

Three Phase Line Construction Subcontractor and Supplier Policies for 2023



Introduction

Three Phase Line Construction's ("Three Phase") published Corporate Social Responsibility (CSR) and Sustainability declarations include a broad range of policies on business and ethics, the environment, and human and labor rights that set the expectations for the employees of Three Phase and for our supply chain. Our goal as a corporation is to set the standards within our supply chain to ensure that our suppliers, subcontractors and business partners are aware of and committed to the same high standards our clients expect of us and we expect of ourselves.

These published policies represent the general guidelines for Three Phase and its suppliers and is not intended to be a full and comprehensive resource of Three Phase policies, guidelines and procedures. Should you require additional information you should consult the applicable policies and guidelines for your specific area of concern. Three Phase reserves the right to review, amend and update our policies on a continual basis without prior notice.

Three Phase Line Construction Policies on Business Practices and Ethics

Three Phase's mission, values and code of ethics all work together to produce exceptional performance that is focused and ethical. Our Code of Business Conduct and Ethics helps reduce the risk of wrongdoing and enables us to satisfy the law.

Each Three Phase employee, officer and director is required to adhere to the highest ethical standards and must not be dishonest in dealing with each other, with clients, customers, vendors and all other persons.

All employees, officers and directors must also respect the rights of fellow employees and third parties. Employee, officer and director actions must be free from discrimination, libel, slander and harassment.

Misconduct will not be excused because it was directed or requested by another. All employees, officers and directors are expected to alert management whenever an illegal, dishonest or unethical act is discovered or suspected; employees, officers and directors will never be penalized solely for reporting, in good faith, discoveries or suspicions.

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Anti-Bribery

Other than modest gifts given or received in the normal course of business (such as meals or reasonable entertainment), neither employees, officers, directors nor their relatives may give gifts to, or receive gifts from, Three Phase's clients or vendors. Cash or cash equivalent tips may only be accepted from customers when they are given for superior service without any solicitation and when they represent a modest amount. Cash or equivalent tips from customers should never be accepted in exchange for work, equipment or any other actual consideration. Employees, officers and directors must not provide gifts or entertainment if such action would violate our customer's code of ethics or business conduct. In no event may an employee, officer or director accept any gift in exchange for taking or failing to take any action on behalf of Three Phase or that would cause third parties to believe that a gift was accepted in exchange for taking or failing to take any action on behalf of Three Phase.

Dealing with government employees is often different than dealing with private persons. Many governmental bodies strictly prohibit the receipt of any gratuities by their employees, including meals and entertainment. Employees, officers and directors must be aware of and strictly follow these prohibitions.

When dealing with government employees, Three Phase forbids:

- Giving or accepting any gift in the form of cash or a cash equivalent.
- Engaging in any illegal or unethical act to entice a customer or potential customer to do business with Three Phase. Do not give inappropriate gifts or provide unusual hospitality to customers or potential customers or their employees that may unfairly influence their purchasing decision. Do not give any gifts that could be construed as a bribe.
- Failing to comply with any applicable law, including the Foreign Corrupt Practices Act (discussed below) and other applicable laws governing the payment of monies or anything of value to government officials or candidates for public office. These laws may prohibit or modify marketing activities that are permissible with other customers.
- Accepting, soliciting, or agreeing to pay bribes, kickbacks, gifts of other than nominal value, loans, special privileges, personal favors, unusual hospitality, services or other benefits from a current or prospective supplier, customer, subcontractor, competitor or other individual or organization with which Three Phase does business, other than customary business amenities such as meals, etc.

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Report benefits other than of nominal value promptly to your supervisor and then return them to the donor. In limited situations, Three Phase may accept reasonable, noncash gifts from a supplier in connection with an event for the general benefit of our employees.

Foreign Corrupt Practices Act

Specifically, with respect to the U.S. Foreign Corrupt Practices Act (the “FCPA”), Three Phase has adopted a Foreign Corrupt Practices Act Policy (the “FCPA Policy”) for Three Phase’s affiliates, subsidiaries, directors, officers, employees, representatives, shareholders and anyone who acts on behalf of Three Phase in international business activities. The purpose of the FCPA Policy is to ensure compliance with both the FCPA and the related laws of the countries in which Three Phase and its affiliates do business. The FCPA prohibits the payment of money or anything of value directly or indirectly to officials of a foreign government, public international organization, or a foreign political party by companies in order to obtain business, retain business or to secure any influence or improper advantage. The FCPA also requires that companies keep detailed books, records and accounts that accurately reflect corporate payments and transactions and institute and maintain internal accounting control systems that assure management’s control over Three Phase’s assets.

