DALE CORPORATION

Building on Our Foundation of Quality and Integrity

Since 1959

MINORITY PARTICIPATION EXPERIENCE

Experience with Minority/Women Owned Business and Local Hiring

For more than two decades, Dale Corp has committed its long term business strategy to working side by side with the communities in which we build. With a focus on local employment and development of community based contractors Dale Corp has been able to enhance community development during the construction process by leaving precious dollars in the local economy.

Our company is proud of its commitment to hiring MBE and WBE contractors. We've developed long term relationships with many MBE & WBE contractors, and those relationships flourish thanks to the MBE & WBE contractor's ability to meet and exceed our rigorous standards. Our track record of performance in meeting these goals is unsurpassed.

Dale Corp's MBE, WBE, & Section 3 Compliance Record
(for projects requiring reporting)

Project Name	Client	Contract Sum	Sec 3 Business		MBE		WBE	
			Amount	Percentage	Amount	Percentage	Amount	Percentage
Gray's Ferry Office Build	Philadelphia Housing Authority	$11,816,868	$1,910,869	16%	$4,384,464	37%	$686,109	6%
Marshall Shepard Village	Philadelphia Housing Authority	$19,417,789	$5,963,724	31%	$6,759,085	35%	$794,319	4%
Nellie Reynolds Apartmt	Philadelphia Housing Authority	$23,840,119	$5,845,212	25%	$8,875,203	37%	$2,053,415	9%
Passyunk Office Building	Philadelphia Housing Authority	$1,953,096	$311,656	16%	$947,699	49%	$98,837	5%
Plymouth Hall Apartmen	Philadelphia Housing Authority	$14,447,276	$4,260,366	29%	$6,176,706	43%	$836,848	6%
Scattered Site Moderniz	Philadelphia Housing Authority	$1,468,148	$584,703	40%	$769,718	52%	$0	0%
Energy Efficiency Moder	Philadelphia Housing Authority	$11,712,459	$3,468,798	30%	$3,481,846	30%	$0	0%
Fire/ Smoke Damaged U	Philadelphia Housing Authority	$765,757	$435,243	57%	$473,043	62%	$0	0%
Spring Garden Revitaliza	Michaels Development	$14,234,056	$2,733,622	19%	$3,963,102	28%	$0	0%
Cecil B. Moore Phase II	OOKS / Michaels Development	$14,393,851	$5,489,677	38%	$4,320,403	30%	$9,405	0%
Cecil B. Moore Phase III	OOKS / Michaels Development	$9,176,069	$3,221,149	35%	$2,416,278	26%	$957	0%
UFAS Category 1 Compli	Philadelphia Housing Authority	$28,710,898	$8,787,896	31%	$8,214,865	29%	$420,861	1%
Branch Village Communi	Michaels Development	$821,800	$178,000	22%	$170,000	21%	$8,000	1%
Totals		$152,758,186	$43,190,915	28%	$50,952,412	33%	$4,908,751	3%

Our track record today meets or exceeds these parameters as we continue to focus on our MBE/WBE performance in everything that we do.

Note: Dale Achieves and provides a minimum of 30% minority work force goal on all of our projects.

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AFFIRMATIVE ACTION

Acknowledgement of the Policies of the Philadelphia Housing Authority and the City of Philadelphia: DALE CORP seeks to ensure the maximum feasible participation of all of society in the performance of tasks associated with Liberty Housing Development Corporation's Solicitation to provide Construction Services for the **LIBERTY 52 DEVELOPMENT**. DALE CORP acknowledges the policies of the Philadelphia Housing Authority and the City of Philadelphia to set best effort goals for soliciting and utilizing the services of M/W/DSBE businesses.

Dale Corporation's Affirmative Action Policy: DALE CORP will recruit, employ, place, train and promote members of minority, female, handicapped, veterans, disabled veterans of Vietnam Era, and all groups consistent with the affirmative action policy. Our actions should not be limited to areas affected by our government contracts, but should encompass the entire applicable scope of our operations. Our overall goal is to attain a proportion of minority employees matching the composition of the civilian work force in the respective geographical area where we are located. This objective relates both to the number of minority employees and to their distribution within organizational levels and each broad job category appropriate to the minority population. The employment figures for this goal will vary with the types of jobs offered the recruitment sources, and other pertinent factors such as transportation and housing.

