
THE TCB CODE OF CONDUCT



LICENSE # 383991 CLASS A,B,C-51

Table of Contents

Forward
Health & Safety
Environmental Leadership
Supplier Diversity
Labor Issues & Human Rights
Ethical Business Conduct
Conflicts of Interest
Engagement with external parties.....
General Management & Administration
Raising Concerns.....

Forward

This code of conduct sets forth the principles and standards of conduct that TCB Industrial expects their Employees, Subcontractors, Suppliers, and Sub-Suppliers to meet while providing goods and services. To support compliance with this code, Management shall ensure that the code is shared with all individuals assigned to perform work for TCB Industrial, or on behalf of TCB Industrial. It is our goal that all tasks performed will be executed by individuals with skills, expertise, and the certification necessary to uphold the principles and meet the standards of the code set forth.

Health & Safety

TCB Industrial, Inc. aims to provide all employees with a workplace which is healthy and safe, and free from all known health and safety risks. We observe all laws and regulations regarding employee safety and nominate Safety Officers in key locations to ensure safe working practices are upheld. We uphold all applicable OSHA standards for health and safety management and integrated quality, environment, health and safety and supply chain matters.

TCB Industrial, Inc. has the following standards in place to ensure the health and safety of our employees, customers, suppliers, and the public.

- **Public Safety:** Minimize hazard exposure to the public.
- **Occupational Safety:** Conduct risk assessment and job safety analysis in order to identify key controls to put in place. Report incidents and near hits. Stop work if needed.
- **Vehicle Safety:** Minimize distractions. Comply with DOT and DMV regulations and codes.
- **Industrial Hygiene:** Control workforce exposure to chemical, biological and physical agents. Use medical surveillance.
- **Emergency Preparedness:** Design and implementing applicable emergency plans and response procedures.
- **Fitness for Duty:** Ensure staff can safely perform essential physical, psychological and cognitive requirements of the job.
- **Use of Drugs and Alcohol:** Inform our customers if any staff member is suspected of taking drugs that would impact safe work practices.
- **Weapons in the Workplace:** Weapons shall not be brought onto, carried, stored or used on customer's property or while on customer business.
- **Sanitation, Food and Housing:** Provide access to clean toilet facilities, potable water, and sanitary food preparation, storage and eating facilities.
- **Third-Party Safety Consultants:** We work with outside Safety Consultants to ensure that we are up to date with all current safety standards.

TCB Industrial's Safety Program is provided to assist personnel in preparing for work site safety and then to execute each work task in the safest possible manner, including the proper use of all required PPE. Although every situation cannot possibly be addressed, this program is intended to increase the awareness of hazards in the work place and how to mitigate the risk of possible injury. Here at TCB Industrial, Inc. safety is the responsibility of each and every employee.

Accidents are costly and the expenses surface in various forms. The "Employee" is by far our most valuable asset; the employee could be injured. Since workers' compensation only provides a portion of the workers' wages, the individual suffers the obvious pain and suffering of an injury as well as the financial impact from the loss of income.

Every person employed by TCB Industrial Inc. is directly responsible for the safety of himself/herself and his/her fellow workers. Intentional unsafe conduct will not be tolerated. Unsafe acts committed through ignorance of proper work methods cannot be accepted. Every supervisor is held responsible to assure that his/her people know the safe work practices required to safely perform all assigned work tasks and that they follow those standards and practices.

There is no job so critical that the safety of our people should ever be compromised.

TCB Industrial's IIPP Program

It is the objective of this company to establish and maintain a proactive, successful "Injury and Illness Prevention Program" (also referred to as "Safety Program") that will ultimately result in top safety performance for all TCB Industrial, Inc. employees. This Program has been established through actual, practical experience. The "Injury and Illness Prevention Program" is not intended to frighten our employees; but rather to increase safety awareness and give the employee the protection benefits of lessons learned in the field of Occupational Health and Safety.