The FCPA imposes significant criminal liability on both individuals and corporations for violations of the FCPA. Before offering anything of value to foreign government officials, employees, or representatives, or their family members or associates, you must first consult with Three Phase’s Legal Department. You can also request a copy of the FCPA Policy from Three Phase’s Human Resources Contact or the Legal Department.

Conflicts of Interest

Three Phase expects its employees, officers and directors to perform their respective duties using their best impartial judgment in all matters affecting Three Phase. All employees, officers and directors must avoid any personal activity, investment or association that would interfere - or that could appear to interfere - with good and objective judgment concerning the Three Phase’s best interests. Employees, officers and directors may not exploit their position or relationship with Three Phase for personal gain and should avoid even the appearance of such a conflict.

For example, there is a likely conflict of interest if an employee, officer or director:

- causes Three Phase to engage in business transactions with relatives or friends;

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- uses nonpublic Three Phase, client, customer or vendor information for the director's, officer's or employee's personal gain, or for the benefit of relatives or friends (including securities transactions based on such information, which are additionally subject to serious legal consequences);
- has more than a modest financial interest in the Three Phase's clients, customers, vendors or competitors;
- receives a loan, or a guarantee of obligations, from the Three Phase or a third party as a result of his or her position at Three Phase;
- competes, or prepares to compete, with the Three Phase while still employed by Three Phase; or
- takes for herself or himself personally any opportunities that are discovered through the use of Three Phase's property, information or position.

Supplier Diversity

It is the policy of Three Phase that minority, women, and disabled veteran owned business enterprises ("MWDVBEs") shall have the maximum practicable opportunity to participate in the performance of contracts. Three Phase, shall make good faith efforts to award of subcontracts, distribution agreements, resale agreements, and other opportunities for MWDVBE participation utilizing certified MBE, WBE, OR DVBE firms.

Customer Data Protection

Three Phase client, customer or vendor confidential or proprietary information is to be used solely for the benefit of Three Phase and its clients, customers or vendors, respectively. Employees, officers and directors may not use or reveal such confidential information to others, nor use such information for their personal benefit. Employees, officers and directors may not accept, use or disclose the confidential information of our competitors. When obtaining competitive information, employees, officers and directors must not violate our competitors' rights.

Confidential information includes, but is not limited to, any documents, knowledge, data or other information relating to Three Phase's (1) customers, suppliers, subcontractors and others with whom Three Phase does business; (2) marketing methods and strategies; (3) contract terms, bid terms, pricing, margins, cost information and other information regarding the relationship between Three Phase and the persons and entities with which Three Phase has contracted;

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(4) services, products, software, technology, developments, improvements and methods of operation; (5) results of operations,

financial condition, projected financial performance, sales and profit performance and financial requirements; (6) the identity of and compensation paid to Three Phase's employees, consultants and outside agents; (7) business plans, models or strategies and the information contained therein; (8) sources, leads or methods of obtaining new business; (9) acquisitions, divestitures, alliances and other business relationships; and (10) all other confidential information of, about or concerning the business of Three Phase, companies controlling, controlled by or under common control with Three Phase ("Affiliates") or any other person or company with which Three Phase or its Affiliates are transacting business, which is not already publicly available from a source other than Three Phase's employees. It should be assumed that all documents, knowledge, data, or other information of the type described above is confidential information unless the employee has specific knowledge or instructions that it is not. All confidential information is the property of Three Phase and may not be removed from the premises of Three Phase without authorization.

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Three Phase Line Construction Policies on Environmental Protection

Three Phase is committed to managing environmental matters as an integral part of our business planning and decision making, along with providing a clean, healthy and sustainable environment for all employees. To obtain our policy goals, we will adhere to the following principles.