From the standpoint of the available work force, women constitute a minority group. This should be recognized on goal setting for the hiring and promotion process.

Policy

We shall always seek and employ the best-qualified personnel and provide equal employment opportunities for all personnel. We will administer and implement this policy in a manner that will not discriminate against any person because of race, color, religion, sex, or national origin, and will always take positive action to insure the fulfillment of this policy.

Dissemination

The policy will be disseminated within the Corporation as follows:
All employees will be advised of this policy through Corporation communications. The policy and its implementation will be a subject of management meetings, making our position in this matter clear to all management personnel. Recognized collective bargaining representatives of corporate employees will be met with and informed of the policy and their cooperation will be demanded. Nondiscrimination clauses will be include in all agreements with collective bargaining representatives of Corporate employees, and all contractual provision will be reviewed to insure that they are nondiscriminatory.

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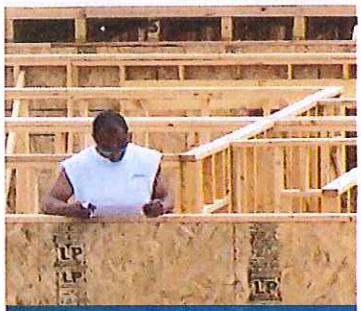

Responsibility for Implementation of Policy

The President and/or Area Manager are responsible for initiating, administering, and controlling activities necessary to ensure full implementation of the Policy and its commitment to affirmative action to ensure such fulfillment. The President and/or Area Manager are responsible for the affirmative implementation of the Policy and Program.

The President and/or Area Manager shall provide the coordination of the policy and will provide guidance in the resolution of the problems that may arise.

All other members of management having administrative or directional authority shall conduct their day-to-day activities, particularly personnel activities, in a manner to ensure compliance with the Corporate Policy and Affirmative Action Program.

Employment

The Corporation recruits on the basis of qualification and without regard to race, color, religion, sex, or national origin. The Corporation will advise its recruiting sources of the Corporate Nondiscrimination Policy and its commitment to equal employment opportunity.

Employee Benefit and Status

All Corporate employee benefits and compensation programs are administered without regard to race, color, religion, sex, or national origin.

Contact Persons:

Jay D. Ferraro
Vice President of Operations
DALE CORP
70 Limekiln Pike
Glenside, PA 19038

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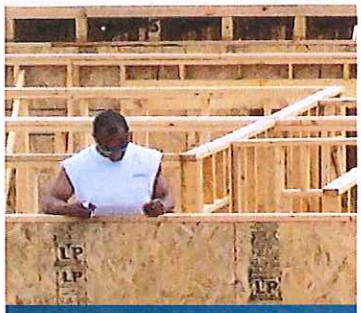

Affirmative Action Implementation Strategy

DALE CORP is committed to encouraging fair and non-discriminatory business employment practices, and to expanding employment opportunities for qualified minority, women and disadvantaged owned business enterprises.

Construction

DALE CORP has set the following goals:

M/W/DSBE's participation goals, expressed in percentage terms for the Contractor's aggregate workforce in each trade on all construction work in the area, are 18%, 7% and 2% respectively.

Business Utilization Goals for the hiring of subcontractors and the use of material suppliers are as follows:

MBE	18%
WBE	7%
DSBE	2%

Outreach and Implementation Strategy

DALE CORP will take the following steps to promote and implement its Economic Opportunity Plan:

- Inform all contractors and subcontractors of their respective obligation relating to the goals of minority, women and disadvantaged employment and training.
- Request that contractors and subcontractors seek trade persons through the local hiring halls, National Job Corps Association, Job Centers and other identified clearinghouses for disadvantaged job seekers.
- DALE CORP or its General Contractor will utilize a list of M/W/DSBE contractors certified by any, and all acceptable entities to the Philadelphia Housing Authority and the City of Philadelphia. The names, addresses, telephone numbers, and contact persons of those firms notified will be provided to the Philadelphia Housing Authority and the City of Philadelphia. Each firm exhibiting interest in bidding the project will be provided with complete information about the plans, specifications and requirements of the contract.
- DALE CORP or its General Contractor will utilize a list of M/W/DSBE contractors used on previous DALE CORP development projects. The names, addresses, telephone numbers, and contact persons of those firms notified will be provided to the Philadelphia Housing Authority and the City of Philadelphia . Each firm exhibiting interest in bidding the project will be provided with complete information about the plans, specifications and requirements of the contract.

