



EMPLOYEE HANDBOOK

INTRODUCTION

WELCOME TO TURNER INDUSTRIES!

We are glad that you are a part of our team. This handbook outlines the general guidelines and policies applicable to your employment with Turner Industries Group, LLC and/or its related or affiliated companies [collectively the “Company” or “Turner”]. This handbook applies to all employees, regardless of whether you are salaried or hourly, exempt or non-exempt under the Fair Labor Standards Act.¹ For those employees who work at client/owner jobsite, this handbook is not intended to be a substitute for those specific jobsite policies and/or procedures but to work in combination with such policies and procedures to ensure a safer, more productive work place. Job and site-specific employees are required to become familiar with and abide by all policies and procedures applicable to them at their jobsite.

You should read this handbook carefully. It is the obligation of all employees to become familiar with and follow all Company rules, policies and procedures. You can obtain a hard copy of the handbook from the Company’s Regional Personnel Offices or access the handbook online at <https://www.turner-industries.com/careers/employee-documents/>.

The term “Company Premises” is referenced throughout this handbook. “Company Premises” includes all locations where work is performed by the Company, or which is/are assigned to the Company for its use by a client, customer, or another contractor, including without limitation, parking lots and storage areas. It also includes aircrafts, automobiles, trucks, and other vehicles and equipment whether Company owned or leased.

This handbook is not a contract and does not create or imply an employment contract between you and the Company. It is an explanation of general guidelines and policies as they exist on the date of publication and is subject to change by the Company. Except for those employees with separate, written employment agreements signed by the Company’s Chief Executive Officer [“CEO”], President, or Chief Operations Officer [“COO”], **employment with the Company is at-will**, meaning that, either you or the Company may terminate the employment relationship at any time, with or without cause, and with or without prior notice. No one other than the CEO, the President, or the COO has the authority to make any express or implied representations in connection with, or in any way limit the Company’s right to terminate an employee at any time.

Notwithstanding the foregoing paragraphs, the Dispute Resolution Agreement [“DRA”] to which you are separately bound as a condition of your employment IS A SEPARATE AND DISTINCT BINDING CONTRACT between you and the

¹ Each business operating entity within the Turner family of companies is separate and distinct, with separate administrative and payroll functions. The mere fact that this handbook applies to all Turner related and affiliated companies shall in no way be deemed nor interpreted to impute any liability of one Turner company to any other distinct Turner company.

Company, which shall cover and address any disputes you or the Company may have regarding your employment, and for which the DRA expressly applies.

All information contained in this handbook is designed to serve as guidelines rather than absolute rules, and exceptions may be made based on particular circumstances. The Company reserves the right to modify, revoke, suspend, or withdraw, any of the provisions of this handbook at any time. From time to time, you may receive updated information concerning changes in policy. No change in Company policy will be effective unless executed in writing by an authorized representative of the Company.

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well.

We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, language, national origin, physical and mental ability, race, religion, socio-economic status, veteran status, and other characteristics that make our employees unique.

Contact information and telephone numbers for regional offices is listed at <https://www.turner-industries.com/get-in-touch/other-locations/>. Employees are encouraged to familiarize themselves with the Turner website. If you have any questions concerning this handbook, please ask your Supervisor or contact the Personnel, Human Resource and/or Employee Relations Office.

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Nothing in this Employee Handbook or in any other document of policy will be interpreted or applied in such a way as to violate any local, state or federal law, including but not limited to the National Labor Relations Act.

COMPANY HISTORY

Our Company is one of the nation's foremost industrial service companies. The Company's corporate headquarters is in Baton Rouge, Louisiana.

Founded in 1961, the Company provides services principally to the industrial marketplace. These industries include refinery, petrochemical, power generating, and paper and pulp facilities. The Company's services include industrial construction, contract maintenance, turnarounds, shutdowns, scaffolding, pipe fabrication, painting, environmental, preventive maintenance, bundle extraction, tank cleaning, procurement, system integration, equipment rental, project management, specialty welding, water treatment, heavy hauling rigging, exchanger and hydro-blasting.

Our Company's culture is one of ongoing commitment to safety, quality performance and service delivery through training, safety planning, job execution, and equal employment opportunity. In addition, we strive to be an actively involved corporate citizen in the communities in which our employees live and work.

We provide value to our clients and customers through establishing positive working relationships, and by implementing sound and innovative business solutions. Our goal is to provide clients and customers with services that will allow them to i.) achieve their business objectives, ii.) be the best, and iii.) deliver results that promote positive economic impacts. We assist our clients by working more efficiently and effectively than our competitors. We deliver innovative solutions so that our clients' and customers' competitive advantage, as well as our own, will be maximized and maintained.

EMPLOYEE ORIENTATION

During the first few days of employment, employees receive important information regarding performance requirements, basic Company policies, benefit programs, and other information necessary to familiarize the employee with their job and the Company.

Please ensure that all information you provide to the Company during the hire-in process and otherwise is accurate. Falsification of any Company documents is a violation of Company policy and may result in disciplinary action, up to and including termination.

CORPORATE CODE OF CONDUCT

Code of Ethics and Professional Conduct

Commitment and dedication to ethical professional conduct is expected of all employees in every aspect of our business practices. Our Company is judged by how its employees act. Our business model is based upon a commitment to i.) sound ethics, ii.) personal integrity, and iii.) shared responsibilities, as well as a firm commitment to our business owners. Therefore, upholding the Turner reputation is of paramount importance. This reputation will be upheld only if we act with honesty and integrity in all business practices. Maintaining the trust and confidence of our owners, employees, customers, vendors, suppliers, and other people with whom we conduct business [even with our competitors], as well as the communities in which we work, is crucial to our continued growth and success.

This code shall serve as a basis for ethical decision-making in the performance of work for this Company. Additionally this code may serve as a basis for judging the merit of a complaint pertaining to violations of professional ethical standards contained herein. It is understood that some words and descriptions in this code of

ethics and professional conduct are subject to varying personal interpretations, and that any ethical principle may conflict with other ethical principles in specific situations. Questions related to ethical conflicts can best be answered by thoughtful consideration of fundamental principles such as honesty, integrity, trust, openness, teamwork, pride, professionalism and respect for others. Put another way, adhering to our Corporate Code of Conduct is an expression of our integrity, attitudes, our way of life, as well as a standard by which we govern our professional and personal lives. This code therefore is a standard to live by – and not just a list of rules to obey. This will often mean making judgment calls about difficult situations that might not be expressly stated in this code.

General Business Principles

Our Company's objectives include the efficient engagement of resources that result in responsible and profitable successes in the construction, maintenance, pipe fabrication, and specialty services industries. We also strive to participate in the search for and development of other sources of revenue. The Company seeks to maintain a high standard of performance, and to maintain long-term competitive business positions.

Economic Principles

Profitability is essential to fulfilling our objectives. Without profits and a strong financial foundation, it is not possible for us to fulfill our objectives. In addition, when making sound investment and business decisions, we will not exclusively consider economic results, but will also consider social and environmental consequences.

Business Integrity, including Receipt of Gifts and Entertainment

As a Company, we insist on honesty, integrity, and fairness in all aspects of our business and expect the same in our relationships with those with whom we conduct business. The direct or indirect offer, payment, solicitation, and acceptance of bribes in any form is unacceptable under any circumstances. An employee's conflicts of interest between his or her private financial activities and the manner in which he or she conducts Company business must be avoided at all times and under all circumstances. All business transactions on behalf of our Company must be reflected accurately and fairly in the accounts of our Company in accordance with and subject to established procedures and verifiable audit. Employees have a duty to avoid situations that are potentially adverse to our Company's interest or that might result in conflicting loyalties or interests.

Our Company's business interests are best served when decisions are based on commercial criteria and not influenced by a gift or entertainment. We should never give or accept anything which could impair, or appear to impair, our or another party's ability to exercise best business judgment in a fair and unbiased manner. On occasion, we may give or receive a gift or entertainment minor in value assuming a definite business purpose is being served and the value and frequency is not excessive under the circumstances. We are expected to use our good judgment and follow our Company's Conflict of Interest policy when determining what may be excessive under the circumstances. **Company employees may NEVER accept or give cash or cash equivalents as a gift or for entertainment.**

Gifts that may be considered excessive and unacceptable include:

- Non-business-related goods or services
- Stocks or bonds
- Travel with no legitimate business purpose
- Expensive bottles of wine or liquor
- Premium priced tickets to entertainment or sporting events
- Use of a residence, vacation home, or other lodging accommodation for non-business use
- Anything of value for which we are not required to pay the retail or usual customary market price.

The Company's Conflict of Interest policy and Related Party Disclosures address prohibited involvement with suppliers, contractors, competitors or customers, prohibit lavish gift giving and inappropriate entertainment of Company customers, vendors, or suppliers, as well as prohibit the use of Company information.

General Moral Imperatives of our Company and our Employees:

1. Avoid harm to self and others
2. Contribute positively to society and human wellbeing
3. Be honest and trustworthy
4. Be fair and take action not to discriminate against others in any way
5. Honor property rights including such assets as copyrights and patents
6. Respect the privacy of others
7. Give proper credit for intellectual property - one must not take credit for another's ideas or work
8. Honor confidentiality
9. Adhere to all federal and state laws and regulations

General Professional Responsibilities:

1. Acquire and maintain professional competence
2. Know, respect and adhere to existing laws related to our operations
3. Learn and grow from work performance evaluations
4. Strive to achieve exceptional quality, effectiveness and dignity in business practices
5. Honor contracts, agreements, and responsibilities

Competition

The Company supports free enterprise. We seek to compete fairly and ethically within the framework of applicable anti-competition laws, and we will not prevent others from competing freely with us. The Company's antitrust compliance policies and guidelines set forth the Company's intentions to conduct operations in strict compliance with all applicable antitrust laws. The antitrust laws generally prohibit business activities that constitute unreasonable restraints on trade.

Political Activities

The Company is a responsible corporate citizen and complies with applicable laws and related regulations regarding the use of corporate resources in connection with political activities. The Company further believes that its commitment toward responsible corporate citizenship demands involvement in a healthy and informed democracy. The Company generally encourages its employees to participate in permitted political activities where they live and work, provided that such activities only occur in an individual and private capacity and not on behalf of the Company. In addition, employees may not take part in political activities on Company time or using Company resources.

In furtherance of these principles, the Company has adopted a political activity policy which provides that the Company may make political contributions or use appropriate corporate funds or assets for any candidates or political parties, including campaign committees and funds, caucuses, independent expenditure committees, or special interest groups engaged in lobbying activities – and which further the Company's interests in our industry and in our communities. All legally permissible political expenditures are made through the Company's Executive Management Committee. The Company's policy further discourages individuals from suggesting or encouraging the Company's support of a candidate or position.

Employees who privately engage in political activities, including the election process, must do so solely on their own behalf and not on the Company's behalf, time, or premises.

Health, Safety and the Environment

All employees are expected to commit to the pursuit of harming neither people nor the environment by using material, equipment and energy efficiently and by following all established safety policies and procedures. Our Company's approach to health, safety and environmental management is designed to achieve continuous successful performance while ensuring compliance with laws. Subcontractors, suppliers, and vendors under our Company's operational control are expected to comply with all required safety policies and procedures.

The Community

Our success is due in large part to the benefits, both tangible and intangible, that we derive from memberships in our communities, whether local, national or global. We encourage employees to participate in community organizations, charities or other activities that return those benefits, but it should not be done in the Company's name without prior approval.

Additionally, our Company takes a constructive interest in social matters that may or may not be directly related to our business. Community involvement in educational and/or charity programs may vary and each opportunity will be evaluated individually.

CORPORATE FRAUD POLICY

The Company insists on honesty, integrity, and fairness in all aspects of our business and expects the same in our relationships with those with whom we conduct business. This Corporate Fraud Policy is established to facilitate the development of controls which will aid in the detection and prevention of fraud against the Company. It is the Company's intent to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and conduct of fraud investigations.

Scope of Policy

This Corporate Fraud Policy applies to any fraud, or suspected fraud, involving employees as well as consultants, vendors, subcontractors, or any outside agencies or parties with a business relationship with the Company. The Company reserves the right to engage all appropriate investigative agencies without regard to the suspected wrongdoer's length of service, position/title, or relationship to the Company.

