

Code of Ethics and Business Conduct

(Revision date 1/15/2021)

Introduction

Code of Ethics and Business Conduct (the “Code”) for Islands Mechanical Contractors, (IMC) Inc. d/b/a IMC Construction Group is to inform all employees, of IMC’s expectations and of the legal and ethical responsibilities and obligations of each employee. IMC not only has legal obligations to fulfill, but also strives to apply the highest ethical, moral and legal principles in every aspect of our business.

The Code of Ethics and Business Conduct spells out the basic values that guide our decisions. These values are an important part of maintaining the respect of our co-workers, customers, stakeholders, government officials, subcontractors, vendors and the public at large. In addition, as a contractor to the Department of Defense, IMC must comply with applicable laws and regulations that come with doing business with the U.S. Government. IMC’s consultants, agents and subcontractors are representatives of our company and will be bound in writing by the Code through written agreement. Our reputation is based on the legal, ethical and moral way in which we each conduct our company’s business.

Please read the code, understand how it applies to your position, retain this document as reference and sign the acknowledgement form on the last page. The completed form confirms that you have read and understand this Code of Ethics and Business Conduct and agree to abide by its terms.

1.0 Professional Interactions

1.1 Respect for Your Fellow Employees

IMC believes that the underlying basis for all professional relationships is respect for others. Employees are expected to treat their peers, superiors, other employees, as well as customers, suppliers, and others with whom IMC does business, with respect. Never engage in abusive or disrespectful behavior. Such behavior reflects poorly on the employee and IMC.

1.2 Equality and Fair Treatment

IMC is firmly committed to the principles of equality of opportunity in employment and human relationships. The Company believes diversity strengthens its work force and enhances its competitiveness. IMC expects its employees to treat each other with respect and to learn to appreciate other backgrounds and cultures.

IMC is committed to recruiting, hiring, developing and promoting employees without discrimination on the basis of race, color, religion, gender, age, national origin or ancestry, disability, marital status, veteran status or any other status protected by law, not listed here. Fulfillment of our commitment to equal employment opportunity requires action by all employees.

Similarly, business relationships with competitors, suppliers and customers of IMC must always be conducted free of discrimination based on race, color, religion, gender, age, national origin or ancestry, disability, marital status, veteran status or any other status protected by law, not listed here. All IMC employees are responsible for implementing IMC's policy of non-discrimination.

1.3 Harassment

IMC does not tolerate harassment and especially not harassment based on race, color, religion, gender, age, national origin or ancestry, disability, marital status, veteran status or any other status protected by law, not listed here. IMC does not tolerate any form of harassment (verbal, physical or visual) by other employees, customers, vendors, agents or other third parties. Harassment is personally offensive, lowers morale and interferes with the ability to work cooperatively. IMC employees must not engage in any sexual or other harassment of co-workers, competitors, suppliers or customers.

Workplace harassment can take many forms, all of which are unacceptable:

Offensive jokes, cartoons, pictures, posters, insults, threats and other unwelcome actions or comments about a person's race, color, gender, age, religion, sexual orientation, national origin or ancestry, citizenship, disability, medical condition, marital status, veteran status, social or economic status, or educational background.

Verbal, written, graphic or taped material that demeans or shows hostility or aversion towards an individual or group because of race, color, religion, sexual orientation, gender, national origin, age, disability, medical condition, or veteran status and is displayed on our walls, bulletin boards, e-mails, Intranet or elsewhere in or on IMC premises, or circulated in the workplace.

Sexual harassment may include unwelcome sexual advances, requests for sexual favors, unwelcome physical contact, or other communications of a sexual nature when such conduct creates an offensive, hostile and intimidating working environment and prevents an individual from effectively performing the duties of his or her position. It also encompasses such conduct when it is made a term or condition of employment or compensation, either implicitly or explicitly, or when an employment or compensation decision or performance evaluation is based on an individual's acceptance or rejection of such conduct. It is important to note that sexual harassment crosses age and gender boundaries and cannot be stereotyped.

