

We are defined by our values: integrity, respect, performance excellence, accountability, and responsibility. These values should guide us in how we deal with every problem at work, large and small. The Company Policy gives us detailed guidance about how to apply Acme Electric's values to specific issues and challenges that arise in our jobs

You must follow the law, the Company Policy, and all Acme Electric LLC policies and guidelines. You can't violate any of these rules for any reason, even if you are instructed to do so by a supervisor. Violations of this Code, or any other Acme Electric LLC policy, can lead to discipline up to and including termination of employment.

But following the Company Policy is just a starting point. We're all expected to help maintain and promote the culture of integrity that is one of Acme Electric LLC's greatest competitive advantages. A critical part of maintaining a culture of integrity is making sure that each of us asks questions and raises concerns. If you do this, you can help the company spot issues before they turn into problems. Reporting misconduct or ethics concerns isn't just an option – it's each Employee/Subcontractor's responsibility. You must report suspected misconduct and violations of the Code.

Employees in supervisory roles have a special duty to set the right example. Supervisors must promote an open door culture in which each Employee/Subcontractor is comfortable speaking his or her mind.

You are required to comply with this Code as a condition of continued employment. This Code may be changed by the company at any time, except pursuant to any applicable collective bargaining obligations, without notice to you. Except where applicable law provides otherwise, employment with Acme Electric LLC is "at will," which means that you or Acme Electric LLC may terminate your employment, at any time, with or without cause, with or without notice, for any reason not prohibited by law, unless governed by a collective bargaining agreement or specific contract of employment. Any at will employment relationship may not be modified except in a written agreement signed by an authorized Acme Electric LLC officer.

## **TIMEKEEPING**

**You must accurately record the time you work and breaks you take accurately. The company work week is Friday through Thursday. You must submit those work time in a timely manner as required by the Company. Checks will be mailed or direct deposits made on the Friday after the next work week. Failure to accurately record your time is a violation of the Code and could result in discipline up to and including termination of employment. Employee/Subcontractors may NOT record time for another person. Supervisors may record times of employees or subcontractors in their charge to verify timekeeping.**

### **Protecting Acme Electric LLC's assets and reputation.**

We are all accountable for protecting the company's assets and reputation. If you are provided tools or equipment to use on the job, you are responsible to keep those tools in good working order and return them in good condition. Report any tools that break to your supervisor. You are never permitted to use Acme Electric LLC equipment or vehicles for personal purposes unless approved by Company leadership.

### **Security of facilities**

It is the responsibility of all Employee/Subcontractors to protect and secure all materials, tools and equipment at each jobsite. Materials, ladders and tools should be locked in a provided Conex container or secured workspace in a building before leaving the premises.

### **Proper use of Acme Electric LLC resources**

You are required to protect Acme Electric LLC's resources, as well as property belonging to customers, business providers, and co-workers. All company resources must be used appropriately, and never for personal gain. Company property cannot be taken, sold, loaned, intentionally damaged, given away, or otherwise disposed of, regardless of its condition or value, without specific authorization.

If you are using company tools and lose them you agree to immediately replace the tool(s) or have the full cost deducted from what you are owed.

### **Preparing, disclosing, and maintaining accurate records**

We are committed to maintaining and providing truthful information that satisfies all legal requirements. We do not tolerate the falsification or improper alteration of records.

You must create and maintain true and accurate records. If you identify any mistakes or discrepancies, no matter how small, you must try to resolve them immediately, and you must promptly notify your supervisor.

Company records must be retained according to applicable laws and Acme Electric LLC's Records Management Policy. You may never destroy, alter, or conceal any record if you have been directed to retain it or if you know – or reasonably believe there is a possibility – of any litigation or any internal or external investigation concerning that record.

If you believe a record was intentionally falsified or created to be misleading, or if anyone directed you to violate any section of this policy, you must immediately contact the Company leadership.

### **Hotel and Travel**

If hotel or lodging expenses are agreed to be provided by the company, they will be covered by the company for each day you work 8 hours or more. If you do not work 8 hours or more, the cost of lodging will be deducted from your payroll/payment.

### **Protecting company communication and information systems**

Acme Electric LLC's communication and information systems, including all company computers and mobile devices, are critical to the company's operation. You must protect company information from accidental or unauthorized disclosure. You must also protect the security of user IDs and passwords for all company systems and devices. Additionally, you must also comply with all company policies relating to the use of computer hardware and software on company systems, and the acquisition, use, and disposition of data on

company systems. Only approved software and hardware may be used on company systems, and such media must have a legitimate business purpose and be malware free.

You may not use company systems, such as email or instant messaging, to engage in activities that are illegal, violate company policy, or could result in Acme Electric LLC's liability or reputational harm. Some examples of improper uses of company systems include:

- pornographic, obscene, offensive, harassing or discriminatory content;
- unauthorized mass distributions;
- communications on behalf of commercial ventures; and
- communications directed to a group of Employee/Subcontractors on behalf of an outside organization.

You may make limited personal use of company systems, so long as it does not interfere with your work responsibilities, incur costs, or otherwise violate the Code or Acme Electric LLC policy. You may not send non-public company information to personal email unless you are authorized to do so by a supervisor and comply with company policies regarding encryption.

## **A respectful, safe and professional workplace.**

We are committed to a safe, healthy, and professional work environment in which each of us is treated with respect and given the opportunity to achieve performance excellence.

As an Acme Electric LLC Employee/Subcontractor, you are expected to treat customers, fellow Employee/Subcontractors, and vendors with respect, dignity, honesty, fairness, and integrity at all times. Not only is this sound business practice, it's also the right thing to do.

