

**Policy Statement-Equal Employment Opportunity for Individuals with
Disabilities and Protected Veterans**

It is the policy of Tarlton Corporation ("Tarlton") not to discriminate against any employee or applicant for employment because he or she is an individual with a disability or a protected veteran, (i.e., disabled veteran, Armed Forces service medal veteran, recently separated veteran, or other veteran who served during a war, or any campaign or expedition for which a campaign badge has been authorized). It is also the policy of Tarlton to take affirmative action to employee and to advance in employment, all persons regardless of their status as individuals with disabilities or protected veterans, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation and selection for training, including apprenticeship, at all levels of employment.

Employees and applicants of Tarlton will not be subject to harassment on the basis of disability or status as a protected veteran. Additionally, retaliation, including intimidation, threats, or coercion, because an employee or applicant has objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing or otherwise sought to obtain their legal rights under any federal, state or local EEO law regarding individuals with disabilities or protected veterans is prohibited.

As President of Tarlton, I am committed to the principals of Affirmative Action and Equal Employment Opportunity. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company, I have selected the Human Resources Manager as the Equal Employment Opportunity ("EEO") manager for Tarlton. One of the Human Resources Manager duties will be to establish and maintain an internal audit and reporting system to allow for affective measurement of Tarlton's programs.

In furtherance of Tarlton's policy regarding Affirmative Action and Equal Employment Opportunity, Tarlton has developed a written Affirmative Action Program, which sets forth the policies, practices and procedures that Tarlton is committed to in order to ensure that its policy of non-discrimination and affirmative action for qualified individuals with disabilities and qualified, protected veterans is accomplished. This Affirmative Action Program is available for inspection by any employee or applicant for employment upon request, during normal business hours, in the Human Resources Department. Interested persons should contact the Human Resources Manager at (314) 633-3320 for assistance.

Tracy Elsperman Hart
Tarlton Corporation

Review of Personnel Processes

Tarlton reviews annually its personnel processes to determine whether its present procedures assure careful, thorough and systematic consideration of the qualifications of known individuals with disabilities and protected veterans. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as all training opportunities offered or made available to employees.

In determining the qualifications of veterans, Tarlton limits its consideration of a protected veteran's military record, including discharge papers, to only that portion of the record, which is relevant to the specific job qualifications for which the veteran is being considered.

Based upon Tarlton's review of its personnel processes, Tarlton will modify the personnel processes when necessary, and will include the development of new procedures in this Affirmative Action Program to ensure equal employment opportunity. To date, no modifications have been necessary.

Review of Physical and Mental Job Qualification Standards

The physical and mental job qualifications of all jobs are reviewed annually to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities and qualified disabled veterans, job qualifications are consistent with business necessity and the safe performance of the job.

No qualification requirements were identified that are likely to have a screening effect. All job qualification requirements were found to be job related and consistent with business necessity and safety.

Tarlton will continue to review physical and mental job qualification requirements whenever a job is vacated and the company intends to fill it through either hiring or promotion and will conduct a qualifications review whenever job duties change.

Pre-employment physical examinations and/or questionnaires are not typically used in Tarlton's hiring process.

If at any time in the future Tarlton should inquire into an employee's physical or mental condition, or should conduct a medical examination, Tarlton affirms that such inquiries or exams will be conducted in accordance with the Section 503 regulations and that obtained as the result of the inquiry or exam will be kept confidential, except as otherwise provided for in the Section 503 regulations. The results of the examination or inquiry will only be used in accordance with the Section 503 regulations.

Reasonable Accommodation to Limitations Due to Disability

Tarlton commits to making reasonable accommodation to known physical or mental limitations of qualified individuals with disabilities and qualified disabled veterans, unless such accommodation would impose an undue hardship on the conduct of its business. Tarlton also commits to engaging in an interactive process with the person requesting the accommodation (or their representative), as needed, to determine an appropriate accommodation. Undue hardship will be determined by assessing whether the requested accommodation would cause significant difficulty or expense, as provided for in the Section 503 regulations.

