



# Code of Business Ethics and Conduct

**Sletten Companies Code of Business Ethics and Conduct**  
(Updated 12/11/2019)  
**TABLE OF CONTENTS**

*Letter from the President*

<b>1.</b>	<b>STATEMENT OF POLICY</b> .....	3
<b>2.</b>	<b>DEFINITIONS</b> .....	3
<b>3.</b>	<b>FAIR COMPETITION</b> .....	3
3.1	Antitrust Policy .....	3
3.2	Claims and Certifications .....	6
3.3	Contract Negotiation .....	6
3.4	Truthfulness.....	7
<b>4.</b>	<b>MAINTAINING ACCURATE RECORDS</b> .....	7
4.1	Charging of Costs/Timecard or Timesheet Reporting .....	7
4.2	Financial Records.....	7
<b>5.</b>	<b>EMPLOYMENT PRACTICES</b> .....	7
5.1	Equal Employment Policy.....	7
5.2	Hiring of Federal Employees .....	8
5.3	Commitment to Disadvantaged Business Enterprises.....	8
<b>6.</b>	<b>PROPER USE OF COMPANY RESOURCES</b> .....	8
6.1	Bribery and Kickbacks .....	8
6.2	Federal Government Personnel .....	8
6.3	State and Local Government Personnel .....	8
6.4	Non-Governmental Personnel.....	9
6.5	Political Activities .....	10
6.6	Environmental Compliance.....	10
<b>7.</b>	<b>ADDITIONAL EMPLOYEE DUTIES</b> .....	10
7.1	Conflicts Of Interest .....	10
7.2	Restricted Company Information.....	11
7.3	Government Classified and Proprietary Information .....	11
7.4	Social Media Use .....	11
<b>8.</b>	<b>DUTY TO OBEY THE LAW</b> .....	12
8.1	Duty to Obey All Applicable Laws.....	12
8.2	Licenses, Permits, Certifications and Credentials.....	12
8.3	Hire Authorized Individuals and Comply with All Immigration Laws .	13
8.4	Drug-Free Workplace.....	13
<b>9.</b>	<b>VIOLATION OF THE CODE; REPORTING VIOLATIONS</b> .....	13
9.1	Consequences of Conduct in Violation of the Law or this Code .....	13
9.2	Reporting Violations .....	14
<b>10.</b>	<b>INTERNAL CONTROL SYSTEM</b> .....	14
<b>11.</b>	<b>COOPERATION</b> .....	14
<b>12.</b>	<b>WORK QUALITY</b> .....	14
<b>13.</b>	<b>CONCLUSION</b> .....	15



## LETTER FROM THE PRESIDENT

Dear Employees:

The Sletten Companies (“Sletten”) has a long reputation for honesty and integrity in business dealings and lawful and ethical behavior. This reputation is a source of pride, as well as one of our greatest assets, because it instills the necessary trust and confidence in us by our customers, subcontractors, suppliers, and communities in which we live. Sletten is committed to the highest standards of business ethics.

In order to maintain our commitment to integrity, we have established a Code of Business Ethics and Conduct (the “Code”). The Code identifies what is expected of our employees when conducting company business. As an employee, you are expected to read the Code and certify your commitment to complying fully with the rules and standards therein.

To help administer and enforce the Code, I have appointed our Vice President and General Counsel, Dallin T. Wayment, Esq. as the Corporate Compliance Officer. Among other things, he is responsible for (i) implementing appropriate procedures and policies for the Code, (ii) ensuring that each of you receive a copy of the Code, (iii) providing training regarding compliance issues, and (iv) ensuring effective and appropriate enforcement of the Code. Mr. Wayment reports directly to me and has my full support and attention. I expect our officers and managers to provide him the same support and attention on these issues. Even though I have appointed Mr. Wayment as the Corporate Compliance Officer, please know that I maintain an open-door policy for any employee who has concerns about the company or employee practices.

I cannot stress strongly enough that Sletten does not, and will not, tolerate any form of unlawful or unethical behavior by any person or associated entity. At the very least, Sletten expects each of you to conduct yourself in accordance with the laws and regulations that apply to our business and not condone criminal or unethical behavior by others. Each of you is expected to alert Mr. Wayment of any information you may have regarding unlawful or unethical behavior by other employees, prime contractors, subcontractors, suppliers, or customers. Violation of this program, including failure to report a violation or other unlawful or unethical behavior, can be grounds for discipline, including termination.