Policy & Reporting Procedures

Management is responsible for having reasonable procedures in place to detect and prevent fraud, misappropriations, and other inappropriate conduct pursuant to this Corporate Fraud Policy. "**Fraud**" is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her detriment. Each member of the management team should be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication of irregularity. An employee who discovers or suspects fraudulent activity should contact the Hotline immediately at **1-800-626-1735**. The employee or other complainant may remain anonymous.

Reports of suspected fraudulent conduct are provided to the Internal Audit Department. The Director of Internal Audit will coordinate all investigations with the Office of the General Counsel and other affected departments and institutions, both internal and external as necessary. All inquiries concerning activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the Director of Internal Audit or to the General Counsel; however only the Office of the General Counsel is authorized to speak to anyone's attorney or to any governmental investigator or official.

Investigation Responsibilities

Subject to review by the Office of the General Counsel, the Internal Audit Department has the primary responsibility for the investigation of all suspected fraudulent acts as defined in the Corporate Fraud Policy. Depending on the nature of the investigation, Internal Audit or the Office of the General Counsel may secure the services of an independent private investigator to assist in investigating relevant facts and circumstances, or to determine whether an impropriety or a violation of this Corporate Fraud Policy has occurred. If the investigation substantiates that fraudulent activities have occurred, the Director of Internal Audit will issue reports to the Company's Ethics and Compliance Department, as well as the Office of the General Counsel.

Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation, as well as final decisions on disposition of the case will be made by the Company's senior management, with input and advice from the Office of the General Counsel and the Internal Audit Department.

Confidentiality for Reporters of Suspected Fraud

Subject to any requirements of law or regulation, the Internal Audit Department treats all information received confidentially. Any employee who suspects dishonest or fraudulent activity should call the Hotline immediately (**1-800-626-1735**) and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act.

Investigative results will only be disclosed or discussed subject to advice and input from the Office of the General Counsel.

Authorization for Investigating Fraud

Subject to review by the Office of the General Counsel, the Internal Audit Department is authorized to investigate allegations of fraud, and Internal Audit will have free and unrestricted access to all Company records and premises, and the authority to examine, copy, and/or remove all or any portion of the contents of files [digital and otherwise], desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who may use or have custody of any such items or facilities when it is within the scope of their investigation.

Disciplinary Action / Termination

If an investigation results in a recommendation to terminate an individual, the recommendation will be reviewed by senior management, the Office of the General Counsel, and a designated representative of Employee Relations, with final approval by senior management.

Administration

The Ethics and Compliance Department and the Office of General Counsel are jointly responsible for the administration, revision, interpretation, and application of this Corporate Fraud policy.

Compliance with this Code

The future of the Company depends on our operational, administrative and ethical excellence. All employees should adhere to the principles of this code as well as encourage and support adherence to these principles by their co-workers. Our compliance policies and this code are all designed to avoid unethical conduct as well as possible violations of laws. Each employee has an obligation to seek clarification and advice whenever a question concerning compliance with this code arises. Such advice may be sought from management, from the Compliance and Ethics Department or from our internal Risk Management, Legal, Audit or Employee Relations departments. Our long-term success in this area will depend on each employee realizing the Company's commitment to this code, seeking advice before engaging in conduct that presents legal or ethical questions, and proceeding with business in a professional and ethical manner.

Reporting Possible Violations of this Code

If an employee feels that he/she has a good faith report of behavior that he/she believe to be a violation of this code they are required to make such report to **1-800-626-1735**. Any attempt at retaliation or intimidation against anyone reporting in good faith, a suspected violation of this code or against anyone who participates in an investigation of a suspected violation will not be tolerated. Once a report of a possible violation of this code is made, a prompt investigation will be conducted by the Company's Ethics & Compliance Department. The Company strives to consistently and appropriately enforce this code. Violators of this code are subject to disciplinary action up to and including termination. In certain cases, where appropriate, law enforcement officials will be informed of facts discovered by any internal investigation concerning non-compliance with laws.

EMPLOYEE CONDUCT

Our Company has standards governing appropriate employee conduct. Subject to applicable law, employee actions contrary to these standards may subject the employee to disciplinary action up to and including termination in the Company's sole discretion. Please note that it is not intended that these standards cover all causes for disciplinary action. Employees of our Company are subject to disciplinary actions such as, but not limited to, oral reprimands, written reprimands, final warnings, suspensions without pay and terminations. Disciplinary actions do not necessarily occur in an escalating or progressive order. Infractions or actions warranting discipline are handled on a case by case basis.

General Conduct Requirements, Standards & Expectations

Employees shall refrain from being discourteous or disrespectful, or from engaging in any rudeness or unprofessional behavior, toward any manager, co-worker, client or customer of the Company, or any member of the public while in the course and scope of the Company's business.

Employees shall work in a cooperative manner with management, supervisors, co-workers, clients, customers, and Company vendors.

Employees are further expected to abide by Company policies and to fully cooperate in any investigation that the Company may undertake.

Employees are prohibited from making inappropriate gestures, use any racial or other offensive slurs, derogatory comments, or insults toward any co-worker, supervisor or any client or customer of the Company.

Any logos or graphics worn by employees must not reflect any form of violent, discriminatory, abusive, offensive, demeaning, or otherwise unprofessional message or depiction.

Any one of the following non-exhaustive acts, actions, or omissions is grounds for disciplinary action up to and including termination:

- a. Violation of safety rules and procedures; Lock-Out/Tag-Out procedures, permit procedures, confined space procedures, and other violations or deviations from Company safety protocol.
- b. Failure to utilize designated personal protective equipment.
- c. Violation of Company harassment, discrimination and/or retaliation policies.
- d. Unsatisfactory job performance.
- e. Removing, circumventing, altering or bypassing any guard or safety device or indicator without specific consent of the job superintendent.
- f. Dishonest acts and/or falsifications of records, including without limitation, giving of false information when hired or during employment.
- g. Engaging in workplace violence, including without limitation, fighting on Company Premises, or an activity that could provoke fighting.
- h. Use or possession of intoxicants, illicit drugs, illegal substances (such as synthetic cannabinoids), certain prohibited prescription drugs, or narcotics on Company Premises in violation of the Company Drug Alcohol and Contraband Policy.
- i. Reporting to work in an impaired condition in violation of the Company Drug, Alcohol and Contraband Policy.
- j. Use or possession of weapons, ammunition, explosives or other prohibited dangerous items on Company Premises in violation of the Company's Security, Workplace Violence and Weapons policy.
- k. Bringing "strike anywhere" matches to the work site or having any type of match, cigarette lighter or flame producing device in restricted areas.
- l. Insubordination or refusal to comply with lawful requests or instructions.
- m. Entering or leaving Company or client/customer property without permission.
- n. Conduct that violates common decency or morality.
- o. Walking off a work shift, failure to report for work for a scheduled shift ("no call-no show") or leaving work early without supervisor permission.
- p. Acts of "horseplay," bullying, or similar acts on the work site.
- q. Using or divulging, without written permission, any confidential or trade secret information acquired through employment with the Company.
- r. Gambling or bringing gambling paraphernalia onto Company premises or any work site.
- s. Theft or unauthorized removal of work site property, Company or client property, employees, contractors or vendors property.
- t. Neglect of duty.
- u. Sleeping or appearing to be sleeping during work periods.
- v. Misuse, damage, incorrect use, or neglect of tools, equipment, machinery, vehicles, and/or property resulting in injury to persons and/or damage to property.
- w. Failure to report, incorrectly reporting, or delay in reporting incidents, injuries, unsafe acts, or unsafe working conditions immediately to supervisory personnel.
- x. Violation of penal or other laws.
- y. Excessive absenteeism or tardiness.
- z. Threatening to do or doing bodily or mental harm to persons.
- aa. Violation of any of the standards/policies contained in this handbook, Company policies, or specific jobsite policies.

Attendance

Excessive absenteeism seriously interferes with job performance and inconveniences and delays the work of others. In the event any employee will be absent from work, the employee must notify his or her supervisor and/or jobsite timekeeper as early as possible prior to the absence. Excessive absenteeism will not be tolerated and may result in disciplinary action up to and including termination. Individual jobsites may set their own policies in regards to disciplinary action. As a general rule, a job-site employee who is absent from work two (2) consecutive days and fails to notify his/her supervisor and timekeeper may be terminated. Visits during jobsite shift times to personal automobiles will not be allowed without prior approval from jobsite supervision.

Late Arrival Pass/Early Out Pass

Any employee finding it necessary to arrive late or to leave work early must obtain prior approval from his or her supervisor and must notify [if applicable] the jobsite timekeeper.

Precedence of Jobsite Policies

Jobsite attendance, tardiness, late arrival, early out and lunch break specific policies as well as supervisor/manager/site specific policies that are more stringent than the procedures detailed in this handbook policy may supersede attendance, tardiness, late arrival, early out and lunch break policies included in this handbook.

Smoking & Tobacco

In order to maintain a safe and comfortable working environment and to comply with applicable laws, except where specifically allowed via clear and visible signage, smoking and the use of any and all tobacco products [including smokeless and/or chewing] and/or any “e-cigarettes” or other forms of electronic smoking is prohibited in or on all Company Premises, including all offices, parking lots, restrooms, and all other areas adjacent to and/or tangential to any such offices. These further include, but are not limited to Company buildings, jobsite offices, tool shacks and trailers. Smoking is also prohibited in all Company vehicles. Specific work locations and jobsites may have nonsmoking policies both within the Company buildings and vehicles on that site as well as for the outside areas of the site. Employees are to comply with all designated nonsmoking areas at their particular job location.

EMPLOYMENT POLICIES

EQUAL EMPLOYMENT OPPORTUNITY POLICY

The Company is committed to providing equal opportunity in all of its employment practices (including, but not limited to, selection, hiring, promotion, transfer, compensation, training, layoff and termination) to all qualified applicants and employees without regard to race, color, religion, sex, gender, national origin, age, disability, veteran status, genetic information, pregnancy, union affiliation or any other basis prohibited by federal, state or local law [collectively and/or individually, “Protected Characteristic”]. Employment decisions at the Company are based on merit, experience, qualifications, abilities, attendance, work history, safety record, and other considerations. Any employee, supervisor or manager who is found to be in violation of this policy will be subject to disciplinary action up to and including termination.

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company’s achievement as well.

The Company embraces and encourages our employees' differences in age, color, disability, ethnicity, family or marital status, language, national origin, physical and mental ability, race, religion, socio-economic status, veteran status, and other characteristics that make our employees unique.

If any individual feels that he or she has been subjected to discrimination in violation of this policy, he or she must report the incident or complaint directly to his or her manager or supervisor, the applicable regional Human Resources Manager, Personnel Department, the corporate Employee Relations Department at **1-800-288-6503** or the Hotline at **1- 800-626-1735**.

WORKPLACE ANTI-HARASSMENT, ANTI-DISCRIMINATION & ANTI-RETALIATION POLICY

The Company strictly prohibits all forms of unlawful harassment, discrimination and retaliation in the workplace and/or at work-related gatherings. Verbal, written, or physical conduct that creates an intimidating, hostile, or offensive work environment based on an individual's Protected Characteristic is strictly prohibited by this policy. Examples of actions that may constitute harassment in violation of this policy include epithets, slurs or stereotyping, offensive jokes or comments, visual displays such as offensive posters, photos, cartoons, drawings or gestures. Written or other materials in or on Company Premises showing hostility toward an individual because of an individual's Protected Characteristic are also prohibited.

The Company will also take all reasonable steps, when made aware, to prevent and eliminate harassment of Company employees, should it occur, by visitors, customers, clients and vendors. The Company also strictly prohibits the unlawful or improper use of Company communication systems and equipment in violation of this policy. Improper use includes any harassing, offensive, discriminatory, demeaning, insulting, defaming, intimidating, obscene, and/or sexually suggestive written, recorded, or electronically transmitted ("e-mail", social media, text & voice mail) messages, jokes, stories, or pictures that inappropriately reference a Protected Characteristic. Company communications services and equipment includes but is not limited to interoffice mail, standard postal mail, instant messaging, texting, electronic mail ("e-mail"), courier services, facsimiles, telephone systems, personal computers, computer networks, social media websites, blogs, on-line services, Internet connections, computer files, video equipment and tapes, tape recorders and recordings, pagers, cell phones, pagers, and bulletin boards.