If you are harassed, you are encouraged, but not required, to complain directly to the alleged harassers and to make it clear that the harasser's behavior is unacceptable, unwelcome, offensive and must stop immediately. However, you also must report the harassment to your supervisor and Human Resources immediately.

1.4 Employee Privacy

IMC respects the privacy of all employees. The Company will only use employee records as necessary for business needs and will share employee information only for business reasons consistent with applicable laws.

1.5 Workplace Safety

The Company is committed to providing a safe and healthy work environment free from illegal drugs, violence, threats of violence and the influence of alcohol. IMC prohibits the illegal use, sale, purchase, transfer, or possession of any controlled substances while on IMC premises or while conducting IMC business or on assignment. The Company also has implemented a Drug and Alcohol-Free Workplace Policy, provided to all IMC employees. The IMC's professional values and its principles of legal, ethical, and moral conduct do not stop with our actions or at our doors. We expect the same from our vendors, suppliers, customers, representatives and others with whom we do business.

2.0 Fair Dealing

2.1 Fair Competition and Antitrust Requirements

All of IMC's business activities are highly competitive and it is our policy to compete aggressively, but fairly. A major part of IMC's commitment to compete fairly is a commitment to comply with the antitrust laws. In general, these complex laws prohibit any form of agreement or understanding, whether formal or informal, written or oral, express or implied between or among competitors or others in the supply chain that unreasonably limits or restricts competition. Breaking these laws can bring very severe penalties to both IMC and the individual. IMC's commitment to compliance with the antitrust laws includes the following guidelines:

Employees may not discuss or enter into a formal or informal agreement with competitors about prices, or matters affecting price, production levels or inventory levels, bids, or dividing production, sales territories, products, or condition the sale of products or services on an agreement to buy other IMC products or services.

Agreements with customers or suppliers that establish the resale price of a product, limit a customer's right to sell products, or condition the sale of products, on an agreement to buy other IMC products are prohibited.

This commitment also prohibits any unfair or untrue disparagement of an IMC competitor. Absent compelling special circumstances, IMC should select all vendors and contractors based on written competitive bids.

2.2 Gathering and Using Competitive Information

To compete in the marketplace, it is necessary and legal to gather competitive information. IMC employees may only gather information through lawful means. Employees should maintain the confidentiality of information entrusted to them by the Company or its customers, except when disclosure is authorized or legally mandated. IMC employees must never use any illegal or unethical means to obtain information about other companies.

IMC employees should not share confidential information from suppliers or customers with anyone outside IMC without written permission. Confidential information includes all non-

public information that might be of use to competitors, or harmful to the Company or its customers, if disclosed. If agreements are signed to protect information, be sure to follow the terms and conditions. Do not steal trade secret information and do not suggest or ask others to disclose trade secrets, especially new employees hired from a competitor. New hires may not bring papers or computer records from prior employers, if those papers or records contain proprietary or confidential information belonging to their prior employer.

2.3 Dealing with Vendors and Suppliers

The relationships we establish with our vendors and suppliers are important to us. The values of IMC are applicable in all of our dealings with vendors and suppliers, including a commitment to achieving the right results **in** the right way. IMC's policy is to base all procurement decisions on the best value received by IMC. IMC will not knowingly use vendors or suppliers who participate in any of the following activities: supply unsafe products or services, violate laws or regulations, or use child labor or forced labor.

Good procurement conduct, which is required of any IMC employee who has dealings with vendors or supplier -includes the following:

- Obtain competitive bids, whenever possible.
- Ensure the overall performance capability of the supplier, including delivery, quality and financial status.
- Ensure all purchase agreements clearly state the services or products to be provided, the basis for earned payment and all applicable rates and fees.
- The fee or price paid for goods and services must represent the value of the goods and services provided.
- Encourage support for small, minority, veteran and women-owned businesses.
- Purchase in support of IMC's environmental, safety and health policies.