Our continued success depends on each of us acting honestly and maintaining the highest ethical standards at all times. Only in this way, can we continue to earn the trust and confidence of our customers and the communities in which we live.

Sincerely,

THE SLETTEN COMPANIES

/s/Erik Sletten

ERIK J. SLETTEN  
President/CEO

## **1. STATEMENT OF POLICY**

This Code of Business Ethics and Conduct is an integral part of the Sletten Companies (The “Company”) that serves as a guide to the proper business conduct for all employees and ensures compliance with the rules, regulations and laws that apply to the Company as a public works contractor. All Company Employees and directors must familiarize themselves with this Code and comply with its terms.

The Company maintains the highest moral, legal and ethical standards by complying with all laws. Any clear infraction of applicable laws or of prevailing business ethics will subject an Employee to disciplinary action which may include termination. Moreover, disciplinary measures will apply to any supervisor who directs or approves of such infractions or has knowledge of them and does not move promptly to correct or report them.

The Company’s Corporate Compliance Officer is Dallin Wayment. Any Employee who has questions about the application of this Code should consult Mr. Wayment at (702) 473-2904 or by email at [dwayment@sletteninc.com](mailto:dwayment@sletteninc.com).

## **2. DEFINITIONS**

*Code of Business Ethics and Conduct:* The written statement of acceptable behavior by the Company’s officers, directors, and Employees that ensures the Company operates according to the highest ethical standards.

*Code:* Code of Business Ethics and Conduct.

*Corporate Compliance Officer:* The Company official designated by the President/CEO to be responsible for implementing and administering the Code.

*Employee:* The Company’s superintendents, project managers, project engineers, administrative personnel, officers, directors, and other persons authorized to act on behalf of the Company.

## **3. FAIR COMPETITION**

### **3.1 Antitrust Policy**

The Company is fully committed to compliance with the antitrust laws, which are designed to promote free and open competition in the marketplace. Not only does the customer benefit by getting the best product at the lowest price, but the Company also benefits by being able to compete on a fair level playing field with competitors. The antitrust laws are complex and must be complied with strictly. Routine business decisions involving prices, terms and conditions of sale, dealings with competitors, and many other matters can present problems of great sensitivity. It is therefore essential that every Employee be generally aware of the antitrust laws. Below is a general overview of the antitrust laws: The Sherman Act is the primary federal antitrust statute. The Sherman Act prohibits any agreement among

competitors to fix prices, rig bids, or engage in other anticompetitive activity. Violation of the Sherman Act is a felony punishable by a fine of up to \$10 million for corporations, and a fine of up to \$350,000 or three years' imprisonment (or both) for individuals and may subject the Company and/or the individual to suspension or debarment. In addition, collusion among competitors may constitute violations of the mail or wire fraud statute, the false statements statute, or other federal felony statutes. In addition to receiving a criminal sentence, a corporation or individual convicted of a Sherman Act violation may be ordered to make restitution to the victims for all overcharges. Victims of bid-rigging and price-fixing conspiracies also may seek civil recovery of up to three times the amount of damages suffered. Most criminal antitrust prosecutions involve price fixing, bid rigging, or market division or allocation schemes (described below). Under the law, price-fixing and bid-rigging schemes are per se violations of the Sherman Act. This means that where such a collusive scheme has been established, it cannot be justified under the law by arguments or evidence that, for example, the agreed-upon prices were reasonable, the agreement was necessary to prevent or eliminate price-cutting or ruinous competition, or the conspirators were merely trying to make sure that each got a fair share of the market.

(1) Price Fixing: Price-fixing is an agreement among competitors to raise, fix, or otherwise maintain the price at which their goods or services are sold. It is not necessary that the competitors agree to charge exactly the same price, or that every competitor in a given industry join the conspiracy. Price-fixing can take many forms, and any agreement that restricts price competition violates the law. Other examples of price-fixing agreements include those to (a) establish or adhere to price discounts; (b) hold prices firm; (c) eliminate or reduce discounts; (e) adopt a standard formula for computing prices; (f) maintain certain price differentials between different types, sizes, or quantities of products; (g) adhere to a minimum fee or price schedule; (h) fix credit terms; and (i) not advertise prices.