Sexual Harassment

The Company strictly prohibits sexual harassment of all Company employees, as well as the employees of vendors, contractors, subcontractors, clients or customers. Sexual harassment has been defined as unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment,
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individuals, or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Examples of behavior that is or may be considered harassment in violation of this policy include but are not limited to:

- Verbal (Spoken) – Sexual innuendoes, suggestive comments, insults, humor and jokes about sex, threats, or sexual demand
- Non-Verbal – Leering, whistling, obscene gestures
- Physical – Intentionally touching or brushing the body, pinching, sexual intercourse or sexual relations, assault
- Written – Harassing, demeaning, obscene, or sexually suggestive pictures, jokes, stories, messages

Filing a Complaint of Harassment of Discrimination

All complaints or concerns regarding harassment, discrimination or retaliation by any manager, co-worker, vendor, client or non-employee **MUST** be reported immediately or as soon as possible. If the employee feels that he or she has been subjected to harassment, discrimination, or retaliation, or sees another person engaging in conduct in violation of this policy, the employee should report the incident or complaint directly to his or her manager or supervisor, regional Human Resources Manager, Personnel Department, the corporate Employee Relations Department at **1-800-288-6503** or the Hotline at **1- 800-626-1735**.

It is not necessary for an employee to complain first to the offending supervisor before reporting harassment, discrimination or retaliation. In addition, if the employee does not receive a response from his or her initial complaint and the complained of conduct continues, the employee should report the conduct directly to the Corporate Employee Relations Department or the Hotline.

Retaliation

The Company strictly prohibits any kind of retaliation against any individual who has made a good faith report of conduct that he or she believes may constitute harassment, discrimination or retaliation in violation of this policy, or who participates in an investigation pursuant to this policy.

As previously noted, to file a complaint or to report retaliatory conduct, the employee should notify his or her manager or supervisor, the applicable regional Human Resources Manager, the corporate Employee Relations Department at **1- 800-288-6503** or the Hotline at **1-800-626-1735**. Calls to the Hotline may be made anonymously.

Investigation

The Company will promptly investigate all allegations of harassment, discrimination and retaliation. Subject at all times to applicable law, regulation, and/or pronouncement, the Company will maintain confidentiality in accordance with legitimate and reasonable business justifications and to the extent consistent with a thorough investigation. The Company may decide in some circumstances that to achieve these objectives, we must maintain the investigation and our role in it in strict confidence. Such circumstances which involve a legitimate business justification include but are not limited to: (a) witness protection, (b) evidence in danger of being destroyed or tampered with, (c) testimony in danger of being fabricated, and/or (d) confidentiality necessary to prevent a cover-up. If the Company reasonably imposes such a requirement and any person does not maintain such confidentiality, such person may be subject to disciplinary action up to and including immediate termination.

Discipline

Any employee at any level found to have engaged in harassment, discrimination, or retaliation in violation of this policy will be subject to appropriate disciplinary action, up to and including termination of employment.

AMERICANS WITH DISABILITIES ACT

The Americans with Disabilities Act of 1990, as amended [“ADA”], protects qualified applicants and employees with disabilities or who are “regarded as” disabled as defined by the ADA from discrimination, harassment, and/or retaliation in hiring and all other personnel practices. It is the policy of this Company to comply with the ADA. To file a complaint or to report harassing, discriminatory, and/or retaliatory conduct, the employee is required to call **1-800-626-1735**. Any employee found to have violated this policy will be subject to disciplinary action, up to and including termination. The Company will provide a reasonable accommodation via an interactive process to any qualified individual with a disability to enable the employee to perform his or her essential job functions unless doing so would be an undue hardship in accordance with the ADA. Notify the employee’s supervisor and contact Turner Medical to commence the interactive process required by law which includes assessment of a reasonable accommodation. This process which commences with contacting Turner Medical shall further require obtaining all necessary medical documentation and clearance to ultimately return to work.

GENETICS (GINA)

Title II of the Genetic Information Nondiscrimination Act of 2008 [“GINA”] protects applicants and employees from discrimination based on genetic information in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. GINA also restricts employers’ acquisition of genetic information and strictly limits disclosure of genetic information. Genetic information includes information about genetic tests of applicants, employees, or their family members; the manifestation of diseases or disorders in family members (family medical history); and requests for or receipt of genetic services by applicants, employees, or their family members.

EMPLOYEE BACKGROUND CHECKS

Subject to applicable law, the Company retains the right to conduct pre-employment background checks on applicants who accept an offer of employment. Background checks may include verification of any information on the applicant’s resume’ or application form. Background checks may include a criminal record check. Background checks for employees assigned to client/customer jobsites will be conducted in accordance with and to the extent mandated by jobsite requirements.

All background checks are conducted in conformity with state and federal laws.

Subject to compliance with the Fair Credit Reporting Act, additional checks such as a driving record, credit report or other deemed consumer reports may be made on applicants for particular job categories if appropriate and job related.

The Company also reserves the right to conduct a background check for current employees to determine eligibility for promotion or reassignment or as agreed by the employee in the same manner as described above.

SAFETY RULES & REGULATIONS

Safety is a condition of employment, and all employees must exhibit a conscientious assumption of health and safety responsibility. People are the most essential element of our Safety program because concerned, involved, and trained employees are the Company’s greatest resource.

Safety is the result of careful attention to all Company operations by those who are directly and indirectly involved. The Company is committed to making sure that all of our jobsites and work locations are safe and therefore, the Company strives for the highest safety standards on all of our projects. Employees must think and act safely.

Employees at all levels should work diligently to execute the Company's policy of maintaining occupational safety and health. Employees should follow good common-sense safety habits. Our safety program has been developed to assure compliance with federal, state, local, and client rules and regulations and to protect the health and safety of our employees.

Unsafe conditions and practices should be reported to your Supervisor and site safety manager immediately. Any accident on the job, regardless of how minor it may seem to you, is to be reported to your Supervisor and site safety manager immediately. Failure to report near-miss incidents, accidents, injuries, unsafe acts, or unsafe conditions immediately to supervision may result in disciplinary action up to and including termination.

It is the employee's obligation to become familiar with and to abide by all of the Company's safety policies, standards and procedures. **A complete copy of the Company's safety policies, standards, and procedures (collectively, the "Company Safety Standards") can be found in the Company's Corporate Health and Safety Manual, which is made available to all employees upon hire.**

Employees may also log in to the intra-company portal where they can find updated versions of the Company's Corporate Health and Safety Manual. **All employees are required, whether as part of their hire-in process, orientation, or on-site job training, to read and understand the Company Safety Standards. Further, as a condition of your employment, you must certify, affirm, and acknowledge that you have been afforded ample opportunity to become acquainted with the Company Safety Standards in the Corporate Health and Safety Manual.** If you have any questions regarding the Company's Safety Standards, please ask your supervisor or refer to the Corporate Health and Safety Manual. You may request a hard copy from the Corporate Health and Safety Department.

MEDICAL EVALUATION AND RELEASE PROCEDURES

It is the policy of the Company that, to the extent allowed by law, applicants to whom a conditional offer of employment has been extended as well as current employees under certain circumstances may be required to undergo medical tests, procedures or examinations wherever management determines these are necessary for the continued safe and/or efficient operation of the organization.

DRUG, ALCOHOL & CONTRABAND POLICY

The Company has established this Drug, Alcohol, and Contraband Policy to assist us in providing a safe and healthy working environment for our employees, to protect our property and the property of our clients, and to cooperate with our clients in their efforts to provide safe and efficient operations.

The use, possession, concealment, transportation, promotion or sale of the following items or substances by any employee of the Company, or by any employees of a subcontractor for the company is strictly prohibited on all company or jobsite premises:

- Illegal drugs, controlled substances (including trace amounts), look-alike drugs, designer drugs, or any other substance which, subject to interpretation and enforcement as per applicable law and regulation, may have the effect on the human body of being a narcotic, depressant, stimulant, hallucinogen or cannabinoid (herein called "drugs")
- Unauthorized alcoholic beverages

- Firearms, weapons, explosives, and ammunition
- Unauthorized items:
 - Any stolen property
 - Unauthorized prescription drugs
 - Drug paraphernalia

Attempting to alter, degrade, substitute, dilute, or switch any urine, hair, and/or blood sample is prohibited.

Employees that are taking prescribed, recommended, controlled, or over the counter medication(s) where a doctor has indicated that a.) the employee's senses, judgment, and/or job performance may be impaired by the medication(s) and/or the employee feels that his/her senses, judgment, and/or job performance may be impaired; and/or b.) the employee's physician has properly documented that the employee requires a particular prescribed, recommended, or controlled drug or medication as a necessary accommodation to perform the essential functions of his or her job, the employee must contact Turner Medical to disclose the actual or anticipated impairment, and/or the requested accommodation, and so that the company can determine if the employee's condition and actual or anticipated impairment can be reasonably accommodated by the company based on the employee's job duties. The company reserves the right to determine the anticipated level of impairment to be expected by discussing the impairment and/or the requested accommodation with the employee and by requesting, through the employee, for the employee's doctor to respond to a medical questionnaire regarding the employee's anticipated impairment. Such inquiries may question whether the medication causing the impairment is the only effective treatment, or if there are alternative treatments available that will eliminate the impairment. The company will also evaluate employees occupying safety-sensitive positions to determine if they can continue to perform their job duties so as to not become a danger to themselves or to others at the employee's worksite. If an employee has questions about whether s/he occupies a safety-sensitive position, the employee should contact his or her regional or local Personnel Office.

Further, notwithstanding anything to the contrary, to the maximum extent allowed by law, rule, or regulation, the Company reserves all rights to determine, in its sole discretion, whether requested use of any drug or medication shall compromise the Company's obligation to maintain a safe and secure workplace for all of its employees, including but not limited to maintaining the ability to deny the requested use of any drug or medication due to any perceived safety or other risk issues.

Subject to applicable law and/or regulation, the guidelines followed for prescription drugs by Medical Review Officers and/or physicians are:

- A. A prescription for a drug other than a controlled dangerous substance shall expire one year after the date written.
- B. A prescription for a controlled dangerous substance listed in Schedule II, III, IV, or V shall expire six months after the date written.
- C. Expired prescriptions shall not be refillable or renewable.

The Company shall adopt and institute appropriate additional guidelines to effectuate these policies in a manner which is consistent with applicable law and/or regulation.

*****NOTE: Where state laws conflict with this policy, the state law will be applicable.**

Subject to applicable law and/or regulation, also prohibited is being at work, or reporting for work, with any detectable quantity of any prohibited drug in the employee's system. In addition, employees are prohibited from

the off-premises use of alcohol and possession, use, or sale of illegal drugs when such activities adversely affect job performance, job safety, or the Company's reputation in the community or industry. The foregoing shall at all times be interpreted and enforced to the maximum extent allowed by law and/or regulation.

Searches and Inspections

To the maximum extent allowed by law and/or regulation, the Company or applicable client or customer may, at any time, conduct searches and inspections of employees or other persons and their lockers, lunch boxes, personal effects, clothing, work areas, and vehicles, for the purpose of determining if such employees or other persons are in possession, use, transportation, or concealment of any prohibited items and substances. Such searches and inspections may be conducted by supervisors or specialists, including trained dogs.

