



Fenstermaker Business Philosophy and Code of Business Conduct



C. H. Fenstermaker & Associates, L.L.C.
Louisiana Survey Firm Registration No. VF. 0000154
Louisiana Engineering Firm Registration No. EF. 0000311
Texas Survey Firm Registration No. 10028500
Texas Engineering Firm Registration No. F-7855

A Letter from Bill Fenstermaker, Chief Executive Officer

Dear Team Members,

Every day our clients, governments and communities put their trust in Fenstermaker, to deliver services with the highest level of quality, professionalism and safety, to provide them with information so that they can make important business decisions.

That said, it is important that you know our “Corporate Soul”, the thing that enables us to perform up to our client expectations. Our soul allows us to stay relevant in the eyes of our clients. It’s not just about growth or money, but about excellence, respect for others and the ability to make people happy to do business with us.

Every day we make decisions and our values should always be foremost in that process. How we hire, how we fire, how we pick our partners and how we do business are what differentiates us from our competition.

Ultimately, it’s about each of us knowing that we have done the “right thing.” If we do this, Fenstermaker will remain a place where we are proud to work.

Our company began “its journey” in 1950 and our efforts over this time have become “our reputation.” Our success didn’t happen by accident, it is based upon conducting business with the highest of ethical standards and living out our core values.

“Our Way of Doing Business” serves as a guide to a standard of behavior that we expect from all who work here. After all, our future depends on it.

Sincerely,



Bill Fenstermaker
Chief Executive Officer
C.H. Fenstermaker & Associates, LLC.



“Our success didn’t happen by accident. It is based upon conducting business with the highest of ethical standards and living out our core values.”





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Our Way of Doing Business
defines The Rules by Which We Live
and establishes our Code of Business Conduct.

The Rules by Which We Live

Fenstermaker is committed to the adherence of ethical conduct in all our Business Practices. Since the firm's inception in 1950, we have always upheld a policy to conduct all business in a lawful and ethical manner.

Fenstermaker's **Our Way of Doing Business** defines our business philosophy and embodies the fundamental principles that govern our ethical and legal obligations to Fenstermaker, our clients and to society. It pertains not only to our conduct within the company, but also to conduct involving our customers, partners, competitors and the community. Encompassing a wide range of business practices, this business philosophy sets out basic principles to guide all Fenstermaker employees. Our Way of Doing Business defines the rules by which we live and establishes our Code of Business Conduct.

Fenstermaker's Code of Business Conduct

This Code provides a general statement of our expectations regarding the ethical standards that team members should adhere to while acting on behalf of the Company. All of our employees must conduct themselves in accordance with this Code and seek to avoid even the appearance of improper behavior.

◆ Our Mission

Our Mission is to provide our clients with high quality service by remaining in the forefront of technology, employing talented people and providing a fulfilling work environment that encourages growth and prosperity.

We strive to make our company a better place for our clients, our employees and our owners:

- **For our Clients** - Provide a quality service that is delivered on time, on budget and that meets or exceeds client's expectations.
- **For our Employees** - Create a work environment that allows team members the opportunity for self-fulfillment.
- **For our Owners** - Realize a reasonable and sustained return on their investment.



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◆ Our Core Values & Principals

Our success is based upon providing innovative, high-quality products and services and on conducting business ethically, honestly and with integrity in everything we do. Our core values and principles define the way we do business. These principles are:

- **Quality** - Provide quality products and services.
- **Integrity** - Demonstrate honesty and high ethical standards in all business dealings.
- **Teamwork** - Continually learn and share ideas and knowledge.

◆ Our Statement of Commitment

Our core values are demonstrated in our interaction with our clients, our team members and the communities in which we work. These commitments form the basis for everything we do as a company. We are committed to the following:

- **Our Clients** - We recognize that customer satisfaction is of primary importance to our success. We will treat our clients with integrity, good will and respect while providing a high quality product that meets their expectations.
- **Our Team Members** - All Team Members will be treated fairly and equitably. We are committed to providing a safe working environment and to fostering diversity within our company.
- **Our Community** - We are committed to responsible corporate citizenship.

As employees, we all have an ongoing responsibility to live our Core Values and Statement of Commitment and are each personally accountable for the highest standards of behavior.

◆ Our Code of Ethics

We are dedicated to the adherence of ethical conduct in all our business practices. Our Code of Ethics can be summed up in one phrase:

DO THE RIGHT THING

◦ Why do we have a Code of Ethics?

