

EQUAL EMPLOYMENT OPPORTUNITY STATEMENT

Statewide Traffic Signal Company provides equal employment opportunities (EEO) to all employees and applicants, where employment is based upon personal capabilities and qualifications, without regards to race, color, religion, sex, sexual orientation, gender, gender identity, national origin, age disability and any other protected status in accordance with applicable federal, state and local laws. Statewide Traffic Signal Company complies with all applicable laws governing nondiscrimination employment. This policy applies to all terms and conditions of employment, including placement, promotion, termination, layoff, recall, transfers, leave of absence, compensation and training.

Statewide Traffic Signal Company expressly prohibits any form of unlawful employee harassment based on race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, or any other protected status. Improper behavior demonstrated with the ability of Statewide Traffic Signal Company's employees to perform their expected job duties is absolutely prohibited and will not be tolerated.

ANTI-HARASSMENT POLICY AND COMPLAINT PROCEDURE

Statewide Traffic Signal Company is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in an atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, Statewide Traffic Signal Company expects that all relationships among employees will be business-like and free of bias, prejudice or harassment.

It is the policy of Statewide Traffic Signal Company to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, gender, gender identity, sex, sexual orientation, national origin, age, disability and any other protected status. Statewide Traffic Signal Company prohibits any such discrimination or harassment.

Statewide Traffic Signal Company encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Statewide Traffic Signal Company to promptly and thoroughly investigate such reports. Statewide Traffic Signal Company prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

DEFINITIONS OF HARASSMENT:

Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purpose of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example (i) submission to such conduct is made either explicitly or implicitly as term or condition of an individual's employment; (ii) submission to or rejection of such conduct by an individual is used as a basis for employment decision affecting such individual or (iii) such 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 a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances, or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, gender, gender identity, sex, sexual orientation, national origin, age, disability, or any other characteristic protected by law or that of his/her relatives, friends or associates, and that a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; b) has the purpose or effect of unreasonably interfering with an individual's work performance; or c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, or intimidating or hostile acts; denigrating jokes, and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment via email, phone (including voice messages), text messages, tweets, blogs, social networking sites or other means.

These policies apply to all applicants and employees, whether related to conduct engaged in by fellow employees or someone not directly connected to Statewide Traffic Signal Company such as an outside vendor, consultant, or customer.

Conduct prohibited by these policies is unacceptable in this workplace and in any other work-related setting outside the workplace, such as a business trip, business meeting and/or any business-related social event.

COMPLAINT PROCESS

Individuals who believe they have been the victims of conduct prohibited by this policy statement or who believe they have witnessed such conduct should discuss their concerns with their immediate supervisor.

When possible, Statewide Traffic Signal Company encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem,

however, Statewide Traffic Signal Company recognizes that an individual may prefer to pursue the matter through complaint procedures.

Statewide Traffic Signal Company encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. Therefore, although no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed. Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately.

If a party to a complaint does not agree with its resolution, that party may appeal to Statewide Traffic Signal Company's EEO Officer or the President.

False or malicious complaints of harassment, discrimination or retaliation may be the subject of appropriate disciplinary action.

AMERICANS with DISABILITIES ACT (ADA) and the ADA AMENDMENTS ACT (ADAAA)

The Americans with Disabilities Act (ADA) and the Americans with Disabilities Amendments Act known as the ADAAA, are federal laws that prohibit employers with 15 or more employees from discriminating against applicants and individuals with disabilities and that when needed provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is the policy of Statewide Traffic Signal Company to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is our company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment.

The company will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to Statewide Traffic Signal Company. Contact the office with any questions or requests for accommodations.

Any questions, complaints or concerns regarding Statewide Traffic Signal Company's Equal Employment Opportunity (EEO) Policy should be directed to our EEO Officer, Joseph G. Spanos at 713-680-2875.