

**Policy for Transactions Involving
Minority, Woman, and Disabled Owned Business Enterprises**
Effective October 23, 2014

William Betz Jr., Inc. (“Betz”) is committed to complying with applicable antidiscrimination and equal opportunity laws, Executive Orders, regulations and policies for the promotion of opportunities for minority, woman, and disabled owned business enterprises (“M/W/DSBEs”) in the City of Philadelphia. Specifically, Betz is committed to taking steps to ensure that it does not encourage or facilitate a contractual relationship or other transaction between a City contractor and a M/W/DSBE that does not perform a Commercially Useful Function in connection with a City contract. **All Betz employees must comply with this Policy.**

1. If a customer or potential customer asks you for a reference to a M/W/DSBE, asks whether Betz recommends a M/W/DSBE the customer can use, or otherwise attempts to enlist your assistance in soliciting work from, engaging or contacting a M/W/DSBE, you may **only** direct that person to the registry of M/W/DSBEs on the website of the City of Philadelphia’s Office of Economic Opportunity (<https://phila.mwdsbe.com/FrontEnd/VendorSearchPublic.asp>).

2. You may not, under any circumstances:

- Provide a contractor with a reference (i.e. name or contact information) to a specific M/W/DSBE;
- Help establish or negotiate a contractual relationship between a contractor and a M/W/DSBE, even if the contractor already has identified and/or contacted the M/W/DSBE;
- Condition a sale or other transaction on the existence of a contractual relationship between a contractor and a M/W/DSBE, or on an agreement or promise by a contractor or M/W/DSBE to establish such contractual relationship; or
- Otherwise facilitate a contractor’s purchase of goods from a M/W/DSBE when you know that the M/W/DSBE is not responsible for sourcing the material, negotiating a price, determining quality and quantity, ordering the material, and/or paying for the material from its own funds.

3. You may only fill an order from a M/W/DSBE if:

- The transaction does not violate any of the restrictions set forth in (2) above;
- Betz received the order directly from the M/W/DSBE; and
- Betz in good faith invoices the M/W/DSBE for the order.

If you have any questions regarding this Policy generally or its application to any specific situation, please contact Rudy Betz at rudy@wmbetz.com or Victoria Hutz at vicky@wmbetz.com. If you have any doubt about whether you are engaging in a transaction or

providing information that may violate this Policy, err on the side of caution and contact Rudy Betz or Victoria Hutz first.

If you believe that any Betz employee has violated this policy, you should report your concerns immediately to Rudy Betz or Victoria Hutz. All such complaints or reports will be investigated promptly. Betz will neither engage in nor tolerate retaliation of any kind against any person who makes a good faith complaint or report of a violation or suspected violation of this Policy.

Any employee who violates this Policy will be subject to appropriate disciplinary and/or corrective action, up to and including termination of his/her employment with Betz.