Fenstermaker's continued success depends upon our reputation for ethical business conduct. We have developed our code to help ensure that we conduct business fairly and honestly and interact ethically with our clients, fellow team members and communities.

◦ What does it mean to "DO THE RIGHT THING?"

At times you might be unsure of what is the right thing to do in a business or personal situation. If you are ever not sure of what to do, ask yourself these questions; it is a simple way to make sure we think about the ramifications of our actions:

- Is it legal and ethical?
- Is it consistent with our Mission, Core Values and Code of Business Conduct?
- Does it protect our interests?
- Would it look okay in the news?
- Would my family, friends, managers or co-workers approve?
- Is it fair to everyone involved?



"We have developed our code to help ensure that we conduct business fairly and honestly and interact ethically with our clients, fellow team members and communities."

If you hesitate when answering, if you are uncomfortable with your answer, or if you answer “no” to any of these questions, don’t do it and seek additional guidance.

- Who is responsible for adhering to this code?

All Fenstermaker employees are personally responsible for adhering the code and for doing the right thing.

- Reporting concerns and violations.

You should seek guidance if you are ever unsure about the right thing to do in a business situation. Communication with your peers or with your immediate supervisor is often the best place to start.

When it is not possible to raise or resolve an issue with your supervisor, if you are uncomfortable discussing the matter with your supervisor, or if his or her response is not adequate, you should contact your next level of management, your Corporate Leadership Team Leader, your Corporate Executive Team Leader or Human Resources.





◆ Our Quality Credo

We have an unending commitment to make our company a better place for our clients, our employees and our owners. We dedicate ourselves to the principle of total quality and continuous process improvement.

For our clients, we provide a project delivery process that produces on-time and on-budget deliverables that meet their expectation.

In order to meet our quality objectives, we must clearly understand each client's requirements, set up the appropriate process to achieve the desired outcome and take the responsibility to do the assigned job correctly, the first time. We understand clearly that our commitment to these principles is in our best interest and without that commitment, we could not continue to operate.

◆ Employee Responsibility

As an employee, you are required to familiarize yourself with our **Rules by Which We Live**, which sets forth our Code of Business Conduct and establishes procedures that further govern the behavior of our team members. Adherence to this Code is essential for all team members.

For clarification or guidance on any issue, you should consult with your direct supervisor, your Corporate Leadership Team Leader, your Corporate Executive Team Leader or Human Resources.

If you have knowledge of any violation of the code, it is your responsibility to disclose such activity to your supervisor or Human Resources. These reports may be made anonymously.

As a supervisor, if you receive a report from a team member regarding a violation or a

possible violation, you must promptly report the matter to senior management. No adverse action or retribution of any kind will be taken against a team member because he or she, in good faith, reports a suspected violation.

Violations of our Code of Business Conduct may result in discipline, up to and including termination of employment.

“We dedicate ourselves to the principle of total quality and continuous process improvement.”

The Way We Deal With Our Clients



Client Focused. Technology Driven.

The Way We Deal With Our Clients

Fenstermaker conducts business ethically, honestly and with integrity. This applies to every business decision in every area of the company.

Each product we deliver and every service we provide is for our clients. We should always focus on delivering innovative, high quality products and services and on demonstrating integrity in every business interaction.

- ◆ **Conflicts of Interest (Company & Personal Conflicts of Interest)**

Every Fenstermaker employee occupies a position of trust. We must be particularly sensitive to any situation, on or off the job, which might erode that trust or cause others to doubt our fairness or to question the good faith of our acts or decisions. Team Members, in conducting business, are expected to act on behalf of and in the best interests of the company.

Appearance is crucial. Even the perception, real or imagined, that personal interests influence business judgment can hurt our reputation and business.

- **What is a conflict of interest?**

As it relates to Fenstermaker team members, the term “conflict of interest” means engaging in conduct, whether by way of investments, outside employment, romantic or other personal relationships, or any other obligation

or relationship, which would cause a Team Member to use his or her position and influence within Fenstermaker for personal gain or for the benefit of others instead of Fenstermaker’s best interests.

A conflict of interest arises when you act, or appear to act, on behalf of someone other than Fenstermaker; and you have, or appear to have, a self-interest of which we are unaware and that is actually or potentially adverse to our best interests or that gives the appearance of impropriety or divided loyalty.

Simply put, a conflict of interest arises when your personal activities and relationships interfere, or appear to interfere, with your responsibilities to Fenstermaker.

