MONITORING COMPLIANCE AND RECRUITMENT OF WORKFORCE: When adding new employees Michels Corporation policy is to assure there are minorities and females in the applicant pool. Michels Corporation supports EEO programs.

SYSTEM OF RECORDS AND ANNUAL SUMMARY: Michels Corporation will monitor applicant data, employee records and job descriptions to assist in its Equal Employment efforts.

Karen Wuest

Signature

5/25/2016

Date



Equal Employment Opportunity/Affirmative Action Policy Statement

It has been and shall continue to be the policy of Michels Corporation and its Operating Divisions and Subsidiaries (hereafter "Michels") to provide equal employment opportunity free of discrimination against any individual on the basis of their race, creed, color, religion, sex, age, national origin, disability, military and veteran status, sexual orientation, gender identity or expression, marital status, genetic information or any other characteristic protected by state or federal law. We are committed to this Policy and its embodiment in the law.

Michels is committed to assuring that any Human Resources activity or action including recruiting, hiring, placement, formal or informal training (such as on-the-job training, co-op programs, apprenticeships and management trainee programs), job classifications, work assignments, transfers, assignment of overtime hours, promotion, lay-off, recall and termination and other related programs are provided fairly to all persons. Similarly, all salaries, wages and benefit programs will be administered in conformity with this Policy.

Michels is always interested in qualified job applicants. All employees are urged to refer qualified job candidates, including women and minorities, to Michels.

Michels encourages each employee to develop their skills so that they can achieve their fullest potential. Therefore, we encourage all employees to continually seek opportunities to upgrade their skills and job knowledge. Accordingly, we ask all employees to feel free to ask their supervisor or the Human Resources Manager about training programs that might be appropriate for the goal of furthering their career path.

Michels pledges that it will maintain a working environment free of harassment, intimidation and coercion at all its sites and facilities. Harassment of any type, including race, sex, gender, or age, will not be tolerated and may result in sanctions up to and including immediate dismissal. Employees who believe that they have been victims of harassment of any kind are urged to immediately report such incidents to the Human Resources Department, who has the overall responsibility of investigating and resolving complaints at Michels.

This Michels' Equal Employment Opportunity/Affirmative Action Policy is a public document of the Company. It has been discussed with all management personnel. All employees are responsible for supporting the goal of Equal Employment Opportunity and Affirmative Action and assisting Michels in meeting these objectives. In addition to being available on our web site (www.michels.us), this Policy will be posted in the Company office, in all work trailers and at all job sites. Our commitment to Equal Employment Opportunity will be carried on our letterhead with the statement that Michels is an Equal Opportunity Employer. This same statement will be carried on all of our employment advertisements. It is our intent to give this Policy the widest possible dissemination including providing copies to all unions with whom we have collective bargaining agreements and all subcontractors and other firms with whom we anticipate doing business. In soliciting bids for subcontracts, minority and female construction contractors and suppliers will be contacted. In seeking referrals of craft workers from the union hall, we will always specify that women and minorities are to be included in all such referrals.

Karen A. Wuest has been designated as Michels' EEO Officer and Jacki R. Warner as EEO Coordinator. Should you have any questions about this Policy, please contact either of them during normal business working hours (8 a.m. to 5 p.m. CST).

We are committed to this Policy. It is Michels' intention that all actions and decisions will support the spirit of this Policy and program. It is incumbent upon every employee to do the same.

Patrick D. Michels, President/CEO

1/1/2016

Date



Michels Corporation Anti- Harassment Policy (Including Sexual Harassment)

Michels is committed to providing a professional work environment. We expect the workplace to be free from sexual, physical, psychological, verbal and non-verbal harassment based on any legally protected characteristic. These protected characteristics may include, but are not limited to, an individual's gender, race, color, ethnic origin, national origin, religion, age, ancestry, disability, sexual orientation, marital status, veteran status. This policy applies to all individuals who work for the company in any capacity at any location, including officers, directors, vendors, customers or visitors.

Harassment, including sexual, may exist when submission to such conduct is implicitly or expressly made a term or condition of employment; when submission to or rejection of such conduct is used as a basis for any employment decisions; or when such conduct results in creating an intimidating, hostile, threatening or offensive working environment.