(2) Bid-Rigging: Bid-rigging is the way that conspiring competitors effectively raise prices where purchasers - often federal, state, or local governments - acquire goods or services by soliciting competing bids. Essentially, competitors agree in advance who will submit the winning bid on a contract being let through the competitive bidding process. Bid-rigging also takes many forms, but bid-rigging conspiracies usually fall into one or more of the following categories:

(a) Bid Suppression: In bid suppression schemes, one or more competitors who otherwise would be expected to bid, or who have previously bid, agree to refrain from bidding or withdraw a previously submitted bid so that the designated winning

competitor's bid will be accepted.

(b) *Complementary Bidding*: Complementary bidding (also known as "cover" or "courtesy" bidding) occurs when some competitors agree to submit bids that are either too high to be accepted or contain special terms that will not be acceptable to the buyer. Such bids are not intended to secure the buyer's acceptance but are merely designed to give the appearance of genuine competitive bidding. Complementary bidding schemes are the most frequently occurring forms of bid rigging, and they defraud purchasers by creating the appearance of competition to conceal secretly inflated prices.

(c) *Bid Rotation*: In bid rotation schemes, all conspirators submit bids but take turns being the low bidder. The terms of the rotation may vary; for example, competitors may take turns on contracts according to the size of the contract, allocating equal amounts to each conspirator or allocating volumes that correspond to the size of each conspirator company. A strict bid rotation pattern defies the law of chance and suggests collusion is taking place.

(d) *Subcontracting*: Subcontracting arrangements can be part of a bid-rigging scheme. Competitors who agree not to bid or to submit a losing bid frequently receive subcontracts or supply contracts in exchange from the successful low bidder. In some schemes, a low bidder will agree to withdraw its bid in favor of the next low bidder in exchange for a lucrative subcontract that divides the illegally obtained higher price between them.

(3) *Market Division*: Market division or allocation schemes are agreements in which competitors divide markets among themselves. In such schemes, competing firms allocate specific customers or types of customers, products, or territories among themselves. For example, one competitor will be allowed to sell to, or bid on contracts let by, certain customers or types of customers. In return, he or she will not sell to, or bid on contracts let by, customers allocated to the other competitors. In other schemes, competitors agree to sell only to customers in certain geographic areas and refuse to sell to, or quote intentionally high prices to, customers in geographic areas allocated to conspirator companies.

Compliance with the antitrust laws is a serious matter and violations could subject the Company to civil and criminal liability. Accordingly, any Employee who violates antitrust laws shall be terminated. Additionally, any Employee who knows or reasonably should know that an antitrust violation has been, or will be,

committed and fails to report it to the Corporate Compliance Officer will be subject to discipline, which may include termination.

Employees are instructed to take special care in this area and seek out legal advice when questions arise. Any questions on the interpretation of the laws should be referred promptly to the Company's General Counsel's Office.

### 3.2 Claims and Certifications

All statements, representations, and certifications made on behalf of the Company, whether written or oral, shall be accurate, truthful, and timely. All requests or demands for payment made on behalf of the Company pursuant to any contract or business agreement shall truthfully and accurately reflect the value of the goods or services provided. Under no circumstances may an Employee make a false claim. Examples of false claims include billing extra time not spent working on a project, charging for materials not used in a project, or artificially inflating subcontractor costs to negotiate additional compensation from the customer. Any claims that are false, fraudulent or otherwise deceitful may subject the Company, and/or the individual making the claim to civil liability and/or criminal liability punishable by up to 5 years imprisonment, a fine, and restitution, and administrative liability through suspension or debarment (on federal projects). Accordingly, any Employee who knowingly makes false claims shall be terminated. Additionally, any Employee who knows, or reasonably should know, that another Employee has submitted, or intends to submit, a false claim and fails to report it to the Corporate Compliance Officer, will be subject to discipline, which may include termination.

Additionally, Employees are routinely required to certify that they and the Company are in compliance with various contractual provisions and regulatory requirements. Examples of common certifications include certifications pertaining to environmental, safety, personnel, and health matters, product quality and material certifications, and quality control and quality assurance testing certifications. Employees must be aware of the requirements applicable to their jobs and ensure that all certifications are accurate and that there is neither a material omission of fact or materially misleading statements.