Drug Screening

To the maximum extent allowed by law and/or regulation, we may utilize a urine drug screen test, hair analysis, oral fluid, or other required or desired medical testing procedures to help in the control or detection of drug or alcohol usage. All testing will be in accordance with all applicable federal, state, and local drug and alcohol related laws and regulations. To the maximum extent allowed by law and/or regulation, these tests may be utilized in, but not limited to, the following circumstances:

- Employment hiring process;
- Re-entrance employee examinations;
- Annual employee physicals;
- Part of an overall search and inspection of the company's or jobsite premises;
- When an employee's supervisor has a reasonable suspicion that the employee is intoxicated or is using or working under the influence of drugs or alcohol. A supervisor may reasonably suspect that an employee illegally uses drugs, based upon (among other things) observation of drug use, apparent drug intoxication, abnormal or erratic behavior, investigation, arrest, or conviction for drug or alcohol related offenses, reports from apparently reliable and credible sources, or evidence that the employee attempted to tamper with a previous drug screen test. When such reasonable suspicion exists, then to the maximum extent allowed by law and/or regulation, the Company may undertake all appropriate and legally available measures to test for the presence of alcohol and/or other illicit substances;
- When an employee is found in possession of suspected illegal or unauthorized drugs, or alcohol, or paraphernalia;
- Following on-the-job accidents, unsafe practices and/or near-miss incidents *;
- When required by the client;
- Random sampling;
- Return to Duty testing (any employees/rehires that has successfully completed the Turner Reinstatement Policy) **;
- To the maximum extent allowed by law and/or regulation, wall to wall testing which may include unannounced en masse drug and alcohol testing of specific groups. Such groups may include, but are not limited to, all company employees on site, or by shift, by crew, by location, by craft, by company or by another similar category;
- Any other method or process deemed appropriate by the company and/or client, and which is allowed by applicable law and/or regulation.

****Follow up testing can be conducted without notice for any employee or rehire with previous violations.***

***** To the maximum extent allowed by law and/or regulation, employees may not be allowed to return to work at the Company or on the clients' premises until documentation has been provided showing a negative alcohol and drug screen or proof of a valid prescription or recommendation (listed in the employee's name) or other medical documentation from the employee's treating physician that the company deems to be sufficient in its sole discretion to establish that prescription drugs or other controlled medication/substances detected by a drug test conducted in accordance with this policy and at levels provided for in applicable law have legally been provided to the employee by the employee's treating physician. In the event such medical documentation is provided, the company maintains the right, as set forth in more detail above, to evaluate whether use of the prescribed or recommended substances will compromise the Company's obligation to maintain a safe and secure workplace for all of its employees.***

The results of these tests will be kept confidential to the extent required by law or regulation. To the extent allowed by law or regulation, test results may also be disclosed to the client when requested or required. Drug tests not conducted under the supervision of the Company are not recognized as approved.

Alcohol Screening

We may utilize several types of alcohol screening methods in effort to control or detect the use of alcohol. Any detectable amount of alcohol is a violation of company policy. Alcohol testing shall be done by:

- Breath Analyzer Test (BAT)
- Saliva Test
- Blood Test

On-Site Testing

To the maximum extent allowed by law and/or regulation, on site testing will be utilized. Appropriate action will be taken against any employee who tests positive until the initial positive screen has been confirmed by a certified laboratory as determined by the Company.

Document Retention

The Company will maintain the appropriate records, in the medical department, for the length of time requested by the client and/or applicable law. The forms retained may include chain of custody forms, alcohol screening forms, acknowledgement forms, etc.

Subcontractor Responsibilities

It is required of all subcontractors to fully comply with the Company's Drug, Alcohol, and Contraband Policy, as well as the client's and all applicable federal, state, and local laws and regulations. Any violation of this requirement will be subject to disciplinary action up to and including termination of the subcontract. The Company will audit subcontractor drug and alcohol testing records, as needed.

Client Rules

In addition to the rules and requirements set forth in this policy and without constituting such Company employees as employees of the client or customer, to the maximum extent allowed by law and/or regulation, the Company and all employees of the Company will be required to comply with all rules and requirements of the Company's clients and customers.

Disciplinary Action for Policy Violations

To the maximum extent allowed by law and/or regulation, an employee who refuses to submit to a search or inspection or to a urine drug screen, hair analysis, or other approved medical testing procedures, or is found as a result of such tests to have any detectable quantity of any illegal drug, controlled substance or other substance which may have the effect on the human body of being a narcotic, depressant, stimulant, hallucinogen or cannabinoid in his/her system who otherwise violates the policy will be subject to disciplinary action up to and including discharge. Attempting to alter, degrade, substitute, dilute, or switch any urine/blood sample shall be a violation of this Policy. Compliance with the policy and programs is a condition of employment.

Any violation of this policy can result in permanent removal from the client's premises, upon their request.

The proper law enforcement authorities may be notified in appropriate cases.

This policy and these programs are made for the maximum safety and well-being of all employees and other personnel. Your assistance and cooperation for the achievement of this goal is vitally important.

Contraband

The use or possession of weapons, ammunition, explosives, intoxicants, illicit drugs, or narcotics on jobsite property, including parking lots, is strictly prohibited. Bringing "strike anywhere" matches to the jobsite, or having any type of match, cigarette lighter, or flame-producing device in restricted areas is also prohibited.

NOTE: Smoking is permitted, but only in designated areas.

Any employee possessing contraband, smoking in unauthorized areas, or reporting to work under the influence of drugs or intoxicants is subject to disciplinary action up to, and including, termination of employment.

INFORMATION TECHNOLOGY AND SOCIAL MEDIA POLICIES

The following policies apply to all users accessing the Company's information systems (computers, networks, etc.) regardless of the method or location of connecting to the systems.

Computer, Email and Messaging Policy

All network transmissions including email are considered Company property. To the maximum extent allowed by applicable law or regulation, the Company email system is to be used for official Company business purposes. This includes all internal and Internet email, instant messaging, text messaging, or electronic means of communication. The Company has the right to review all information traveling over the Company's network and stored on Company devices. Unless expressly authorized by the Information Technology Department, sending, transmitting, or otherwise disseminating proprietary data, trade secrets, or other confidential information of the Company is strictly prohibited. Material that is fraudulent, harassing, embarrassing, sexually explicit, profane, obscene, intimidating, defamatory, or otherwise unlawful or inappropriate may not be sent by email or any other form of electronic communication. Users encountering or receiving this kind of material should immediately report the incident to the Hotline **1-800-626-1735**. Employees may not initiate or forward any non-business-related chain email, solicitations, or personal events. The email accounts given to employees are to assist them in the performance of their jobs. Users should not have an expectation of privacy in anything they create, store, send, or receive via the Company computer, email or messaging system regardless of any password protections or other security applications. The Company may access and monitor all network transmissions and stored communications and files on its systems and devices as it considers appropriate at its sole discretion and

without further notice. Additionally, the Company deems email as a transient communication tool and will automatically delete email in the email system based on a time line established by the Company. Any emails deemed to be a document of record or subject to applicable litigation hold protocols need to be archived or otherwise moved to other network locations which is/are exempt from any applicable deletion period.

Password Policy

The Company strictly prohibits the sharing of passwords to all electronic devices (Company owned or personally owned but connected to the Company network) including, but not limited to; computers, cell phones, smart phones, tablets, or other handheld devices. The no sharing policy also applies to our intranet and the internet as well as all installed or online applications/software. If a user needs access to a program or specifics in a program, he or she should request personal access from his or her supervisor.

Internet Policy

The Company's Internet system is to be used for official Company business purposes. The Company has the right to review all information traveling over the Company's network. The display of any kind of explicit image or document, regardless of whether sexual, race, gender, or protected class-based, or other demeaning or disparaging image on any Company system is prohibited by our policy on workplace harassment, discrimination, and/or retaliation. This prohibition includes offensive or objectional images, and further includes but is not limited to raster image files [joint photographic experts group (JPEG), graphics interchange format (GIF), portable network graphics (PNG)], vector image files [encapsulated postscript (EPS), adobe illustrator document (AI), portable document format (PDF)], tagged image files (TIFF), photoshop documents (PSD)], high and low resolution files, adobe indesign documents (INDD), raw image formats (RAW), other image-based formats, videos and video file formats [audio video interleave (AVI), flash video format (FLV), windows media video (WMV), apple quicktime movie (MOV), moving pictures expert group 4 (MPEG4), and other video-based formats], and/or symbols of every kind and nature. In addition, explicit or other offensive material which violates Turner policies may not be archived, stored, distributed, edited or recorded using the Company Internet connection or computing resources. Under no circumstances should software be downloaded from the Internet without proper authorization from the Information Technology Department. Employees may not use Company Internet facilities to download entertainment software or games, or to play games over the Internet. Employees with Internet access may not use Company Internet facilities to download images or videos unless there is an express business-related use for the material. Employees may not upload any software licensed to the Company or data owned or licensed by the Company without the express authorization of the Information Technology Department. Because a wide variety of materials may be considered offensive by colleagues, customers, or suppliers, it is a violation of Company policy to store, view, print, or redistribute any document or graphic file that is not directly related to the user's job or the Company's business activities.

Company Property

All Company information systems, including the information transmitted or stored by them, are the sole property of the Company. Subject to applicable law or regulation, the Company may access and monitor employee communications and files, as it considers appropriate at its sole discretion and without further notice. Information systems include, but may not be limited to: mail, electronic mail (email), instant messaging, text messages, courier services, facsimiles, telephone systems, personal computers, computer networks, wireless and cellular networks, on-line services, Internet connections, computer files, video equipment and tapes, tape recorders and recordings, pagers, cellular phones and bulletin boards. On-line services, Internet and email access may be provided to employees based on business justification and the meeting of technical

requirements. It is the employee's responsibility to ensure all Company data is returned to the Company at separation. In cases where data has been copied, the data must be destroyed with supervisor and/or IT supervision. No software of any type is to be installed or executed on Company information systems without prior approval from the Information Technology Department. It is the responsibility of each employee to utilize communications services as a business tool. Employees should represent the Company in a professional manner while sending and receiving information within and outside the Company. The sending or public posting of confidential materials outside of the Company is strictly prohibited. Employees should refrain from exchanging any confidential information to unauthorized personnel. In no event shall any employee be allowed to publish or post to any social media site while on Company time unless required by their job duties.

Disciplinary Action

Improper use of Company Information Systems and equipment in violation of this policy may result in disciplinary action, up to and including employment termination. Management reserves the right to terminate access to its information systems and/or equipment at any time.

Media Contact & Social Media Guidelines

The Internet has become an accessible and powerful means of public communication, including through Social Media. Social Media as used in this policy includes e-mail, chat rooms, websites, blogs, and wikis (whether maintained by the employee or by a third party), and social networking sites like Facebook, Twitter, LinkedIn and others.

The Company requires that its employees' use of Social Media be confined to non-work time and to employees' own devices unless required as part of the Employee's job duties. We do not permit employees to use Social Media during work time or on Company equipment. The Company also expects and insists that employees' use of Social Media does not damage the Company or its working environment. Employees should observe the following guidelines to ensure that their public activities on Social Media do not conflict with their responsibilities to the Company and its customers or clients.

Our strong preference is that you not discuss the Company or Company-related matters in any Social Media. However, if you choose to do so, note the following:

- If you choose to identify yourself as an employee of the Company on Social Media, you are expected to also make clear to your readers that the views you express do not necessarily reflect the views of the Company, by posting a disclaimer in a prominent place (e.g., "The views expressed are mine alone and do not necessarily reflect the views of my employer.")
- If you post any comment that promotes or endorses Company products or services in any way on any Social Media, the law requires that you disclose that you are employed by the Company. Again, we require the use of a disclaimer in that circumstance.
- We would prefer that you not disparage Company products or services. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening, harassing or intimidating, or that mention clients, customers, suppliers, or vendors. Examples of such conduct might include offensive posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other characteristics protected by law or Company policy.

- Protect the Company's confidential, proprietary and trade information, and that of its customers, clients, and vendors. You have an obligation to maintain the confidentiality of this information under Company policy. Such information includes, but is not limited to, financial, marketing, performance and other business or confidential information. If you are unsure whether it is appropriate to post certain information, please check with your supervisor or HR.
- Be aware of and follow copyright and fair use laws. For your protection as well as the Company's, you must comply with all laws governing copyright and fair use of copyrighted material owned by others. This means, for example, that you may not publish copyrighted material without the permission of the copyright owner, whether that is the Company or a third party.

This policy is not intended to infringe in any way on Company employees' legal rights to discuss the terms and conditions of their employment with other Company employees for their mutual aid and benefit. Instead, it seeks to balance the Company's legal duties and legitimate business objectives with employees' protected rights in this regard.

To summarize, when you use Social Media, use good judgment. Be aware that there may be consequences to what you post or publish online. These consequences may include discipline up to and including dismissal if the conduct violates Company policy or if the Company determines that your posting or publication is not legally protected and harms (or has the potential to harm) the Company's legitimate business interests and obligations toward its employees and its customers or clients.

