

**POLICY ON AFFIRMATIVE ACTION AND
EQUAL EMPLOYMENT OPPORTUNITY
THE WALSH GROUP, LTD.
WALSH CONSTRUCTION GROUP, LLC**

The Walsh Group, Ltd., and its subsidiaries, and Walsh Construction Group, LLC, and its subsidiaries, (collectively referred to herein as "the Company") hereby reaffirm that its officers and employees are committed to, and shall diligently apply, all the terms and provisions of the Civil Rights Act of 1964, Executive Order 13496, and Executive Order 11246 (as amended by Executive Order 11375) in establishing and carrying out its Affirmative Action and Equal Employment Opportunity ("EEO") Policy, and Executive Order 13672, and Executive Order 13665. The Company shall also abide by the requirements of 41 CFR Parts 60.300.5 (a) referring to Disabled Veterans and/or Protected Veterans and 41 CFR Parts 60-741.5 (a) referring to Individuals with Disabilities, as well as all relevant state and local laws and regulations. These regulations prohibit discrimination against qualified individuals on the basis of race, gender, gender identity, sexual orientation, disability or protected veteran status, and require affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified minority individuals, females, individuals with disabilities and/or protected veterans. "It is the policy of this Company to assure that applicants are employed, and that employees are treated during employment, without regard to their race, religion, sex, color, national origin, age or disability. Such action shall include: employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship, pre-apprenticeship, and/or on-the job training."

Statement of Policy

In order to provide equal employment opportunities to all qualified persons without regard to race, color, religion, gender, gender identity, sexual orientation, age, national origin, disability, protected veteran status, or any other protected characteristic under federal, state, or local law, the Company shall do the following:

1. Recruit, hire, train, and promote persons in all job titles without regard to race, color, religion, gender, gender identity, sexual orientation, age, national origin, disability, protected veteran status, or any other protected characteristic under federal, state, or local law;
2. Base decisions on employment so as to further the principle of equal employment opportunity;
3. Ensure that promotion decisions are in accord with the principles of equal employment opportunity by imposing only valid requirements for promotional opportunities;
4. Ensure that all personnel actions, including but not limited to termination, compensation, benefits, transfers, demotion, lay-offs, and return from lay-offs, will be undertaken without regard to race, color, religion, gender, gender identity, sexual orientation, age, national origin, disability, or protected veteran status, or any other protected characteristic under federal, state, or local law; and
5. Ensure that all services, Company sponsored training, and Company sponsored activities are made available to employees regardless of handicap, race, color, religion, gender, gender identity, sexual orientation, age, national origin, disability, protected veteran status, or any other protected characteristic under federal, state, or local law.

To implement this Policy, the Company will adhere to the following:

1. The Company has designated Blair Knopp as the Equal Employment Opportunity Officer (“EEO Officer”) for The Walsh Group and its subsidiaries. Blair Knopp is located in the Chicago, Illinois office and can be reached at (312) 563 - 5400. The Regional Offices of the Company should designate Equal Employment Representatives for the Region or for a Specific Project. When any Representative is designated, that designation must be forwarded to the EEO Officer and published in all offices and projects covered by the representative. The Representative must report all contacts to the EEO Officer.
2. The EEO Officer is hereby given full authority to carry out the program and is given the responsibility and authority to:
 - a. Implement the Affirmative Action and Equal Employment Opportunity program including internal and external dissemination of the Company’s policies.
 - b. Assist line management in collecting and analyzing employment data, identifying problem areas, setting goals and timetables and developing programs to achieve goals. Such programs should include specific remedies if discriminatory practices are discovered in the employment system.
 - c. Design, implement and monitor internal audit and reporting systems to measure program effectiveness to determine where progress has been made and where further action is needed, if necessary, to assure that such action is taken.
 - d. Serve as a liaison between the Company, government regulatory agencies, and other community groups.
 - e. Keep management informed of the latest developments in the area of Equal Employment Opportunity and Affirmative Action.
3. Project Management shall be responsible for carrying out the Company policies and this Affirmative Action and EEO Policy on their respective jobs. Any questions regarding the compliance with this Policy may be directed to the Corporate EEO Officer, Business Group Leader, the designated EEO Officer for your region, or the Human Resources Director.