It contains the safety policy, rules and procedures for the compliance performance of this company, its employees and our subcontractors. The "Illness and Injury Prevention Program" is an integral part of each project and must be carried out as dutifully and faithfully as any other specification for the project. There will be no exception to the rules set forth in this program. This being said, TCB Industrial, Inc. realizes some safety issues are site specific so they may not be directly addressed in our safety program. We will work with all customers to be compliant with their site-specific safety requirements, upon written request. Each site-specific request will be reviewed and added to our program as a "site-specific requirement," when agreed upon. Any alteration to the written program must be documented as fully authorized and approved utilizing the forms and format set forth in this legal document and must have prior written authorization from the President of TCB Industrial, Inc. prior to implementation.

Employees and/or subcontractors who exhibit a poor attitude toward safe work and safety procedures will not be tolerated. Any employee or subcontractor in violation of these safety rules is subject to appropriate remedial action, which may include employment or contract termination.

The "Illness and Injury Prevention Program" is to be utilized in conjunction with all applicable Federal, State or Local laws. Should any procedure be in conflict with the aforementioned, the latter shall take precedence.

Environmental Leadership

TCB Industrial, Inc. and its employees are committed to maintaining a clean and healthy environment. The purpose of this Corporate Environmental Policy (CEP) is to outline our policies and practices throughout TCB and our projects concerning environmental protection.

Environmental Principles

At TCB we realize that natural resources are limited. We consider environmental protection to be consistent with our goals and values and an important consideration in all our activities. Our commitment to environmental protection is reflected in our policies, programs and practices for conducting operations in an environmentally as well as economically responsible manner. Furthermore, we recognize that an effective environmental management system can positively impact our profitability in several important ways.

1. Programs designed to make efficient use of natural resources often minimize operating costs.
2. Environmental quality programs help sustain and enhance a company's presence and reputation with its customers.

Compliance programs minimize risk and potential legal liability.

In these ways and more, environmental protection is viewed by TCB as important to the economic well-being of the company. In light of the above principles, the following corporate environmental policy has been established.

Environmental Policy Statement

TCB Industrial is committed to environmental stewardship and we believe that environmental protection is a management responsibility as well as the responsibility of every employee of the company. This policy concerning environmental protection addresses aspects of the company's operations which can potentially impact the environment. As a contractor and manufacturer, our environmental impacts can be considerable. We recognize that our practices if not managed properly could produce pollutions and wastes such as soil contamination, greenhouse gas emissions, water contamination, and overuse of landfills. We have developed this CEP to avoid any risk of creating these types of negative impacts to the environment. Our policy that demonstrates our commitment to the environment and the standards we expect from our employees and business partners.

TCB Industrial, Inc. is committed to:

- Conduct its operations in compliance with applicable laws, regulations and standards concerning environmental protection and provide a mechanism for self-monitoring to ensure compliance and continual improvement.

- Establish corporate environmental objectives and targets relevant to the environmental impacts of its activities and a means to measure progress against these objectives. These objectives and targets shall be reviewed and revised as necessary on an annual basis.
- Continually improve our environmental management system and related policies, programs, and performance, based on the results of our periodic reviews and taking into account regulatory changes, customer needs, and community expectations.
- Minimize the environmental risks to our employees, their families, and the communities in which we operate.
- Promote employee awareness of environmental concerns, actions and responsibilities through our program and communication channels.
- Promote the adoption of environmental protection goals and practices by our subcontractors and suppliers acting on behalf of the company, strongly encouraging improvements in our subcontractors' and suppliers' practices to make them consistent with those of TCB Industrial.
- Construct and manufacture while taking into consideration the environment and efficient use of energy.
- Reduce and where possible eliminate waste through recycling and handle and dispose of all waste through safe and responsible methods.

Climate Change

At TCB Industrial, Inc. we are committed to reducing our impact on climate change and increasing our contribution to understanding sustainability issues, including climate change. Some measures we are taking to reduce our impact include:

- Monitoring energy consumption and continuing ongoing measurement of performance to identify poor energy performers. Replace high energy consumption equipment and appliances with higher performers through Energy Star (or LEED certification).
- Striving to meet our environmental performance targets to reduce the environmental impact of our operations over time.
- Continue to engage employees on Personal Sustainability Practices (PSP) to reducing the Company's environmental footprint.
- Continuing our partnerships with our customers, vendors, and subcontractors to advocate for positive change, and provide relevant information to assist in their leadership and policy efforts on climate change.