- Ensure that all applicable environmental regulations and compliance requirements are met.
- Manage our operations to promote environmental protection.
- Promote a workplace where we will strive to be a leader in improving environmental quality by minimizing waste and emissions, reusing and recycling, reducing the use of natural resources, and promoting pollution prevention efforts throughout our business process.
- We shall strive to minimize releases to the air, land, or water through use of cleaner technologies and the safer use of chemicals.
- We shall minimize the amount of toxic waste generated and shall ensure the safe treatment and disposal of waste.
- In treating our environment, we shall manage our natural resources, such as water, energy, land, habitats and scenic values in an environmentally sensitive manner.
- We shall share information on our commitment to environmental performance improvement to our employees, vendors, and customers.

Energy Efficiency

Three Phase is committed to reducing our energy use on an intensity basis through a program of fleet optimization, fleet behavioral education and monitoring, improvements in our logistics and reducing corporate use of other resources such as water, paper and other materials that produce greenhouse gases. In addition to our corporate program that includes assessment of our suppliers, Three Phase encourages our employees to become sustainability advocates in their personal lives by educating and supporting our employees' efforts to reduce, reuse and recycle in their homes as well as at work.

Hazardous Substances

RoHS restricts the use of certain hazardous substances in electrical and electronic equipment. As a result of RoHS, manufacturers typically manufacture and distribute CE compliant goods on a

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global basis. New electrical and electronic equipment containing more than agreed levels of lead, cadmium, mercury, hexavalent chromium, polybrominated biphenyl (PBB) and polybrominated diphenyl ether (PBDE) flame retardants are predominately no longer available.

RoHS-compliant parts have less than or equal to the maximum concentration of 0.1% by weight in homogeneous materials of lead, hex chrome, mercury, PBB, PBDE and 0.01% for cadmium, or qualify for an exemption to the above limits as defined in the Annex of the RoHS Directive.

Three Phase employees have undergone training to understand and identify RoHS and CE marked products.

Three Phase material suppliers are surveyed on their current status and compliance with this policy and their efforts to restrict hazardous substances in their supply chain as defined by RoHS.

Conflict Minerals

Conflict minerals are minerals mined in conditions of armed conflict and human rights abuse, most notably in the eastern provinces of the Democratic Republic of the Congo (DRC). The profits from the sale of conflict minerals may help perpetuate human rights abuses and finance ongoing unrest in the DRC.

The most common conflict minerals that may end up in our supply chain include:

- Gold
- Tin
- Tantalum
- Tungsten

The Dodd-Frank law signed into effect in July 2010 included a section on conflict minerals with the intent on ensuring that minerals do not come from conflict areas of the DRC or fund conflict in the DRC.

Under the law, companies must disclose if the minerals originated in the DRC or in adjoining countries and post a description of measures taken to obtain the source and chain of custody of the minerals as well as provide an independent audit of the report.

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Hazardous and Regulated Waste Management

Employees who work with or are potentially “exposed” to Chemical or Biological hazards shall receive initial training and any necessary retraining on hazardous materials requirements and the safe use of those materials to ensure employees are not over exposed.

The training provided shall emphasize these elements:

- Summary of the standard and this written program, including what hazardous chemicals are present, the labeling system used, and access to hazardous material information and what it means.
- The chemical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals.
- The physical properties of hazardous materials (e.g., potential for fire, explosion, etc.)
- Health hazards, including signs and symptoms of exposure associated with exposure to chemical or biological materials along with any medical condition known to be aggravated by these exposures.
- The procedures to protect against hazards (e.g., engineering controls; work practices or methods to assure proper use and handling of chemicals; personal protective equipment required, and its proper use, and maintenance; and procedures for reporting chemical emergencies.)

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Three Phase Line Construction Policies on Human Rights and Labor Practices

Three Phase has a zero-tolerance policy for unlawful discrimination, harassment or retaliation and will not tolerate any such conduct. Three Phase provides equal employment opportunities to all qualified individuals without regard to race, color, religion, national origin, age, sex, sexual orientation, veteran status, marital status, disability or any other basis or characteristic protected by law. Three Phase is also committed to providing a work environment free of harassment on the basis of race, color, national origin, religion, religious creed, ancestry, age, sex, sexual orientation, gender, gender identity, gender expression, veteran status, marital status, citizenship status, military status, pregnancy, medical condition, genetic information, physical or mental disability or any other characteristic protected by federal, state, or local laws.

It is the responsibility of each and every employee to report unlawful harassment or discrimination when it occurs-whether they are a victim of, or a witness to, unlawful behavior. Employees will be protected from retaliation for opposing unlawful discriminatory practices when they report, in good faith, unlawful harassment or discrimination.

