

T. N. Ward Company has always set its goals for M/WBE and Section 3 firm participation above those established by project owners or governmental agencies. We have constructed numerous projects which have been funded by either the Federal Government, State Agencies, County Agencies, City Agencies, or corporate owners in which various levels of M/WBE and Section 3 participation goals were established. T. N. Ward Company has always strived to surpass these goals. We have been successful for a number of reasons.

We have a reputation of always paying our subcontractors in a timely fashion. Some of our M/WBE and section 3 subcontractor/suppliers are smaller and less established and have cash flow shortfalls, so in certain instances, we have advanced funds necessary or reduced retention, with the owner's agreement, to these subcontractors to help them meet their financial needs.

We take seriously our obligation to fulfill the employment goals for the project. Since the goals of each project vary, we will create project specific Equal Opportunity Plan (EOP) which is distributed to all contractual parties, include in all invitations to bid and is an exhibit to each subcontract and purchase order. We have a multi-faceted approach for meeting these goals which includes contracting and onsite labor participation.

Contracting Participation

Maintenance of List

1. T.N. Ward maintains an active list of over 3,500 subcontractors and suppliers in our SmartBid database including many MWBE and Section 3 contractors with whom we have worked in the past to solicit bids. We will also research additional contractors from the following databases as new companies are coming online daily:
 - a. Pennsylvania State approved list (BMWBO)
 - b. City of Philadelphia OEO list.
 - c. New Jersey State/DPMC approved list.
 - d. Additional state and federal lists as may be appropriate for the project.

Subcontractor Solicitation

1. From these lists, we will select those contractors who are qualified to perform the type of work involved in the project and solicit quotations from each them using our SmartBid invitation system which sends notices via fax and email. This system is directly linked using a single click to our password protected ftp site.
2. We advertise in local newspapers and other periodicals which are monitored by construction subcontractors to apprise all interested firms of our interest in their participation.
3. We will send multiple notices and all addenda to contractors as well as make calls to confirm their interest in bidding.
4. Our bid invitation will clearly identify any goals that have established for the project so that each firm understand both their opportunity and requirements for participation before submitting a bid.

Estimating, Interview and Award

1. We will encourage M/WBE and Section 3 firms to bid and will take the time to review the project's scope with contractors in advance of the bid.

2. In some cases, we will also break the project into smaller prices to enable smaller companies to participate at a level in which they are comfortable.
3. We will also seek to pair smaller, less experienced contractors with more established mentors on projects.
4. All responsible bidders whose price is competitive will be interviewed to determine the bidder's level of understanding of the project. The low responsible bidder will be awarded the project.
5. Each subcontract and purchase order will have an EOP exhibit to the contract which established the goals for the project; in addition, we write each contractor's total commitments towards that goal into their contract.

Onsite Labor Participation

The TN Ward team views the relationship between the owner and its surrounding community as of vital interest. We understand that the community is integral both to the project and to the owner's mission. This project represents an opportunity for the promotion of the employment of community residents as well as minority and women workers and the development of their skills. Our plan to achieve meaningful participation for onsite labor in accordance with Section 3 specifications' is as follows:

1. We will contact all trade unions associated with this project and request their assistance with obtaining lists of people in the surrounding community. We will direct candidates to the appropriate local union so that they may begin the process of obtaining entry into the training program. TN Ward Company in cooperation with the trade unions will provide job related qualification descriptions and distribute applications to new hires.
2. In addition, we will contact any agencies and groups engaged in the promotion of community resident workers.
3. We will require from each of our subcontractors that they obtain community Section 3 resident workers, minorities, or women for their workforce. Furthermore, we will monitor our subcontractors on a daily and weekly basis and notify them if they are not in compliance immediately so that they might take remedial action quickly to correct deficiencies..
4. We will cooperate in surveys and studies required to monitor our performance with regard the compliance with obtaining such participation.
5. If required, we will submit certified payrolls on a weekly basis evidencing worker participation and provide monthly reports of workers' hours as it relates to total hours worked on the contract including all subcontracts under each trade.

This effort will be supplemented through a variety of communication measures including the following:

1. Job advertisements
2. Job signage at the site
3. Town meetings in the community
4. Union halls
5. Language in Subcontracts
6. Sponsoring apprentices (both TN Ward and its subcontractors)
7. Meeting with local leaders

By utilizing such a comprehensive effort, TN Ward will be able to maximize the minority, woman, and Section 3 community resident participation on the project.

Policy on Nondiscrimination in Employment and Hiring

TN Ward Company takes seriously our approach to nondiscrimination, equal employment opportunity, and harassment prevention. The TN Ward Company Employee Handbook – which was written and approved by senior management and implemented on a daily basis by all managers – addresses these issues multiple times. In fact, the Company Philosophy that is addressed early in that handbook, references three primary components, thus emphasizing their critical nature:

1. Open-Door Policy
2. Equal Employment Opportunity
3. Harassment Policy

The company's Open Door Policy reflects the company's commitment to open communications, emphasizing that all employees "have the right and are encouraged to speak freely with management about their job-related concerns." These concerns relate from day-to-day project issues to more serious concerns such as harassment.

Additionally, it is the policy of TN Ward to provide equal employment opportunity to "all employees and applicants for employment and not to discriminate on any basis prohibited by law, including race, color, sex, age, religion, national origin, disability, marital status, or veteran status". Moreover, "it is our intent and desire that equal employment opportunities will be provided in employment, recruitment, selection, compensation, benefits, promotion, demotion, layoff, termination, and all other terms and conditions of employment". At TN Ward, employees are directed to bring any violation of this policy to the immediate attention of their supervisor or the company president.

TN Ward's Harassment Policy is consistent with our policy of Equal Employment Opportunity. Specifically, "harassment in the workplace based on a person's race, color, sex (or marital status), religion, national origin, age, veteran status, political affiliation or disability (including height and weight), will not be tolerated".

The Harassment Policy specifically covers two aspects. First, is that "intimidation, hostility, or other offenses which might interfere with work performance or our customers, their employees work performance or their clientele's comfort and respect". The second is a "clarification of the prohibition of any form of sexual harassment in the workplace". A detailed description of the type of conduct that is prohibited as well as the complaint provisions to investigate and remedy any problems that may arise are included as well. All employees are not only made aware of these aspects prior to and upon hiring but are also reminded repeatedly of these policies and processes throughout their employment.