

Affirmative Action Company Pledge

In accordance with NJAC, Title 17, Chapter 27, Department of the Treasury- Affirmative Action Rules, it is the policy and employment practice of Braen Supply, Inc., (sometimes referred as "The Company") that there will be no discrimination on the basis of race, color, sex, religion, national origin, or disability in the recruiting of applicants for employment or in the hiring of employees. Further, it is the policy of Braen Supply, Inc., that there will be no discrimination in the promotion, transfer, discharge, training or retraining under the Affirmative Action Program to which Braen Supply, Inc. subscribes concerning compensation, terms and conditions of employment or privileges of employment by reason of an individual's race, sex, color, religion, national origin, or disability. Further, the Company will take affirmative action to seek out qualified minority and female group members and provide opportunity for minority and female group workers to become qualified for employment and advancement within the Company.

Braen Supply, Inc., respectfully submits this plan, and has instituted the steps necessary, as set forth in the plan, to assure compliance with the Civil Rights Act of 1964, the Civil Rights Act of 1991, Executive Order No. 11246 and NJAC Title 17, Chapter 27, (N.J.S.A. 10:5-31 et seq., (P.L. 1975, c. 127) , Affirmative Action Rules, which was readopted as R.2004 d.450, effective November 9, 2004, and any and all orders to a program of equal employment opportunity and merit employment policies.

The Company's Equal Employment Opportunity (EEO) Officer shall be Samantha Braen, Director of Human Resources. Her address is 400-402 Central Avenue. PO Box 8310 Haledon NJ 07538. She shall coordinate and administer the company's Affirmative Action Program and investigate any complaint of discrimination and, if she finds such complaint to be true, shall institute all necessary procedures to correct such discrimination.

She shall, at least once every six (6) months review the Company's Affirmative Action Program and shall initiate and establish, as necessary changes to assure that the programs do affirmatively fulfill Braen Supply, Inc.'s obligations and commitment to establish a workable Affirmative Action Program.

Ms. Braen's appointment shall be posted on bulletin boards throughout the Company, and its subsidiaries, on all job and worksites.

The Affirmative Action Plan shall be posted throughout the Company, all its subsidiaries, on its websites and any application for employment to Braen Supply, Inc., or any of its subsidiaries.

The Affirmative Action Plan shall be made available in Spanish.

Braen Supply, Inc. utilizes a Spanish language employment application.

Ms. Braen shall meet annually with all Braen Supply, Inc. employees concerning their obligations to fulfill the terms as well as the spirit of the Affirmative Action Plan.

Ms. Braen, as Equal Employment Opportunity (EEO) Officer shall inform and instruct supervisory employees of the Braen Supply, Inc. policy of Equal Employment Opportunity (EEO) in regard to hiring, retention, promotion, demotion and termination of employees.

The EEO Officer shall obtain the supervisor's employees commitment to affirmatively follow and enforce the Affirmative Action Plan within the area over which he or she has supervisory authority. The Company EEO

officer shall, at least once every (3) months), review with the supervisors their responsibility to follow an Affirmative Action Program.

Braen Supply, Inc. will, through its goal setting, monitoring and evaluation of its Affirmative Action Plan review its effectiveness on a six month basis. Those supervisors not meeting or exceeding the Affirmative Action Plan goals will be required to detail a six month remedial plan.

All Supervisors will be required to make a good faith effort to meet or exceed the hiring goals as set forth by the Affirmative Action Plan.

Braen Supply, Inc. will meet at least twice (2) annually hold a meeting to provide opportunity for the Company's EEO officer or his or her designee to review and instruct supervisory employees in their responsibilities under the Affirmative Action Program. The EEO Officer reserves the right to meet more frequently on an as needed basis as part of the monitoring requirements of the plan.

Meeting minutes, agenda and/or sign in sheets are available for review and comment for the special internal staff meetings.

Company Pledge

Braen Supply, Inc., Pledges to:

Submit a summary of the current workforce, in connection with specific geographic areas relative to which the breakdown is requested. The breakdown will show all classification of employees, the total number of employees in each classification, and the number of minority and female group members employed in each classification.