TCB Industrial's President Todd Raybourn and Vice President Bryan Martin oversee and ensure that the company and its employees exercise responsible environmental practices and comply with all state and local regulatory policy. It is TCB Industrial's priority to contribute to the sustainability of a cleaner environment. Although environmental decisions are not always free of conflicting interests, we aim to make all of them transparent and to find the best solutions possible. The responsible use of natural resources, targeted investments in future-oriented technologies that support profitable growth while offering customers

competitive advantages, and a company ethic that goes beyond mere compliance with the law and places integrity at the center of business operations – these are the factors enabling us to drive sustainable development and to lay the basis for our company’s successful future.

Risk and Impact Identification and Management

- Identify and mitigate all emissions, releases, wastes and natural resource used.

Compliance with Environmental Legal Requirements

- Operate in full compliance with the letter and spirit of all applicable environmental laws, regulations and standards.

Pollution Prevention and Resource Preservation

- Reduce or eliminate waste and pollution, and maximize materials efficiency.

Supplier Diversity

We aim to source all the materials used in our supply chain for the manufacture of our products in a way which upholds human rights. We expect our suppliers to engage in responsible sourcing practices, using verified sources where possible.

Successful and meaningful supplier diversity is more than just a program. TCB Industrial, Inc. is committed to developing mutually beneficial relationships with Small Business (SB), Small Disadvantaged Business (SDB), Women owned Business (WBE), Service-Disabled Veteran Owned Business (DVBE), Veteran owned Business (VBE), & Minority owned business (MBE), collectively referred to as Diverse Business Enterprise (DBE). Our Supplier Diversity Program reflects TCB Industrial's efforts to create opportunity for suppliers to market their products and services to TCB Industrial and to encourage TCB Staff to offer opportunities to such suppliers.

Program Statement

We are committed to:

- Tracking our supplier diversity results to meet our clients' supplier diversity expectations.
- Communicating the value of supplier diversity internally.
- Ensuring the inclusion of diverse suppliers as part of our procurement process.
- Actively seeking out certified diverse suppliers that can supply competitive, quality goods, and services.

We take part in several efforts with the goal of increasing diversity.

TCB Industrial participates in various regional conferences, matchmaker events & forums, which relate to promoting business with Diverse Suppliers.

Responsibilities

We are committed to expend our best efforts to achieve the goals presented in this program, and to work with our clients for mutual implementation. To accomplish this, we have appointed a specific team member, Supplier Diversity Advisor, to head the supplier diversity program. This individual will assist the Project Managers with the overall procurement process and will encourage them to routinely obtain quotes from Diverse Suppliers for products and subcontracting services. The Supplier Diversity Advisor will also record our supplier diversity participation and efforts made toward supplier diversity. It will also be the responsibility of the Advisor to make continual efforts to educate their peers on Supplier diversity, attend Supplier Diversity workshops, as well as meet & greet events, and assist in maintaining the goals set forth for TCB Industrial.

Goals

TCB Industrial, Inc. has established the following goals to diverse supplier businesses. TCB will use its best efforts to award a minimum of 15% total supplier diversity participation per project.

➤ Small Disadvantaged Business (SDB)	2.5%
➤ Women Owned Small Business (WBE)	5%
➤ Minority Owned Business (MBE)	5%
➤ Veteran Owned Small Business (VBE)	1.5%
➤ Service-Disabled Veteran Owned Small Business (DVBE)	1%
	<hr/>
	15%

Accountability/ Celebrating Accomplishments

Accountability will be used as a motivational tool to promote the commitment of this program company wide. Accomplishments of meeting our goals per project will be recognized. TCB industrial notes the positive impact of teamwork and we will utilize various methods to track our diversity spend per project and reward our staff for their continual participation in our diversity program.