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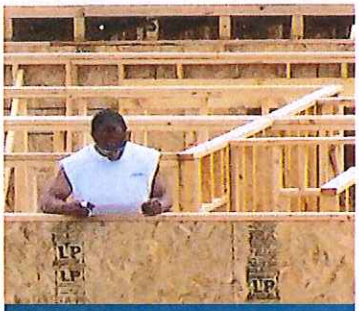

- DALE CORP will utilize the National Association of Minority Contractors national database to identify local and regional minority contractors.
- Should the stated goals for M/W/DSBE participation not be met through the above listed means, DALE CORP will advertise in selected general circulation, media, trade association publications, and minority/women-focused media concerning subcontracting and supplier opportunities. Exact publications and media will be determined based on the type and location of the specific project.
- Upon contract award, DALE CORP will provide the Philadelphia Housing Authority and the City of Philadelphia with a Schedule for Participation by M/W/DSBEs. This Schedule shall serve as a binding commitment and contain:
    1. The names and addresses of M/W/DSBEs that will participate in the contract, identifying for each such business whether it is a minority, women or disadvantaged owned business;
    2. A description of the work to be performed by each named M/W/DSBE.
    3. The dollar amount of participation reflected by the quotation provided to the contractor by each named M/W/DSBE.
- Upon contract award, DALE CORP will provide the Philadelphia Housing Authority and the City of Philadelphia with a list of M/W/DSBE firms solicited. Included information will be the date of solicitation, contact person's name, method of contact (phone, fax, mail, etc.), and quote received from the firm.
- DALE CORP will make best efforts to negotiate a reasonable bid with certified M/W/DSBEs. All such contacts will be fully documented.

IF ANY ASPECT OF THIS PLAN CONFLICTS WITH APPLICABLE LAWS OR REGULATIONS THEN THE GOVERNING LAW OR REGULATION SHALL TAKE PRECEDENCE. IN ADDITION, DUE TO THE ONGOING DEVELOPMENT OF THIS PROGRAM, DALE CORP. RESERVES THE RIGHT TO MAKE CHANGES IN ANY OF THE SAID PROCESSES OR PROCEDURES AS DEEMED NECESSARY FOR THE BENEFIT OF THE STATED GOALS AND/OR DALE CORP.

END OF AFFIRMATIVE ACTION

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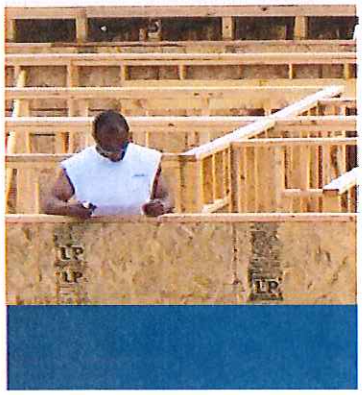

SECTION 3

Acknowledgement of the Policies of the Philadelphia Housing Authority: The DALE CORP seeks to ensure Section 3 participation to the fullest extent feasible of all of society in the performance of tasks associated with Liberty Housing Development Corporation's Solicitation to provide Construction Services for the LIBERTY 52 DEVELOPMENT. The DALE CORP acknowledges the policy of the Philadelphia Housing Authority to set new hire best effort goals for soliciting and utilizing the services.

Dale Corporation's Section 3 Policy: In the event of new hires, DALE CORP will make best efforts to provide training and employment opportunities to Section 3 residents, particularly PHA professionally trained resident roster and HUD equal opportunity and labor requirements including Executive Order 11236 and the sections on Affirmative Action and Section Three Program in the Request for Proposals. With respect to the Section 3 of the HUD Action of 1968, to the greatest extent feasible, the project team will:

- Provide opportunities for training and employment to lower-income persons (as defined by HUD) residing in the approved area of each development.
- Award contracts to business concerns, which are located in or owned in substantial part by persons residing in the area of the development.
- in the following order of priority:
    1. Residents (selected from a qualified pool) of the PHA housing development or developments for which the Section 3 covered assistance is expected (category 1 residents).
    2. Residents (selected from a qualified pool) of other housing developments managed by PHA that is expending the Section 3 covered housing assistance, including recipients of certificates or vouchers under the Section 8 housing assistance program (category 2 residents).
    3. Participants in HUD Youthbuild programs being carried our in Philadelphia (category 3 residents).
    4. Other Section 3 residents in the City of Philadelphia.

