



Syblon Reid Code of Business Conduct

January 2023

SYBLON REID
General Engineering Contractors

Providing Solutions to Difficult Projects

CODE OF BUSINESS CONDUCT

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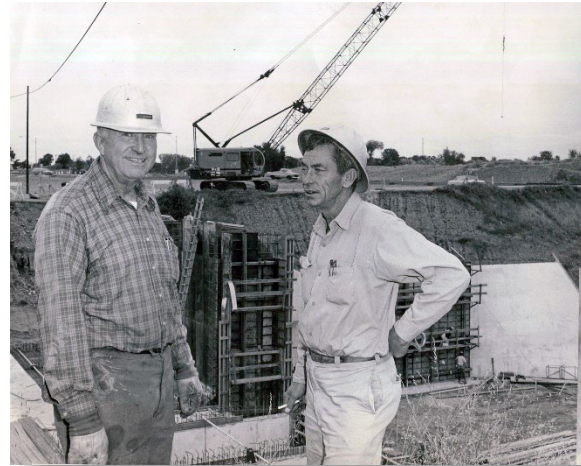
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1. PRESIDENT'S MESSAGE

Founded in 1955 by Ray Syblon and John Reid, over the years Syblon Reid has become a recognized leader in the engineering industry. We are proud of the reputation we have earned in the course of developing relationships with our customers, employees, business partners, suppliers, regulators, external stakeholders, and the communities in which we live and work.

Our well-earned reputation is based on consistently making the right decisions with integrity. These decisions are not only wise from an economic point of view, but also from a legal, moral, and ethical point of view. It is not enough to have made the right decisions in the past. We must continue to make the right decisions in the future.



Founders Ray Syblon and John Reid

We have always been committed to managing our business in compliance with both the law and our moral and ethical values. It is our sincere belief that we will always conduct business fairly, honestly, and ethically. This has been the very foundation of our reputation, and maintaining this reputation is vital to our continued growth and success.

The *Syblon Reid Code of Business Conduct* is designed to guide all employees and suppliers in daily business decisions and practices. If any aspect of this code is unclear to you, or if a situation occurs that raises a question in your mind regarding legal or ethical compliance, it is your personal responsibility to voice your question or concern to the company.

Leading with integrity and making the right decisions are about creating a climate for success. It's about creating an environment where good people can make good decisions. By ensuring our understanding of our legal, moral, and ethical responsibilities, by conducting our business with these obligations in mind, by using good judgment and respecting each other, we will continue to ensure our legacy of leading with integrity. The future of Syblon Reid and our reputation belongs to us all, as does the duty to protect it.

Greg Cederstrom

President



2. INTRODUCTION

The successful business operation and reputation of Syblon Reid is built upon the principles of fair dealing and the ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of Syblon Reid is dependent on our customers' trust, which we are dedicated to preserving. All employees and suppliers are expected to act in such a way as to merit the continued trust and confidence of our customers, their employees, and the public.

The use of good judgment, based on high ethical principles, will serve as a guide with respect to defining acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed with your immediate supervisor, and if necessary, Human Resources.

Compliance with the *Syblon Reid Code of Business Conduct* is the responsibility of every Syblon Reid employee, manager, officer, director, and supplier.

The following summarizes Syblon Reid's expectations for its employees, managers, officers, and directors:

- ❖ **We Obey The Law** – Syblon Reid respects and obeys all laws and regulations, particularly those applicable to its operations.
- ❖ **Safety** – Syblon Reid is committed to the safety, health, and welfare of its employees by providing a safe working environment. All applicable OSHA, DOT, and other safety laws and regulations will govern our operations. All Syblon Reid employees are responsible for their own safety and the safety of others. There is no substitute for safety.
- ❖ **Customer Relationships** – We will work with our customers in an honest, fair, and ethical manner. Without our customers we cannot exist. Customers will be responded to in a manner consistent with the *Syblon Reid Customer Excellence Policy*. All Syblon Reid employees, managers, officers, and directors will conduct themselves in a manner that is in the best interest of the customer. All communication with a customer must be honest, timely, and ethical. All Syblon Reid customers must be treated with dignity and respect.
- ❖ **Business Partners** – We will work with our suppliers and subcontractors in an honest, fair, and ethical manner. Our valued suppliers and subcontractors are instrumental in providing service to our customers. They will be responded to with the fairness, honesty, and respect consistent with the *Syblon Reid Customer Excellence Policy*.
- ❖ **Employment Practices** – We value our employees and their contributions. We are committed to providing an environment of success that respects and values the individual employee.



