

SUPPLIER CODE OF CONDUCT

Turner Industries Bahamas Services and its affiliated companies (“Turner”) is committed to the highest standards of product quality, safety, and business integrity. We want to ensure that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that our goods, services, and manufacturing processes are environmentally friendly and safe. Therefore, Turner has created this **SUPPLIER CODE OF CONDUCT** (this “Code”) defining the basic requirements expected of our suppliers of goods and services concerning their responsibilities towards their customers, stakeholders, and the environment.

AUDITING OF SUPPLIERS’ COMPLIANCE WITH THIS CODE

Turner’s Procurement and Internal Auditing Departments have developed tools and resources to periodically audit Turner’s subcontractors and suppliers’ compliance with this code.

The Supplier declares herewith:

● Ethics & Integrity

- to comply with Turner’s *Corporate Code of Ethics and Professional Conduct* *
- to commit and dedicate to ethical professional conduct at all times
- to insist on honesty, integrity, and fairness in all aspects of Supplier’s business
- to conduct all business transactions accurately and fairly in accordance with applicable law or regulation
- to avoid conflicting loyalties or interests

* Turner’s *Corporate Code of Ethics and Professional Conduct* is included as an attachment.

● Labor and Human Rights

- To comply with Turner’s Respect for/Commitment to Human Rights *
- to respect the personal dignity, privacy and human rights of each individual
- not to use forced or involuntary labor
- to uphold equal opportunities for and treatment of its employees irrespective of skin color, nationality, race, disabilities, political or religious conviction, sexual orientation, age, sex or social background
- to refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment, discrimination and/or retaliation
- to honor the right to reasonable compensation and guarantee the applicable national statutory minimum wage
- to respect the maximum number of working hours determined in the applicable laws
- to neither favor nor discriminate against members of employee organizations or trade unions.
- to employ no workers under the age of 16 years

* Universal support of human rights is essential to the Combusiness model, including in its relationships with its customers, vendors, suppliers, and subcontractors. Turner encourages its employees to join in Turner’s commitment to respect and support the rights of all human beings and to fundamental principles of fairness and dignity – not just in the conduct of their lives, but also in the communities where Turner and its employees work and live. Fulfilling that responsibility in the respect of human rights is a key to Turner’s vision as a business enterprise. Further to the foregoing, neither Turner nor its employees tolerate any form of human trafficking, forced labor, or child labor and

Turner has full expectation that this commitment of non-tolerance is shared with Turner's vendors, suppliers, subcontractors, and those that do business with Turner.

● **Legal compliance**

- to comply with the laws of all applicable legal systems
- to develop, implement and maintain methods and processes appropriate to its products and services
- to minimize the risk of introducing counterfeit parts and materials into deliverable products to establish effective processes to detect counterfeit parts and materials and, if detected, quarantine the materials and notify Turner, regulatory and/or law enforcement as appropriate
- to accurately record, maintain and report business documentation including, but not limited to, financial accounts, quality reports, time recording, expense reports, and submissions to customers and regulatory authorities, when appropriate
- to maintain books and records in accordance with applicable law and generally accepted accounting and auditing principles

● **Anti- Corruption, Extortion or Bribery**

- to tolerate no form of corruption, extortion and/or bribery
- not to offer or take receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something which is or could be viewed as dishonest, illegal or a breach of trust
- Trust lies at the heart of Turner's purpose. This ethics and compliance approach contributes to this trust by promoting a culture of integrity with no room for corruption of any kind.
- Turner's anti-corruption policy is proactive: we are committed to conducting Turner business with transparency and integrity throughout the entire organization.
- Turner's anti-corruption policy is a reference document: it tells us what behavior is appropriate and what behavior is prohibited as it is likely to constitute an act of corruption or influence peddling. So, it protects us individually and collectively.
- Turner anti-corruption policy applies to all employees, managers, and directors, as well as anyone who acts on Turner behalf. Everyone must play an active role because preventing the risk of corruption is everyone's business.
- Supplier hereby reaffirms its commitment to uphold the principle of zero tolerance for corruption and influence peddling in our daily activities.