As a company, Fenstermaker can also experience conflicts of interest with our clients or other business partners, and it may be necessary or appropriate to disclose these conflicts to others for resolution.



Conflicts of Interest



- **How do I recognize a conflict of interest?**

Conflicts of interest can generally be found at two levels: organizational conflicts of interest and personal conflicts of interest. An organizational conflict of interest arises where the organization's objectivity in performing work is or might be impaired or the organization has an unfair competitive advantage. A personal conflict of interest is a situation where a person's private interests interfere or may be perceived to interfere with his/her performance of official duties.

In any potential conflict of interest situation, ask yourself:

Could my personal interests interfere with those of the Company?

Might it appear that way to others, either inside or outside of the Company?

- **How do I avoid conflicts of interest?**

Employees should avoid conflicts of interest, whether actual, perceived or potential, between work and personal life and should avoid situations where your personal interests could inappropriately influence or appear to influence, your business judgment.

An actual conflict of interest does not need to be present to constitute a violation of our policy. Activities that create the appearance of a conflict of interest must also be avoided to ensure that Fenstermaker's reputation and our employees' reputations are not harmed.

You should not use your position at Fenstermaker to obtain favored treatment for yourself, family members or others with whom you have a significant relationship. All business decisions you make should be made in the best interest of Fenstermaker.

- You may take part in legitimate financial, business, charitable and other activities outside your Fenstermaker job,

but any actual, potential or perceived conflict of interest raised by those activities must be promptly disclosed to management and you should update management on these activities on a periodic basis.

- **How do I resolve conflicts of interest?**

It is imperative that any actual or potential conflict or any situation that may be perceived as an actual or potential conflict be disclosed immediately to management.

Use good judgment, and if you believe you have a potential conflict or if you are unsure about a potential conflict involving a family member or other individual, talk to your manager or contact Human Resources.

- **Outside Work Conflict of Interest**

A conflict of interest can also arise when you take on outside work that could compromise the diligent performance of your duties for Fenstermaker. Should such a situation arise, you are encouraged to discuss it with your supervisor or Human Resources to assess the impact the outside work could have on your duties to Fenstermaker.

- ◆ **Client Relations and Business Courtesies**

A business courtesy is a present, hospitality or favor for which fair market value is not paid by the recipient. A business courtesy may be a tangible or intangible benefit such as meals, drinks, recreation, door prizes, honoraria, transportation, discounts, promotional items or use of a donor's time, materials, facilities or equipment.



“Each product we deliver and every service we provide is for our clients. We should always focus on delivering innovative, high quality products and services and on demonstrating integrity in every business interaction.”

As a Fenstermaker Team Member, you must ensure that any offered business courtesy is ethical, legal and cannot reasonably be interpreted as an attempt to gain an unfair business advantage or that could otherwise reflect negatively on Fenstermaker or the recipient. In addition, you may not use personal funds or resources to do something that cannot be done with company resources.

♦ **Monetary, Gifts and Entertainment, Future Considerations, etc.**

Traditionally, offering and receiving business gifts, entertainment or travel strengthens business relationships. When consistent with our Code of Conduct and done within established limits, these activities are a lawful and appropriate business practice. At Fenstermaker, we provide and accept gifts and entertainment only when appropriate. We must avoid giving or receiving gifts or entertainment if these might improperly influence the recipient's judgment or might be perceived to do so. We must never give or accept gifts when prohibited from doing so by law or by the recipient's or donor organization's policies. Gifts can include goods, services, favors, loans, trips, accommodation or use of property, etc.

The following are some guidelines to help you decide appropriateness:

- Gifts, meals, travel and entertainment must be reasonable for the business relationship and intended only to improve Fenstermaker's image, better represent products and services, or establish cordial relationships and foster goodwill in business relationships and then, only if consistent with the policies of the recipient's employer.
- We should never provide or accept gifts, meals, travel or entertainment that may create undue influence, or even the appearance of undue influence, and should never provide or accept gifts, meals, travel or entertainment in exchange or return for a reciprocal action.

- All expenditures for gifts and entertainment provided by Fenstermaker must be accurately recorded in our books and records.

If you are offered a gift, meal or entertainment that exceeds Fenstermaker's guidelines, politely decline and explain our rules. If returning a gift would offend the giver, or the circumstances under which it was given preclude its return, you may accept the gift, but should notify Human Resources. Human Resources will work with you either to donate the item to charity or to distribute or raffle the item among a large group of team members.

