



SIMON CONTRACTORS EQUAL OPPORTUNITY POLICY

1. EQUAL OPPORTUNITY POLICY STATEMENT

It is the policy and employment practices of SIMON CONTRACTORS that there will be no discrimination on the basis of race, religion, sex, color, national origin, age, disability or any other class protected by law in the recruiting of applicants for employment. Further, there will be no discrimination in the hiring, promotion, upgrading, transfer, discharge, layoff, recall, training, or retaining under programs to which the company subscribes, compensation, terms and conditions of employment or privileges of employment by reason of an individual's race, religion, sex, color, national origin, age, disability or any other class protected by law. Further, this company will take affirmative action to seek out qualified females and minority group members and provide an opportunity for females and minority group workers to become qualified for employment advancement within the company. This company submits this plan and has instituted the steps necessary, as set forth in the plan, to assure compliance of laws, executive orders, rules, regulations (28 CFR35, 29CFR 1630 and 41 CFR 60) and orders of the Secretary of Labor as modified by the provisions prescribed herein, and imposed pursuant to 23 U.S.C. 140, 41 CFR 60-4.3 and the provisions of the American Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) set forth under 28 CFR 35 and 29 CFR 1630.

2. EQUAL EMPLOYMENT OPPORTUNITY OFFICER

This company's equal employment opportunity officers are:

- Coordinator: Allen Andrews, P O Box 149, Cheyenne, WY 307.214.8200
- Cheyenne, WY: Sarah Armel, PO Box 209, Cheyenne, WY 307.632.7900 ofc; or 307-578-6876 mobile
- North Platte, NE: Linda Thompson, P O Box 130, North Platte, NE 308.532.8600 ofc; 308.530.6767 mobile
- Rapid City, SD: Vicky Horst, P O Box 397, Rapid City, SD 605.342.3734 ofc; 605.484.4924 mobile
- Ogallala, Sterling & Ft. Morgan CO, Scottsbluff, NE: Dee McCroden, P.O. Box 178, Ogallala, NE 308.284.8160 ofc; 308.289.4584 mobile
- Gillette, WY: Vicky Horst, P O Box 541, Gillette, WY 307.686.8644 ofc; 605.484.4924 mobile

This company's equal employment officer shall coordinate and administer the contractor's affirmative action program. This company's E.E.O. officer shall investigate any complaint of discrimination and if he finds such to be true, shall institute all necessary procedures to correct such discrimination. The E.E.O. officer shall periodically review the company's affirmative action program and shall initiate and establish, as necessary, changes to assure that the program does affirmatively fulfill the company's obligation to establish a workable affirmative action program. The name, address, and office telephone number of the company's E.E.O. officer will be posted on bulletin boards at the home office and all job sites.

3. COMPANY PERSONNEL STAFF

This company's E.E.O. Officer shall inform and instruct supervisory employees to the company's policy of equal employment opportunity in regard to hiring, promotion, demotion, and termination of employees. The E.E.O. officer shall obtain the supervisory employee's commitment to affirmatively follow and enforce an equal employment opportunity program within the area over which he has supervisory authority. The company E.E.O. officer shall periodically review with the supervisors their responsibility to follow an affirmative action program. The company shall, at its supervisory conferences or meetings provide opportunity for the company's E.E.O. officer or his designated representative to review and instruct supervisory employees in their responsibilities under the Company's affirmative action program.

4. EMPLOYMENT

- A. When advertising in newspapers or other publications for employees, the Company shall include in the ad the statement, "An Equal Opportunity Employer" or "All Qualified Applicants Welcome." The ads shall be placed in newspapers and publications listed in the contractor's provisions and any other publication the contractor may choose having a large circulation among minority groups in the area from which the project work force would normally be derived.
- B. This company will make its equal opportunity policy known to all employees through such media as posted notices, letters to employees, and employee meetings and will advise prospective employees and potential sources of employees, such as schools, employment agencies, labor unions, college placement officer, etc., through visits, phone call, conferences, personal letters and other methods as are appropriate in the individual instances.
- C. Where recruiting employees, (if not covered by valid collective bargaining agreements) this company will by such means as personal contact and letter, conduct systematic and direct recruitment through public and private employee referral sources listed in the contract provisions and sources likely to yield female and minority group applicants, such as schools, college, female and minority group organizations.
- D. This company shall, when seeking new employees, (if not covered by union contracts) personally notify present employees, especially present female and minority employees, of the openings and encourage them to refer qualified female and minority applicants for employment.
- E. The company has established a system of feedback controls including periodic inspections, reviews, reports and surveys within all management and key levels both at the home office and at the project sites to assure that wages, working conditions, employee benefits, upgradings, promotions, transfers, demotions, layoffs, and terminations of minority group employees are administered on a nondiscriminatory basis. Such inspections, reviews, etc. will be conducted by the company's E.E.O. officer whether immediately prior to the above actions being taken or as soon as possible after such actions have been taken.

5. SUBCONTRACTS

This company agrees to solicit by such means as letter and personal contact the employment of female and minority group subcontractors and subcontractors with female and minority group representation among their employees. Information as to such sources as minority group organizations, contractor organizations, the Small Business Administration, and other federal or state agencies. This company will, where such female and minority group contractors are available, offer to counsel and otherwise offer assistance to help those subcontractors in addition to subcontractors with female and minority group representation among their employees to qualify on Federal Aid construction work.

This company agrees to comply with all provisions regarding equal opportunity as set forth in the contract documents and will include the provisions of paragraph (a) through (g) in every subcontract or purchase order unless exempted by regulations and relevant orders of the Secretary of Labor.

E.E.O. goals will be established in accordance with individual project requirements and guidelines.

6. REPORTING CONCERNS OR ISSUES

Applicants or employees may report concerns to their regional/area managers, regional/corporate controllers, supervisors, President of the company, HR Manager, Lighthouse Services hotline (877-472-2110). Reports can be made in person or by phone.

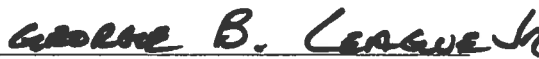
Employees may also contact the following offices for further assistance:

Office for Civil Rights
U.S. Department of Health
and Human Services
999 18th Street, Suite 417
Denver, CO 80202
Phone: (303)844-2024
TDD: (303)844-3439

U.S. Equal Employment
Opportunity Commission
131 M Street, NE
Washington, DC 20507
Phone: 202-663-4900
TTY: 202-663-4494



Signature



Printed Name



Title



Date