This Policy shall be published throughout the company, including in The Walsh Group Employee Handbook, on the Company public and internal websites, and will be reviewed at all new hire orientations so that every new employee of the Company shall be made aware of its provisions. Regular management level training will be undertaken to ensure publication of the policy to supervisory employees. The Policy shall be posted at all jobsites and in all offices where employee notices are posted.

4. All superintendents, foremen, office managers and other supervisory personnel employed by the Company and having the authority to hire, discharge, promote, demote, lay off, or discipline employees, will read and be familiar with this Affirmative Action and EEO Policy.

5. The Company shall maintain such documentation as may be necessary to accomplish this policy, including personnel files, EEO-1 reports, VETS 100 reports, and all other records as required to comply with the provisions of Executive Order 11246.
6. The Company will post conspicuously such announcements with respect to nondiscrimination and equal employment opportunity as required by law and Executive Orders 11246 and 13496, rules and regulations of agencies concerned, including the United States Department of Labor, and require that all subcontractors shall do likewise.
7. The Company will make its hiring policy and Affirmative Action and Equal Opportunity Policy available to all subcontractors upon request and shall include as a condition of the subcontract that the subcontractor shall observe the provisions of Executive Order 11246.
8. In requesting workers from hiring sources, the Company will ask for qualified workers. Where required by the provisions of Executive Order 11246, the Company will take steps to recruit or request female and minority applicants in conformance with the requirements of federal law. The Company will also undertake appropriate recruitment methods to effectively recruit qualified individuals with disabilities as required by 41 CFR 60-741.5(a) and qualified protected veterans as required by 41 CFR 60-300.1(a). The Company will ask for written assurances from hiring sources that admission to their referral facilities is open on equal terms to all qualified persons, without discrimination based on race, color, religion, gender, gender identity, sexual orientation, age, national origin, disability, or protected veteran status.
9. The Company will cooperate with governmental agencies, federal, state and local, who have the responsibility to observe our actual compliance with various laws relating to recruitment and employment by furnishing such reports, records and other matters as requested, in order to foster the Equal Employment Opportunity (“EEO”) Policy for all persons, regardless of handicap, race, color, religion, gender, gender identity, sexual orientation, age, protected veteran status, or national origin.
10. In all Company advertisements for employees, such advertisements shall contain the phrase, “An Equal Opportunity Employer, Disabled/Veteran” and publications of special interest to minority groups will be given such advertisements when feasible or required by law or contract.
11. Placement, promotion, and transfer activities at all levels will be monitored to ensure that full consideration, as required by this policy, has been given to qualified minorities, disabled persons, protected veterans, and female employees. From time to time, the Company will review job categories where minority groups, disabled persons, protected veterans, and female persons may appear to be underemployed, and seek to determine the cause for such situations. When necessary, remedial efforts may include such actions as the following:
 - a. More vigorous recruitment of qualified minority groups, disabled persons, protected veterans, and female candidates.

