



March 17, 2021

**Turner Industries Group, L.L.C.
Corporate Code of Conduct – Gifts and Entertainment**

To all suppliers and subcontractors:

I would like to take the opportunity to remind our suppliers and subcontractors of Turner's formal Corporate Code of Conduct as it relates to gifts and entertainment. Specifically, Turner employees may not solicit, acquire, accept, or retain any personal benefit from, or maintain an ongoing relationship with any supplier, vendor, subcontractor, or any individual or organization doing (or seeking to do) business with Turner that may have the effect of creating, or the appearance of creating a conflict of interest. A conflict of interest may arise when a gift, gratuity, favor, service, discount, special treatment, compensation in any form, or anything of monetary value has an effect, or appears to have an effect on an individual's business judgment. As such, no gift or more than the nominal value, travel, loan, cash in any amount, excessive entertainment, services, favored treatment, or substantial or unusual accommodation of any nature may be accepted by a Turner employee from an individual or organization doing (or seeking to do) business with Turner.

As a company, Turner insists in honesty, integrity, and fairness in all aspects of our business and expects the same in relationships with those who we do business. Entertainment should be limited to infrequent events such as business lunches, and accepted only on a reciprocal basis.

Turner projects are located in many regions, potentially conducting business with your organization at multiple locations. Please support our commitment and dedication to ethical professional conduct, and circulate this letter to all individuals in your organization who may conduct business with Turner and its employees.

If you have any questions, or would like to get a copy of Turner's Corporate Code of Ethics and Professional Conduct, please contact Farrah Zeppuhar, Vice President of Corporate Procurement. The code is available at: <http://www.turner-industries.com>

Regards,

A handwritten signature in blue ink, appearing to read "D. Franks".

David Franks
Chief Operations Officer

A handwritten signature in blue ink, appearing to read "Stephen M. Toups".

Stephen M. Toups
President & CEO

A handwritten signature in blue ink, appearing to read "Roland M. Toups".

Roland M. Toups
Chairman Emeritus

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