2.4 Relationships and Conflicts of Interest

2.4.1 Fair Dealing: Each IMC employee should endeavor to deal fairly with the IMC's customers, vendors, suppliers, competitors and employees. No IMC officer or employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

2.4.2 Conflicts of Interest: A "conflict of interest" occurs when an individual's private interest interferes in any way, or even just appears to interfere with the interests of the IMC as a whole. A conflict of interest may occur if an IMC employee's outside activities, personal financial interests, or other personal interests influence or appear to influence his or her ability to make objective decisions in the course of his or her job responsibilities. IMC employees are obligated to ensure that they remain free of conflicts of interest in the performance of their workplace duties and responsibilities. If employees have any question about whether an outside activity or personal interest might constitute a conflict of interest, they should ask their supervisor before

pursuing the activity or obtaining or retaining the interest.

2.5 Gifts and Entertainment

Generally, business courtesies such as gifts, entertainment, services, or favors offered to commercial, non-governmental customers or other business associates should be infrequent and reasonable, legal and offered in a way that does not create the appearance of impropriety. IMC's position is clear: no gift, favor or entertainment should be accepted or provided if it will obligate or appear to create any obligation, either stated or implied, to a competitor, supplier or customer.

Gifts should not be accepted from such companies or their agents unless (1) receipt of the gift has been approved in writing by a supervisor, or (2) the gift is of only nominal value (e.g., lunch, t-shirts, mugs, etc.). Receiving or giving gifts of cash or cash equivalents is never permitted.

Similarly, IMC employees may not offer any gift or favor to any employee, or a member of the immediate family of an employee of a competitor, supplier or customer if the gift or favor might place the recipient under any obligation to either the employee making the gift or to IMC. Kickbacks, bribes, rebates or other forms of illegal consideration are never acceptable and should never be given or accepted by anyone acting on behalf of IMC.

IMC employees may accept or give gifts, favors, and entertainment only if they meet all of the following criteria:

- Gifts may not be unlawful or violate any of the policies of the other party's company.
- They are consistent with customary business practices in the industry.
- They are reasonably related to business relationships, of nominal value and are consistent with any existing business unit guidelines.
- The gift cannot be construed as a bribe, payoff or improper influence.
- Public disclosure of the facts would not embarrass IMC or the employee.
- They do not violate our business values or ethics in any other manner.

IMC employees dealing with U.S. Government customers and foreign government customers should be particularly alert to the special rules that prohibit giving gifts, gratuities, entertainment or other favors to these types of Government employees. The additional constraints on IMC's ability to offer or accept business courtesies in connection with potential U.S. or foreign government customers or representatives are discussed separately in this Code of Conduct.

While integrity is the foundation for our dealing with all customers, special rules apply when the U.S. Government is our customer. The rules imposed on IMC when it does business with the U.S. Government are different from and more restrictive than the rules that apply to purely commercial transactions. As a Government contractor, IMC is committed to complying with all of these special requirements.

Violations of Government contracting laws and regulations can result in criminal and civil penalties, loss of contracts and ineligibility from doing further business with the U.S. Government, either as a prime contractor or as a subcontractor. Collateral consequences also can

include debarment from bidding on state and local government contracts. *These penalties and sanctions apply with equal force to IMC and to those employees and agents involved in the improper activity.*

3.0 Rules and Regulations

3.1 How to Recognize When These Special Rules Apply

While IMC typically does business directly with the U.S. Government, the special rules for doing business with the U.S. Government also apply when IMC does business indirectly with the Government as a subcontractor. In those cases, even though IMC does not hold a contract directly with the Government, many of the special rules still apply to IMC because the U.S. Government pays for IMC's services. In addition, there are rules that apply to IMC's relationships with third parties, such as teaming partners, vendors and suppliers who are working with it to meet the U.S. Government's needs and requirements.

3.2 Special Rules Applicable To U.S. Government Contracts

Company employees involved in bidding or providing products or services to the Government need to know the special rules that apply to U.S. Government contracts and subcontracts awarded to IMC. This section of the Code of Conduct highlights some of the key legal requirements that apply when IMC performs a Government contract or subcontract.