WORKPLACE AUDIO-VISUAL RECORDING POLICY

The use of audio and video recording devices on or in the Company's personnel processing area(s), pipe fabrication bays, equipment and modular yards, warehouses, corporate headquarters, customer or client operating facilities, and/or the parking lot area(s) associated with any of the foregoing are strictly prohibited without the express written authorization of Turner Industries management. This includes all cell phones, iPhones, iPads, tablets, or other PDA devices with built-in cameras and/or video cameras or audio recording devices. Notwithstanding the foregoing, **to the extent allowed by the law**, photographs, recordings, and/or digital images may be taken to document any perceived safety related concerns, provided that Company management is contemporaneously contacted and provided with access to and/or a copy of such photographs, recordings, and/or digital images. Any violation of this policy may lead to disciplinary action up to and including termination.

As to approved photography and audio/video recordings, to the extent allowed by law, the Company reserves the right to use any photographs, digital images or audio/video recordings of its employees taken at work, Company functions, Company sponsored events, or any other Company related occasion for business purposes. Employees who wish to revoke this right are required to contact the marketing department and complete a written opt-out form.

VEHICLE POLICY

Designated employees of the Company are allowed to operate and use Company vehicles for **BUSINESS PURPOSES ONLY**. This Policy is designed to assure that all Company vehicles are operated in a safe and professional manner in compliance with all Company policies and applicable laws and regulations.

"Company Business Use" shall be defined as activities that involve performance of one's duties for the benefit of the Company in accordance with the directives and instructions received from Company management.

“Company Vehicles” shall be defined as all vehicles owned, leased, reimbursed, or otherwise provided for by the Company and used in the furtherance of Company business activities or interests.

No Company Vehicle is to be used for any reason other than a Company Business Use. Company owned or leased Vehicles are not intended for Personal Use.

“Personal Use” is defined as: ANY vehicle operation outside the scope of Company Business Use.

Employees who are assigned a Company Vehicle will be held responsible for any and all incidents or damage that occurs during the use, other than a Company Business Use, related to driving or operation of the Vehicle. The Company does not provide automobile liability insurance coverage for any incidents, claims, demands, suits, damages, etc. occurring or arising out of the use, other than a Company Business Use, of a Company vehicle, or for the operation or use of a Company Vehicle in a manner which is in violation of this policy.

Authorized Operators, Users and Occupants of Company Vehicles

The operation or use of any Company Vehicle is limited to Company Business Use by the assigned driver or other Company employee acting under the authority of the assigned driver and in compliance with Company Policies. No other person is authorized or permitted to operate or use a Company Vehicle, including but not limited to the spouse, friend, children, or other family member of the Company employee.

Field supervisors, superintendents and Company management employees may authorize or permit another Company employee to operate or use a Company Vehicle for Company Business Use, but only for specific and limited business-related assignments. Any deviation from that limited and specific assignment by a Company employee will be considered use or operation of the vehicle without the permission of the Company.

Company employees, clients, vendors and suppliers are allowed to occupy a Company Vehicle in the course of Company business interests or activities.

No animal or pet may occupy a Company Vehicle.

General Provisions

Any Company employee to whom a Company Vehicle has been assigned, or who receives a monetary allowance as reimbursement for expenses incurred in the operation and/or use of a personal vehicle for Company Business, must maintain a valid operator’s license at all times.

Any Company employee whose operating license or privileges have been suspended or revoked must notify the Company’s safety department immediately. Operating or using a Company Vehicle or a personal vehicle for Company business under a suspended or revoked license is a violation of this policy.

Under no circumstances shall an operator of a Company Vehicle remove or in any way deface Company information, safety information, or other Company authorized information on a Company Vehicle, including but not limited to the 1-800 information displayed on the vehicle.

No other decals, bumper stickers, or other information may be displayed on a Company Vehicle without Company executive-level authorization.

Violations of this Policy

Use or operation of a Company vehicle under any of the following circumstances is considered a direct violation of this policy:

1. Unauthorized operation or Use of a Company Vehicle;
2. Operating a Company Vehicle without a valid operator's license or under suspension or revocation of operating privileges;
3. Operating or using a Company Vehicle by anyone who has consumed any alcoholic beverage of any amount whatsoever;
4. Operating a Company Vehicle in a careless or dangerous manner, including speeding or any other unlawful operation;
5. Operating, using or occupying a Company Vehicle by anyone who has consumed or ingested any controlled or illegal substance or drug, unless the controlled substance or drug has been prescribed by a physician having knowledge that a vehicle may be operated or used by that person while under the influence of the controlled substance or drug;
6. Hauling goods or pulling any type of trailer for any reason other than Company Business, including but not limited to the hauling or pulling of boats, motorcycles, etc.;
7. Operating, using or occupying a Company Vehicle for any reason except as may be necessary for traveling to and from work or for Company Business Use only. Deviation from normal and ordinary travel routes to or from work is not authorized or permitted, unless directly related to Company Business;
8. Operating or occupying a Company Vehicle while not wearing a seat belt;
9. Smoking in a Company Vehicle;
10. Texting, sending, or receiving emails when operating a Company Vehicle;
11. Operating or parking a Company Vehicle at an establishment that serves alcohol as its primary business;
12. No employee driving, operating, or occupying a Company Vehicle shall engage in any activity that is or could be construed as detrimental to the Company's reputation in the community

Violation of this policy will result in discipline up to and including termination.

Employees Receiving Automobile Allowances

Any Company employee who receives a monetary allowance as reimbursement for expenses incurred in the operation and use of his/her personal vehicle for Company business, shall obtain a minimum of \$250,000/\$500,000 single limit liability insurance coverage per occurrence, naming the Company as an additional insured. A certificate of insurance coverage, showing that the Company employee has obtained this coverage, shall be furnished to the Company.

ETHICS, PROCUREMENT, & RELATED PARTY DISCLOSURES

Those employees in procurement or other sensitive positions who have been identified as being required to undertake annual training in the form of disclosure reporting shall do so as required. Employees who fail to timely complete this training face disciplinary action, up to and including termination of employment.

CONFIDENTIALITY AND NON-DISCLOSURE

The protection of confidential business information and trade secrets is vital to the interests and the success of the Company. Company policy therefore is that the operations, activities and business affairs of the Company and our clients and customers are kept confidential to the greatest possible extent. It is the responsibility of all employees to keep sensitive Company information confidential and secure, as well as such confidential, private, and proprietary information that belongs to the Company's customers, clients, and other third parties.

Definition of "Confidential Information"

Confidential information is defined as any information possessed by the Company and/or its employees that is not readily available to the public. Such Confidential Information includes, but is not limited to, the following examples: accounting or financial data; accounting systems/programs; business plans and/or strategies; commercial labor rates; contracts and negotiations; Company/Customer/Client lists, preferences, processes and procedures; cost systems/programs; designs; drawings; intellectual property rights; labor relations strategies; marketing strategies; new materials research; pricing information; proprietary production processes; proprietary, trademarked or copyright information, including that relative to tracking labor movement[s] or job performance; research and development strategies; technological data; sales and financial data; scientific prototypes; and technological prototypes.

Confidentiality and Non-Disclosure Policy

This Confidentiality and Non-Disclosure Policy serves to protect the Confidential Information and systems, in addition to confidential information regarding customers, products, services, and systems of the Company. The Company, not its employees, owns all Confidential Information. This holds true even in instances where employees develop or discover information or products during their employment with the Company.

In order to remain in compliance with this Confidentiality and Non-Disclosure Policy, employees must:

Not disclose any Confidential Information to third parties, unless required for the Company's business operations, required by proper legal process or regulation, or as may be authorized in writing by the Company;

Not send or forward any Confidential Information to a personal cell phone, PDA, home computer, or similar device, without the prior written authorization of the Company;

Maintain the confidentiality of all Confidential Information encountered while engaged in business activities, such as Company, employee, or customer information; and

Maintain the confidentiality of all Confidential Information and property in whatever form it is maintained, including documents, records, or electronic media, and, upon termination, immediately return such Confidential Information and property to the Company.

The Company considers all records, information, and all other Confidential Information obtained or created in the performance of your duties to be the sole property of the Company. Every employee is responsible for ensuring that confidentiality is not compromised. As an employee of the Company, you are responsible for protecting all such Confidential Information by adhering to this Confidentiality and Non-Disclosure policy. Failure to do so, will subject you to disciplinary action, up to and including termination, as well as other applicable legal actions.

Logos, Copyrights, Trade Names, Trade Marks & Intellectual Property Rights

Employees shall respect all copyright, trademark, trade name, patent, and other intellectual property rights laws, rights of publicity, and other rights of the Company, its customers and clients, as well as other third parties. For the Company's protection as well as its employees, it is critical that the employee show proper respect for the laws governing copyright, fair use of copyrighted material owned by others, trademarks and other intellectual property, including copyrights, trademarks, patents, and brands owned by the Company, its customers and clients, and other third parties. To minimize the risk of a copyright violation, the employee should provide references to the source(s) of information used and accurately cite copyrighted works the employee identifies in any applicable online communications. Do not infringe on logos, brand names, taglines, slogans, patents, or other trademarks that belong to the Company, its customers and clients, as well as other third parties.

SECURITY, WORKPLACE VIOLENCE & WEAPONS

To maintain project security, all employees entering or leaving Company premises/the jobsite/jobsite premises shall display their badges and submit to an inspection of, lunch boxes and other parcels upon the request of the security guard. No employee shall have a reasonable expectation of privacy in any lunch box or other parcel brought onto Company Premises.

Workplace Violence

In order to ensure a safe workplace, the Company does not tolerate bullying behavior. Turner defines bullying as "repeated and/or severe abusive, intimidating or humiliating behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment." Such behavior violates the Company Code of Conduct, which clearly states that all employees will be treated with dignity and respect. Employees found in violation of this policy will be disciplined up to and including termination. The Company considers the following types of behavior examples of bullying:

- Verbal bullying: Slandering, ridiculing or maligning a person or his/her family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- Physical bullying: Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault; damage to a person's work area or property.
- Gesture bullying: Nonverbal threatening gestures or glances that convey threatening messages.

Conduct that threatens, intimidates or coerces another employee, customer, vendor or business associate will not be tolerated. Company resources may not be used to threaten, stalk or harass anyone at the workplace or outside the workplace.

Indirect or direct threats of violence, incidents of actual violence and suspicious individuals or activities should be reported as soon as possible to a supervisor, security personnel, Corporate Security Director, Employee Relations Department, applicable Human Resources manager, or any member of senior management. When reporting a threat or incident of violence, the employee should be as specific and detailed as possible. Employees should not place themselves in peril, nor should they attempt to intercede during an incident.

The Company treats threats coming from an abusive personal relationship as it does other forms of violence. Employees should promptly inform the Employee Relations or applicable Human Resource department of any protective or restraining order that they have obtained that lists the workplace as a protected area. Employees are encouraged to report safety concerns with regard to intimate partner violence. Turner is committed to supporting

victims of intimate partner violence by providing referrals to Turner's employee assistance program (EAP) and community resources and providing time off for reasons related to intimate partner violence.

Turner will promptly and thoroughly investigate all reports of threats of violence or incidents of actual violence and of suspicious individuals or activities. Reports can be submitted anonymously to **1-800-626-1735**. Turner will not retaliate against employees making good-faith reports of violence, threats or suspicious individuals or activities. In order to maintain workplace safety and the integrity of its investigation, Turner may suspend employees suspected of workplace violence or threats of violence, either with or without pay, pending investigation.

Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.

Weapons

Employees may not possess firearms or weapons of any kind on their person while at work or on Company Premises, including company-owned or leased vehicles, except as follows:

Subject to jobsite-specific policies and procedures, employees may [only as allowed by state or local law] store lawfully possessed firearms or other weapons in their personal vehicles while parked on company property provided the vehicle is locked and such firearms or other weapons are hidden from plain view or locked in a case or container within the vehicle. All employees shall be required to familiarize themselves with any jobsite-specific policies and procedures regarding the presence of firearms or other weapons on client/owner premises and/or parking facilities. Turner reserves the right to alter or amend this policy in accordance with changes in applicable law.