- ❖ **Environment** – Syblon Reid is sensitive and committed to the needs of the environment. We will adhere to any and all laws and regulations applicable to the environment in which we work.
- ❖ **Community** – Syblon Reid is actively involved in the communities in which we live and work. We will conduct our business with public safety as a priority.

It is vital that every Syblon Reid employee, manager, officer, and director fully understands and complies with the *Syblon Reid Code of Business Conduct*. This code cannot anticipate every possible situation or cover every topic in detail. Topics are further discussed in detail in the Code Provisions found later in this code.

This Code does not create an express or implied employment or supplier contract and is not intended to be interpreted as a contract. To the contrary, it presents guidelines and constitutes a statement of principles to which all Syblon Reid employees, officers, directors, and suppliers are held accountable.



3. CORE VALUES

We pride ourselves on our ability to evaluate difficult situations or projects and use our resources to develop an efficient, environmentally sound, and economical solution. It is our commitment to embrace the owner's problems as if they were our own. The long-term success of our company depends on our reputation and our ability to satisfy our clients.

We accomplish this by:

- ❖ Always providing more than is expected.
- ❖ Developing relationships that are based on trust and integrity.
- ❖ Providing a professional and family environment for Syblon Reid employees.
- ❖ Syblon Reid conducts its business with five priorities in mind:
 1. Safety
 2. Quality
 3. Workforce Excellence
 4. Customer service
 5. Profit

Our core values are client-driven. Without satisfied clients, Syblon Reid has no business and thus, no opportunities for its employees. At the beginning and end of all projects, Syblon Reid clients are the most important members of the project team.



4. CORE PROVISIONS

We Obey The Law – Syblon Reid respects and obeys all laws and regulations, particularly those specific to its operations. Expectations of this Code Provision include:

Employees, managers, officers, directors, and suppliers are expected to obey all laws applicable to their business dealings, including but not limited to the following:

- ❖ **Trade Secrets and confidential company information.** The protection of confidential business information and trade secrets is vital to the interests and success of Syblon Reid. Such confidential information includes, but is not limited to, the following:

- Compensation Data
- Customer Lists
- Financial Information
- Marketing Strategies
- Pending Projects and Proposals
- Past Costs and Past Production Budgets

Employees who are exposed to confidential information may be required to sign a non-disclosure agreement as a condition of employment. Employees who improperly use or disclose trade secrets or confidential business information will be subject to disciplinary action, up to and including termination of employment and legal action, even if they do not actually benefit from the disclosed information.

- ❖ **Employment and labor, including anti-discrimination and harassment.** All state and federal safety laws and regulations applicable to our operations and dealings with customers, business partners, suppliers, and the public, must be followed without exception. This includes all OSHA and DOT standards. Failure to follow or to disregard these laws in decision-making may lead to disciplinary action, up to and including termination of employment and legal action, if appropriate. Be advised that failure to follow certain labor, safety and legal requirements can result in civil liability.
- ❖ **Intellectual property, including copyright.** Syblon Reid purchases and licenses the use of various computer software for business purposes and does not own the copyright to this software or its related documentation. Unless authorized by the software developer, Syblon Reid does not have the right to reproduce such software for use on more than one computer. Employees may only use software on local area networks or on multiple machines according to the software license agreement. Syblon Reid prohibits the illegal duplication of software and its related documentation. Employees should notify their immediate manager or Human Resources upon learning of violations of this policy. Employees who violate this policy will be subject to disciplinary action, up to and including termination of employment.
- ❖ **Criminal Activity.** All Syblon Reid employees, officers, and directors must refrain from any criminal activity when such activity can impact our customer relations or the safety of others.



Upon being charged with or prosecuted for a criminal act, an employee may be removed from their position or may be terminated, depending on the nature of the criminal activity.

Example: An employee drives a company vehicle while performing his duties. This individual is cited for driving under the influence while in his personal vehicle. The employee's loss of a driver's license or Syblon Reid's inability to insure him to drive a company vehicle could result in his inability to meet the minimum qualifications for his current job.

Be advised that being charged with or convicted of a criminal activity that poses a hazard to our customers, employees, or the public, or causes loss of the minimum qualifications for employment, may be cause for disciplinary action, up to and including termination of employment, depending on the nature of the criminal activity. Be further advised that criminal activity in the workplace may result in civil liability.

- ❖ **Safety** – *Syblon Reid is committed to the safety, health, and welfare of its employees by providing a safe working environment in all operations.* Expectations of this Code Provision include:

Employees, managers, officers, directors, and suppliers are expected to respect and follow all safety laws and regulatory laws applicable to their business operations. These laws and regulations include OSHA and DOT, customer and local agencies, and Syblon Reid safety rules and procedures. The safety expectations for Syblon Reid employees are outlined in detail in the *Syblon Reid Injury and Illness Prevention Program (IIPP)*. This book is available in the main office and is on every job site.