When advertising in newspapers or other publications for employees, Braen Supply, Inc., shall include in the advertisement the statement, "An Equal Opportunity Employer", and such advertisement shall be placed in newspapers and publications which have a large circulation among minority and female groups in the area which the project work force is derived.

Braen Supply, Inc., will make its Equal Employment Opportunity policy known to all employees through posted notices, letters to employees and all employee meetings, and will advertise for prospective employees and potential sources of employees through advertisements, personal visits, phone calls, letters, and other methods as appropriate. Such action will be undertaken by the EEO officer or the Company appointed representative.

Braen Supply, Inc., will conduct on a personal basis, systemic and direct recruitment through public and private employment sources likely to yield minority and female group applicants, including community based organizations, churches, colleges, minority and female group organizations, where the recruitment is not covered by collective bargaining agreements.

Braen Supply, Inc., shall, when seeking new employees not covered by union contract, personally notify current minority and female employees of the openings and shall encourage employees to refer minority and female applications for employment.

Braen Supply, Inc., has established a system of feedback controls, including periodic inspections, reviews, reports and surveys within all management and key levels, at all subsidiary locations and job sites to assure wages, working conditions, employee benefits, up-grading, promotions, transfers, demotions, layoffs, and

terminations of minority and female employees are administered on a nondiscriminatory basis. Such inspections and reviews will be conducted by the Company EEO Officer or the Company appointed representative, prior to such action being taken or as soon as possible after such actions have been taken. This monitoring will take place twice (2) annually.

Braen Supply, Inc., shall request the cooperation of the unions' representatives their employees as an aid to increasing the number of minority and female group representation within the unions and effecting greater numbers of minority and female group referrals from the unions.

Braen Supply, Inc., shall meet twice (2) annually with the various union representatives to seek ways of increasing the number of minority and female group representatives within the unions, the training programs and the referral system.

Braen Supply, Inc., will monitor the EEO Program and that of our subcontractors to assure compliance therewith and to effect changes therein with the Division of Contract Compliance and Equal Employment Opportunity's approval to increase the possibility of results. The monitoring of the Company's program shall be accomplished through surveys and reviews by the Company's EEO officer. In addition, compliance reports shall be submitted when requested, to the Company by supervisors.

Wages, working conditions and employee benefits shall be established and administered, an any and all personnel action of every type, including hiring, upgrading, promotion, transfer, demotion, transfer, layoff and termination, shall be taken without regard to race, color, religion, sex, national origin or disability.

In any and all solicitation, either by competitive bidding, or negotiation, for subcontracts including procurement of materials and leases of equipment, each potential subcontractor, supplier or lesser will be notified by Braen Supply, Inc., of their obligations relative to non-discrimination on the grounds of race, color, sex, national origin or disability.

Braen Supply, Inc. will use its best efforts in the selection and retention of minority and female employees. It is the policy of Braen Supply, Inc., and any and all subsidiary companies that all employees shall experience a work environment free of all forms of unlawful discrimination including sexual harassment or discrimination.

Sexual Harassment has been defined as the following types of conduct, engaged in by either a male or female toward another employee, regardless of sex; unsolicited and unwelcome sexual overtures or conduct, either verbally or physically, or other behaviors that are unwelcome, personally offensive, such that it lowers morale and creates an intimidating or hostile working environment. It is against Company policy for any person to insinuate or suggest, directly or implicitly, that another employee's wages, hours or other terms or conditions of employment will be adversely affected by that employee's refusal to submit to sexual advances.

All subcontractors and vendors shall include the provision of NJAC, Title 17, Chapter 27 (P.L. 1975, c. 127) so that such provisions will be binding upon each subcontractor or vendor.

It is the policy of Braen Supply, Inc., to comply with all the relevant and applicable provisions of the Americans with Disabilities Act ("ADA").

Braen Supply, Inc. will not discriminate against any qualified employee or job applicant with respect to any terms, privileges or conditions of employment because of a person's physical or mental disability. Braen Supply, Inc., also will make reasonable accommodations wherever necessary for all employees or applicants with disabilities, provided that the individual is otherwise qualified to safely perform the duties and assignments connected with the job and provided that any accommodations made do not require significant difficulty or expense.

