



C. W. MATTHEWS CONTRACTING CO., INC.

DRAWER 970

MARIETTA, GEORGIA 30061

TELEPHONE (770) 422-7520

FAX (770) 422-1068

January 1, 2015

EEO AND SEXUAL HARASSMENT POLICY

As set forth in C.W. Matthews Contracting Co., Inc.'s Statement of Equal Employment Opportunity (EEO) Policy, the Company maintains a work environment free of inappropriate or unlawful conduct. In keeping with this commitment, the Company will not tolerate harassment, discrimination, or unlawful treatment of employees by anyone, including any supervisor, co-worker, vendor, client or customer of the Company, on the basis of sex, race, color, religion, national origin, age, disability, or other protected class status.

Unwelcome conduct of a sexual nature constitutes sexual harassment, which has been determined to be sex discrimination prohibited by Title VII of the Civil Rights Act of 1964, as amended.

Unwelcome sexual advances, requests for sexual favors and other physical, verbal or visual conduct based on sex constitute sexual harassment when (1) submission to the conduct is an explicit or implicit term or condition of employment; (2) submission to or rejection of the conduct is used as the basis for an employment decision; or (3) the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. Sexual harassment may include explicit sexual propositions, sexual innuendo, suggestive comments, sexually oriented "kidding" or "teasing," "practical jokes," jokes about gender-specific traits, foul or obscene language or gestures, display of foul or obscene printed or visual material, and physical contact, such as patting, pinching or brushing against another's body.

If at any time you feel that you have been subjected to any form of sexual harassment, discrimination, failure to accommodate, or other unlawful conduct, you must report the complaint. You have the option to present your complaint in the manner set forth in our Company Channels for Complaint. If the circumstances are such that you do not wish to follow the Channels for Complaint, the complaint immediately (preferably within 24 hours) should be brought to the attention of Mr. Ray A. Rodriguez, Vice President, Company EEO Officer. You may contact Mr. Rodriguez at (770) 422-7520. If you do not receive a response to your complaint within 3 working days, you are directed to submit your complaint in writing to Mr. Rodriguez at the following address: P.O. Drawer 970, Marietta, Georgia 30061.

Each employee should be aware they have the right to file a charge of discrimination with the Equal Employment Opportunity Commission (EEOC) or other state agency as provided by law. Employees should be aware that applicable federal, state, and local law sets forth deadlines for filing a charge of discrimination with the EEOC or a state agency.

This policy has been established for the benefit of all employees, and no retaliatory action will be taken against any employee for expressing or filing a complaint either through our normal Channels for Complaint, directly to the Company EEO Officer, or the Equal Employment Opportunity Commission (EEOC), for participating in any such complaint brought by another Company employee, or for providing information related to a complaint.

The Company encourages any employee to raise questions he or she may have regarding misconduct of this policy with Ray A. Rodriguez, Division Vice President of Human Resources or a higher-level officer.

C.W. MATTHEWS CONTRACTING CO., INC.

A handwritten signature in blue ink, appearing to read 'Daniel P. Garcia', is written over a horizontal line.

Daniel P. Garcia
President