The special rules applicable to Government contracts include, but are not limited to, the following:

3.2.1 Representations and Certifications to the Government: The Government includes representations and certifications in solicitations and contracts, in order to verify an offeror's or contractor's compliance with various legal requirements, such as socioeconomic requirements governing equal employment opportunity. It is Company policy that all representations and certifications made to Government agencies be truthful, accurate, current and complete.

3.2.2 Contract Pricing, Including "Most Favored Customer" Pricing: There are detailed rules governing pricing and disclosure requirements under the Company's Government contracts, with which the Company must comply. In addition, charging and allocation of costs, including employee time and overhead costs and provision of any cost or pricing data and billings to the government must always be accurate, complete and in full compliance with applicable procurement laws and regulations.

3.2.3 Prohibition on Accepting Kickbacks: Two basic rules govern gifts and favors offered to IMC personnel by vendors, suppliers, and subcontractors who seek to do business with IMC under U.S. Government contracts: (1) never solicit anything of value; and (2) never accept cash. An occasional meal or gifts of nominal value, such as advertising items of nominal value offered during the course of a business meeting and approved by management, is permitted.

3.2.4 Offering Gifts and Gratuities: IMC employees will not offer U.S. Government employees any gifts or business courtesies, except for IMC approved advertising items of nominal value

(such as pens and caps), plaques and certificates of recognition and coffee and other non-alcoholic beverages offered during a business meeting. In no event should the value of these courtesies exceed \$20 per person per occasion or \$50 per person annually. **Employees should be aware that Government employees often prefer or have been instructed to refuse any gift or business courtesy.**

3.2.5 Hiring Current or Former U.S. Government Employees: Government procurement laws and regulations restrict employment discussions with and offers of employment to, current and former U.S. Government employees. There also are post-employment, or "revolving door," restrictions that can limit the types of activities in which former Government employees can participate as private sector employees. It is IMC's policy that approval must be obtained from a company officer before any employee may initiate employment discussions with any current or former U.S. Government employees.

3.2.6 Procurement Integrity: Procurement integrity laws and regulations make it illegal for IMC to use or have in its possession certain types of procurement-related information. During the competitive procurement process, certain types of Government agency information, designated or marked as "source selection information," may not be requested or obtained by IMC unless the information is released to all competitors. Under the procurement integrity rules, source selection information includes the Government's source selection plans, technical, cost or price evaluations of proposals, competitive range determinations, rankings of bids, proposals or competitors source selection reports or evaluations and any other information marked as "Source Selection Information".

In addition, other types of contractor bid or proposal information submitted by IMC's competitors to a federal agency as part of, or in connection with, a bid or proposal to enter into a Government contract is strictly off limits irrespective of any legends or other markings. This prohibition includes information such as cost or pricing data, indirect costs and labor rates, proprietary information about a competitor's manufacturing processes, operations or techniques, or trade secrets and information marked by an offer or contractor as "contractor bid or proposal information." Company employees may not seek or accept from any federal agency, or from any other source, a competitor's confidential bid or proposal information. Access to publicly available information about competitors, such as information on a competitor's website, is permitted.

If you receive information that you are not sure the Company should have pertaining to a federal agency procurement or to a competitor, you should immediately contact a company officer before reviewing or sharing the information with anyone inside or outside the Company.

3.2.7 Retention of Consultants: IMC employees must comply with the various rules and restrictions governing arrangements and agreements for consulting services. In addition, IMC can be held accountable for the acts of its agents and therefore, has exposure to penalties and sanctions for illegal acts of consultants providing services to, or on behalf of IMC. Any consulting agreement or arrangement must be approved in advance.

3.2.8 Lobbying: IMC employees must recognize what constitutes lobbying activities under Government procurement laws and regulations and comply with requirements governing such

activities, including registration of lobbyists, reporting and disclosure requirements.

3.2.9 Purchasing and Subcontracting: Because the value of subcontracts and purchase orders awarded by a Government contractor can be substantial, the Government has an interest in a contractor's subcontracting process. Among other things, Government requirements can affect the types of subcontract used, the amount and type of competition used and the terms and conditions that are required to be “**flowed down**” to the Company's subcontractors.