### 3.3 Contract Negotiation

In negotiating contracts, Employees must be accurate and complete in all representations. The submission of a proposal, quotation, or other document or statement that is false, incomplete, or misleading can result in civil and criminal liability for the Company, the involved Employee, and any supervisors who condone such a practice. In negotiating contracts with public bodies, we have an affirmative duty to disclose current, accurate, and complete cost or pricing data where such data are required under appropriate law or regulation.

### 3.4 Truthfulness

Each Employee involved in proposals, bid preparation or contract negotiations must be certain that all statements, communications, certifications and representations to prospective clients are accurate and truthful. Employees must never make a false statement or submit a false claim to a public body.

## 4. **MAINTAINING ACCURATE RECORDS**

### 4.1 Charging of Costs/Timecard or Timesheet Reporting

Employees who file timecards, manually or electronically, must do so in a complete, accurate and timely manner. No cost may be charged or allocated to a contract if the cost is unallowable by regulation or contract provision or is otherwise improper.

Employees are required to sign their own timecards or timesheets. An Employee's signature on a timecard or timesheet is his or her representation that the timecard or timesheet accurately reflects the number of hours worked on the specified project or job order. A supervisor's signature on a timecard or timesheet is a representation that the timecard or timesheet has been reviewed and that steps have been taken to verify the validity of the hours reported and the correctness of the allocation of the hours. It is understood that Employee signatures may be maintained and transmitted electronically.

### 4.2 Financial Records

The Company maintains its records in a manner that provides for an accurate and auditable record of all financial transactions in conformity with generally accepted accounting principles. No false or deceptive entries may be made, and all entries must contain an appropriate description of the underlying transaction. All reports, vouchers, bills, invoices, payroll and service records and other essential data must be prepared with care and honesty. All records submitted pursuant to bid/contract requirements must be made accurately, timely and in compliance with all applicable laws and regulations.

## 5. **EMPLOYMENT PRACTICES**

### 5.1 Equal Employment Policy

The Company provides equal employment opportunity to qualified individuals and will not discriminate against any Employee or applicant because of race, color, religion, sex, national origin, age, or physical or mental handicap. This policy of equal opportunity pertains to all aspects of the employment relationship, including application and initial employment, promotion and transfer, selection for training opportunity, wage and salary administration, and the application of service, retirement, seniority, and employee benefit plan policies.

Any questions or comments relating to this policy should be referred to the Company's Human Resources Director, Nicholas Neuman. Mr. Neuman may be reached at (406) 454-6420 or emailed at [nneuman@sletteninc.com](mailto:nneuman@sletteninc.com). Every Employee of the Company should have a copy of this Equal Employment Policy. Copies can be obtained from the Company's Human Resources Department.

## 5.2 Hiring of Federal Employees

Complex rules govern the recruitment and employment of U.S. Government employees in private industry. Prior clearance to discuss possible employment with, make offers to, or hire (as an employee or consultant) any current or former Government employee (military or civilian) must be obtained from the Human Resources Department with notification to the Corporate Compliance Officer.

## 5.3 Commitment to Disadvantaged Business Enterprises

The Company is committed to full compliance with government sponsored opportunity programs, such as the disadvantaged business enterprise (DBE) program and maximizing the opportunities of DBEs. As such, the Company will not discriminate on the basis of race, color, national origin, or sex in the hiring of suppliers or subcontractors and will foster an environment in which everyone is treated with respect, trust, honesty, fairness, and dignity. For each government-funded contract, the Company will make good faith efforts to maximize the participation of DBEs in subcontracts and ensure that each DBE is performing a commercially useful function. A DBE is deemed to be performing a commercially useful function if the DBE is responsible for executing the work and carrying out their responsibilities by actually performing, managing, and supervising the work.

# 6. **PROPER USE OF COMPANY RESOURCES**

## 6.1 Bribery and Kickbacks

All forms of bribery and kickbacks are illegal and expressly prohibited. Any Employee caught participating in such activity will be promptly terminated. Any Employee who knows about, or reasonably should know about, any such activity and fails to report it to the Corporate Compliance Officer will be disciplined.