If you observe or are aware of safety hazards in any Syblon Reid workplace you are to report the situation to your immediate supervisor, any manager, or the Corporate Safety Director.

All injuries and vehicle accidents, regardless of severity, must be reported within 24 hours to the Corporate Safety Director. All forms and reporting procedures can be obtained on any worksite or by contacting your manager.

Due to the nature of our business, safety is a priority at Syblon Reid. Your safety and that of others is the most important consideration on every project. It is your responsibility to contact your manager or the Corporate Safety Manager if you ever have questions or concerns regarding safety.

Failure to follow the safety guidelines and procedures of Syblon Reid may result in disciplinary action, up to and including termination of employment. Be further advised that safety violations in the workplace can result in civil liability.

- ❖ **Customer Relationships** – *We will work with our customers in an honest, fair, and ethical manner. Syblon Reid employees, officers and directors will treat customers in a manner consistent with the Syblon Reid Customer Excellence Policy.*

Neither Syblon Reid nor its employees, managers, officers, directors, or suppliers will conduct



themselves in any way that is contrary to the best interests of our customers. This includes avoiding actual or apparent conflicts of interest, as well as refraining from soliciting or accepting bribes, kickbacks, or gifts of substantial value. It also includes treating customers and their employees with respect and dignity. Violations of this Code Provision include the following:

- Making claims that are inflated, exaggerated, reckless, or careless to customers or prospects about Syblon Reid’s products, services, or prices.
- Generating, creating, or contributing to internal reports that contain false or misleading information.
- Offering a bribe, gift, entertainment, or other gratuity to anyone in an effort to establish or expand a customer relationship with Syblon Reid unless it is of nominal value and/or has been approved by your immediate manager. Under no circumstances should you offer, give, or accept a gift of cash.
- Treating a customer or its employees rudely or with disrespect.
- Mishandling information that has been entrusted to us by our customers. You are not to divulge, use, or make information about Syblon Reid’s customers available to anyone outside the company unless the customer requests it and provides full authorization.
- Exhibiting violent or threatening behavior, sexual or other harassment, and discrimination of any kind directed toward customers or other employees. Any violation of this type will be dealt with through immediate disciplinary action, up to and including termination of employment.

❖ **Business Partners** – *We will work with our business partners, suppliers, and subcontractors in an honest, fair, and ethical manner.* Expectations of this Code Provision include:

- Treating business partners, suppliers, and subcontractors in a manner consistent with the *Syblon Reid Customer Excellence Policy*. Violations of this Code include the following:
- Soliciting or accepting money, gifts, or other valuables from anyone who is seeking to establish a business or vendor relationship with Syblon Reid. Accepting gifts of nominal value, that are unsolicited or that are not given in connection with a transaction, does not violate this policy. Participation as a guest in entertainment activities with business partners or vendors should be scrutinized and/or approved by your manager. Under no circumstances are you to accept cash.
- Treating a business partner, supplier, subcontractor, or external stakeholder rudely or with disrespect.
- Mishandling information that has been entrusted to us by our business partners, suppliers, or subcontractors. You are not to divulge, use, or make information about Syblon Reid’s business partners, suppliers, or subcontractors available to anyone outside the company unless a business partner, supplier, or subcontractor requests it and provides full authorization.
- Exhibiting any violent or threatening behavior, sexual or other harassment, and



discrimination of any kind directed toward business partners, suppliers, and subcontractors, and/or their employees. Any violation of this type will be dealt with through immediate disciplinary action, upto and including termination of employment.

❖ **External Stakeholders Human Rights** – *Syblon Reid is committed to dialogue and collaboration with a wide range of external stakeholders, including our clients, business partners, and suppliers in the public, and private labor sectors to proactively identify areas of improvement and have a sustainable impact. We accomplish this by the following principles:*

- **Transparency:** We respect the views and values of external stakeholders and work to engage them by providing information they need to make contributions to our decision-making processes and activities.
- **Inclusiveness:** Include a wide range of external stakeholders and groups that traditionally may be marginalized.
- **Consistency:** Make regular and consistent communications to ensure meaningful engagement.
- **Accountability:** Inform stakeholders of how their feedback influenced the decision or activity.