- b. Special discussions with appropriate management, supervisory, or other personnel, regarding the Company's policy and its desire to ensure the utilization of qualified minority groups, disabled persons, protected veterans, and female personnel at all job levels.
 - c. Re-evaluate qualifications of the lower echelon of minority groups, disabled persons, protected veterans, and female employees to determine whether their skills and capabilities may be more fully utilized at higher job levels or would warrant their transfer to other types of jobs more readily leading to advancement.
 - d. On-the-job training programs, as well as all other training and educational programs, to which the Company gives support or sponsorship, will be reviewed to ensure that minority groups, disabled persons, protected veterans, and female candidates, as well as all other employees, are given equal opportunity to participate.
 - e. Steps will be taken to give active encouragement to minority groups, disabled persons, protected veterans, and female employees to increase their skills and job potential through participation in available training and educational programs.
 - f. The Company will ensure that qualified minority groups, disabled persons, protected veterans, or female employees are included in supervisory training classes sponsored or supported by the Company.
12. The Company will seek the active support of the local associations and trade groups, including, but not limited to, Associated General Contractors and Underground Contractors Association in providing implementation of this Policy. When required by federal law or contract, the Company shall engage in outreach to minority, female, disability, and veteran recruiting sources in compliance with Executive Order 11246.
13. The Company will ensure that all services and Company sponsored activities are made available to employees, regardless of disability, race, color, religion, gender, gender identity, sexual orientation, age, national origin or protected veteran status.
14. There will be no segregated facilities sponsored by, nor the use of such accepted by, the Company for employee utilization. These include, but are not limited to, rest areas, parking lots, drinking fountains, and all other such common facilities. Toilets and necessary changing facilities will offer privacy to both male and female employees.
15. The Company will seek and make known to qualified minority group and female subcontractors what work can be sublet so that they will have an opportunity to bid.
17. The Company will advise and make known in writing to all sources from which it obtains employees that it is an Equal Opportunity Employer and will provide this Affirmative Action and Equal Opportunity Policy if required or requested. The Company will work

cooperatively with affected unions in reviewing construction action on apprenticeship programs, apprenticeship training and union referral practices. Whenever the Company may, under a union referral plan or contract, solicit applicants from other sources, it will seek to obtain qualified protected veteran, minority group and female applicants, including contacting representatives of local civic and community organizations to fill such job openings, and through advertisements in news media predominantly used by protected veteran, female, and minority group communities.

18. The Company agrees that it will be bound by the Equal Opportunity clauses required by Executive Order 11246 with respect to its own employment practices when it participates in nonfederal construction work during which time it also has federally-assisted or direct federal work.
19. The Company will refrain from knowingly entering into any contract or contract modifications subject to Executive Order 11246 with a contractor or subcontractor debarred from or who has not demonstrated eligibility for direct or federally assisted construction contracts pursuant to Executive Order 11246.
20. In accordance with Executive Order 13665, the Company will not discharge or in any other manner discriminate against any employee or applicant for employment because such employee or applicant has inquired about, discussed, or disclosed their own compensation or the compensation of another employee or applicant. However, an employee who has access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint, or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.
 - a. "Compensation" is defined as any payments made to, or on behalf of, an employee or offered to an applicant as remuneration for employment, including but not limited to salary, wages, overtime pay, bonuses, vacation and holiday pay, allowances, insurance and other benefits, profit sharing, and retirement.
 - b. "Compensation information" is defined as the amount and type of compensation provided to employees or offered to applicants, including but not limited to market research about the worth of similar jobs in the relevant marketplace; job analysis, descriptions, and evaluations; salary and pay structures; labor union agreements; and contractor decisions, statements, and policies related to setting or altering employee compensation.
 - c. A job function is "essential" under this paragraph if: (1) The access to compensation information is necessary in order to perform that function or other routinely assigned business task; and (2) the function or duties of the position include protecting and maintaining the privacy of employee personnel records, including compensation information.

On behalf of The Walsh Group, Ltd., and subsidiaries and Walsh Construction Group, LLC and its subsidiaries.



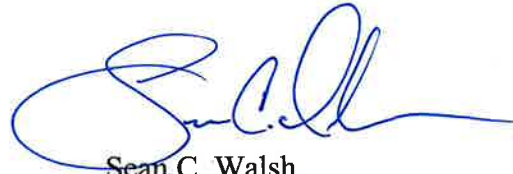
Matthew Walsh
Chief Executive Officer
The Walsh Group, Ltd.



Daniel J. Walsh
President
The Walsh Group, Ltd.



Daniel P. Walsh
Managing Director
Walsh Construction Group, LLC



Sean C. Walsh
Managing Director
Walsh Construction Group, LLC