Monitoring Diverse Spend

The Supplier Diversity Advisor will be responsible for monitoring TCB Industrial's spend with certified businesses. This is a very important aspect of the program as it will allow TCB to see our program growth, and adjust our strategies as needed. The Supplier Diversity Advisor will track results on a per customer basis as well as in the aggregate. The Advisor is also responsible for reporting performance based on customer requests.

Implementation Plan

To improve our Supplier Diversity participation, TCB Industrial, Inc. presents the following examples of current and planned initiatives.

- TCB will increase program awareness through companywide training of our Supplier Diversity program.
- Project Managers will provide bid opportunities to a diverse range of suppliers and subcontractors.
- Project Managers will strive to procure high-quality, competitively priced goods and services from a diverse range of suppliers and subcontractors.

Labor Issues & Human Rights

TCB Industrial, Inc. is an equal opportunity employer.

Diversity and inclusion are the keys to TCB's Culture, and we strive for a workplace where everyone can bring their unique and varied perspectives and talents. We prohibit discrimination, harassment and retaliation, and we work to ensure our policies, standards and procedures reinforce this Culture.

- **Freely Chosen Employment:** All staff can leave the workplace at will and no one shall be required to surrender ID.
- **Child Labor:** Abide by local minimum legal age requirements for employment and no hazardous work under 18.
- **Wages and Benefits:** Wages must be documented and comply with local laws; deduction from wages for discipline is not allowed
- **Working Hours:** Abide by applicable government laws.
- **Harassment and Discrimination:** Supplier shall not tolerate any form of harassment or discrimination, regardless of the other person's willingness to participate.
- **Workplace Violence:** Engaging in acts or threats of violence will result in termination of the offending worker and possibly of supplier's assignment; disclose disciplinary policies and procedures.
- **Humane Treatment:** No corporal punishment, threats of violence or other forms of physical coercion or harassment.
- **Freedom of Association:** The rights of the workforce to associate freely, join or not join labor unions shall be respected.
- **Non-Reprisal:** Ensure your workforce is able to openly communicate grievances without fear of reprisal, intimidation or harassment.

Harassment and Discrimination Characteristics

What are the individual characteristics or actions protected from discrimination and harassment?

- Race, color
- Physical or mental disability
- Ancestry, national origin
- Protected veteran status
- Sex, gender (which includes but is not limited to pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding)
- Medical condition
- Marital status
- Genetic information
- Military and veteran status
- Citizenship status
- Sexual orientation
- Gender identity, gender expression
- Transgender status

- Age
- Religion, religious creed
- Utilization of leaves of absence protected under state or federal law

Unacceptable Conduct

Although it is impossible to identify every possible deviation, the following is a partial list of infractions which will result in corrective action or discharge:

- Negligence or willful inattention to duties and responsibilities
- Discourteous or insubordinate conduct
- Theft or dishonesty
- Smoking in unauthorized areas
- Frequent absence or tardiness
- Failure to adhere to personnel policies and procedures
- Disregard of safety and health rules
- Being under the influence, possessing, using, or selling alcohol or illegal drugs during work hours
- Harassment in any form, including verbal, physical, and visual
- Failure to maintain proper standards of performance or productivity
- Disclosing confidential information about TCB Industrial, Inc., clients, or other employees.
- Using or removing from any TCB Industrial, Inc. office or other employee's property without receiving proper authorization.

Employees should be aware that conduct not specifically listed above but which adversely affects or is otherwise detrimental to the interests of TCB Industrial, Inc., other employees, or clients may also result in corrective action or discharge.

Fitness for Duty

Employees are expected to be mentally and physically fit for duty, and to remain fit while on duty. If your fitness for duty is called into question, you may be subject to a mandatory fitness for duty assessment and/or U.S. Department of Transportation (DOT) or non-DOT Reasonable Suspicion testing. TCB Industrial, Inc. is an alcohol-free and drug-free workplace. Being under the influence of alcohol or drugs, including recreational and medical marijuana, while working or while on company property is prohibited. Employees may not transport alcohol or drugs in a company-owned, rented or leased vehicle, or a personal vehicle while on company business. In rare circumstances, employees may seek prior consent from a director or above to transport alcohol in a company-owned, rented or leased vehicle.