Braen Supply, Inc., agrees to keep such records as necessary to determine compliance with, and progress under, the Company's Equal Opportunity Program. The records kept by the Company will be designed to indicate:

- the number of minority and female members employed in each work classification
- to the extent permissible under State law, the name, address and any other pertinent information, of each minority and female applicant for employment who was not hired and the reason therefore
- the progress being made in cooperation with the unions to increase minority and female hiring
- the progress being made in locating, hiring, training, qualifying and upgrading minority and female employees
- the progress being made in securing the services of minority and female subcontractors
- the general progress being made in securing the services of minority and female subcontractors used by the Company, under such subcontractor's Equal Employment Opportunity Program. All such records will be retained for a period of three years following completion of the contract work and will be available at reasonable time and places for inspection of authorized representative of the State or Federal Government.

We will use our best efforts to assure Braen Supply, Inc., employees, supervisors, contractors and vendors comply with the Braen Supply, Inc. Affirmative Action and Equal Employment Opportunity Plans.

Americans With Disabilities Act ("ADA") Compliance Policy For Applicants and Employees with Disabilities

STATEMENT OF INTENT

It is the policy of Braen Supply, Inc., to comply with all the relevant and applicable provisions of the Americans with Disabilities Act ("ADA"). Braen Supply, Inc., will not discriminate against any qualified employee or job applicant with respect to any terms, privileges or conditions of employment because of a person's physical or mental disability. Braen Supply, Inc., also will make reasonable accommodation wherever necessary for all employees or applicants with disabilities, provided that the individual is otherwise qualified to safely perform the duties and assignments connected with the job and provided that any accommodations made do not require significant difficulty or expense.

Braen Supply, Inc.'s, policy of non discrimination applies to all personnel and employment practices, including:

Hiring
Upgrading
Transfer
Recruitment Advertising
Layoff or termination

Compensation of any kind
Selection for training
Educational programs
Company sponsored recreational and social activities

EMPLOYMENT PRACTICES

Braen Supply, Inc., will make every attempt to ensure that job applicants and employees with disabilities are given nondiscriminatory consideration when their job qualifications are assessed.

All employment and advancement decisions will be based solely upon the objective determination of each candidate's job qualifications. Actions to be taken to ensure the nondiscriminatory nature of personnel practices include:

- Arranging alternative sites for interviews if the personnel office presents barriers to the mobility impaired
- Documenting the process of reasonable accommodation, including when and how a request for accommodation was made, the possible accommodations considered, an analysis of the costs and benefits with each accommodation and the reason an accommodation was chosen and others rejected or why no accommodation was implemented
- Identification of steps Braen Supply, Inc., will take to ensure nondiscrimination in recruiting, advertising or processing applicants
- Keeping confidential the need to make particular accommodation for an employee with a disability and not disclosing this information except in accordance with law
- Not discriminating on the basis of a disability in contractual arrangement with unions, employment or referral agencies, providers of fringe benefits, apprenticeship or training programs
- Providing recreational and social opportunities for employees with disabilities equal to the opportunity to non-disabled employees
- Not discriminating on the basis of disability in determining vacations, sick leave, and leave of absence
- Holding formal briefing sessions with all entities, supervisors and employees that perform recruitment functions for the Company
- These briefing sessions will emphasize Braen Supply, Inc.'s., commitment to nondiscriminatory policies on the basis of disability

ADMINISTRATION AND IMPLEMENTATION

Samantha Braen, Director of Human Resources and Corporate EEO Officer, is directly responsible for the ADA Compliance Program at Braen Supply, Inc., and has the complete support of the management in the implementation of this program. Samantha Braen, Corporate EEO Officer, will be responsible for the following functions:

Development of policy statement, guideline and internal and external communications about the requirement of the ADA and the Company's Compliance Program

Meeting with Management, Supervisors and employees to discuss any problems or concerns that may arise in accommodating individuals with disabilities to ensure that the program is followed

Determining the need for remedial action and designating policies to correct deficiencies in the program

Serving as the liaison between Braen Supply, Inc., and enforcement agencies, persons with disabilities and organizations representing individuals with disabilities

Keeping Management informed of the latest development in hiring and employing persons with disabilities

Disseminate the policies of the Company regarding the Compliance program, including nondiscrimination clauses included in all union agreements, personnel manuals for all non-union employees and reviewed and discussed in employee orientation sessions.