◆ Gifts and Entertainment for Government Officials

U.S. Government employees, officials and representatives have very strict regulations with respect to the offering and acceptance of gifts, entertainment, meals or other gratuities from U.S. Government contractors. U.S. Government employees, officials and representatives are required to disclose any gifts, entertainment, meals or other gratuities received from U.S. Government contractors, because such gifts may be seen as influencing their impartiality. Many state and local governments have adopted similar or additional regulations.

Therefore, as a Fenstermaker team member, you may not solicit, give or offer to give anything of value to government employees in the form of entertainment, meals or gifts that are in violation of the applicable rules and regulations of the particular government agency. Before offering

anything of value to government employees, check with Human Resources.

◆ Recruitment and Employment of Current or Former Government Employees

Complex rules cover the recruitment and employment of past and present government employees into private industry. Laws often limit the duties and types of services that former government, military or other public sector employees may perform as Fenstermaker employees or consultants.

Employment negotiations with government employees are prohibited while the employees are participating in a matter involving our interests. Consult with Human Resources prior to making offers of employment to current or former government employees.

◆ Contracts and Procurements

In negotiating contracts with any clients, subcontractors or vendors, Fenstermaker team members must be accurate and thorough in all





“Fenstermaker team members must be accurate and thorough in all representations.”

representations. In negotiating contracts with governmental agencies, the firm has an affirmative duty to disclose current, accurate and complete cost and pricing data where such data are required under law or regulation. The submission to a federal, state or local governmental entity of a proposal, quotation or other document or statement that is false, incomplete or misleading can result in civil and/or criminal liability for the company, the involved team member(s) and supervisors.

- ◆ **Confidential and/or Propriety Client & Third Party Information**

Confidential information is information that is not subject to public disclosure. It encompasses information produced by Fenstermaker or obtained in confidence from a third party and covered by a non-disclosure agreement.

Periodically, in the normal course of business, clients and others disclose confidential information to us for business purposes. In these situations, properly label client sensitive information to indicate how it should be handled, distributed and returned or destroyed.

Except when disclosure is authorized or legally mandated, it is the responsibility of every team member to protect and maintain the confidentiality of this information. Failure to protect client and third-party information may damage relations with clients or others and may result in legal liability.

Examples of confidential information are financial data, strategic plans, intellectual property, information on bids, personal employee information, legal documents and

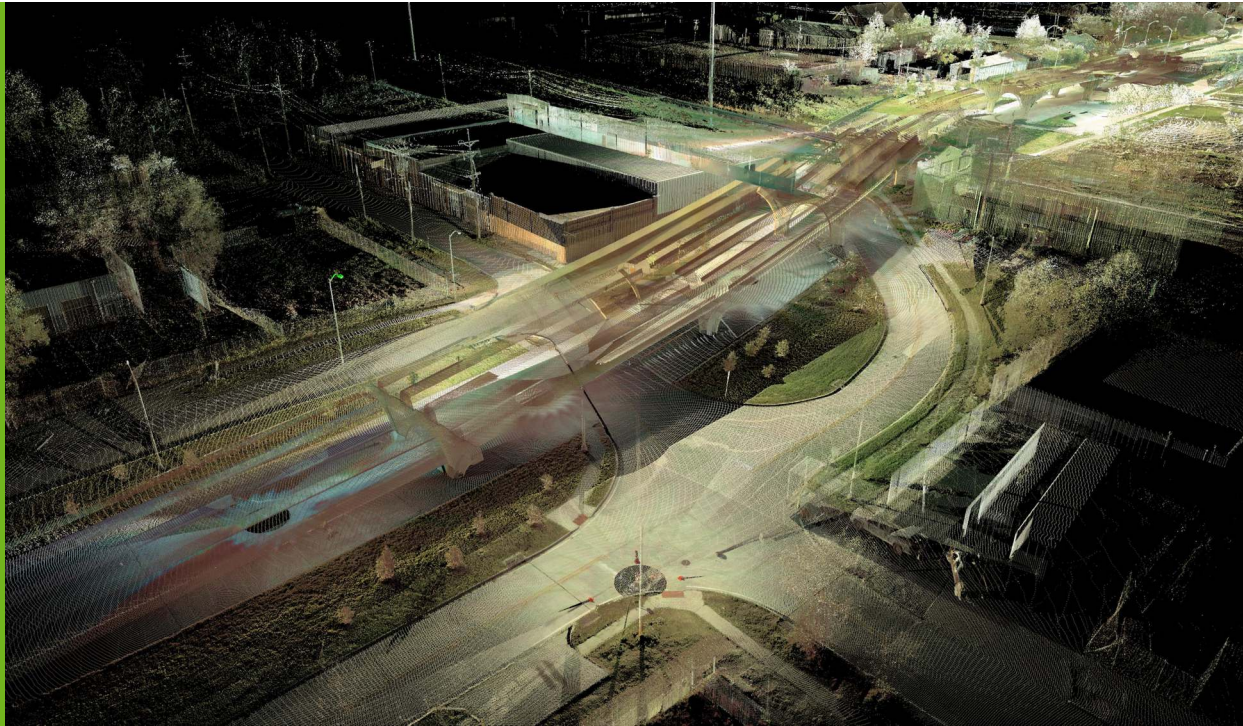
information on customers and suppliers.