3.2.10 Government Property: IMC is required to establish and maintain a system in accordance with regulations governing control, protection, preservation, and maintenance of Government property. Because the Company is responsible and accountable for all Government-furnished property, IMC employees must be able to identify such property and track it through the Company's property records.

3.2.11 Record Retention: Certain documents and other records pertaining to our business must be maintained for specific periods of time for possible review by regulatory authorities. When a Government prime contract or subcontract is involved, records generally must be retained for three years after final payment. In addition, there may be other retention requirements imposed by contract or by law. Please review the company SOP or related FAR on the subject of document retention requirements. IMC will comply fully with all record retention requirements imposed by the Government.

3.2.12 Performance Obligations: IMC must conform strictly to the contract terms and conditions, specifications, and all quality, quantity, delivery and testing requirements imposed under a Government contract. When IMC submits an invoice for payment to the Government, it is certifying that it has met all contract obligations, no matter how minor or material.

If you are involved with any aspect of a Government contract, you must not take any action that would violate any of these requirements.

4.0 Company Data

4.1 Accuracy of Books, Records and Financial Reporting

IMC's credibility is judged in many ways and one fundamental way is the integrity of its books, records and accounting. All IMC officers and employees must properly record many kinds of business information. All financial books, records and reports whether computerized or paper, must correctly reflect transactions and events. This includes accurate recording of cost, sales, shipments, time sheets, vouchers, bills, payroll, benefits records and regulatory data, among other business information.

IMC directors, officers and employees must be sure that any document they prepare or sign is current, accurate and complete. Employees must not improperly destroy, improperly alter, make false entries on, or willfully fail to make correct entries on any IMC documents or records. Employees are also expected to ensure that any information provided to outside parties is accurate and truthful. When IMC is asked to provide information to the U.S. Government or to state or foreign government officials, inaccuracies or falsehoods could result in severe legal and

financial consequences for IMC. Extra care must be given to any statements, certifications, representations and submissions made to government customers.

4.2. Intellectual Property

IMC's intellectual property, patents, trade secrets, trademarks, copyrights and other proprietary information is considered a valuable company asset. It is IMC's policy to establish, protect, maintain and defend its rights in all commercially significant intellectual property and to use those rights in responsible ways. IMC's intellectual property must be used for authorized company business purposes only. Employees must protect IMC's proprietary or private information, which may include technical designs or strategy, software, employee records, or information learned in a partnership or teaming arrangement.

IMC's intellectual property, including data and information systems, customer lists, proposals and other trade secrets, must remain with IMC when an employee leaves the company. Use by a former employee of IMC's intellectual property is a violation of law. By signing this Code of Ethics, employees agree to protect and properly use IMC's proprietary and private information.

In addition to protecting IMC's intellectual property rights, IMC respects the valid intellectual property rights of others. Unauthorized use of the intellectual property rights of others may expose IMC to civil lawsuits and damages. Theft and misappropriation of trade secrets, proprietary information or other intellectual property may result in significant fines and criminal penalties to both IMC and to the individual. New IMC services, products, processes, software and any proposed use of the intellectual property of others, should be timely and reasonably reviewed for infringement.

4.3. Responsible Use of Company Resources and Assets

IMC resources, including material, facilities, equipment, information and services, are made available to assist each employee in the performance of his or her job. These resources should only be used for authorized business purposes.

IMC employees should respect company property and use company assets, including computers and related information technology assets, only in accordance with established Company policies. Theft, carelessness, misuse and waste of IMC property have a direct impact on the IMC's profitability. IMC assets and resources should be used only to conduct company business and not for personal gain or any non-business purpose.