## 6.2 Federal Government Personnel

All forms of gifts and entertainment to or from federal government personnel, including persons that may be acting for or on behalf of the federal government, are expressly prohibited. However, the Corporate Compliance Officer may authorize an exception where a familial or personal relationship exists outside of the Employee's business relationship with the government employee.

## 6.3 State and Local Government Personnel

All forms of gifts and entertainment to or from state or local government personnel, including persons that may be acting for or on behalf of the state or local government, shall be guided by the laws and ordinances of that jurisdiction.

#### 6.4 Non-Governmental Personnel

Receiving or accepting gifts or entertainment in the business context is a particularly sensitive area and can be inappropriate, or even illegal, depending on the circumstances. For this reason, it is important that all Employees be extra sensitive when it comes to giving or receiving gifts and entertainment from non-governmental personnel (as stated above, the giving or receiving of gifts from government personnel is prohibited). Therefore, regardless of the circumstances, the following rules apply:

- (1) With the exception of de minimis gifts (traditional birthday and holiday gifts of property, not cash, with low fair market value), the Corporate Compliance Officer must approve the giving or receiving of all forms of gifts and entertainment.
- (2) Money, in any form, is never given, offered, solicited, or accepted.
- (3) No gift or entertainment may be given or received if it is, or could reasonably be construed to be, intended to influence an Employee's behavior.
- (4) No Employee may encourage or solicit gifts or entertainment of any kind from any individual or entity with whom the Company conducts business.
- (5) The Corporate Compliance Officer may authorize the expenditure of a non-monetary gift or entertainment with a value equal to or less than \$500 to an individual or entity with whom the Company conducts business only if it is for a legitimate and identifiable business purpose.
- (6) Employees may receive a non-monetary gift or entertainment from an individual or entity with whom the Company conducts business with a value equal to or less than \$500, provided that such gifts or entertainment are reported to and approved by the Corporate Compliance Officer and is for a legitimate and identifiable business purpose.
- (7) The Corporate Compliance Officer may authorize an exception where a familial or personal relationship exists outside of the employee's business relationship with the non-governmental employee.

## 6.5 Political Activities

The Company believes strongly in the democratic political process and encourages Employees to participate personally on their own time in that process. The Company's activities, however, are limited significantly by law. For this reason, no political contribution of corporate funds or use of corporate property, services, or other assets may be made without the written approval of the General Counsel's Office.

In turn, indirect expenditures on behalf of a candidate or elected official, such as travel on corporate aircraft or use of telephones and other corporate equipment, may be considered as contributions. Any questions should be referred to the General Counsel's Office. In no event may an Employee be reimbursed in any manner for political activities.

## 6.6 Environmental Compliance

The Company is committed to full compliance with all federal, state and local environmental laws, standards, and guidelines. Not only is environmental compliance legally necessary, but it is also an important component of our obligation to the community and our good reputation. It is essential that each Employee involved with regulated air emissions, water discharges, hazardous materials, or other regulated pollutants know and comply with all applicable environmental laws and guidelines. No one at the Company may participate in concealing an improper discharge, disposal, or storage of hazardous materials or other pollutants. Any person who has reason to believe that there may have been violations of any aspect of the Company's environmental compliance policy shall report immediately to the Corporate Compliance Officer.

# 7. **ADDITIONAL EMPLOYEE DUTIES**

The Company expects each Employee to devote his or her full working time and efforts to the Company's interests and to avoid any activity that might detract from or conflict with those interests. In particular, Employees must be aware of the following obligations.

## 7.1 Conflicts Of Interest

Employees may not have any employment, consulting, or other business relationships with a competitor, customer, or supplier of the Company, or invest in any competitor, customer, or supplier (except for holdings of less than 5% of publicly-traded securities) unless the Employee has the advance written permission of the Office of General Counsel.

Outside employment may also constitute a conflict of interest if it places an Employee in the position of appearing to represent the Company, involves providing goods or services substantially similar to those the Company provides or

is considering making available, or lessens the efficiency, alertness, or productivity normally expected of Employees on their jobs. All outside employment that raises any question in this regard must be approved in advance by the Office of General Counsel.

Employees must notify the Company of all benefits they obtain from third parties because of the Employee's position and must pay over to the Company all such benefits that are capable of being transferred.