◆ Competitor Trade Secrets and Proprietary Information

It is our policy to respect the trade secrets and proprietary information of others. Although information obtained from the public domain is a legitimate source of competitive information, business intelligence obtained by illegal or unethical means is not.

Competitors may not be contacted for the purpose of obtaining business intelligence. Sometimes information is obtained accidentally or is provided to us by unknown sources. In such cases, it may be unethical, or even illegal, to use or even retain the information and you should immediately contact your manager or Human Resources.

- Always respect people's obligations to protect the confidential information of their current and former employers, and never induce anyone to violate any obligation of confidentiality.
- Do not request, accept, use or share confidential competitor trade secrets or proprietary information.
- Accept information in confidence only when Fenstermaker management agrees that we need it, and only under a written agreement that defines and limits our obligations in dealing with it.





The Way We Operate

♦ Political Activities and Contributions

As a company, we consider that registering and voting, contributing financially to the party or candidate of your choice, keeping informed on political matters, serving on civic bodies, campaigning and office holding at local, state and national levels are important rights and responsibilities of the citizens of a democracy.

◦ Political Activities

All Fenstermaker team members engaging in political activities are expected to do so as private citizens and not as representatives of the Company. You may engage in legitimate political activity, as long as it is carried out on your own time and without using Fenstermaker property. If you express your views on public or community issues of importance, it must be clear at all times that the views expressed are yours and not those of Fenstermaker.

◦ Political Contributions

Fenstermaker contributes selectively to political candidates and committees and only as permitted by applicable laws and authorized by our CEO or by our President. All corporate political contributions, whether monetary or in-kind (such as the donation/lending of equipment or technical services to a campaign), must be approved in advance. Team members may not use our assets (including employee work time or use our premises, equipment or funds) to personally support candidates and campaigns.

◦ What do I do if unethically approached?

All Fenstermaker team members should feel comfortable taking appropriate action against the illegal, improper or unethical behavior of others. Any team member who is unethically approached has a duty to report it to their manager. If unsure of what specific action to take, it is your responsibility to ask questions and see guidance. Retaliation against employees who raise genuine concerns will not be tolerated.

“Fenstermaker contributes selectively to political candidates and committees and only as permitted by applicable laws and authorized by our CEO or by our President.”



“Team members must also abide by the copyright laws and obtain secure legal permissions prior to duplicating any copyrighted material.”

- ◆ **Software License and Copyright Compliance**

Only company-authorized, duly licensed software shall be installed on Fenstermaker computers.

Team members must also abide by the copyright laws and obtain secure legal permissions prior to duplicating any copyrighted material.

- ◆ **Protecting Company Assets**

Safeguarding Company assets is the responsibility of all team members. Our company assets include equipment, facilities, information, technology, financial assets, intellectual property and other resources.

- **Confidential / Proprietary Information**

Confidential information is information belonging to Fenstermaker that is not subject to public disclosure. Confidential information encompasses information produced by Fenstermaker or obtained in confidence from a third party.

One of Fenstermaker’s greatest assets is our wealth of historical information. In addition, we have developed a vast body of technical information. As a team member, you must protect this information. You may not disclose any non-public, business, financial, personnel, survey or technical information, or plans, or data to any outside party, except as specifically authorized by management.

You must exercise caution to avoid misusing or inadvertently disclosing confidential information.

Upon leaving Fenstermaker, you may not copy, take or retain any documents or files containing Fenstermaker’s private, proprietary or confidential information. This prohibition against disclosure of Fenstermaker’s private, proprietary or confidential information extends indefinitely beyond your period of employment. Your agreement to protect the confidentiality of such information is considered an essential and crucial condition of employment with the company.