Ethical Business Conduct

We as the TCB family conduct ourselves in an honest and ethical manner in accordance with our Company Culture, and comply with all laws, rules and regulations, and our company's policies, standards and procedures.

As one team, we behave in a manner that is safe and ethical, and in a way that is consistent with applicable laws and TCB Culture and policies. We take personal responsibility for:

- Speaking up, listening up and following up.
- Raising questions and concerns if we become aware of possible violations of laws, regulations, our Code or customer requirements.
- Cooperating fully when responding to an investigation or audit.

Making Ethical Decisions

When faced with an ethical dilemma, ask yourself:

- Have I made sure that my actions will not impact anyone's safety?
- Is it legal?
- Does it feel right?
- Is it consistent with our Code, our Culture and our policies?
- Am I willing to be held accountable for my actions?

We work with outsourced vendors for the supply of our products and components which are manufactured and assembled to our specifications. In general, we cultivate long-term relationships with our outsourced vendors, who are of themselves respected business operations that are familiar with our approach to human rights and labor standards. Of necessity, we work closely with our outsourced suppliers enabling us to observe the standards that are maintained and the workplace conditions provided to their employees.

We strive to have our outsourced vendors and key suppliers confirm that they observe the following practices which protect labor rights and human rights:

- Respect for employees and treating employees with dignity, applying humane, decent and fair practices. To the extent possible, suppliers will invest in employee training and development.
- Encourage diversity and avoidance of discrimination in the workplace.
- Declare support for freely chosen employment and prohibit any form of forced labor.
- Prohibit child labor under the legal age permitted by law in the country of operation.
- Act in accordance with working hours as defined by local laws.
- Observe laws and regulations relating to health and safety of employees.
- Compensate employees in accordance with applicable laws and regulations.
- Provide formal grievance mechanisms for employees to voice their concerns and receive appropriate acknowledgement without fear of retaliation.

TCB Industrial, Inc. and all of our suppliers conduct business in accordance with the highest ethical standards.

- **Business Integrity:** No bribery, corruption, extortion or embezzlement.
- **Criminal and Civil Claims:** Inform customers of all pending legal charges and claims as required
- **Company Records and Disclosures:** Full and timely disclosure and no inaccuracies, misleading information, or omission of material information
- **Privacy:** TCB has the right to monitor the work space, computers, voicemail or systems on TCB assets and/or property
- **Confidential Information and Intellectual Property:** No disclosure of confidential documentation
- **Insider Trading:** No investment decisions based on non-public information ascertained through work with TCB.
- **Responsible Procurement:** Take reasonable steps to procure products and services from ethical sources and use subcontractors who comply with the principles in this code of conduct.

Employees who don't comply with this Code or other company policies, standards or procedures may face disciplinary action, including employment termination. Leaders should contact their HR representative for help determining the appropriate course of action.

Suppliers and subcontractors who don't comply with this Code or other company policies will be removed from the jobsite and the contract terminated.

If you see something that you believe goes against our culture or goes against our company policies, TCB encourages you to speak up. When you speak up for safety, you are doing the right thing and you will be positively recognized for doing so. Speaking up strengthens our learning culture and helps to reduce both the frequency and severity of safety incidents.

Conflicts of Interests

You must not use company property, corporate assets, company information or the influence of your position in a manner that places your personal interests and/or the interests of a competitor before the interests of the company.

Take reasonable precautions to avoid the condition or appearance of a conflict of interest.

- **Conflicting Business Interests:** Disclose any potential conflicts such as working with customer regulators or competitors.
- **Close Personal Relationships:** Avoid or report relationships that can interfere with independent judgment.
- **Gifts to Customers:** Avoid creating any sense of obligation by providing “gifts” (anything of value).
- **Gifts to Foreign Officials:** No gift, money, entertainment, service may be promised to a foreign official.

If a potential conflict of interest arises:

- I will disclose any potential conflict of interest to my leader.
- If I find myself facing a situation that might be perceived as a conflict of interest, I won't proceed without a written agreement from my leader or appropriate decision maker.