Reports of unlawful harassment, discrimination or retaliation can be made to your Human Resources contact or the Legal Department. Human Resources will investigate all allegations of unlawful harassment and discrimination promptly, impartially and in a confidential manner. If Three Phase determines that unlawful harassment, discrimination or retaliation has occurred, it will take prompt and effective remedial action.

Child Labor, Involuntary Labor, Physical Coercion and Human Trafficking

Three Phase is committed to conducting our business and operations in an environment that is free from child labor, human trafficking and forced labor. This policy covers all suppliers, subcontractors and associates of Three Phase.

Child labor is defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Any work that is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling by depriving them of the opportunity to attend school or obliges them to leave school

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prematurely or requires them to attempt to combine school attendance with excessively long and heavy work.

Human trafficking is the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Involuntary labor is involuntary work or service that is obtained from an individual under the threat of force or penalty. Involuntary or forced labor often takes place in situations in which persons are physically coerced to work through the use of violence or coerced through intimidation or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.

Three Phase will not tolerate the use of unlawful or forced labor in the manufacture of products or services it sells and will not accept products or services from Suppliers that employ or utilize unlawful or forced labor in any manner. Human trafficking and slavery are crimes under state, federal and international law.

Three Phase has implemented a comprehensive corporate social responsibility program to ensure that we operate within the highest standards of business ethics and in accordance with all applicable laws and regulations.

As good corporate citizens, Three Phase does not conduct business with any suppliers that engage in human trafficking, child labor or forced labor. As part of our comprehensive social responsibility program, we engage with our suppliers on a continual basis and conduct annual surveys which assess and affirm our suppliers' compliance and adherence to our published Corporate Social Responsibility policies.

Freedom of Association

Three Phase respects the rights of their employees to join or not to join worker organizations, including collectively bargained trade unions or similar external representative organizations.

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Wages and Compensation

Three Phase offers competitive benefits and valuable training and development opportunities for its employees. Three Phase expects our suppliers to fairly compensate their employees in compliance with local, state and national wage and hour laws.

Drug and Smoke Free Workplace

In keeping with our responsibility for the safety of our employees and customers, Three Phase does not tolerate the use of illegal or synthetic drugs, the abuse of prescription drugs or being under the influence of drugs or alcohol while on company time or property. The use of any tobacco products is prohibited in company vehicles and is limited to designated areas on company property. In situations where the preferences of smokers and nonsmokers are in direct conflict, the preferences of nonsmokers will prevail.

This policy covers the smoking of any tobacco product, including any form of electronic cigarette, and the use of oral tobacco products, and applies both to employees and non-employee visitors of Three Phase facilities and worksites. Three Phase also prohibits the display of any cigarette paraphernalia, such as electronic cigarettes, pipes, cigarette papers or wrappers, and any other item designed for the smoking, preparation, storing or consumption of tobacco products.

Three Phase will comply with all applicable state laws pertaining to smoking inside company facilities as well as permissible locations to smoke outside buildings. This policy also covers temporary employees or contract workers, consultants, vendors and visitors.

Occupational Health and Safety

Three Phase Health, Safety and Environmental program is based on the premise that Safety, Quality and Production are of equal importance. In following this philosophy, Three Phase is committed to achieving and sustaining HSE excellence in all phases of our projects through continuous improvement of our workplace processes.

We will strive to create a culture in which the safety of our employees is the highest value and in which employees, our suppliers, employees and management work together to take responsibility and accountability for creating a safe work environment.

The objective of the HSE program is to promote communication between management and workers while developing; accountability, awareness and improving skills through training and experience to eliminate injuries and illness from all operations with the overall goal of providing

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a safe work environment for all workers. The HSE program will meet and in some cases, exceed the applicable health and safety legislation.

To be successful, all employees and suppliers must have a full understanding in all safety and health related matters. Only through such a cooperative effort can a safety program for all (term removed) be established and preserved in the team's best interests. We will include HSE in every part of our daily operations and will not allow its value to be compromised.

We recognize that the responsibilities for Health, Safety, and Environmental are shared:

- Three Phase accepts the responsibility for leadership of the HSE program; for its effectiveness and improvement along with providing the safeguards required to ensure safe working conditions for all employees.
- Employees and suppliers are responsible for adhering to and complying with all aspects of Three Phase HSE program.