Clients may also require the company to keep certain information confidential, in which case the same requirements concerning disclosure that apply to our information also apply to client confidential information.

◦ Confidential Employee Information & Privacy

As part of your job, you may have access to personal information regarding other Fenstermaker employees or applicants, including information regarding their employment history, personal contact information, compensation, health information or performance and disciplinary matters. This information is confidential and should be shared only with those who have a business need to know. It should not be shared outside the company unless there is a legal or business reason to share the information and you have approval from the Human Resources department.

◦ Intellectual Property

Intellectual property is comprised of trademarks, domain names, patents, commercial designs, copyrights and trade secrets. Team Members have a duty to protect Fenstermaker's intellectual property, just as they have the obligation to respect that of others. Subject to applicable laws, any inventions or discoveries made by team members during the course of their work are Fenstermaker's property. Intellectual property is considered confidential information and should be treated as such.

◦ Computer & Data Security

Fenstermaker owns or has been licensed to use the technology used in our business including hardware, software and computer systems. This technology and the information stored on our computer systems are critical to our success. The company has entrusted you with its technologies so that you may conduct company business. Everyone who uses a computer at any of our offices is responsible for protecting these valuable technology resources.



◦ Email Awareness & Electronic Communications

Fenstermaker reserves the right to monitor your use of company resources for any reason, at any time, subject to applicable law. This includes information resources such as email and the internet.

In addition, when you use your personal equipment for business purposes, you consent to the search of your devices for business-related purposes and agree to disclose electronic communications stored at third-party service providers.

◦ Social Media

Most of us have access to the Internet on our work computers. While occasional personal use

is permitted, you must be careful to protect our reputation and business information. You should not post confidential documents that are or could be attributed to our company on any social networking sites. You should always make clear that your posts are your own and in no way reflect the views of Fenstermaker, its employees or its customers.

You must use social media sites and tools responsibly, with good judgment and in compliance with company policy. You are responsible for understanding and following our policies for the use of social media, including user forums, blogs, chat rooms and bulletin boards.

Never discuss our intellectual property, trade secrets and other company confidential information on social media. This principal concerning social media sites also applies to protecting information entrusted to us by our clients.

- **Personal Use of Company Property**

At times, you may need to use company equipment (including, but not limited to, computers, telephones, cellular phones, copiers, faxes, Internet services, printers, etc.) for limited personal use. You are permitted to do so within limits, as long as your use is reasonable and it does not interfere with your work. Using company facilities or equipment excessively or for unauthorized, abusive, unethical or inappropriate purposes is not allowed. Never overuse or abuse company assets for your personal use or gain or to conduct work on behalf of others.

Subject to laws affecting an employee's rights, Fenstermaker may monitor or search our work environments, including equipment, networks, mail and electronic systems, without prior notice.

Facilities and equipment are monitored to promote safety, prevent unlawful activity, investigate misconduct, manage information systems, comply with legal guidelines and for other business purposes.

“Facilities and equipment are monitored to promote safety, prevent unlawful activity, investigate misconduct, manager information systems, comply with legal guidelines and for other business purposes.”

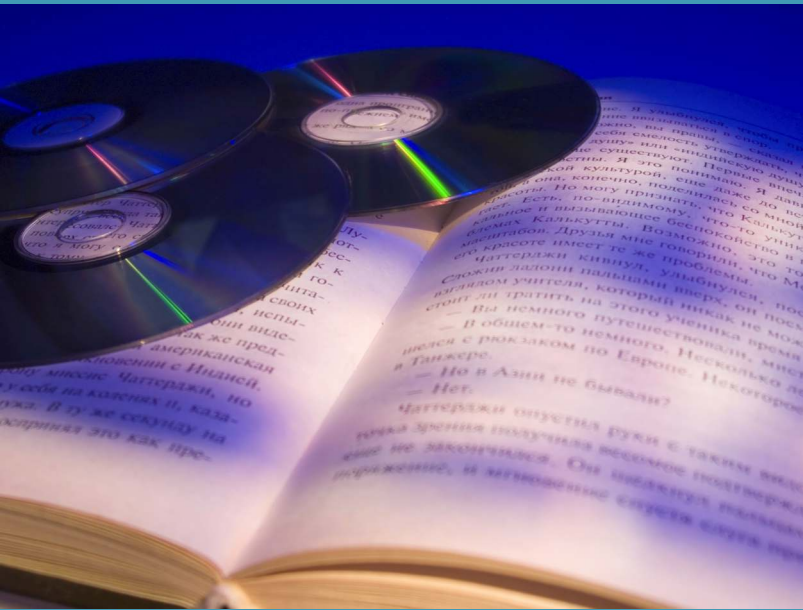
◆ Complete and Accurate Financial Information and Record Retention