This policy will be strictly enforced, and any violations will result in disciplinary action up to and including termination of employment.

SOLICITATION

It is the policy of the Company to prohibit solicitation and distribution on Company Premises by non-employees and to permit solicitation and distribution by employees only as outlined below.

1. The Company limits solicitation and distribution on Company Premises because when left unrestricted, such activities can interfere with the normal operations of the organization, can be detrimental to employee efficiency, and can be annoying to customers and coworkers.
2. The Personnel and Legal departments are responsible for administering this policy and for enforcing its provisions. Employees will be subject to disciplinary action up to and including termination for violation of this policy.
3. Persons who are not employed by the Company are prohibited from soliciting funds or signatures, conducting membership drives, distributing literature or gifts, offering to sell merchandise or services, or engaging in any other solicitation or similar activity.
4. The Company may authorize fund drives on behalf of charitable organizations. Employees are encouraged to volunteer to assist in these drives. However, employees are not to be discriminated against because of their willingness or unwillingness to participate.
5. Employees are permitted to engage in solicitation or distribution of literature for any group or organization, including charitable organizations, only in accordance with the following restrictions:

- A. The sale of merchandise is prohibited on Company Premises.
 - B. Solicitation and distribution of literature are prohibited during the working time of either the employee making the solicitation or distribution, or the targeted employee. The term “working time” does not include an employee’s authorized lunch or rest periods.
 - C. Except as otherwise provided by law and regulations, distribution of literature related to solicitation is prohibited during working time, and in all work areas without computer access at all times.
 - D. The distribution of literature in such a manner as to cause litter on Company Premises is prohibited.
 - E. Except as otherwise provided by law, off-duty employees are not allowed to return to Company Premises until their next scheduled work time.
 - F. Subject to applicable law and regulations, the solicitation, dissemination, and/or communication of any matters through the Company’s electronic communication systems which do not specifically relate to employees’ job duties and/or job performance is strictly prohibited during working time. The Company in all respects reserves any and all rights available under any applicable law, regulation, policy directive, and/or memorandum to assert that special circumstances warrant further restrictions on non-business email use in order to maintain production and discipline. In all respects and notwithstanding anything contained in the foregoing, employees are expressly prohibited from sending significantly large amounts of data in the form of attachments, digital images, or other data that adversely impact the functionality of the Company’s email server.
- 6. Further notwithstanding the foregoing, this Solicitation Policy shall not be deemed to conflict with the Company’s Email and Internet Usage Policies, which shall govern and control the use of the Company’s electronic media, including but not limited to its email, internet, and electronic networking systems.
 - 7. The Company maintains bulletin boards to communicate information to employees and to post notices required by law. These bulletin boards are for the posting of Company information and notices only, and only designated persons may place notices on or take down material from the bulletin boards.

COMPANY PROPERTY

It is impermissible to remove the Company’s, the client’s, other contractors, fellow employees or vendor’s property from Company Premises for personal use. Removal of such property may result in immediate dismissal and/or legal action.

Property Return

Upon conclusion of employment, including resignation, termination, retirement, or other occurrence, employees are required to return to his or her supervisor all Company property that they have been issued and/or have in their possession or control. This includes such items as keys, company files and documents, scan cards, company uniforms, vehicles, and electronic equipment such as cell phones, pagers, and computers. In the event that Company property is not returned, to the extent allowed or provided by law, the Company may withhold from your final paycheck the costs for any unreturned items. **Under no circumstances shall any deductions from final paychecks result in any payments to employees at rates or amounts less than as required by federal or state minimum wage laws.**

COMPENSATION POLICIES

CLASSIFICATION OF EMPLOYMENT

For purposes of pay administration and eligibility for overtime payments and employee benefits, the Company classifies its employees. Since all employees are hired for an unspecified duration, the categories below are not intended to and do not suggest or guarantee employment for any length of time. All employees whether regular, temporary or working either full-time or part-time are hired with the understanding that their employment may be terminated at any time for any reason not expressly prohibited by law.

Regular Employees

Full-Time: An employee who works forty (40) hours or more per week, for a continuous and indefinite period of time is considered to be full-time. Hourly employees are not guaranteed forty (40) hours of work for a given week.

Note: Subject to project-specific or job site specific policies, to qualify for vacation accrual, eligible employees must be scheduled for and work at least 40 hours per week on a continuous and indefinite basis.

Project-Specific Employees

An employee who is hired for a specific project or assignment, regardless of the number of hours worked per week, are hired with the understanding that their employment may be terminated during or upon completion of the specific project or assignment for any reason not expressly prohibited by law.

Salaried Nonexempt Employees

Employees, who are paid on a salary basis but based on their job duties and in accordance with applicable federal and/or state wage and hour laws, are paid overtime at the rate of time and one half their regular rate of pay for all hours worked beyond forty hours in a work week.

Exempt Employees

Employees who are paid on a salary basis and based on their job duties and in accordance with applicable federal wage and hour laws are not required to be paid overtime pay for work performed beyond forty hours in a workweek. Those employees whose job duties meet the applicable exemption classifications as per federal wage and hour law are generally exempt.

RECORDING WORK HOURS

To ensure that accurate records are kept of the hours worked, including overtime hours, vacation, sick, and leave time, employees will be required to record their time worked and absences on the Payroll Timesheet.

All employees must submit weekly or bi-weekly timesheets showing the department or job number and accounting code for the time worked. Timesheets must be filled out properly and completely. Explanations appear on the timesheet. Each employee will be responsible for making sure that his or her time worked is recorded accurately. The employee's immediate supervisor must sign the timesheet to verify its accuracy. Falsification of a timesheet is a violation of Company policy and may result in disciplinary action, up to and including termination.

Timesheets for hourly employees must be turned in by noon on the Monday following the end of the weekly pay period. Timesheets for salaried employees must be turned in by noon on the Monday following the end of the bi-weekly pay period. If you have any questions, contact your supervisor or the Payroll Department.

PAY PROCEDURES

Where applicable or approved and once transitioned as a policy, employees are required to use our automatic payroll deposit program. Jobsite and hourly employees shall abide by all Company directives regarding auto-deposit. On the Friday following the end of the pay period earnings typically will be electronically transferred to the account designated by you. If the normal pay date falls on a holiday, then the transfer will typically take place on the last preceding workday.

Although an employee may be employed by more than one company over a period of time, on any given date he or she is an employee of only one Company. The legal employer is the Company that reports the employee's earnings to the federal government and from which the employee receives a W-2 form. Your earnings may be transferred from a Turner Industries Group account as a matter of administrative convenience; however, the name of the employing Company will be designated on the bi-weekly statement of earnings.

Other than for executives, Turner Industries utilizes myADP as an efficient and secure method for delivering direct deposit remittance data to our employees. The Payroll Department has notified employees of instructions on how to access their payroll data from www.myAdp.com, including instructions for first time users in creating their account. All questions should be directed to the Payroll Department.

Employees should notify the Payroll Department if they discover a mistake on their statement of earnings, or if there is a problem with the transfer of funds.

OVERTIME PAY

Depending on Company work needs, non-exempt employees will be required to work overtime only when requested to do so. Prior approval of a supervisor is required before any non-exempt employee works overtime.

Employees are responsible for calculating their own hours for each work day. Overtime pay is based on hours worked per week in accordance with state and/or federal regulations. Overtime hours worked by non-exempt employees are paid at one and one-half times the employee's base rate of pay per hour. Hours worked means time actually spent on the job. It does not include hours away from work due to vacation, sickness, paid or unpaid leave, or holiday even when these days are compensated.

Subject to individual jobsite policies and procedures, the following provisions apply. Employees who arrive at work prior to their shift or start time do so on their own time and for their own convenience and shall not work nor perform any work until their shift or start time commences. Employees who arrive early at the jobsite/yard/office are free to engage in any non-employment related activities they wish so long as they do not engage in any work. Employees who arrive early to their jobsite/yard/office before their shift begins are also free to leave the jobsite/yard/office at their discretion, provided they return to their assigned work areas for the start of their respective shift(s). Employees understand and acknowledge that early arrival at the jobsite/yard/office, coupled with unauthorized engagement of work, is in violation of this policy, and shall be subject to employee discipline appropriate to the circumstances, including possibly termination of employment.

PAYROLL DEDUCTIONS

The Company will automatically withhold federal and state income taxes and social security (FICA) from the employee's gross wages. In addition, any outstanding employee advances may be deducted from the employee's paycheck. The foregoing shall not result in any final paychecks at rates less than allowed by federal or state minimum wage laws.

Voluntary payroll deductions will not be made without a written request or authorization. These items may include contributions to the group insurance policy, savings plan, and charitable organizations. All deductions will be itemized on the employee's bi-weekly statement of earnings. Employees should review their pay stubs each pay period for accuracy and report any problems immediately.

Personal tools brought on the jobsite should be checked in with a Tool Room attendant or Supervisor according to the policy for your work location so that the employee may obtain a Gate Tool Pass in order to remove any of the tools from the jobsite when necessary.

Employees owing any money or sums to the Company, whether from cash advance or otherwise, or owing any return of property to the Company, expressly acknowledge such liability to the Company for the return of such property or sums. To the maximum extent allowed by law, the Company reserves and maintains any and all rights for the return of such property or sums, which may include payroll deductions from final paychecks to the extent allowed by law.

Under no circumstances shall any deductions from final paychecks result in any payments to employees at rates or amounts less than as required by state or federal minimum wage laws.

The Company will not retaliate against any employee for reporting what he or she in good faith believes is an improper deduction from his or her wages.

EMPLOYEE BENEFITS

Employment benefits are available to qualified and eligible full-time employees. For further information, please contact the Company's Benefits Department at **225-214-2566**, or www.tigbenefits.com. Information regarding vacation eligibility and accrual may further be obtained from the Company's payroll, personnel, or employee relations departments. Job-site specific and/or unique Company office or departmental employees' vacation eligibility and/or accrual may be obtained from Company management at the particular jobsite or through the applicable office or department.

Notwithstanding the foregoing, and except as provided by applicable law, any and all employees who work at jobsites shall, to the extent applicable, be governed by the vacation and/or sick time policies in place at the respective jobsites. In the event of any conflict between this handbook and the jobsite specific vacation policy[ies], the jobsite specific vacation and/or sick time policy[ies] shall govern the employees' vacation and/or sick time benefits. Any portability or transference of vacation and/or sick time benefits shall be governed by the appropriate and applicable jobsite policy[ies].

HOLIDAYS

For its corporate and administrative offices, the Company provides paid time off to all employees on the following holidays: New Year's Day, Good Friday, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, day after

Thanksgiving Day and Christmas Day. Employees who work at jobsites are subject to the site's policies as to paid holidays.

Paid holiday time will not be considered as time worked for the purpose of computing overtime for non-exempt employees.

SICK LEAVE

Eligible employees will be granted fifty-six (56) hours of paid sick leave per year. Sick leave may be utilized by an employee for his or her own illness, injury, or other personal medical reason or when the employee is needed to care for their child, spouse, or parent who has an illness, injury or other medical condition. **No employee will be granted or allowed to utilize more than fifty-six (56) hours of paid sick leave per year.** In the event an absence requires more time off than the employee has unused sick time available, any accrued unused paid vacation time may be applied toward the remainder of the leave. Unused sick leave cannot be carried forward to the next year.

Employees are prohibited from falsifying the reason for an absence. In the event of an illness or injury, the Company may request a medical statement from the employee's doctor or require the employee to submit to a medical examination to verify a claimed illness or injury. The Company may also require the employee to obtain a doctor's release in order to return to work. Unauthorized absences will be considered abuses of this policy and are grounds for disciplinary action, up to and including termination. In addition, unauthorized absences will not be compensated.

Employees must notify their supervisors as soon as possible in the event of an absence. It is the employee's responsibility to report promptly to his or her supervisor on the status and intention of the employee to return to work.

In the event an employee's employment relationship with the Company ends for any reason, that employee will not be paid for any unused sick leave. In addition, unused sick leave may not be converted into cash, holidays, or vacation.