Harassment Prevention and Prohibition Against Retaliation

Employees and applicants of Tarlton will not be subject to harassment because of disability or their status as a protected veteran. If an employee or applicant believes that he/she has been subject to harassment, he/she may file a complaint with the Human Resources Manager's office. Any employee or applicant that believes that he/she has been subject to harassment because of his/her disability or status as a protected veteran should promptly contact a manager in his/her chain of command, or promptly contact the Human Resources Manager at (314) 633-3320 for assistance.

Retaliation, including intimidation, threat, or coercion, against any employee or applicant because they have objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing or have otherwise sought to obtain their legal rights under any federal, state, or local EEO Law regarding individuals with disabilities or protected veterans is prohibited. Any employee or applicant who believes that they have been subject to retaliation because of their disability or status as a protected veteran should contact the Human Resources Manager at (314) 633-3320 for assistance.

This policy is communicated to all employees and supervisors annually and a notice is posted in the Human Resources Department's office.

External Dissemination of Policy, Outreach and Positive Recruitment

All subcontractors, vendors and suppliers have been sent written notification of Tarlton's Equal Employment Opportunity and Affirmative Action Policy regarding the employment of qualified individuals with disabilities and qualified protected veterans. All recruiting sources, including state employment agencies, educational institutions and social service agencies have been informed of the company's policy concerning the employment of qualified individuals with disabilities and qualified protected veterans and have been advised to actively recruit and refer qualified persons for job opportunities.

Tarlton lists all suitable employment openings with the appropriate employment service delivery system when the openings occur and maintains regular contact with the local Veteran's Employment Representative. A copy of Tarlton's Affirmative Action Policy for qualified individuals with disabilities and qualified protected veterans is provided to the state employment service annually.

Formal briefing sessions are held with representatives from recruitment sources and placement agencies, which may include facility tours, discussion of current and prospective position openings, job descriptions and required qualifications and explanations of Tarlton's selection procedures. Formal arrangements have been made to ensure that each recruitment source is provided with timely notice of job opportunities to ensure that recruitment sources have an opportunity to refer qualified candidates.

Tarlton participates in local job fairs sponsored by support groups for individuals with disabilities and veterans.

The equal employment opportunity clause concerning the employment of qualified individuals with disabilities and qualified protected veterans are included in all nonexempt subcontracts and purchase orders.

Internal Dissemination of Policy

Copies of our affirmative action programs will be made available for inspection to any employee or applicant upon request to promote understanding, acceptance and support. Policies are re-emphasized to managers and supervisors annually.

Tarlton's Affirmative Action Policy and the EEO posters are posted on bulletin boards located throughout our facilities and office work areas.

All applicants have been invited to identify themselves as an individual with a disability, as defined in Section 503 of the Rehabilitation Act of 1973, as amended, and/or as a protected veteran under the equal employment opportunity provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, if they wish to benefit under this affirmative action program. Such invitation has been posted on bulletin boards throughout the facility and work areas. Employees may self-identify at any time.

All employees are advised annually of Tarlton's policy and are encouraged to aid in Tarlton's affirmative action efforts to ensure a fair and effective program.

Briefing sessions are conducted annually for managers and supervisors to review the applicable regulations and to discuss such affirmative action measures as training and reasonable accommodation.

When making internal Equal Opportunity audits, implementation of this Affirmative Action Program will be reviewed.

This facility's Human Resources Manager has attended state sponsored workshops, which stressed the use of vocational rehabilitation agencies in hiring qualified individuals with disabilities and qualified disabled veterans and the provision of reasonable accommodation.

Articles (and pictures) regarding accomplishments of employees who are individuals with disabilities and protected veterans shall be included in company and/or facility publications.

At least once a year the policy is distributed to all employees.