## 7.2 Restricted Company Information

Employees may not disclose to any outside party, except as specifically authorized by management pursuant to established policy and procedures, any non-public business, financial, personnel, or technological information, plans, or data acquired during employment at the Company. On termination of employment, Employees may not copy, take, or retain any documents containing restricted information.

The prohibition against disclosing restricted information extends indefinitely beyond the period of employment at the Company. Each Employee's agreement to protect the confidentiality of such information in perpetuity is considered an important condition of his or her employment at the Company.

## 7.3 Government Classified and Proprietary Information

The Company has special obligations to comply with laws and regulations that protect classified information. Employees must retain documents and records in accordance with the requirements of the law, governing contracts and the Company policies. Documents that are in any way related to ongoing or potential investigation of the Company by any U.S. Government agency or any other public body must be protected and cannot be destroyed unless and until any such investigation is concluded. The Company corporate records and documents shall not be removed from the Company premises or used for personal gain or benefit.

Employees with valid security clearances who have access to classified information must ensure that the information is handled in accordance with pertinent federal procedures. These restrictions apply to any form of information, whether in written or electronic form.

The Company does not solicit nor will it receive any sensitive proprietary internal Government information, including budgetary or program information, before it is available through normal processes.

## 7.4 Social Media Use

Social media and digital media have transformed the way we communicate. Today, social media tools such as Facebook, Twitter, videos, networking sites and forums are used to share information, express opinions and can be used as a tool to

strengthen relationships in a modern way. The conversations that take place in these social and digital platforms can shape the way the general public views the Company and the services we provide.

We respect our employees' and contractors' rights to participate in social media platforms, but it is important that the integrity of the Company and our vision, values and policies are always maintained. The Company's policy is not intended to restrict communications or actions legally protected under applicable laws. When engaging in social media conversations pertaining to the Company, employees should:

- Be respectful.
- Be transparent.
- Protect confidential information, trade secrets and proprietary and security related information.
- Abide by all Company communications policies.
- Respect the rights of others.

Use of social media during working time or should be limited to conducting Company business.

## **8. DUTY TO OBEY THE LAW**

### **8.1 Duty to Obey All Applicable Laws**

The Company's role as a public works contractor subjects it to myriad rules and regulations including, without limitation, the Federal Acquisition Regulations, Department of Defense Federal Acquisition Regulations Supplement, and other rules and regulations governing accounting, time-keeping, workplace behavior, safety, drug use, gratuities, and conflicts of interest.

The Company and its Employees must obey all applicable and relevant laws that affect the business. Such laws include, without limitation, the Sarbanes-Oxley Act and others, including but not limited to those that apply to procurement integrity, securities, fraudulent conduct, workplace behavior, antitrust, civil rights, and anti-discrimination, copyright protection, campaign finance and taxation. While the Company does not expect its Employees to be experts in legal matters, it holds each Employee responsible for being familiar with the laws governing his or her area of responsibility and to be generally aware of possible legal issues and exposures, or threatened litigation. Employees should seek immediate advice from the Company's Office of General Counsel whenever they have a question concerning any application of the law.

### **8.2 Licenses, Permits, Certifications and Credentials**

The Company will obtain and maintain required operating and business licenses and permits, as well as all applicable certifications and accreditations. Employees,

vendors and contractors must obtain and maintain all applicable licensure or certifications required for their job responsibilities or contracts.

### 8.3 Hire Authorized Individuals and Comply with All Immigration Laws

For all work in the United States, the Company will hire only those individuals who are authorized to work in the United States and will comply with regulations promulgated in accordance with the Immigration Reform and Control Act of 1986 and subsequent relevant legislation, including the U.S.A. Patriot Act. The Company will comply with federal and state regulations with respect to the employment of minors.

In addition, the Company will make a reasonable effort to exclude from hire individuals whose due diligence would expose as having engaged in conduct that is illegal or otherwise in conflict with this Code.

### 8.4 Drug-Free Workplace

The unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Company's workplace. The Company will take disciplinary action against violators of the drug prohibition. Compliance with The Company's prohibition on the use of illegal drugs is a condition of employment for all the Company Employees.