LEAVES OF ABSENCE

JURY DUTY

Time off for mandatory jury duty or court appearances required as a result of a valid subpoena or court order is excused provided that proof of duty is verified by the employee's supervisor and timekeeper. Non-exempt employees may be required to take leave without pay for any time spent on jury duty unless prohibited by specific federal, municipal or state law. Subject to state and/or municipal law, employees may be entitled to pay for jury duty. Employees are expected to report for work when it does not conflict with court obligations. It is the employee's responsibility to keep his or her supervisor informed about the amount of time required for jury duty or court appearances.

FAMILY and MEDICAL LEAVE ACT [as amended] (FMLA)

It is the policy of this Company to provide eligible employees up to 12 weeks of unpaid, job protected leave for *certain* family and medical reasons during a rolling 12-month period measured backward from the initial date an employee uses FMLA leave. In some circumstances, taking of leave may be denied if the employee does not meet the eligibility requirements or if the reason for leave is not covered by the Family and Medical Leave Act. FMLA leave is handled through the FMLA Leave Administrator, to whom all questions should be directed.

Eligibility

Employees are eligible if they have been employed for at least 12 months (as defined by FMLA) **AND** have worked 1,250 hours of service with the same Turner company during the previous 12-month period preceding the start of the leave, **AND** if there are at least 50 employees within a 75 mile radius of the employee's worksite.

FMLA leaves are granted for one or more of the following reasons:

- Birth of the employee's child, and in order to care for the child within twelve months of the birth
- Placement of a child with the employee for adoption or foster care for the child within 12 months of placement
- Where the employee is needed to care for their child (biological, adopted, foster child, stepchild, or legal ward), spouse (a husband or wife as recognized under state law for the purposes of marriage in the state where the employee lives, including common law marriages and same-sex marriages in certain states), or parent (biological or an individual who stood in the place of a biological parent during the employees childhood) who has a "serious health condition" (defined below)
- Employee's own "serious health condition" (defined below)

Serious Health Condition

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves one of the following:

- Inpatient care (i.e., an overnight stay) in a hospital, hospice, or residential medical facility
- A condition requiring absence of more than 3 consecutive work days that involves treatment by a healthcare provider
- Pregnancy or prenatal care
- To support or care for a covered family member in the Armed forces who incurs injury or illness in the line of duty or experiences a "qualifying exigency" pursuant to statute.
- A chronic condition (i.e., asthma, diabetes, anemia, atrial fibrillation, epilepsy, etc.)
- A permanent or long-term condition requiring medical supervision (i.e. terminal cancer, Alzheimer's disease, stroke, terminal diseases etc.)
- Absences to receive and recover from multiple treatments by, or on referral by, a health care provider for a condition that likely would result in incapacity of more than 3 consecutive work days if left untreated (i.e., chemotherapy, physical therapy, dialysis, etc.).

Examples of what is NOT a serious health condition

- Treatment that includes taking over-the-counter medications such as aspirin or antihistamines that can be started without visiting a health care provider
- Routine physical exams; including eye and dental exams
- Cosmetic treatments (i.e., plastic surgery) unless inpatient hospital care becomes necessary or complications develop
- The common cold, an ordinary case of the flu, earaches, upset stomach, allergy shots, tendonitis, minor ulcers, headaches other than migraine, routine dental problems.
- Absence because of the employee's substance abuse, rather than for treatment.

Service Member Leave Entitlement

Service member FMLA provides eligible employees unpaid leave for anyone, or for a combination, of the following reasons:

- Eligible employees with a spouse, son, daughter or parent on duty or call to active duty status in the Armed Forces in support of a contingency operation may take up to 12 weeks of leave entitlement to address qualifying exigencies which may include attending certain military events, arranging for alternative childcare, addressing certain legal and deployment reintegration briefings.
- Eligible employees may take up to 26 weeks during a single 12-month period to care for a covered family member who had incurred an injury or illness may render the family member medically unfit to perform duties of the member's office, grade, rank or rating

Advance Notice

If the need for FMLA leave is foreseeable, the employee must provide the Company with at least 30 days' notice. If the leave is unforeseeable, the employee should provide as much notice as practicable. Failure to provide required notice may result in denial or delay of the requested leave.

Intermittent or Reduced Leave

Intermittent or reduced schedule leave shall be granted under the following types of circumstances:

- There must be a medical need that can best be accommodated by intermittent or reduced leave.
- The employee or his or her spouse, child or parent is suffering from a serious health condition that requires intermittent leave by the employee.
- The medical need for the intermittent or reduced schedule leave and the existence of a serious health condition must be verified by a health care provider.

The employee must attempt to schedule the intermittent or reduced schedule leave so as not to disrupt the operation of the employee's department.

The employer can temporarily transfer the employee to an alternate position with equivalent pay and benefits that better accommodates the intermittent leave or reduced schedule.

Medical Certification & Required Documentation

Employees must complete and return the required Company FMLA paperwork timely.

The Company has the right to require an employee to provide serious health condition medical certification from the health care provider of the employee, his or her spouse, the employee's child or his or her parent. The Company may also require second or third opinions. Second and third medical opinions, if requested, are at the employer's cost. The Company may require an employee to recertify the medical need or the reason for leave at any reasonable interval.

The Company also has the right to require that the need for leave be supported with birth, adoption, or foster care records. To prove a family relationship, the employer may also require documentation of the relationship. Examples include birth certificate or court document.

An employer must allow at least 15 calendar days for the employee to obtain the medical certification or leave need verification.

Maintaining Contact

Employees on family or medical leave must contact the Company's Benefits Department at **225-214-2566** and their supervisor at least two business days prior to their expected date of return regarding the status of their leave and their intention to return to work. Furthermore, notice must be given as soon as practicable (within two business days if feasible) if the dates of the leave change, are extended, or initially were unknown and have been determined.

Returning from FMLA Leave

Upon return from FMLA leave, most employees must be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms. If a shift or position has been eliminated or overtime has been decreased while an employee is on leave, an employee would not be entitled to return to work the eliminated shift or the original overtime hours. If an employee was hired for a specific term or only to perform work on a specific project, the employer has no obligation to restore the employee if the employment term or project ends while the employee is on leave and the employer would not have otherwise continued to employ the employee. All questions should be directed to the FMLA Leave Administrator.

Any employee returning from a leave that was necessary for their own serious health condition will be required to complete the Company medical release procedures and paperwork prior to returning to work in any capacity. The Company may delay the return to work of an employee who fails to provide the Company medical release paperwork.

Continuation of Health Insurance

If the employee is a participant in the Company health insurance plan and wishes to continue his/her health benefit coverage while on leave he/she must continue to pay their normal employee contribution for the duration of the leave.

For the duration of FMLA leave, the Company will continue to pay the Company's portion of the employee's health insurance premiums so long as the employee is a participant in the Company health plan at the time that his/her leave commences. Health insurance coverage may cease if the premium payment is more than 30 days late. Where an employee does not return to work after completing an approved leave of absence and where the Company has paid any portion of health insurance premiums for coverage during the leave, the employee may be obligated to reimburse the Company for the cost of such health insurance premiums. The only exception to this requirement is where the reason the employee does not return to work after the leave of absence is the continuation, recurrence, or onset of a serious health condition or other circumstance beyond the employee's control.

Accrual of Benefits

The time spent by employees on FMLA leave will not count as time worked for the accrual of eligible and available vacation or sick time.

Use of sick time for continuous and intermittent/reduced scheduled FMLA leave

Any employee who has unused paid sick time will be required to use their paid sick time as part of any FMLA leave due to their own or a family member's serious health condition (i.e. the sick leave runs concurrently with FMLA leave), whether the leave is continuous or intermittent/reduced scheduled FMLA leave.

It is mandatory to notify your supervisor and Benefits Department and/or the FMLA Leave Administrator when you will be out for any significant time.

PREGNANCY LEAVE

The Company complies with all relevant state and federal laws and regulations relative to pregnancy and pregnancy leave benefits. Employees are required to contact the Company Benefits Department for processing any such leave requests. Nothing provided herein shall be deemed to expand any pregnancy-based benefits as available under state or federal law.

Lactation/Breastfeeding Policy

As part of the Company's family-friendly policies and benefits, and in accordance with applicable law or regulation, the Company supports breastfeeding mothers by accommodating the mother who wishes to express breast milk during her workday when separated from her newborn child.

Accommodation for Lactating Employees

For up to one year after the child's birth, any employee who is breastfeeding her child will be provided reasonable break times to express breast milk for her baby. The Company has designated certain rooms at its regional and corporate offices for this purpose. A small refrigerator reserved for the specific storage of breast milk is available. Nursing employees wishing to use this room must request/reserve the room by contacting the Personnel, applicable Human Resource and/or Employee Relations Department. Additional guidelines for use of the room and refrigerator storage are posted in the room. Employees who work at a jobsite or in other locations will be accommodated with a private area as necessary.

Breaks of more than 20 minutes in length will be unpaid, and the employee should indicate this break period on her time record.

MILITARY LEAVE (USERRA)

The Company is committed to protecting the job rights of employees absent on military leave. In accordance with federal and state law, it is the Company's policy that no employee or prospective employee will be subjected to any form of discrimination based on that person's membership in or obligation to perform service for any of the Uniformed Services of the United States. Specifically, no person will be denied employment, reemployment, promotion, or other benefit of employment based on such membership. Furthermore, no person will be subjected to retaliation or adverse employment action because such person has exercised his or her rights under applicable law or this policy.

If any employee believes that he or she has been subjected to discrimination in violation of this policy, the employee should immediately contact their supervisor and Employee Relations and/or Company Benefits— **1-800-288-6503**.

Employees who have military reserve obligations or who are called to active duty should inform their supervisor, the Military Leave Administrator, and/or Company Benefits at **225-214-2566** as far in advance as is reasonable under the circumstances prior to commencement of the leave.

Eligibility

Employees taking part in a variety of military duties are eligible for benefits under this policy. Such military duties include leaves of absence taken by members of the uniformed services, including Reservists, National Guard members for training, periods of active military service, and funeral honors duty, as well as time spent being examined to determine fitness to perform such service. Subject to certain exceptions under the applicable laws, these benefits are generally limited to five years of leave of absence.

Procedures for Military Leave

1. Unless military necessity prevents it, or is otherwise impossible or unreasonable, an employee should provide the Company with notice of the need for leave as far in advance as is reasonable under the circumstances. Written notice is preferred but not required under the law or this policy.
2. To request a temporary or extended military leave of absence, the employee should contact the Military Leave Administrator or the Company Benefits Department at **225-214-2566**.
3. Employees on temporary or extended military leave may, at their option, use any or all accrued paid vacation or personal leave during their absence.
4. When the employee intends to return to work, he or she must first contact the Military Leave Administrator and, if required, must further be cleared through Turner Medical. In the event the employee's previous job is no longer available, whether through a reduction of force, completed job [i.e., turnaround or construction], or any other issue of unavailability, the employee should contact his or her applicable Personnel Office for purposes of re-applying.
5. If the employee does not return to work, the supervisor must notify Employee Relations so that appropriate action may be taken.

All other issues or questions as to available benefits, eligibility and allocation(s) of premium payments should be directed to the Company's Benefits Department at **225-214-2566**.

The rights listed in this policy may vary depending on the circumstances and state specific laws.

PERSONAL LEAVE

Employees may request but are not guaranteed a personal unpaid leave of absence for bereavement or other personal reasons not related to statutory leave laws. Personal leave requests must be submitted in writing and are subject to the discretionary approval of the Company. Requests for a personal leave of absence shall be submitted in writing to the employee's supervisor, as well as the requesting employee's Project Manager, or applicable Vice President of the employee's department. Any such request for personal leave shall further include input of the Company's Benefits Department for appropriate consideration of other factors and/or impacts of the request. The request for personal leave must be dated, signed by the employee, and state all circumstances concerning the requested personal leave. The Company reserves the right, to the extent allowed by law, to require employees granted an unpaid leave of absence to be cleared by Personnel Medical prior to returning to his or her work location.

Following an approved unpaid personal leave of absence, the Company will make a reasonable effort, consistent with Company needs or applicable law and regulations, to return the employee to the same position he or she previously occupied. However, the Company does not guarantee that the employee will be returned to the same or similar position. If the same or similar position is not available, the employee may be offered, but is not guaranteed, a lower-level position with wages appropriate or commensurate to such job classification.