Solicitation

Solicitation or distribution in any way connected with the sale of any goods or services for profit is strictly prohibited anywhere on TCB Industrial, Inc. property at any time. Similarly, solicitation or distribution of literature for any purpose by non-employees is strictly prohibited on TCB Industrial, Inc. property at any time.

Violation of this policy will result in corrective action up to and including immediate discharge.

Engagement with External Parties

Here at TCB Industrial, Inc., our employees and subcontractors are our most important sources of public relations. Therefore, cheerfulness, friendliness, politeness, and tactfulness are important traits that TCB Industrial will expect from all of our employees and associates.

At TCB, we want to give each and every client the feeling that they come first. TCB Industrial, Inc. anticipates that all employees and subcontractors will perform their job duties to the best of his/her ability, in addition, certain basic rules and policies will be observed.

Any communications with customers and the public should be clear, accurate, open and consistent, and should always demonstrate the utmost concern for the public's benefit and safety.

Standards for external engagement include:

- **News Media:** One must be authorized to speak on behalf of the customer.
- **Communication Restrictions for Current/Former Government Employees:** Comply with post-government employment ethics requirements.
- **Social Media:** Confer with Customer External Communications team before making any social media posts related to said customer, its staff, or its projects.
- **Customers:** Professional attire and conduct by suppliers is essential for a positive customer experience.

Contractor representation

Under no circumstances are contractors permitted to represent themselves to the media as speaking on behalf of TCB Industrial, Inc. or any of our customers.

General Management & Administration

At TCB Industrial, Inc., we strive to attract, engage and retain employees who can help deliver our business strategy in a way which aligns with our core commitment to our core values, ethical conduct and integrity in all we do. We recruit highly competent individuals on the basis of appropriate education, training, skills, and experience. Our commitment to our employees is to respect and uphold their rights in all aspects of their employment and engagement with TCB Industrial. Our approach to creating an ethical working environment stems from a basic appreciation and respect for core internationally accepted labor standards.

TCB has multiple training courses in place for all aspects of our office as well as for the men and women in the field.

- **Employee Eligibility:** Must have a process in place to confirm employment eligibility.
- **TCB Assets:** TCB Assets are for TCB project use only.
- **Computer and System Security:** Must comply with TCB's cyber security policies and standards; violations will result in termination.
- **Network/Premises Access:** Obtain/display appropriate badges.
- **Business Continuity:** Develop and test mitigation plans for emergencies, crisis situations, and natural disasters; share plans with customers as requested.
- **Records Retention:** Maintain records as required; return as requested.
- **Management Systems:** Establish policies and processes appropriate to the nature and scale of your operations.

Personal Telephone Calls & Cell Phone Usage

The office telephones are for office business communications. With the exception of an emergency, personal calls are to be of short duration and only made during lunch or break periods.

Cell phones are used by TCB Industrial employees for internal and external communication. For the purposes of this policy, cell phones are understood to include any device that makes or receives phone calls, leaves messages, sends text messages, surfs the Internet, or downloads and allows for the reading of and responding to e-mail, whether the device is company supplied or personally owned.

Raising Concerns

We at TCB Industrial, Inc. respect the right of employees to open communication and equitable treatment. We maintain open and direct communication with our employees through our Human Resources Department and encourage their full participation in our business. We provide updates to employees about business activities and results, and all other matters which affect them, or may help them perform their roles more effectively. During the course of employment, management and members of our Human Resources team are committed to responding to all questions or grievances raised by employees relating to terms and conditions, rights and any other matters of concern.

If you encounter activities at work that you believe may constitute misconduct, including unethical behavior, or a violation of applicable laws or regulations, speak up immediately to your supervisor. Leaders have a duty to act when employees raise issues about safety or misconduct. They are expected to listen, take action, and follow up.

TCB Industrial, Inc. is committed to fostering a workplace where everyone feels safe to ask for guidance, share ideas or raise concerns—and one where everyone is confident that those concerns will be heard and taken seriously. When we fail to speak up, we lose an opportunity to correct problems before they become more serious, and we lose the ability to make improvements.

Emergency Concerns

If there is a life-threatening or emergency situation, contact 911 and seek emergency care immediately.