Any Employee who is convicted of any violation of any federal or state drug abuse statute occurring in the workplace must notify the Company of the conviction no more than five days after the conviction. The Company will notify the appropriate public bodies of any such conviction within ten days of receipt of the Employee conviction notice and will take appropriate personnel action within 30 days of receipt of that notice. Any Employee convicted of a violation of a drug abuse statute in the workplace may be terminated or required to participate in a drug abuse assistance or rehabilitation program.

The drug-free workplace provisions outlined herein are separate and distinct from THE COMPANY'S POLICY STATEMENT REGARDING DRUG AND ALCOHOL TESTING PROGRAM.

## **9. VIOLATION OF THE CODE; REPORTING VIOLATIONS**

### 9.1 Consequences of Conduct in Violation of the Law or this Code

Failure to obey applicable laws can result in conviction of misdemeanor and felony offenses and can result in a substantial term of imprisonment and/or fines and restitution. In the event of criminal conviction of a Company Employee, the Company could be charged with the payment of onerous fines, which, depending on the seriousness of the offense and the culpability of the institution, could have substantial impact. Criminal misconduct committed by a Company Employee or

manager could also subject the Company to civil penalties that could be significant.

In the event that an Employee violates this Code or other applicable rule or regulation or in the event that an Employee fails to take reasonable steps to prevent, detect or report improper conduct, that Employee shall be subject to disciplinary action that may result in any of the following consequences: (a) reprimand; (b) loss of compensation, seniority, or promotional opportunities; (c) reduction in pay; (d) demotion; (e) suspension with or without pay; or (f) discharge.

## 9.2 Reporting Violations

Employees shall report suspected violations of the law and/or this Code directly to Dallin Wayment, the Company's Corporate Compliance Officer. Mr. Wayment may be reached at (702) 473-2904 or by email at [dwayment@sletteninc.com](mailto:dwayment@sletteninc.com). **No adverse action or retribution of any kind will be taken against an Employee because he or she reports a suspected violation of this Code or other irregularity.** All reports shall be treated confidentially to the maximum extent consistent with fair and rigorous enforcement of the Code. Employees are subject to discipline for improper conduct or for failing to take reasonable steps to prevent or detect improper conduct.

## 10. INTERNAL CONTROL SYSTEM

The Company will maintain an Internal Control System to ensure that the Company continues to meet the highest ethical, legal, and business standards. The Internal Control System will include:

- (1) Periodic reviews of the Company's practices, procedures, policies, and internal controls to judge whether they are in compliance with this Code and other applicable standards;
- (2) Periodic monitoring and/or auditing to detect criminal conduct and the risk of criminal conduct;
- (3) The maintenance and promotion of a confidential and anonymous business ethics reporting as described in Section 8;
- (4) Disciplinary action up to and including termination for violations of this Code or other applicable rules or regulations.

## 11. COOPERATION

Employees shall cooperate fully with any audit, investigation, or corrective action.

## 12. WORK QUALITY

The Company is committed to providing quality services that meet all contractual obligations and our own quality standards. The services we deliver must:

- (1) Be of the quality ordered by our customers;
- (2) Comply with applicable laws and regulations regarding the identification of the origin of products used;
- (3) Meet contract specifications;
- (4) Be delivered safely and with proper safety instructions; and
- (5) Meet all applicable laws, regulations and industry standards.

### **13. CONCLUSION**

The Company's business success and reputation depend on the actions of each Employee. Therefore, each Employee has an obligation to behave with honesty and integrity at all times. Each Employee must read, understand, and adhere to this Code in carrying out daily activities. For clarification or guidance on any point in the Code, please contact the General Counsel's Office, the Human Resources Department, or the Corporate Compliance Officer for assistance.





EMPLOYEE CERTIFICATION

The undersigned employee of The Sletten Companies (the "Company") hereby acknowledges and certifies as follows:

- (1) I have received and reviewed a copy of The Sletten Companies Code of Business Ethics and Conduct (the "Code").
- (2) I agree to abide by all of the terms and conditions, without exception, of the Code.
- (3) I agree to fully cooperate with the Corporate Compliance Officer or any other individuals or entities managing the Code. I understand that failure to cooperate is the basis for disciplinary action.
- (4) I understand that failure to comply with the Code is the basis for disciplinary action up to and including termination.

By: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_