E-mail and the Internet are powerful communication tools and valuable business assets. However, improper use of e-mail, Internet and company intranet services can waste time, resources and create legal liabilities. Accordingly, IMC has specific policies concerning employee use of company e-mail, the Internet and other electronic information sources while on company time or using company computers. While limited personal use of IMC communications systems is permitted, users should assume these communications are not private. Employees may not use IMC communication channels or access to the internet at work to post, store, transmit, download, or distribute any threatening materials; or to knowingly, recklessly, or maliciously transmit false materials, obscene materials, or anything constituting or encouraging the violation

of any laws.

The unauthorized removal of IMC property may be considered theft. IMC also reserves the right to revoke the personal use of company property in the event of abuse.

4.4. Document and Records Management

IMC's records and information are company assets. Records and information can exist in as documents, files, graphs, databases and may be kept in hard copy or electronically. Employees should properly label and carefully handle company confidential and proprietary information.

Certain documents and other records pertaining to our business must be maintained for specific periods of time for possible review by regulatory authorities. As noted above, when a Government contract or a subcontract to a prime Government contractor is involved, records generally must be retained for three years after final payment under the prime contractor subcontract.

In addition, from time to time, we may receive requests from Government agencies or other third parties for documents and records relating to our business. Once we have received such a request, we are prohibited by law from destroying any document or record that would be responsive to that request. If you are advised that the Company has received any such document request, you must not destroy related documents or records until you have been advised that you are permitted to do so.

4.5. Insider Trading

In the course of your employment with IMC, you may become aware of information about IMC or other companies that has not been made public. The use of non-public or "inside" information about IMC or another company for your financial or other benefit (or the benefit of others who receive the information from you) is not only unethical, but also may be a violation of strict Federal laws against "insider trading" in securities (for example, stocks, bonds and options). Securities law and IMC policy prohibit individuals from trading securities or influencing others to trade in securities based on non-public, material information.

4.6. Marketing and Advertising Materials

In preparing and using company marketing and advertising materials, we must ensure that (1) no false or misleading statements are made; (2) all company proprietary data are properly marked with the appropriate legends; and (3) when we use the trademarks of another company, these marks are used correctly, and their owners are given proper attribution. At IMC, we are committed to responsible corporate citizenship and to complying with requirements applicable in the communities in which we conduct business.

5.0 Community

5.1. Environmental and Workplace Safety Policy

It is IMC's policy to protect the environment, the health and safety of its employees and the

communities in which we work. Daily decisions and actions at IMC are guided by the following principles:

- ~ Comply with applicable environmental laws and regulations;
- ~ Encourage and take actions to foster a safe and healthy work environment;
- ~ Minimize waste and prevent pollution;
- ~ Strive to eliminate releases that impact the environment;
- ~ Strive continually to improve environmental performance.

5.2. Political Contributions and Public Service Involvement

IMC works hard to earn and maintain the respect of the communities in which it operates. As a good neighbor and corporate citizen, we seek to support the efforts of our employee-volunteers who contribute time and talent to local organizations. IMC employees are encouraged to speak out on important community issues. Employees must be careful, however, not to give the impression that they are speaking on behalf of IMC unless they are authorized to do so. Employees may not use company funds or expense accounts to pay for any personal political contributions or seek any other form of company reimbursement.

6.0 International Business

6.1. U.S. Foreign Corrupt Practices Act

Political payments in foreign countries pose special legal problems. The U.S. Foreign Corrupt Practices Act ("FCPA") and similar non-U.S. laws prohibit bribes and improper payments to foreign Government and other officials (including foreign political candidates, political parties and their officials, employees of Government-owned businesses and United Nations officials, among others). A violation is a serious criminal offense for both the companies and individuals involved and may result in significant criminal fines of up to \$2 million for a corporation and up to \$250,000 per violation for individuals, as well as loss of export privileges and imprisonment for individuals. The prohibitions of the Act apply to actions taken by all Company employees and as well as to consultants and agents retained to act on the Company's behalf.