● **Sourcing from Civil War Zones & Other Areas with Severe Human Rights Infringements**

- Turner is mindful of areas of the planet where governments and infrastructure are abusive of human rights and which diverge from the Company's commitments toward maintaining human rights, all as more fully pronounced by the United Nations.
- Documented areas where this conduct occurs include the Democratic Republic of Congo and its neighboring countries ("Documented Areas of Human Rights Abuses").
- Neither Turner nor its suppliers source any materials from Documented Areas of Human Rights Abuses.
- Turner has updated its Supplier Code of Conduct to reflect that no suppliers of materials to the Company source from Documented Areas of Human Rights Abuses.
- This is documented as affirmative statements from the Company's suppliers attesting to this commitment.

● **Checking Against International/Regional/National Sanction Party Lists**

- Turner has a process in place to check any of its business partners who are a part of international/regional/national sanction party lists.
- This includes any such lists relating to arms, weapons and/or terrorism.
- Turner's Procurement Department periodically screens its suppliers against any such lists.

● **Public Policy on Setting Boundaries re: Trading with Suppliers and Business Partners Against International/Regional/National Sanction Party Lists**

- The Company has instituted the following public policy which will be included in the Company handbook:
 - The Company shall not conduct any business with any entity who is identified on any international/regional/national sanction party lists related or regarding terrorism, war perpetration and/or ethnic genocide.
- The Company's Procurement Department periodically screens its suppliers against any such lists.

● **Health and Safety**

- to take responsibility for the health and safety of its employees
- to provide training and ensure that employees are educated in health and safety issues
- to establish reasonable occupational health and safety management rules
- to control hazards and take all required precautionary measures against accidents and occupational diseases.

● **Environment**

- to comply with Turner's commitment to the environment *
- to act in compliance with the applicable statutory and international standards of environmental protection
- to minimize environmental pollution and make continuous improvements in environmental protection
- to avoid or continuously reduce all forms of waste

* Turner works with its clients in supporting their lower carbon and sustainability initiatives. In addition, Turner is committed to a sustainable future and to improving the social, economic, and environmental well-being of its workplaces and the communities where we work and live. Turner is dedicated to environmental improvements that foster a sustainable future and lead to social and economic improvements that further this commitment. Turner supports Turner customers and embraces their commitments to safe and sustainable work environments that further these principles.

● **Supply Chain**

- to promote the compliance with the principles of this Code among its sub-suppliers and vendors
- to consider the compliance with these principles when selecting suppliers

- to implement a conflict-free sourcing policy to ensure that so-called “conflict minerals” are not used by their suppliers and sub-suppliers throughout the whole supply chain

Turner reserves the right to amend this Code at any time. Any questions or comments should be directed to Turner’s Purchasing or Corporate Procurement Department(s).



CORPORATE CODE OF ETHICS AND PROFESSIONAL CONDUCT

Commitment and dedication to ethical professional conduct are expected of all employees in every aspect of our business practices. Our Company is judged by how its employees act. Our business model is based upon a commitment to i.) sound ethics, ii.) personal integrity, and iii.) shared responsibilities, as well as a firm commitment to our business owners. Therefore, upholding the Turner reputation is of paramount importance. This reputation will be upheld only if we act with honesty and integrity in all business practices. Maintaining the trust and confidence of our owners, employees, customers, vendors, suppliers, and other people with whom we conduct business [even with our competitors], as well as the communities in which we work, is crucial to our continued growth and success.

This Code serves as a basis for ethical decision-making in the performance of work for this Company. Additionally, this Code serves as a basis for judging the merit of a complaint pertaining to violations of professional ethical standards contained herein. It is understood that some words and descriptions in this Code are subject to varying interpretations, and that any ethical principle may conflict with other ethical principles in specific situations. Questions related to ethical conflicts can best be answered by thoughtful consideration of fundamental principles such as honesty, integrity, trust, openness, teamwork, pride, professionalism, and respect for others. Put another way, adhering to this Code of Conduct is an expression of our integrity, attitudes, and our way of life, as well as a standard by which we govern our professional and personal lives. This Code therefore is a standard to live by – and not just a list of rules to obey. This will often mean making judgment calls about difficult situations that might not be expressly stated in this Code.

Anti-Corruption and Legal Compliance Commitment

Trust lies at the heart of our Company's purpose. Our ethics and compliance approach contributes to this trust by promoting a culture of integrity with no room for corruption of any kind, which cannot be accepted.