Employment Practices – *We value our employees and their contributions. We are committed to providing an environment of success that respects and values the individual employee.* Expectations of this Code Provision include:

- ❖ **Respect and Dignity.** Syblon Reid employees and suppliers are expected to treat each other with respect and dignity.
- ❖ **Equal Employment Opportunity.** Syblon Reid is an Equal Opportunity Employer. It is our policy to provide equal hiring, training, compensation, promotion, transfer, termination, and rehire benefits, without regard to race (including traits historically associated with race, such as hair styles and textures); color; religious creed (including religious belief, observance and practice, and dressing and/or grooming practices); age (40 and above); national origin (including immigration and/or citizenship status); ancestry; mental or physical disability; sex (including pregnancy, childbirth, breastfeeding or related condition); decision to use or access a particular drug, device, product, or medical service for reproductive health; gender; sexual orientation; gender identity; gender expression; transgender status; medical condition; genetic information; marital status; military or veteran status; political activities/affiliations; or any other characteristic protected under federal or state laws or local ordinance or regulation.

Syblon Reid complies with the Equal Pay Act and all other applicable federal, state, and local laws regarding pay and compensation.

The use of child or forced labor is prohibited by Syblon Reid and its business partners, suppliers, and external stakeholders.



Syblon Reid is an equal opportunity employer, and strictly prohibits unlawful discrimination by any employee, including managers, supervisors, co-workers, and suppliers. This policy protects individuals who either belong to any of the above-mentioned protected categories, or who have been perceived as belonging to any of the above-mentioned protected categories.

The Company will make reasonable accommodations for known physical or mental disabilities, medical conditions or religious creed and practices of employees. An employee that may require accommodation in order to perform the essential functions of the job should notify the Syblon Reid EEO Compliance Officer at (916) 351-0457. The Company will engage in a timely, good faith, interactive process with the employee to determine the need for a reasonable accommodation. If a reasonable accommodation exists and will not impose an undue hardship on the Company, an accommodation will be made.

As noted above, the Company will make reasonable accommodations for employees with a sincerely held religious belief if the accommodation would resolve a conflict between the individual's religious beliefs or practices and a work requirement, unless doing so would create an undue hardship for the Company.

If you believe you have been subjected to unlawful discrimination, please follow the complaint procedure outlined in the Harassment, Discrimination and Retaliation Prevention policy which follows.

- ❖ **Harassment, Discrimination and Retaliation Prevention.** Syblon Reid maintains a strict policy prohibiting harassment, discrimination, retaliation, and disrespectful or other unprofessional behavior based on race (including traits historically associated with race, such as hair styles and textures); color; religious creed (including religious belief, observance and practice, and dressing and/or grooming practices); age (40 and above); national origin (including immigration and/or citizenship status); ancestry; mental or physical disability; sex (including pregnancy, childbirth, breastfeeding or related condition); decision to use or access a particular drug, device, product, or medical service for reproductive health; gender; sexual orientation; gender identity; gender expression; transgender status; medical condition; genetic information; marital status; military or veteran status; political activities/affiliations, or any other characteristic protected under federal or state laws or local ordinance or regulation.

Further details are found in the *Syblon Reid Harassment, Discrimination, and Retaliation Prevention Policy* in the *Syblon Reid Employee Handbook*. If you believe you or anyone has been subjected to any kind of unlawful sexual or other harassment, or if any employee has questions about any type of harassment in the workplace, you are required to report it to your manager, or the EEO Manager. Violations related to the *Syblon Reid Harassment, Discrimination, and Retaliation Prevention Policy* may result in disciplinary action, up to and including termination of employment. Further be advised that violations in the above areas can result in civil liability.

- ❖ **Drug and Alcohol-Free Workplace.** Syblon Reid is committed to a drug and alcohol-free workplace. Use of alcohol or illegal drugs and controlled substances can adversely affect an employee's work



performance while exposing Syblon Reid to the risks of property loss or damage, or injury to other persons, and are prohibited. Further information regarding the *Syblon Reid Drug and Alcohol Policy* is found in the *Syblon Reid Employee Handbook*.

Violations related to the *Syblon Reid Drug and Alcohol Policy* may result in disciplinary action, up to and including termination of employment.

- ❖ **Workplace Violence Prevention.** Syblon Reid is committed to preventing workplace violence, intimidation, and other threats. Further information regarding the *Syblon Reid Workplace Violence Prevention Policy* is contained in the *Syblon Reid Employee Handbook*.

Violations related to the *Syblon Reid Violence Prevention Policy* may result in disciplinary action, up to and including termination of employment.