IMC's policy with respect to foreign corrupt practices and irregular transactions is to respect and adhere to the laws of each country in which it does business and to comply fully with the FCPA. In certain circumstances, certain types of payments, generally referred to as "facilitating payments," are permissible under the FCPA. The purpose of such payments is to facilitate or expedite the performance of routine government actions that a foreign official is otherwise required to perform and is distinguishable from a bribe, which is a payment given to persuade an official to give favorable treatment or exercise his discretion in favor of a payment giver. Facilitating payments include payments for routine governmental actions such as obtaining permits, licenses or other official documents to qualify a person to do business in a foreign country and processing visas and work orders. Routine governmental action does not include any

decisions by a foreign official to award new business or to continue business with a particular party and does not involve the exercise of any official discretion.

IMC's policy requires strict compliance with the FCPA. No employee, representative or agent acting for, or on behalf of, IMC may offer to make any payment or gift, directly or indirectly, to any foreign government official in order to cause that official to take favorable (or not to take unfavorable) action with respect to obtaining or retaining business for IMC. In addition, the FCPA exceptions, such as for facilitating payments and reasonable and bona fide expenditures, are narrowly construed. You must seek guidance from the before making any payment that could implicate the FCPA.

6.2. International Trade

IMC's policy is to comply with the specific laws and regulations of countries where we do business and to comply with all U.S. laws and regulations affecting international trade, such as anti-boycott, trade sanctions, export control and foreign corrupt practices laws. Violations of these laws carry stiff civil and criminal penalties for individuals and the company and could cause serious damage not only to our corporate reputation, but also to the public at large. Employees involved in foreign operations should be aware of these laws and should always ensure that IMC does not violate any applicable laws.

I hereby acknowledge that:

I have received a copy of the Code of Ethics and Business Conduct for Islands Mechanical Contractor, Inc. I have read, understood and agree to adhere to the standards of conduct contained in the Code of Ethics and Business Conduct. I will report any action that appears inconsistent with these standards.

Signature: _____

Name Printed or Typed: _____

Position or Title: _____

Date: _____

You can report any actions the appear to be in violation of the Code of Ethics and Business Conduct to IMC's Compliance Officer at the contact information noted below:

Dezra Steep, Compliance Officer

DSteep@IMCConstructionGroup.com

3070 Blanding Blvd. Middleburg, FL 32068

Office: (904) 406.6100 Direct: (904) 406.6049 Cell: (904) 307.0178

Or if you wish to remain anonymous you may contact the Safe Hotline. The information is on the following page. **Our business identification number for the Safe Hotline is 2020265882.**

You will need this number when you call.

SAFE HOTLINE REPORTING INFORMATION

Safe Hotline provides you with three ways to make a report. You can type your report at safehotline.com by selecting the 'Submit Report' option in the upper right-hand corner. You can also text or call to leave a voicemail at 1-855-662-SAFE (1-855-662-7233). Your voicemail will be transcribed into text so that you can remain anonymous.

- If you want to remain anonymous when making your report, **please do not leave any self-identifying information**. If you would like to be contacted by the company, include your name and contact information. We will not modify your report. The report will be submitted to your company "as is" with no changes.
- Safe Hotline does not investigate your report. Your report will be forwarded to your company for investigation. The Safe Hotline service is a third-party service that allows you to report anonymously without fear of retribution.
- The status of your report can be checked by selecting the 'Report Status' option via any reporting method – text, voicemail or website. To check the status and respond to any comments and/or questions made by the company, you will need the Company ID number and the Report Key number. After entering a new report, you will receive a Report Key number that identifies your report. The Report Key number **cannot be retrieved**, so you must take care to safeguard this number if you wish to know the status or to add new information to your report.
- Employees also have the option to have two-way anonymous communication with their company. To opt into two-way communication, you will need to make your report at safehotline.com by clicking on 'Submit Report' in the upper right hand corner and following the instructions listed in Step 1. Emails will flow between you and the company through Safe Hotline acting as the intermediary. The company will not know your name or email address, unless you specifically provide it in the report or email contents. If you elect to have two-way communication, you should not use the Report Status feature. You should instead login to safehotline.com, which will take you to the reporter Home Page where you can read and add new messages to your report.
- Spanish speaking employees will only be able to make a report by phone. Instructions in Spanish are provided with this option, but not with the text or website options.