

Equal Employment Opportunity/Affirmative Action Policy Statement

It has been and shall continue to be the policy of Michels Energy Holdings, Inc. (hereinafter referred to as "Michels") to provide equal employment opportunity free of discrimination against any individual on the basis of their race, creed, color, religion, sex (including pregnancy, childbirth, and related medical conditions), age, national origin/ancestry, disability, military and veteran status, sexual orientation, gender identity or expression, marital status, familial status, genetic information, work-related injury, arrest and conviction record, use of public assistance, local human rights commission activity, work authorization status, or any other characteristic protected by federal, state or local law. In some cases, local laws and regulations may provide greater protections than those outlined here. Individuals will be covered by the laws of their local jurisdiction. We are committed to this Policy and its embodiment in the law. The policy also applies to the selection and treatment of independent contractors, personnel working on our premises who are employed by temporary agencies and any other persons or firms doing business for or with Michels.

Michels is committed to assuring that any Human Resources activity or action including recruiting, hiring, placement, formal or informal training (such as on-the-job training, co-op programs, apprenticeships and management trainee programs), job classifications, work assignments, transfers, assignment of overtime hours, promotion, lay-off, recall and termination and other related programs are provided fairly to all persons. Similarly, all salaries, wages and benefit programs will be administered in conformity with this Policy. Michels encourages each employee to develop their skills so that they can achieve their fullest potential. Therefore, we encourage all employees to continually seek opportunities to upgrade their skills and job knowledge. Accordingly, we ask all employees to feel free to ask their supervisor about training programs that might be appropriate for the goal of furthering their career path.

Michels pledges that it will maintain a working environment free of harassment, intimidation and coercion at all its locations. Harassment of any type, including race, sex, gender, or age, will not be tolerated and may result in sanctions up to and including immediate dismissal. Employees who believe that they have been victims of harassment of any kind are urged to immediately report such incidents to the Human Resources Department (services provided via Professional Services Agreement), who has the overall responsibility of investigating and resolving complaints at Michels. Michels maintains and enforces a separate policy on harassment prevention, complaint procedures, and penalties for violations.

Michels Equal Employment Opportunity (EEO)/Affirmative Action Policy is a public document. All managerial personnel, supervisory personnel, and employees must share in the responsibility to ensure our Company's compliance with the EEO/Affirmative Action Plan. This Policy is available on our web site (www.michels.us) and is posted at all offices and job sites. Our EEO commitment appears on our company letterhead and all of our employment advertisements.

Michels is interested in qualified job applicants. All employees are urged to refer qualified job candidates, including women, minorities and those with disabilities, to Michels. In seeking referrals of craft workers from the union hall, we will specify that women, minorities and those with disabilities are to be included in all such referrals. In soliciting bids for subcontracts, minority, female and disadvantaged business enterprise construction contractors and suppliers will be contacted.

Michels prohibits employees, subcontractors and their employees, suppliers and others doing business with us to engage in any form of discrimination, human trafficking and forced labor activities.

Karen A. Wuest has been appointed to serve as the EEO Officer for Michels (services provided via Professional Services Agreement). The EEO Officer will assure that Michels is in full compliance with EEO requirements and has full authority to carry out all required EEO-related duties. Should you have any questions about this Policy, please contact the EEO Officer during normal business working hours (8 a.m. to 5 p.m. CST) at 920-583-3132.

We are committed to this Policy. It is Michels intention that all actions and decisions will support the spirit of this Policy and program. It is incumbent upon every employee to do the same.

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Robert C. Osborn, President	Date