Examples of conduct prohibited under this policy include, but are not limited to, the following:

- Unwelcome sexual advances, requests for sexual favors or physical conduct of a sexual nature such as touching, brushing up against another or derogatory comments.
- Unwelcome verbal or non-verbal conduct or visual displays of a sexual, offensive or discriminating manner such as posters, calendars, photographs, cartoons, graffiti or other offensive graphic displays.
- Making submission to or rejection of harassment the basis of any employment decision.
- Unprofessional comments in any work environment based on an individual's protected characteristics.
- Insults, name-calling or slurs based on an individual's protected characteristics.
- Jokes or other remarks that are sexual or offensive in nature or demeaning to an individual's protected characteristics.
- Physical, verbal or psychological abuse based on an individual's protected characteristics such as stereotyping, name calling, assaulting, sabotaging, segregating or threatening any individual in the workplace.
- Using abusive, threatening or other inappropriate language or profanity in the workplace.

This or similar conduct is offensive and inappropriate in the workplace. The company will not tolerate any forms of harassment. Such conduct can be the basis for disciplinary action, up to and including termination of employment. Similarly, if after an investigation, it is revealed that such allegations are baseless, then the originator of such entirely baseless and possible defamatory claims might also be subject to disciplinary actions up to and including discharge.

If you believe you have been the subject of harassment or you have knowledge of violations of this policy, report the matter immediately to Karen A. Wuest, Vice President of Human Resources at (920) 924-4300 extension 2376 or A. David Stegeman, Vice President and Chief Legal Officer at (920) 924-4300 extension 2264. There will be no retaliation against anyone who, in good faith, makes a report regarding harassment or assists in an investigation. Complaints will be treated as confidentially as possible in light of Michels' need to fully investigate the matter and take corrective action. In addition, any member of management who receives a complaint or is on notice of potential harassment is under an absolute obligation to pass the information on to Human Resources before 24 hours has passed.

Questions regarding this policy should be addressed directly to the Human Resources Department, who has the overall responsibility of investigating and resolving complaints at Michels.

Patrick D. Michels, President/CEO

January 1, 2016

Date

POLICY REGARDING SEXUAL HARASSMENT IN EMPLOYMENT

Michels Corporation

FULL COMPANY NAME

I. STATEMENT OF COMPANY POLICY

This company is committed to providing a workplace that is free from all forms of discrimination, including sexual harassment. Any employee's behavior that fits the definition of sexual harassment is a form of misconduct which may result in disciplinary action up to and including dismissal. Sexual harassment could also subject this company and, in some cases, an individual to substantial civil penalties.

The company's policy on sexual harassment is part of its overall affirmative action efforts pursuant to state and federal laws prohibiting discrimination based on age, race, color, religion, national origin, citizenship status, unfavorable discharge from the military, marital status, disability, and gender. Specifically, sexual harassment is prohibited by the Civil Rights Act of 1964, as amended in 1991, the Illinois Human Rights Act and the Urbana Human Rights Ordinance.

Each employee of this company bears the responsibility to refrain from sexual harassment in the workplace. No employee, male or female, should be subjected to unsolicited or unwelcome sexual overtures or conduct in the workplace. Furthermore, it is the responsibility of all supervisors to make sure that the work environment is free from sexual harassment. All forms of discrimination and conduct which can be considered harassing, coercive or disruptive, or which create a hostile or offensive environment must be eliminated. Instances of sexual harassment must be investigated in a prompt and effective manner.

All employees of this company, particularly those in a supervisory or management capacity, are expected to become familiar with the contents of this Policy and to abide by the requirements it establishes.

II. DEFINITION OF SEXUAL HARASSMENT

According to the Illinois Human Rights Act, sexual harassment is defined as: Any unwelcome sexual advances or requests for sexual favors or any conduct of a sexual nature when;

- (1) submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment.
- (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or
- (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

The courts have determined that sexual harassment is a form of discrimination under Title VII of the Civil Rights Act of 1964, as amended in 1991.

Conduct commonly considered to be sexual harassment includes:

* Verbal: sexual innuendos, suggestive comments, insults, humor and jokes about sex, anatomy or gender-specific traits, sexual propositions, threats, repeated requests for dates, or statements about other employees, even outside their presence, of a sexual nature.