EMPLOYEE ACTIONS

DRESS & GROOMING

Company policy is that each employee's dress, grooming, and personal hygiene should be appropriate to the work situation.

Employees must present a professional and businesslike image to clients, fellow employees and the public.

Acceptable personal appearance, like proper maintenance of work areas, is an ongoing requirement of employment with the Company. Radical departures from dress or personal grooming and hygiene standards are not permitted, subject to applicable laws.

Religious practices or clothing unique to a particular religious belief shall be reasonably accommodated on a case by case basis in accordance with applicable law, taking into account legitimate and lawful expectations of work site safety and other considerations unique to the Company's business.

Employees who do not comply with the dress and grooming policy will be subject to discipline up to and including termination.

Office Workers

Company office workers and employees who may meet with clients and the public must comply with the personal appearance standards that are normally acceptable in conventional business establishments. Employees should not wear suggestive attire, suggestive jeans, athletic clothing, shorts, flip flop sandals, T-shirts, novelty buttons, hats, and similar items of casual attire that do not present a professional appearance. Projecting a professional business image should be uppermost in the mind of any employee when dressing for work. Appropriate business attire is required at all times.

Standard hygiene and grooming are expected of all employees. Subject to applicable law, employees are expected to observe the following:

- Avoid extremes of unprofessional or disruptive clothing, accessories, make-up, hairstyles, or nail fashions. Finger nails and toenails should be clean and well maintained.
- Hair should be clean, combed, and neatly trimmed or arranged. Sideburns, moustaches, and beards should be neatly trimmed.
- For jobsite employees, hair that falls below the nape of the neck must be contained in some manner which will not cause danger to the employee or others; by fire or entanglement in moving machinery.
- Employees' hair may not interfere with the wearing of hard hats or other PPE when required.
- Tattoos and body piercing (other than single earring in each ear) should not be visible.
- Appropriate undergarments should be worn at all times by all employees.

These lists are not all inclusive. If the employee has questions regarding the dress policy, please contact the appropriate supervisor or the Employee Relations Department at **1-800-288-6503**.

Clothing

Subject to applicable law, all clothing shall be in accordance with general business and safety practices. In some cases, flame-resistant clothing may be required at the specific jobsite. Employees are not to wear clothing that could get caught in machinery or otherwise cause an incident. Examples include dragging pants, torn or loose long sleeves, or torn clothing. Shirts must be worn at all times. Clothing must be modest and should reflect a neat and professional attitude. Any clothing provided to an employee at the cost of the Company must be returned to the Company upon employment separation, failing which that employee shall pay for the replacement cost thereof, subject to applicable state law.

Casual Days for Office Workers

Certain days [usually Fridays] may be designated at certain Company office locations as a “Casual Day.” Employees may dress in more casual fashion than is normally required. On casual dress days, employees are still expected to present a neat appearance and are not permitted to wear distressed, disheveled, “skimp”, “extreme” clothing, t-shirts, athletic wear or other similarly inappropriate clothing. Business casual is acceptable. Dark blue jeans, khaki slacks and polo-type shirts are acceptable attire. Shorts, flip-flops, etc. are never acceptable business attire. Common sense should dictate business casual.

Footwear

Employees may be required to wear American National Standards Institute (“ANSI”) approved protective footwear.

“Flip-flops,” bare slides, thongs, bedroom slippers, casual sandals that do not fasten around the foot and athletic shoes are prohibited (i.e. jogging shoes, cross trainers, etc.). Business-appropriate sandals, open-toed and casual canvas shoes (i.e. Keds and similar shoes) are acceptable footwear.

Jewelry

The Company has the right to request at any time that any and all types of jewelry be removed for safety purposes and for professional appearance. Jewelry unique to a particular religious belief shall be reasonably accommodated on a case by case basis in accordance with applicable law, taking into account legitimate and lawful expectations of work site safety and other considerations.

HOURS OF WORK

The Company shall establish the time and duration of working hours as required by the workload, customer needs, the efficient management of human resources and any applicable law.

The Company reserves the right to change work hours and days from time to time if business conditions require us to do so.

Break Periods

Break periods for non-exempt hourly employees shall be governed as per applicable jobsite policy[ies] or office location. For salaried employees, individual supervisors have the option and discretion on whether they will

allow employees to take a morning and/or afternoon break, at what time those breaks may be taken, and how long the break(s) will be in duration. Employees are not to leave the work premises for break periods of (20) twenty minutes or less. Break periods greater than (20) twenty minutes are unpaid and the employee will be relieved of all job duties.

Lunch Periods

Lunch periods for non-exempt hourly employees may vary in duration and shall be governed as per applicable jobsite policy[ies] or office location. For salaried employees, individual supervisors have the option and discretion in allocating a lunch period, when that lunch period may be taken, and how long the lunch period will be in duration. Lunch periods are typically either (30) thirty minutes or (60) sixty minutes in duration. During any applicable lunch break, nonexempt, hourly employees are required to remain in the project area and should utilize the lunch areas provided. Nonexempt hourly employees must be relieved of all job duties during their lunch break unless prior approval is obtained from his or her immediate supervisor. Non-exempt salaried employees may not work through lunch unless prior approval is obtained from their immediate supervisor. Please note that in most cases, federal and state laws do not require that employees be given lunch breaks during the workday.

MISCELLANEOUS

EMPLOYEE RECORDS

Personnel records are maintained in the Personnel Department and are the property of the Company. Any changes to your personal information must be promptly reported to the Personnel Department. Requests for copies of your personnel file must be accompanied by an official legal subpoena approved by the Turner Legal Department.

A manager or supervisor considering the hire of a former employee or transfer of a current employee may be granted access to the personnel file or limited parts of it, in accordance with antidiscrimination laws. If mandated by Federal, state or other law, personnel file access by current employees and former employees shall be sent to the Legal Department and the Personnel Department and upon such request will generally be permitted within fifteen business days of the request unless otherwise required under state law or unless a longer period of time is required to locate the records. Personnel files are to be reviewed in the Human Resource and Legal department. Personnel files may not be taken outside the department. Representatives of government or law enforcement agencies, in the course of their duties, may be allowed access to file information. Company clients and customers may request employee records pertinent to particular jobsite requirements, such as skills and/or crafts certifications. To the extent allowed by law or regulation, the Company shall provide such employee information. This policy is subject to revision and change at any time.

PROMOTION & ADVANCEMENT

The Company has a policy of promoting and advancing qualified individuals who have demonstrated excellent work performance. Such promotions and advancements are subject to pertinent and applicable jobsite compensation policies, but in all respects the Company shall not unlawfully discriminate against any employee in connection with any such promotion or advancement opportunities.

EMPLOYMENT VERIFICATIONS

It is the policy of the Company to respond to requests for employment verifications of former employees only by confirming [1] that the individual had been employed by the Company, [2] dates of employment, and [3] position(s) occupied.

Employees who need proof of employment or income should use The Work Number. Please visit www.theworknumber.com or call 1-800-367-2884. For information prior to 12/31/2018, you will need Turner Industries' Employer Code (11792), your SSN, and your PIN (Last 4 digits of your SSN and birth year SSSYYYY). For information post 12/31/2018, the Turner Industries' Employer Code is 28299.

TRAINING

Education and training are essential to employee development and in preparation for career advancement. Employees may be asked to attend or participate in job related training programs, whether the programs are sponsored by the Company or by a Company approved provider of public seminars. Attendance or participation approval must be obtained from your immediate supervisor prior to enrollment in the training program.

TRAVEL EXPENSES & REIMBURSEMENT

The Company will reimburse all approved actual and reasonable business-related travel expenses incurred by eligible [generally only salaried] employees in the performance of job responsibilities. Pre- approval of such expenses is required. All such expenses incurred must be approved by the employee's supervisor for payment to be processed. Employees should use the most expedient mode of transportation available, book the least expensive fares, rent mid-sized vehicles, and stay and eat at moderately priced establishments.

Employee expenses for approved travel will be paid or reimbursed when properly documented by the employee through the Company's designated portal, app, or pertinent instructions, and approved by the supervisor. All lines or data fields on the expense report must be filled in completely. The purpose of the business and the job or account to which the expense is to be charged should be indicated on the report. If you are unsure of the job or account to be charged, please check with your supervisor or a representative of the Accounting Department. The Accounting Department will handle any inter-Company billing that is indicated and approved on the expense report.

Original receipts must be attached or scanned for hotel expense, transportation expense, or any other expense. Reimbursement will not be made for finance charges on personal credit cards, nor will non-itemized credit card billings be accepted as receipts.

If airline tickets are charged to a travel agency, the agency should bill the Company that pays the employee. The charge from the agency may be charged to the appropriate employee receivable account until an expense report is received.

Employees may, in some circumstances obtain a cash advance for approved business travel by submitting a written request to the Accounting Department. Cash advances and Company credit cards are Company property, and their use must be properly documented and approved.

Any travel expenses deemed unreasonable relative to the circumstances will not be paid or reimbursed and are the employee's personal responsibility. The Accounting Department will make every effort to issue expense reimbursements within one week of receipt.

Political and charitable contributions cannot be paid by the employee and reimbursed through their expense report.

PER DIEM POLICIES

Certain employees may be eligible for per diem travel expense reimbursement. All such eligible employees shall provide true and accurate records regarding their residence and otherwise comply with the per diem accountable

plan and jobsite regulations. A violation of such plan and regulations will result in discipline up to and including termination of employment.

PIPE FABRICATION POLICIES

Employees who work for the Pipe Fabrication Department/Division understand and acknowledge that there exist additional policies which may apply and are pertinent to work performed in some of the pipe fabrication offices and/or shops. All such employees are required to consult with all applicable pipe fabrication human resource managers, the Personnel Department, and/or the corporate Employee Relations Department for further information about such pipe fabrication policies. To the extent there is any conflict between this handbook and such pipe fabrication policies, those policies implemented by the Pipe Fabrication Department/Division shall control and take precedence.

EMPLOYEE HANDBOOK ACKNOWLEDGEMENT FORM

I acknowledge that I have received and/or have been given appropriate time and opportunity to view, whether on-line or in-person, the foregoing Employee Handbook, which outlines the general policies and procedures of the Company. By my signature below I acknowledge, understand, accept and agree to comply with the policies and procedures contained in the Employee Handbook. I have read and fully understand all policies and procedures included in the handbook. I understand and agree that my failure to comply with said policies and procedures can lead to disciplinary action, up to and including termination.

I have been informed of and agree, as a condition of employment, to abide by and participate in the Company's Drug, Alcohol, and Contraband Policy. I have provided accurate and complete information for the Second Injury Fund Questionnaire and / or all other medical history inquiries. I understand that violations of safety rules or procedures can lead to disciplinary action up to and including termination. I understand and accept my responsibility for PROMPTLY reporting and/or correcting any safety hazards or hazardous conditions that I become aware of, before proceeding or allowing others to proceed. I am to immediately report such situations to my supervisor and the Safety Department. I understand and am aware of the reporting procedures for filing complaints of harassment, discrimination and/or retaliation. I understand that violations of the policies, practices and procedures contained in this handbook can lead to disciplinary action up to and including termination.

I acknowledge that the information, policies and benefits described herein are only guidelines, not guarantees which the Company may, in its sole discretion, change as needed to manage its workforce. I understand that any changes, modifications or additions to this handbook will generally be communicated via Turner email and/or through other means of notice, and then posted on the Turner Intranet. Updates of the Handbook will be posted and may be found at <https://www.turner-industries.com/careers/employee-documents/>. I acknowledge and understand it is my responsibility to remain current with revisions. In addition to the policies contained in this handbook, I understand that, as a condition of employment, I must also adhere to any and all additional Company, state and federal laws, and specific jobsite work rules and procedures.

I understand and acknowledge that my employment may be terminated at any time, with or without cause and that nothing contained in this handbook creates a contract of employment or changes my at-will employment. I understand that there is no guarantee as to the length of my employment or the number of hours I will be asked to work each day.

Employee's Name (printed)

Employee # or Last 4 digits of SSN

Employee's Signature

Date

FOR REMOTE HIRE SITES:

Turner Site Representative

Date