Accurate records are critical to meeting Fenstermaker's legal, financial and management obligations. The accuracy of our financial reports depends on every team member properly recording information such as job sheets, project estimates, and costs, bills, payroll and regulatory data. These records include not only financial accounts, but other records such as quality reports, time entry records, expense reports and submissions such as benefits claim forms. It is each of our responsibility to ensure that all records and reports, including customer information, technical information and correspondence, are accurate, complete and timely.

You should never misstate facts, omit critical information or modify records or reports in any way to mislead others, and never assist others in doing so. False or intentionally misleading statements should not be made in any form of communication, verbally (in person or by telephone) or textually (in documents, letters or e-mails).

As a Fenstermaker team member, you have a responsibility to manage documents and make decisions on document retention. This includes both project and non-project documents. A "document" can take many forms. It may consist of email or other electronic files, notes, customer records, customer supplied plans or information and all transaction involving the creation of a document. Different documents have different retention periods. Check with your manager or contact Human Resources to assist in determining the appropriate retention period of documents in your area.

At times, Fenstermaker may need to retain documents beyond the period they would normally be retained. If you are notified that documents in your possession may be relevant to litigation, an investigation, an audit or other legal matters, you are required to maintain such records and follow the instructions set forth in the notice. In these situations, retention and preservation of documents is critical. This includes Fenstermaker documents and data contained on personal devices and in third-party storage such as cloud-bases storage providers.



◆ Treating Employees Fairly

The exceptional quality of our people provides us with a valuable competitive advantage. To build on this advantage, we strive to hire and retain the most qualified people available and to maximize their opportunities for success through training and development. We are committed to maintaining a safe work environment enriched by diversity and characterized by open communication, trust and fair treatment.

◦ Respectful and Stimulating Work Environment

Fenstermaker's goal is to have a respectful and stimulating work environment that reflects and values the best in everyone, where people treat each other professionally, with dignity and respect and where individual differences are valued.

A respectful workplace is free from unlawful discrimination and harassment, free of inappropriate or unprofessional behavior and is consistent with Fenstermaker's core values and principals. It is a place where team members can do their best and where they are free to report workplace concerns without fear of retaliation or reprisal.

◦ Diversity and Inclusion

Diversity and inclusion are embedded in our core value of Teamwork. Our workforce is comprised of skilled professionals who are dedicated to achieving excellence for all of our stakeholders.

At Fenstermaker, diversity and inclusion means promoting an inclusive work environment by practicing appropriate and fair behavior, demonstrating dignity and respect for all and intentionally engaging and respecting the talents, perspectives and uniqueness in all team members.

◦ Harassment and Personal Security

Providing a safe and secure work environment gives us a competitive advantage in attracting the best applicants, retaining our valuable workforce and winning and keeping clients.

Our policies encourage a non-hostile work environment and protect employees from harassment, bullying and victimization in the workplace. This includes all forms of sexual, physical and psychological abuse. As a team member you are entitled to, and are expected to preserve a positive and professional work environment.



"We strive to hire and retain the most qualified people available and to maximize their opportunities for success through training and development."

- **Drug / Alcohol / Violence-Free Workplace**

Prohibited substances and/or illegal drugs are inconsistent with our commitment to providing a safe working environment for all of our team members.

As an employee, you are not permitted to use, possess, distribute, manufacture, sell, attempt to sell or be under the influence of alcohol or illegal drugs on Fenstermaker property, while conducting company business or while operating a company vehicle.

In keeping with our commitment to the safety of our people, Fenstermaker will not tolerate workplace violence, threatening remarks or gestures or other disruptive behavior in the workplace.

Alcohol may, at times, be served responsibly at sanctioned company parties or other events approved by management.

- **Workplace Relationships**

Personal relationships in the workplace may present an actual or perceived conflict of interest where one individual in the relationship may be in a position to make or influence employment decisions regarding the other. Employees in consensual romantic relationships must comply with our Conflict of Interest policy.