* Non-verbal: Suggestive or insulting sounds (whistling), leering, obscene gestures, sexually suggestive bodily gestures, "catcalls", "smacking", or "kissing" noises

* Visual: posters, signs, pin-ups or slogans of a sexual nature.

* Physical: Touching, unwelcome hugging or kissing, pinching, brushing the body, coerced sexual intercourse, or actual assault.

Sexual harassment most frequently involves a man harassing a woman. However, it can also involve a woman harassing a man or harassment between members of the same gender.

III. RESPONSIBILITY OF INDIVIDUAL EMPLOYEES.

Each individual employee has the responsibility to refrain from sexual harassment in the workplace.

An individual employee who sexually harasses a fellow worker is, of course, liable for his or her individual conduct.

The harassing employee will be subject to disciplinary action up to and including discharge in accord with the company's disciplinary policy and the terms of any applicable collective bargaining agreement.

The company has designated Karen Wuest (Name), VP of Human Resources (Title) to coordinate the company's sexual harassment policy compliance. Mr./Ms. Wuest can be reached at 817 W. Main St. Brownsville, WI 53006, 920.924.4373 (Address and Telephone).

[NOTE: Insert the name of the company's EEO Officer, Human Resource Administrator, Personnel Officer, or other person designated by company management to coordinate compliance with this policy] He/She is available to consult with employees regarding their obligations under this policy.

IV. RESPONSIBILITY OF SUPERVISORY EMPLOYEES.

Each supervisor is responsible for maintaining the workplace free from sexual harassment. This is accomplished by promoting a professional environment and by dealing with sexual harassment as with all other forms of employee misconduct.

A supervisor must address an observed incident of sexual harassment or a complaint, with seriousness, take prompt action to investigate it, report it, and end it, implement appropriate disciplinary action, and observe strict confidentiality. This also applies to cases where an employee tells the supervisor about behavior that constitutes sexual harassment but does not want to make a formal complaint.

In addition, supervisors must ensure that no **retaliation will result against an employee making a sexual harassment complaint.**

Supervisors in need of information regarding their obligations under this policy or procedures to follow upon receipt of a complaint of sexual harassment should contact Karen Wuest (Name), VP of Human Resources (Title) at 817 W. Main St. Brownsville, WI 53006, 920.924.4373 (Address and telephone). [NOTE: Insert name of company EEO Officer, Human Resource Administrator, Personnel Officer, or other person designated by company management]

V. PROCEDURES FOR FILING A COMPLAINT OF SEXUAL HARASSMENT

A. INTERNAL

An employee who either observes or believes herself/himself to be the object of sexual harassment should deal with the incident(s) as directly and firmly as possible by clearly communicating her/his position to the supervisor, EEO Officer*, and to the offending employee. It is not necessary for the sexual harassment to be directed at the person making the complaint.

Each incident of sexual harassment should be documented or recorded. A note should be made of the date, time, place, what was said or done, and by whom. The documentation may be augmented by written records such as letters, notes, memos, and telephone messages.

No one making a complaint of sexual harassment will be retaliated against even if a complaint made in good faith is not substantiated. Any witness to an incident of sexual harassment is also protected from retaliation.

The process for making a complaint about sexual harassment falls into several stages.

1. DIRECT COMMUNICATION. If there is sexually harassing behavior in the workplace, the harassed employee should directly and clearly express her/his objection that the conduct is unwelcome and request that the offending behavior stop. The initial message may be verbal. If subsequent messages are needed, they should be put in writing in a note or a memo.

2. CONTACT SUPERVISORY PERSONNEL. At the same time direct communication is undertaken, or in the event the employee feels threatened or intimidated by the situation, the problem must be promptly reported to the immediate supervisor or the EEO Officer. If the harasser is the immediate supervisor, the problem should be reported to the next level of supervision of the EEO Officer.

3. FORMAL WRITTEN COMPLAINT. An employee may also report incidents of sexual harassment directly to the EEO Officer. The EEO Officer will counsel the reporting employee and be available to assist with filing a formal complaint. The Company will fully investigate the complaint, and will advise the complainant and the alleged harasser of the results of the investigation.