    Note: Any Section 3 resident seeking preference in job training or employment must provide proof of their Section 3 status to the contractor.
- The DALE CORP will make best efforts to provide contracting and subcontracting opportunities to Section 3 business concerns in the following order of priority:
    1. Business concerns that are 51 percent or more owned by residents of the housing development or developments for which the Section 3 covered assistance is expended, or whose full-time, permanent workforce includes 30 percent of these persons as employees (category 1 business).

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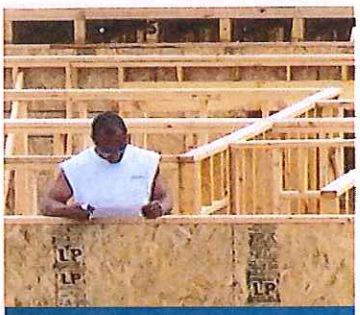

SECTION 3

2. Business concerns that are 51 percent or more owned by residents of other PHA housing developments or developments managed by PHA or whose full- time. Permanent workforce includes 30 percent of these persons as employees (category 2 business).
3. HUD Youthbuild programs being carried out in the Philadelphia area (category 3 business).
4. Business concerns that are 51 percent or more owned by Section 3 residents, or whose permanent, full-time workforce includes no less than 30 percent Section 3 residents (category 4 business), or that subcontract in excess of 25 percent of the total amount of subcontracts to business concerns identified in items number 1 and 2 above.

NOTE: Any Section 3 business concern seeking preference for contracts or subcontracts must provide proof of their Section 3 status to the DALE CORP.

- DALE CORP may solicit Section 3 residents by any or all of the below listed methods:
  1. Advertising the training and employment positions by distributing flyers to occupied dwelling units in the PHA development or developments where category 1 and category 2 residents reside, as well as posting flyers in other housing developments located within the Section 3 compliance area.
  2. Contacting resident councils, resident management corporations, or other resident organizations, where they exist, in the PHA housing development or developments where category 1 and category 2 residents reside, and community organizations in HUD-assisted neighborhoods.
  3. If necessary, sponsoring site specific "job fairs" and accepting applications and conducting interviews at the job site for potential new hires.
  4. Contacting agencies administering HUD Youthbuild and/or other training programs, and requesting their assistance in recruiting HUD Youthbuild and other training program participants for employment positions.
  5. Advertising the jobs to be filled through the local media. Exact publications and media will be determined based on the type and location of the specific project.

  NOTE: Where there are more qualified applicants than positions available, the contractor will maintain a list of eligible Section 3 residents for possible future employment positions.

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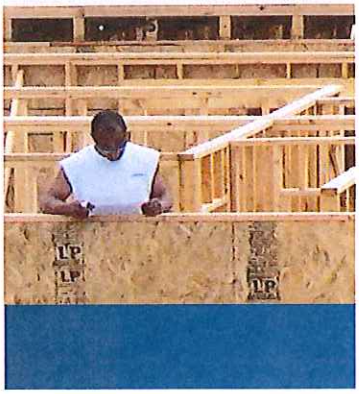

SECTION 3

- DALE CORP may solicit Section 3 business concerns by any or all of the below listed methods:
    1. Contacting business assistance agencies, minority contractor associations and community organizations to inform them of contracting opportunities and requesting their assistance in identifying Section 3 businesses.
    2. Advertising contracting opportunities by posting notices in the common areas of housing developments owned or operated by the PHA.
    3. Providing written notice to all known Section 3 business concerns of contracting opportunities pertinent to their business.
    4. Advertising the contracting opportunities available through the local media. Exact publications and media will be determined based on the type and location of the specific project.

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END OF SECTION 3