### **Commitment to diversity**

An inclusive workplace is key to our success and we will win in the marketplace by attracting, retaining, and developing a highly qualified, dedicated, and diverse workforce.

### **Discrimination and harassment**

We are committed to maintaining a workplace free from illegal discrimination or harassment. We respect and comply with all laws providing equal opportunity to individuals without regard to race, color, religion, age, gender, pregnancy, sexual orientation, gender identity and expression, national origin, disability, marital status, citizenship status, veteran status, military service status, and any other protected category under applicable law.

We do not tolerate such behavior. If you are subjected to or observe unlawful harassment, you should report it to your, and, if you are comfortable doing so, confront the perceived harasser and ask him or her to stop. Supervisors who become aware of harassment concerns must report the issue.

## **A safe and healthy workplace**

We share a responsibility for maintaining a safe and healthy workplace and for doing business in a way that meets our responsibilities to each other, our customers, and the public.

We are committed to providing a safe workplace and to meeting our environmental responsibilities. That means that each of us must perform our jobs in a safe and environmentally responsible manner and in compliance with Acme Electric LLC policy and the law. Supervisors must ensure that direct reports are trained in the safety and environmental practices of their jobs, report potential noncompliance, and investigate all EHS concerns of which they become aware.

You must report a work-related crash or injury; a hazard or incident; or a violation of an environmental, health, or safety law or company policy to your Supervisor

### **Workplace violence**

We are committed to maintaining a work environment that is free from violence and weapons, or threatening, hostile, or abusive behavior.

You must never engage in violent or threatening behavior toward fellow Employee/Subcontractors, customers, or business partners resulting in Police being called.

### **Drugs and alcohol**

Substance abuse is incompatible with workplace health and safety.

You are agree to substance testing at any time.

You may not report to work under the influence of alcohol, an illegal drug, or any controlled substance for which you do not have a prescription. If you are taking prescription medication that may affect your perception or responsiveness, you must notify your supervisor. Never operate a vehicle or machinery while in an impaired state.

You must not use or possess illegal drugs or drug paraphernalia while on company property, in a company vehicle, or when on company time. You should not possess or use controlled substances or prescription drugs that have not been prescribed to you by a physician.

Marijuana is an illegal drug under U.S. federal law. Even if you work in a jurisdiction that has legalized marijuana for medical or recreational purposes, you may not report to work under the influence of marijuana, or use or possess marijuana while on company property, in a company vehicle, or when on company time.

Possession and use of alcohol are prohibited on company property, while in Acme Electric LLC vehicles, and when conducting company business. There are limited exceptions to this prohibition:

- alcohol may be served at social functions on company premises, but only with prior approval from Jeff
- alcohol may be consumed if it is served at an external event at which you are representing Acme Electric LLC (e.g., a business dinner or cocktail reception).

In such cases, consumption of alcohol must be voluntary, in moderation, and in a manner that does not embarrass the company.

### **Employee/Subcontractor privacy**

You must take appropriate steps to protect confidential personal Employee/Subcontractor information, including social security numbers, identification numbers, passwords, bank account information, and medical information. You should never access or obtain, and may not disclose outside of Acme Electric LLC, another Employee/Subcontractor's personal information obtained from Acme Electric LLC business records or systems unless you are acting for legitimate business purposes and in accordance with applicable laws, legal process, and company policies, including obtaining any approvals necessary under those policies.

### **Monitoring and recording at work**

To maintain a safe and professional work environment, Acme Electric LLC monitors Employee/Subcontractor use of company property, consistent with applicable law. Monitoring applies to company facilities and vehicles. Such monitoring also applies to company-provided communications devices, our networks and computer systems (including corporate email, encrypted and unencrypted internet access, and any application, such as web-based email, accessed from company provided devices and systems).

In cases involving safety or suspected misconduct (for example, investigating claims of sexual harassment, workplace violence, or suspected theft), the company reserves the right to monitor or inspect, without notice, any company property or any personal

property on company premises that may contain evidence of misconduct, consistent with applicable law or any local data privacy notice. With respect to company provided or paid for communications devices or accounts, the company may, as permitted by law or any local data privacy notice, access any stored information (whether on the device, our servers or with a third-party) that may contain evidence of misconduct, and Employee/Subcontractors are required to cooperate, including by providing access to the information, when requested by Company leadership.

**Our company's reputation is based on the actions of its Employee/Subcontractors. Each of us must act with integrity and respect at all times.**

### **Conflicts of interest**

You must avoid any relationships or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job. When acting on behalf of the company, you must advance the company's legitimate interests when the opportunity to do so arises. If you identify a situation where the company's interests are being harmed, you must report the matter to the Company leadership

You must never use Acme Electric LLC property or information for personal gain or take personal advantage of any opportunity that arises in your work for Acme Electric LLC.

You must disclose any potential or actual conflict to the Company leadership as soon as you become aware of it.

### **Personal conflicts of interest**

Certain types of personal relationships can create actual or apparent conflicts of interest both internally at Acme Electric LLC and in our interactions with third parties. Never use your position at the company to advance your personal interests or those of a friend or relative at the expense of the company's interests.

Internally, you may not supervise – directly or indirectly – someone with whom you share a close personal relationship, such as anyone in your family or household, or someone with whom you have or had a romantic relationship or other similar relationship. Even if a family member or romantic partner is not in your

reporting chain, if you interact with such a person as part of your Acme Electric LLC work responsibilities, you must avoid any actions at work that could create even the appearance of a conflict of interest. If you are uncertain about what interactions are appropriate, you must contact the Company leadership.

I certify that I have read and understand the Acme Electric LLC Policy Manual. I agree to the terms therein.

Employee/subcontractor: \_\_\_\_\_

Date: \_\_\_\_\_, 20\_\_\_\_