B. EXTERNAL

The Company hopes that any incident of sexual harassment can be resolved through the internal process outlined above. All employees, however, have the right to file formal charges with the Illinois Department of Human Rights (IDHR), the United States Equal Employment Opportunity Commission (EEOC) and/or the Urbana Human Relations Commission (UHRC). A charge with IDHR must be filed within 180 days of the incident of sexual harassment. A charge with EEOC must be filed within 300 days of the incident. A charge with UHRC must be filed within 90 days of the incident.

Karen Wuest, VP of HR 5/25/16
Name, Title and Date
Authorized Company Official



Recruitment Efforts to Increase Diversity

Michels Corporation engages in numerous recruitment efforts to increase the number of women, minorities, veterans, and those with disabilities. Majority of our outreach is Wisconsin based, as our corporate office is located in Brownsville, WI. Michels is also committed to educating their employees of our recruiting efforts. Communication of such efforts ensures that all employees are aware of Michels' devotion to promoting equal opportunity. Listed below are some specific examples of how we seek to hire diversity in our workplace.

1. Union Relations
 - a. The human resource department notified the union hall of the majority of the field positions that are available. We advise them we are looking to hire qualified women and minorities.

2. Employee Training
 - a. Safety Training
 - i. Annually we hold safety training for each division given to all employees to provide them with specific training related directly to safety on the jobsite, but also additional human resource related topics. These topics include harassment, general overview of our EEO/Affirmative Action policy, and additional topics related to specific divisions.
 - b. Human Resource Staff Training
 - i. Current Human Resource staff members are required to participate in seminars, presentation and other events specifically to further educate on how to increase diversity in the workplace.
 - c. Leadership Meetings
 - i. These meetings provide management employees specific training to continue their growth and education within the company as well as trends in the construction utility industry. There is a specific training program offered that specifically deals with our EEO/Affirmative Action Policy. The Director of Human Resources of Michels Corporation speaks about our recruiting efforts to increase diversity. Management is educated and made aware of the different efforts and the importance of them so they are prepared when they start hiring in the field.

3. Educational Outreach
 - a. Michels attends various continuing education facilities to recruit diverse populations. This includes elementary, middle schools and high schools. We also recruit at technical schools,

colleges and universities. In addition, we offer internship opportunities, both field and office based positions.

4. Organizational Outreach

- a. Forward Service Corporation- TrANS (Transportation Alliance for New Solutions) Program
 - i. Most of our field positions that become available are sent to each district for qualified candidate referrals. Michels participates in on-site interviews upon completion of students graduating. We have taken the initiative to hire graduates on our construction projects.
- b. Urban Leagues
 - i. This program offers assistance to those that are unemployed and underemployed. Our continued partnership is having those potential candidates direct access to applying for our current openings. We partner with Milwaukee, Chicago, and Minneapolis.
- c. WRTP/Big Step
 - i. Assists minorities, women, and youth with training courses in construction or manufacturing where they can be eligible for either an apprenticeship of full time positions upon completion. This is a source we use to attract diverse talent.
- d. Chicago Women in Trades
 - i. Another source Michels uses to attract diverse talent. This program offers women the training and knowledge to obtain careers in construction and manufacturing.
- e. Oneida Nation
 - i. Assists minorities and women with training courses in construction or manufacturing. We have utilized Oneida Nation to help fulfill open positions and actively recruit a diverse talent.
- f. ATS (Associated Training Services)
 - i. ATS is a source Michels uses to attract diverse talent. ATS is a heavy equipment operator training school.

5. Job Boards and Posting of Current Employment Opportunities

- a. Positions are posted within our local Job Center location.
- b. We also utilize CareerBuilder as our main online job posting source. The positions that are posted are automatically posted to certain diversity based websites sponsored by CareerBuilder.
- c. We utilize local job boards at technical schools and universities depending on the positions and the qualifications.

6. Michels Corporation promotes a culture of compliance- one in which all employees understand their responsibility to act ethically and in compliance with the law. This applies to all communication with suppliers, customers, governmental agencies and regulatory firms, competitors, fellow employees and within the communities in which we work and live. We make it a best practice to reach out to the local communities in which we work to also recruit from for our projects.