Our anti-corruption policy is proactive: we are committed to conducting our business with transparency and integrity throughout the entire organization.

Our anti-corruption policy is a reference document: it tells us what behavior is appropriate and what behavior is prohibited as it is likely to constitute an act of corruption or influence peddling. So, it protects us individually and collectively.

Our anti-corruption policy applies to all employees, managers, and directors, as well as anyone who acts on our behalf. Everyone must play an active role because preventing the risk of corruption is everyone's business.

We hereby reaffirm our commitment to uphold the principle of zero tolerance for corruption and influence peddling in our daily activities.

Sourcing from Civil War Zones & Other Areas with Severe Human Rights Infringements

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Business Integrity, including Receipt of Gifts and Entertainment

As a company, we insist on honesty, integrity, and fairness in all aspects of our business and expect the same in our relationships with those with whom we conduct business. The direct or indirect offer, payment, solicitation, and acceptance of bribes or illegal payment in any form is unacceptable under any circumstances. An employee's conflicts of interest between his or her private financial activities and the manner in which he or she conducts Company business must be avoided at all times and under all circumstances. All business transactions on behalf of our Company must be reflected accurately and fairly in the accounts of our Company in accordance with and subject to established procedures and verifiable audit. Employees have a duty to avoid situations that are potentially adverse to our Company's interests or that might result in conflicting loyalties or interests.

Our Company's business interests are best served when decisions are based on commercial criteria and not influenced by a gift, gratuity, or entertainment. We should never give or accept anything which could impair, or appear to impair, our or another party's ability to exercise best business judgment in a fair and unbiased manner. On occasion, we may give or receive a gift or entertainment minor in value assuming a definite and legitimate business purpose is being served and the value and frequency are not excessive under the circumstances. We are expected to use our good judgment and follow our Company's Conflict of Interest policy when determining what may be excessive under the circumstances. **Company employees may NEVER accept or give cash or cash equivalents as a gift or for entertainment.**

Gifts that may be considered excessive and unacceptable include:

- Non-business-related goods or services
- Stocks or bonds
- Travel with no legitimate business purpose
- Expensive bottles of wine or liquor
- Premium priced tickets to entertainment or sporting events
- Use of a residence, vacation home, or other lodging accommodation for non-business use
- Anything of value for which we are not required to pay the retail or usual and customary market price.

The Company's Conflict of Interest policy and Related Party Disclosures address prohibited involvement with suppliers, contractors, competitors, or customers, prohibit lavish gift giving and inappropriate entertainment of Company customers, vendors, or suppliers, as well as prohibit the use of Company information.

General Moral Imperatives of our Company and our Employees:

1. Avoid harm to self and others
2. Contribute positively to society and human well-being
3. Be honest and trustworthy
4. Be fair and take action not to discriminate, harass, or retaliate against others in any way
5. Honor property rights including such assets as copyrights, trademarks, and patents
6. Respect the privacy of others
7. Give proper credit for intellectual property - one must not take credit for another's ideas or work
8. Honor confidentiality
9. Adhere to all applicable federal and state laws and regulations

General Professional Responsibilities:

1. Acquire and maintain professional competence
2. Know, respect, and adhere to existing laws related to our operations
3. Learn and grow from work performance evaluations
4. Strive to achieve exceptional quality, effectiveness and dignity in business practices
5. Honor contracts, agreements, and responsibilities

Competition

The Company supports competition and free enterprise. We seek to compete fairly and ethically within the framework of applicable antitrust and anti-competition laws, and we will not prevent others from competing freely with us. The Company's antitrust compliance policies and guidelines set forth the Company's intentions to conduct operations in strict compliance with all applicable antitrust laws. The antitrust laws generally prohibit business activities that constitute unreasonable restraints on trade.

The Community

Our success is due in large part to the benefits, both tangible and intangible, that we derive from memberships in our communities, whether local, national, or global. We encourage employees to participate in community organizations, charities, or other activities that return those benefits, but it should not be done in the Company's name without prior approval.

Additionally, our Company takes a constructive interest in social matters that may or may not be directly related to our business. Community involvement in educational and/or charity programs may vary, and each opportunity will be evaluated individually.