

 <p>DW TOWER, INC.</p>	POLICIES AND PROCEDURES		
<p>SUBJECT</p> <p>Equal Employment Opportunity Policy</p>	<p>ISSUED</p> <p>03/01/2007</p>	<p>REVISED</p>	<p>NO.</p> <p>A-103</p>
<p>APPROVED</p> <p><i>Approved with Policy A-100</i></p> <p>President</p>			

Purpose: The purpose of this policy is to ensure that equal employment and advancement opportunities are provided to all individuals and to communicate that employment decisions at D. W. Tower, Inc. will be based on merit, qualifications, and abilities.

Policy: D. W. Tower, Inc. will not tolerate any discriminatory behavior that violates Company policy and/or federal, state or other governmental entity laws. Except where required by law, employment practices will not be influenced or affected by an applicant's or team member's race, color, religion, sex, national origin, age, disability, gender identity or any other characteristic protected by law. This policy prohibits disrespectful or unprofessional behavior based on any of the above characteristics or on any other basis protected by federal, state, or other government entity law or ordinance.

Definitions:

- *Reasonable accommodation* means making existing facilities readily accessible to and usable by individuals with known disabilities, job restructuring, part-time or modified work schedules, reassignment to a vacant position, acquisition or modification of equipment or devices, adjustment or modification of examinations, adjustment or modification of training materials, adjustment or modification of policies, and similar activities.
- *Undue hardship* means an action requiring significant difficulty or expense by the Company. The factors to be considered in determining an undue hardship include, but are not limited to: (1) the nature and cost of the accommodation; (2) the overall financial resources of the facility at which the reasonable accommodation is to be made; (3) the number of team members employed at that facility; (4) the effect on expenses and resources or other impact upon that facility; (5) the overall financial resources of the Company; (6) the overall number of team members and facilities; (7) the operations of the particular facility as well as the entire Company; and (8) the relationship of the particular facility to the Company.
- *Disability* refers to a physical or mental impairment that substantially limits one or more of the major life activities of an individual. An individual who has such

impairment, has a record of such impairment, or is regarded as having such impairment is a “disabled individual”.

Scope: This policy applies to all team members of the Company and to job applicants.

Procedures:

1. All team members are responsible for ensuring that this policy is followed. Human Resources is responsible for monitoring compliance with this policy.
2. Except where required by law, D. W. Tower, Inc.’s employment practices will not be influenced or affected by an applicant’s or team member’s race, color, religion, sex, national origin, age, disability, gender identity or any other characteristic protected by law.
3. This policy prohibits all Company team members from engaging in disrespectful or unprofessional behavior based on any of the above characteristics or on any other basis protected by federal, state, or local law or ordinance.
4. D. W. Tower, Inc. will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship for the Company or present a safety hazard. This policy governs all aspects of employment, including but not limited to, selection, job assignment, compensation, discipline, termination, and access to benefits and training.
5. Team members with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their designated supervisor/manager. Team members who are uncomfortable reporting issues to their supervisor may contact Human Resources or the President.
6. Team members may raise concerns and make reports without fear of reprisal or retaliation. D. W. Tower, Inc. will not tolerate any retaliatory behavior.

See the Americans with Disability Act Policy, the Anti-Harassment Policy and the Discipline Policy for more information.

Anyone found violating any portion of this policy may be subject to disciplinary action, up to and including termination.

No changes will be made to this policy or any deviations authorized without the express written permission of the President.