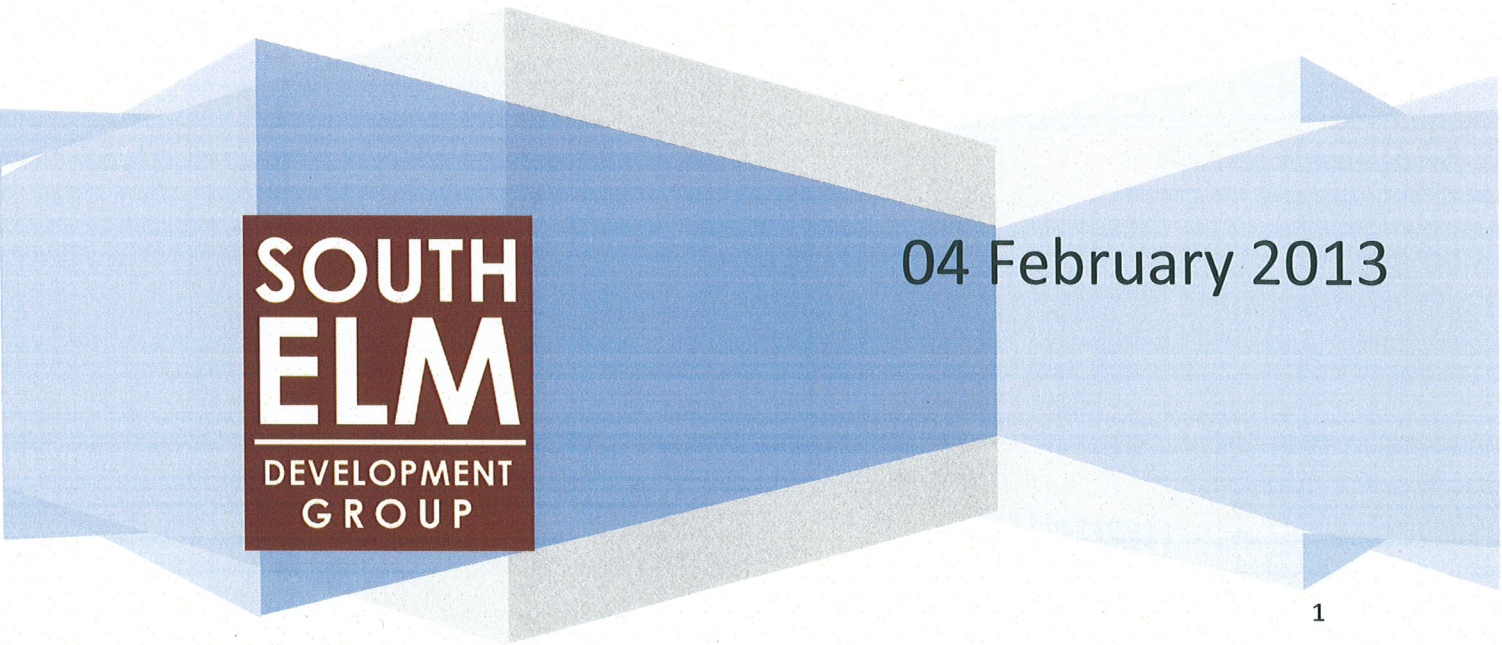


SOUTH ELM DEVELOPMENT GROUP

**COMMUNITY OUTREACH/MWBE/HUB
PARTICIPATION PLAN**



**SOUTH
ELM**
DEVELOPMENT
GROUP

04 February 2013

South Elm Development Group POLICY STATEMENT

It is the policy of the South Elm Development Group, LLC (SEDG) that it, as Master Developer, and its sub-developers, contractors and subcontractors, shall not discriminate on the basis of race, color, religion, national origin, or sex in the award and performance of contracts, subcontracts and purchases and to remove barriers for minority and women-owned business enterprises to compete for contracts, subcontracts and procurement awarded by SEDG.

It is the policy of SEDG to support the growth and development of minority and women-owned businesses that can successfully compete, within this project, for contracting opportunities.

In the implementation of this policy, the priority of SEDG is to encourage and foster the growth and development of locally owned minority and women-owned businesses in the City of Greensboro. SEDG incorporates by reference the policy of the City on M/WBE participation.

SEDG will strive to maximize the participation of Disadvantaged Business Enterprises (DBE), Historically Underutilized Businesses (HUB), and Minority/Women-owned Business Enterprises (M/WBE) in all aspects of the development project. SEDG has established an overall DBE/HUB/M/WBE utilization goal of 20% for the project.

SEDG will conduct a professional outreach and communication program to further the attainment of these goals. SEDG will maximize its diversity outreach to include not only construction contracts but also purchasing of goods and services and workforce practices.

SEDG will measure participation using generally accepted methodology which includes measuring the 20% M/WBE participation against the overall dollar value of the project and will report to Commission and to the City monthly and quarterly. The achievement of this goal will be measured based on the availability of opportunities to contract with MWBE businesses. Therefore, a purchase or contract that provides no opportunity to contract with MWBEs will not be included in the calculation of total goods/services available for purchase or contract.

Should SEDG fall short in attaining its overall goal, it will provide detailed report(s) to the Commission and the City describing the reasons and will also present a plan for attaining these goals. It is the policy of SEDG to use race conscious and race neutral measures to enhance the participation of minority and women-owned businesses in contracts, subcontracts and procurement to the extent permitted by law.

It is the policy of SEDG to establish a contract specific M/WBE goal for each project within in the master plan in order to gain the overall 20% goal.

It is the policy of SEDG not to contract or continue to contract with any business entity that engages in discriminatory conduct in the award and performance of contracts, subcontracts and procurement.

In furtherance of this policy, SEDG partners have implemented a Community Outreach and Communication Program designed to increase inclusion and minority participation in every aspect of the South Elm Street project. This Program is designed to increase minority and women-owned business utilization, in the awarding of contracts by SEDG and third party contracts for construction, professional services and procurement. This program is an extension of City of Greensboro policies designed to ensure that minority and women-owned businesses are afforded an equitable opportunity to compete on all South Elm Street project contracts.

The Program has been developed pursuant to generally accepted affirmative action principles, and applicable state, federal and municipal regulations. SEDG sub-developers, contractors, potential contractors and third parties and their contractors must, in addition to complying with the applicable provisions of the City's Minority/Women Business Enterprise Policy and Procedures Manual, shall also comply with any other specific M/WBE requirement(s) set forth by various laws and orders resulting from local, state or federal funding initiatives on this project. All requirements placed on SEDG by various funding sources are specifically passed on to sub-developers and contractors involved in the project.