Although having a consensual romantic relationship with another Fenstermaker team member is not harassment, harassment may occur if either person in the relationship engages in workplace conduct that is inappropriate or unwelcome.

Team members should not allow their relationships to disrupt the workplace or interfere with their work responsibilities or judgment.

“Doing the right thing is part of the Fenstermaker culture.”

- **Team Member’s Responsibility**

Every employee has a responsibility to report any alleged misconduct immediately. We will take action when made aware of misconduct. Failure to report misconduct is considered a violation of company policy.

- **What if I am concerned about retaliation?**

Fenstermaker will not tolerate any direct or indirect retaliation of any kind for reporting a business conduct concern or cooperating with an investigation, even if the concern turns out to be unsubstantiated. We expect such reports to be made in good faith.

This does not mean that the reporting employee must have all of the facts; the employee should feel free to ask questions and to report any issue that causes them concern without fear of retaliation. If you suspect that you are experiencing retaliation, contact Human Resources.

- ♦ **Corporate Citizenship and Community Relations**

Doing the right thing is part of the Fenstermaker culture. Our team members take this concept beyond the workplace and into the communities in which they live. They volunteer, raise money and dedicate their time and talent to help others and to improve the quality of life for those around them.

- **Responsible Citizenship**

Corporate citizenship is the responsibility of the entire Fenstermaker organization. We recognize the critical role it plays in the many locations where we have a presence. We strive to be good neighbors in the communities where we live and work.

As Fenstermaker team members, we should be active and informed participants in the political process, and we should do our part to protect the environment.

- **Corporate Social Responsibility and Community Engagement**

We are committed to respecting and upholding the human rights of all people. Human rights are the fundamental rights, freedoms and standards of treatment adhered to by governments,

“If it’s important
to the
community...



...IT'S
IMPORTANT
TO US.”

businesses and individuals around the world.

We are committed to supporting our communities and making them a better place to live and work. As Fenstermaker team members, we are encouraged to become involved in our communities by volunteering our time and talent and by financially supporting education and other worthy causes. We encourage our team members to join and serve on various community boards and organizations. We continue to fulfill our commitment to good citizenship by contributing cash, in-kind services and the expertise of our people to community organizations and projects. Our sustained involvement in our communities is an important element of the Fenstermaker culture and an integral part of the way we do business.

- **Philanthropy**

Fenstermaker is committed to serving the needs of our communities through the investment of our resources. We direct our giving to numerous organizations that are vital to our community needs and issues.

If it’s important to the community, it’s important to us.

- ♦ **Health, Safety and the Environment**

Environmental protection and the occupational health and safety of team members are priorities at Fenstermaker and are regarded as fundamental corporate social responsibilities.

We strive to reduce the impact of our operations, conserve natural resources and conduct all business activities in a manner that protects not only the health and safety of our employees, but also of our communities.

Appropriate safety and health considerations are incorporated into our daily job duties and we operate and maintain equipment, facilities and processes in a safe manner. Team members participate in training and education programs to manage health and safety risks. We encourage the use of good judgment and always put the environment, health, and safety first.

Fenstermaker endeavors to reduce waste wherever and whenever possible and we are committed to continuously improving our business practices to reduce our environmental impact. We encourage recycling and reuse of materials and we incorporate energy saving devices and practices to minimize our environmental footprint.

It is our policy to comply with all laws and government regulations that are applicable to our business. Since much of our business involves the environment, we, as team members, must be particularly attentive to environmental laws and regulations and remain respectful of the environment. Human Resources is available to assist Fenstermaker team members with respect to the interpretation of environmental laws as they relate to company projects.

“We strive to reduce the impact of our operations, conserve natural resources and conduct all business activities in a manner that protects not only the health and safety of our employees, but also of our communities.”



Remember:

Our Way of Doing Business enumerates the Fenstermaker Business Philosophy and our Code of Business Conduct.

Our Code of Ethics is “DO THE RIGHT THING.”

- ♦ Keep in mind these key questions to consider in your business conduct:
 - Is it legal and ethical?
 - Is it consistent with our Mission, Core Values, and Code of Business Conduct?
 - Does it protect our interests?
 - Would it look OK in the news?
 - Would my family, friends, managers, or co-workers approve?
 - Is it fair to everyone involved?
- ♦ Use good judgment and common sense. If it seems improper or unethical, it probably is.

Still have questions or need additional information?

- Talk to your supervisor.
- Talk to your Operation Leader.
- Speak to your Division Vice President.
- Get in touch with Human Resources.