- ❖ **Conflict of Interest.** Syblon Reid employees, managers, officers, directors, and suppliers must avoid situations in which their personal interests could directly or indirectly affect the interests of Syblon Reid. Examples of conflicts of interest may include:

1. The owning of a significant interest, by an employee or family member, in a business that is a vendor for Syblon Reid.
2. Hiring of relatives that may result in a direct reporting relationship.
3. Engaging in a business practice or activities that violate existing anti-trust laws.
4. Taking outside business opportunities that are discovered using Syblon Reid resources for personal gain or money-laundering.
5. Unauthorized use of Syblon Reid's name, time, assets, materials, facilities, or employees for any outside employment or venture, without the direct authorization of a Syblon Reid manager.
6. Using or disclosing inside information of Syblon Reid and/or its customers, business partners, suppliers, subcontractors, or competitors for financial gain, or to aid in the financial gain of others.

Conflict of interest violations can cause irreparable damage to the reputation of Syblon Reid, its customers, employees, business partners, suppliers, and subcontractors. Violations may result in severe disciplinary action, up to and including termination of employment.

- ❖ **Use of Company Assets.** All employees, managers, officers, and directors are charged with protecting company assets. All equipment, tools and resources used on projects are property of Syblon Reid and are to be stored and secured on or in company property only. All company assets are to be used only for legitimate Syblon Reid business purposes, and not for personal purposes, unless with the direct authorization of the employee's manager.

- ❖ **Company Credit Cards.** Company-issued credit cards and vendor accounts are to be used for Syblon



Reid business only; personal use is prohibited.

- ❖ **Electronic Use.** All computers, telephones, facsimile machines, and related services, such as internet access, are provided as tools for business use by Syblon Reid employees. These business tools are not to be used for personal reasons in an excessive manner. Any questions regarding use of these tools are to be directed to your immediate manager.

Environment – *Syblon Reid is sensitive and committed to the needs of the environment in which we work.* Syblon Reid employees, managers, officers, directors, and suppliers are expected to conduct their business operations with respect and adherence to environmental law at all times.

- ❖ Environmental considerations are built into the operational plan of all our projects. All questions or concerns regarding the effect our projects have on the local environment, outside the scope of the current operational plan, must be brought to the attention of your manager.

Community – *Syblon Reid is actively involved in the communities in which we live and work.* We will conduct our business with public safety as a priority. Expectations of this Code Provision include:

- ❖ All business activities conducted in the public arena are to reflect on Syblon Reid in a positive manner.
- ❖ During our business operations, the safety and respect of the public is paramount. We will conduct our operations in consideration of the public, answering their concerns when necessary.
- ❖ Any concerns or disputes with members of the public are to be immediately resolved. Those disputes or concerns, which you cannot resolve are to be immediately directed to your manager or Division Senior Manager.
- ❖ Syblon Reid is a proud sponsor and charitable donor of money, time, and services to the communities in which we live and work. Any requests for sponsorship, donations, or charitable services are to be directed to a Senior Manager.

Any disputes, safety violations, or confrontations with members of the public may leave the employee subject to disciplinary action, up to and including termination.



5. INFORMATION AND RESOURCES

Information and resources related to the *Syblon Reid Code of Business Conduct* can be found in the following areas:

1. The *Syblon Reid Employee Handbook* contains all employment-related policies referred to in this Code.
2. The *Syblon Reid Injury and Illness Prevention Program (IIPP)* contains all safety related policies, forms and reports referred to in this Code.

Your direct manager is one of your best sources of information. You are encouraged to approach and discuss any topic with your manager and/or any member of management as is consistent with the *Syblon Reid Open Door Policy*.

REPORTING DUTY

Every employee is expected to report suspected violations directly to Syblon Reid's EEO Compliance Officer at (916) 351-0457. This reporting will be confidential, and the reporting employee will be protected and not subject to retribution.

Every Syblon Reid employee, manager, officer, and director has a duty to adhere to *Syblon Reid Code of Business Conduct* and to report any suspected violations as specified in this Code. Syblon Reid will promptly investigate any reported violation and may take corrective action, up to and including termination of employment.

WHISTLEBLOWING AND NON-RETALIATION

Syblon Reid forbids retaliation against any employee who reports violations of this Code in good faith or initiates a whistleblowing complaint with any outside agency or regulatory body. No action will be taken against any employee for asking in good faith about the Code, clarifying the eligibility of activities you are considering, or reporting in good faith a perceived violation of the Code – even if turns out there was in fact no violation.

CONSEQUENCES

Anyone who is found to have violated the provisions contained in this Code may be subject to disciplinary action, up to and including termination of employment, depending on the circumstances. Members of management, officers, and directors will be held to the highest standard of ethics, honesty, and fairness, and thus may be subject to more stringent sanctions for violations. Be advised that certain violations may result in personal civil liability.