CONFIDENTIALITY

Applicants and employees are assured that all information regarding a disability shall be kept confidential except that appropriate supervisor and project manager may be informed regarding restrictions on work and any accommodation that have been made, if an condition requiring emergency treatment, first aid or safety personnel .

INTERNAL REVIEW PROCEDURES

Any employee or job applicant who believes that he or she has been discriminated against on the basis of disability should immediately bring the problem to his or her Supervisor, unless the complaint is regarding the Supervisor. The employee would bring the complaint to the attention of the head of the ADA Compliance Program. Braen Supply, Inc., has established an internal review procedure to investigate and resolve discrimination complaints expeditiously.

No applicant or employee will be subject to coercion, intimidation, interference or discrimination for registering a complaint or for assisting in an investigation of any alleged violation of laws prohibiting discrimination on the basis of disability.

Sexual Harassment Policy

Braen Supply, Inc., is committed to providing a work environment that is free of sexual or other types of harassment. In keeping with this commitment, Braen Supply, Inc., maintains a strict policy prohibiting unlawful harassment, including sexual harassment.

Sexual Harassment may include any unwelcome action, sexual in content or implication, whenever submission to the action is either an explicit or implicit term or condition of employment, where submission to or rejection of the action is used as a basis for employment decisions affecting that employee, conduct which has the purpose of interfering or effecting with an employees work performance or creating an

intimidating, hostile or offensive work environment. Such conduct would include unwelcome sexual advances, requests or demands for sexual favors or other verbal, physical or visual conduct of a sexual nature.

Sexual harassment does not refer to occasional compliments of a socially acceptable nature. It refers to behavior on or off premises which is not welcome, which is personally intimidating, hostile or offensive, which debilitates morale and which, therefore interferes with work effectiveness.

Any employee who believes that he or she has been subjected to sexual harassment by a co-worker, supervisor or other third party associated with the Company is strongly encouraged to report the incident to the Corporate EEO Officer. All such complaints will be properly and fairly investigated and, where necessary appropriate corrective action taken.

All complaints will be treated with the strictest of confidence. Clarification concerning this policy can be directed to the Corporate EEO Officer.

Compliance with Sex Discrimination Guidelines

41 C.F.R. Sections 60-2.13 (h); 41 C.F.R. PART 60.20

It has been and will continue to be the policy of Braen Supply, Inc. (hereinafter referred to as the "Company") not to discriminate on the basis of sex. To this end, we continue to do the following:

The Company's employment advertising does not express a sex preference, and, if printed does not appear in sex-segregated columns.

The Company's Employee Handbook and its employment application form expressly states that there will be no discrimination on account of sex.

All employees have an equal opportunity for any job for which they are qualified. Sex is not considered a bona fide occupational qualification for any job within the Company.

No distinction is made between the employment treatment of a woman or man based upon his or her marital status.

The Company provides appropriate and comparable physical facilities for both male and female employees.

In compliance with the 1978 Pregnancy Amendment to Title VII of the Civil Rights Act of 1964, the Company treats disabilities caused or contributed by pregnancy, childbearing or related medical conditions the same as disabilities caused or contributed to by other medical conditions.

No distinction is made based upon sex with regard to seniority lines and lists for employment purposes.

In addition to the above, the Company will continue to take affirmative action as follows:

Encourage female applicants and/or employees to apply for all positions in the Company for which they are qualified.

Include female employees in management training programs used by the Company.

Encourage female employees for all training programs which can facilitate their ability to be promoted.

The principles contained in these guidelines have been incorporated into the Company's Affirmative Action Program.