Audit and Reporting Systems

The Human Resources Manager has the responsibility for developing and preparing the formal documents of the AAP. The Human Resources Manager is responsible for the effective implementation of the AAP; however, responsibility is likewise vested with each department manager and supervisor. Tarlton's audit and reporting system is designed to:

- Measure the effectiveness of the APP/EEO Program;
- Document personnel activities;
- Identify problem areas for remedial action as needed; and
- Determine the degree at which Tarlton's AAP goals and objectives have been obtained.

The following activities are reviewed at least annually to ensure freedom from discrimination or stereo typing of individuals with disabilities and protected veterans in any manner, including that which may limit their access to any job for which they are qualified:

- Recruitment, advertising, and job application procedures;
- Hiring, promotion, upgrading, layoff, recall from layoff;
- Rates of pay and any other forms of compensation applicable, including fringe benefits;
- Job assignments, job classifications, job descriptions, and seniority lists;
- Sick leave, leaves of absence, or any other leave;
- Training, apprenticeships, attendance at professional meetings and conferences; and
- Any other term, condition or privilege of employment.

Tarlton's audit system includes a quarterly report documenting Tarlton's efforts to comply with its EEO/AAP responsibilities. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. If problem areas arise, the manager or supervisor is to report problem areas immediately to the Human Resources Manager. During quarterly reporting the following occurs:

1. The Human Resources Manager will discuss any problems related to significant rejection ratios, EEO charges, etc., with the President; and
2. The Human Resources Manager will report the status of Tarlton's AAP goals and objectives to the President. The Human Resources Manager will recommend remedial actions for the effective implementation of the AAP.

Responsibility for Implementation of AAP

Responsibilities of the Equal Employment Opportunity Manager

In furtherance of Tarlton's commitment to Affirmative Action and Equal Employment Opportunity for individuals with disabilities and protected veterans, the Human Resources Manager has the responsibility for designing and ensuring effective implementation of Tarlton's AAP. These responsibilities include but are not limited to:

1. The development of the APP for individuals with disabilities and protected veterans, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
2. Reviewing all personnel actions, policies and procedures to ensure compliance with Tarlton's affirmative action obligation;
3. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a non-discriminatory manor when hiring, promotion, transfer and termination actions occur;
4. Assisting in the identification of problem areas and the development of solutions to those problems;
5. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit and reporting system that measures the effectiveness of the program;
6. Keeping the President of Tarlton informed of equal opportunity progress and problems within the company through quarterly reports;
7. Providing appropriate managers with a copy of the Affirmative Action Program for Qualified Individuals with Disabilities and Qualified Protected Veterans and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
8. Reviewing the company's AAP for individuals with disabilities and protected veterans with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
9. Auditing the contents of company bulletin boards annually to ensure that compliance information is posted and is up to date;
10. Serving as liaison between Tarlton and enforcement agencies; and

11. Serving as liaison between Tarlton and organizations for individuals with disabilities and protected veterans.

Responsibilities of Managers and Supervisors

Managers and supervisors are advised annually of their responsibilities under Tarlton's AAP for individuals with disabilities and protected veterans and of their obligations to:

1. Review the company's Affirmative Action policy for individuals with disabilities and protected veterans with subordinate managers and supervisors to ensure that they are aware of the policy and understand their obligation to comply with it in all personnel actions;
2. Assist in the identification and problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
3. Review the qualifications of all applicants and employees to ensure qualified individuals are treated in a non-discriminatory manor when hire, promotion, transfer and termination actions occur; and
4. Review all employees' performance to ensure that non-discrimination is adhered to in all personnel activities.

Training to Ensure AAP Implementations

Training is provided to all personnel involved in the recruitment, screening, hiring, promotion, disciplinary and related employment processes to ensure that the commitments made in Tarlton's AAP are implemented. Training sessions are held annually.

