



BUSINESS PARTNER CODE OF CONDUCT

Introduction

Brandt's long history of success has been based on our strong reputation for excellence that reflects the hard work and accomplishments of all our team members and our excellent working relationships with others like you. Brandt is committed to conducting business in strict compliance with our CORE VALUES. Doing business with care and integrity mean strictly complying with all applicable laws, rules and regulations as well as observing the highest standards of ethical behavior. We do business the right way!

Brandt's core values – Care, Integrity, Perseverance and Agility – are at the heart of everything we do and serve as guiding principles that govern how we conduct ourselves. The core values described below represent Brandt's commitment to its employees, the community, the environment and our customers.

CARE

- CARE is at the core of everything we do. Our reliable, consistent customer service is the cornerstone of our work. However, our dedication to care isn't only related to our customers. Our employees are the foundation of our company, and we protect one another at every turn. Safety is our top priority on the job, and we work hard to help those who trust us with their careers to find plenty of time for life outside the workplace.

INTEGRITY

- INTEGRITY - Our relationships with customers, vendors and - employees are based on respect and honesty. It is our unwavering policy to do what we say we will do, when we say we will do it. From design to construction to service, integrity is what we demand of ourselves and our team members.

PERSEVERANCE

- PERSEVERANCE - We do whatever it takes to live up to our commitments. Over the course of a long and complex project, that means fostering a culture of adaptability and creativity. We understand that construction and working in fully operational facilities can be hard and demanding. We understand that it takes resilience and drive to meet the changing demands of our clients, and we are focused on successfully making it to the finish line.

AGILITY

- AGILITY - To respond to ever changing conditions, businesses must be able to adapt quickly and easily. Using leading-edge technologies, we proactively manage our work to help us identify problems early and fix them fast. We can't always predict what will happen, but we are always ready for the challenges that come our way.



When Brandt works together with contractors, vendors, suppliers, subcontractors, consultants or other people or businesses essential to our work (“Business Partners”), we expect Business Partners to conduct business activities in a manner that is consistent with Brandt’s Code of Conduct and core values.

This Business Partner Code of Conduct (“Business Partner Code”) serves as an overview to provide our Business Partners guidance on expected conduct and behavior.

While the Business Partner Code is meant to provide guidance on important topics you may encounter as a Business Partner of Brandt, it is not a comprehensive, full or complete representation of all of the policies, laws, and regulations that may apply to Business Partners.

Our mutual reputations and continued success rely on Brandt and its Business Partners doing what is right.

1. Health, Safety, Environment

Brandt is committed to protecting the health and safety of all team members, our current or prospective customers, and our Business Partners as well as the general public. Brandt expects its employees and Business Partners to obey safety rules and standards and exercise caution and common sense in all work activities. We are all responsible for following instructions and making safe choices in the workplace and on the jobsite.

Brandt expects that its Business Partners will fully comply with all applicable federal, state and local health, safety and environmental laws, ordinances and regulations.

2. Anti-Bribery and Anti-Corruption

Brandt conducts business in an honest and fair manner at all times. It is Brandt’s policy that we never offer (or accept) a bribe to anybody under any circumstance and we expect our employees and Business Partners to act with integrity in all our interactions with our customers and when doing business with each other. We expect our employees and Business Partners to never seek any improper influence and to avoid activities that create even the appearance that we sought, received or gave favorable treatment in exchange for business courtesies.

3. Gifts and Entertainment

Brandt is committed to competing in our industry solely on the merit of our services, our people, and our expertise. We must avoid any actions that create a perception that Brandt sought, received, or gave favorable treatment in exchange for personal business courtesies. Managing this perception is important on both sides of our business – those who hire us and those who we are hire.

While our employees can accept occasional meals, refreshments, entertainment and similar business courtesies, we expect our employees and Business Partners to always proceed with caution and exercise good judgment in giving or receiving certain meals, entertainment or even nominal gifts.



Receiving or accepting gifts or entertainment may be inappropriate or illegal in certain circumstances or could create the perception that we sought, received, or gave favorable treatment in exchange for gifts or personal business courtesies. Generally, Brandt employees may not accept compensation, honoraria (fees, allowances, grants, scholarships), or money of any amount from Business Partners.

Special laws and regulations apply to public company and federal, state, and local government customers and Business Partners.

4. Antitrust and Fair Competition

Brandt is committed to free and open competition in the marketplace. We expect that both Brandt and its Business Partners comply with all applicable antitrust and unfair competition laws, as well as those laws related to unfair business practices.

5. Conflicts of Interest

Brandt expects all employees and Business Partners to avoid conflicts of interests or the appearance of conflicts of interest. Brandt employees may not have any economic involvement or interest with any competitors or customers or Business Partners of Brandt and vice-versa. Brandt Business Partners should contact Brandt's Legal Department immediately in cases involving transactions where a close family member of a Brandt employee is involved in making corporate decisions for that Business Partner.

6. Confidential Information

Brandt employees and its Business Partners must protect any confidential or proprietary business information and trade secrets obtained in our professional capacity. We also expect our employees and Business Partners to take reasonable steps to ensure confidential business information is safely handled and secured in a manner that prevents unauthorized access by external parties.

7. Respect, Diversity, Harassment and Discrimination

Brandt strives to foster a safe, welcoming and positive workplace environment where we treat our employees, Customers and Business Partners with dignity, fairness and respect. Brandt is committed to providing a work environment that is free of discrimination and unlawful harassment. Brandt prohibits discrimination and harassment, including sexual harassment, based on individual's race, color, religion, sex, sexual orientation, gender identity, national origin, age, marital status, genetic information, disability or protected veteran status, or any other category protected by law. We expect our Business Partners to demonstrate the same commitment.

8. Reporting Violations

We expect our Business Partners to report any concern of illegal or unethical activities or violations of this Business Partner Code to Brandt's Legal Department at Legal@brandt.us.



Anonymous reports can also be made through Brandt's toll-free hotline, available in English and Spanish, at the following numbers:

877-222-1089 (English)

800-216-1288 (Spanish)

Anonymous reports can also be made online at the following address: www.lighthouse-services.com/brandt,

Reports (which must include the company name) can also be made by email at the following e-mail address: reports@lighthouse-services.com.

Brandt takes all reports of suspected violations seriously and will conduct investigations into all reports professionally and promptly and respond as appropriate.

9. Compliance with Laws and Regulations

All Brandt employees must conduct business in strict compliance with all applicable federal, state and local laws and regulations and we expect our Business Partners to do the same. Brandt may refuse to continue doing business with any Business Partner who violates this Business Partner Code or otherwise engages in illegal or unethical business conduct.