Invitation to Self-Identify for Protected Veterans

Tarlton Corporation ("Tarlton") is a Government contractor subject to the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, (VEVRAA), which requires Government contractors to take affirmative action to employ and advance veterans in employment. VEVRAA prohibits discrimination and requires affirmative action in all personnel practices regarding protected veterans. The statute covers disabled veterans, Armed Forces service medal veterans, recently separated veterans, and other veterans who served during a war, or in a campaign or expedition for which a campaign badge has been authorized.

If you are a disabled veteran, recently separated veteran, or other protected veteran, or Armed Forces service medal veteran, we would like to include you under our affirmative action program. If you would like to be included under the affirmative action program, please tell us. The term "recently separated veteran" refers to any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty. The term "other protected veteran" refers to a person who served on active duty during a war or in a campaign or expedition for which a campaign badge has been authorized, under laws administered by the Department of Defense. The term "Armed Forces service medal veteran" refers to any person who, while serving on active duty in the Armed Forces, participated in a United States military operation for which an Armed Forces services medal was awarded under Executive Order 12985 (62 FR 1209).

You may inform us of your desire to benefit under the program at this time and/or at any time in the future.

Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are not inconsistent with the Vietnam Veterans' Readjustment Assistance Act of 1974, as amended.

The information you submit will be kept confidential, except that (i) supervisors and managers may be informed regarding restrictions on the work or duties of disabled veterans, and regarding necessary accommodations; (ii) first aid and safety personnel may be informed, when and to the extent appropriate, if you have a condition that might require emergency treatment; and (iii) Government officials engaged in enforcing laws administered by OFCCP, or enforcing the Americans with Disabilities Act, as amended, may be informed.

A written copy of this Affirmative Action Program is available for inspection by any employee or applicant for employment, during normal business hours, in the Human Resources Department. Interested persons should contact Angela M. Lovatto, Human Resources Manager at (314) 633-3320 for assistance.

If you are a disabled veteran it would assist us if you tell us about (i) any special methods, skills and procedures that qualify you for positions that you might not otherwise be able to do because of your disability so that you will be considered for any positions of that kind, and (ii) any reasonable accommodations we could make that would enable you to perform the job, including special equipment, changes in the physical layout of the job, elimination of certain

duties relating to the job, provision of personal assistance services or other accommodations. This information will assist us in placing you in an appropriate position and in making accommodations for your disability.

Invitation to Self-Identify for Individuals With Disabilities

Tarlton is a Government contractor subject to Section 503 of the Rehabilitation Act of 1973, as amended, which requires Government contractors to take affirmative action to employ an advance in employment qualified individuals with disabilities.

If you have a disability and would like to be considered under the affirmative action program, please tell us.

You may inform us of your desire to benefit under the program at this time and/or at any time in the future. This information will assist us in placing you in an appropriate position and in making any necessary accommodations for your disability.

Submission if this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are not inconsistent with Section 403 of the Rehabilitation Act.

Information you submit about your disability will be kept confidential, except that (i) supervisors and managers may be informed regarding restrictions on the work or duties of qualified individuals with disabilities and regarding necessary accommodations; (ii) first aid and safety personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment; and (iii) government officials engaged in enforcing laws administered by OFCCP or the Americans with Disabilities Act, as amended, may be informed.

If you are a qualified individual with a disability, we would like to include you under the affirmative action program. It would assist us if you tell us about (i) any special methods, skills, and procedures that qualify you for positions that you might not otherwise be able to do because of your disability so that you will be considered for any positions of that kind, and (ii) any needed accommodations that would enable you to perform the essential functions of the job, including special equipment, changes in the physical layout of the job, elimination of marginal job duties, provision of personal assistance services or other accommodations.

A written copy of this Affirmative Action Program is available for inspection by any employee or applicant for employment, during normal business hours, in the Human Resources Department. Interested persons should contact the Human Resources Manager at (314) 633-3320 for assistance.

