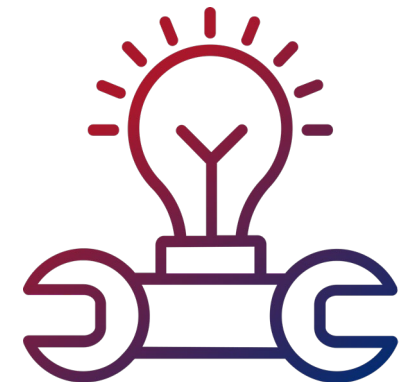
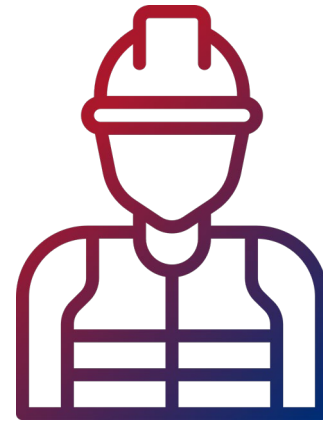


Code of Business Ethics and Conduct



A message from our President

A cornerstone of our success has been the high degree of professionalism and integrity demonstrated every day by our employees throughout the company. As we grow in numbers and in the variety of clients and locales that we serve, it is important that we provide clear guidelines regarding how we should approach important issues and decisions that may arise as we strive to provide the best service to our clients and the best work environment for our employees. This Code of Business Ethics and Conduct is intended to be the key source for that guidance.

The objective of the Code of Business Ethics and Conduct is to provide information on the expectations and processes that should guide our business behavior on a variety of issues. Every effort has been made to ensure that the code is clear, practical, and consistent. However, no document can address every situation, so we encourage you to raise questions to your manager or other appropriate person if something is unclear.

We are strongly committed to the expectations and guidelines expressed in the Code. We hope it is a helpful guide for how we do our business.

- Bridgett McMahan





Our Core Values:

**Safety,
Teamwork,
Integrity,
Respect,
Family.**

Ethical Conduct

BESCO aspires to conduct its business in accordance with uncompromising ethical standards and in full compliance with all laws and regulations. As a government contractor, BESCO has a special role as a steward of public resources. While conducting BESCO business, integrity must underlie all BESCO relationships. BESCO expects every employee to adhere to high ethical standards, promote ethical behavior and be honest and forthright in dealings with one another as well as with customers, business partners and the public. Employees must not engage in conduct or activity that may raise questions as to BESCO's honesty, impartiality, or reputation or otherwise cause embarrassment to BESCO. Every action should be judged by considering whether it is legal, fair to all concerned, in the best interests of our stockholders, employees and customers, and able to withstand public scrutiny.

your role and responsibility

At BESCO, we act with integrity. Speak up and do the right thing, every time.

Applicability

This Code of Business Ethics and Conduct ("Code") applies to all officers, directors and employees of BESCO and its subcontractors and to all business activities. This Code shall be incorporated in all contracts with all companies and individual consultants whom BESCO engages to perform services for its customers, and they shall be expected to comply with this Code. As used in this Code, "employees" shall include such individual consultants and BESCO's outside directors.

Guidance

No code or manual can provide answers to all questions. In the end, you must rely on your good sense and of what these standards require. This includes seeking guidance when you are not sure about the proper course of action.

Integrity

Our commitment to integrity is one of our Core Values. All employees are expected to:

- Do what is right, not simply what is permissible or convenient.
- Adhere to the highest standards of ethical business conduct.
- Know and comply with this Code and our other corporate policies and procedures.
- Maintain a work environment that encourages open and honest communication regarding ethics and

business conduct issues and concerns.

- Avoid placing, or seeming to place, pressure on employees that could cause them to deviate from acceptable ethical behavior.
- Seek advice and guidance when unsure of a specific action.
- Report suspected violations of this Code.

Reporting suspected violations

It is the responsibility of any employee having knowledge of any activity that is or may be in violation of this Code or any law or regulation applicable to BESCO's business to report such activity. Employees should make such reports to their immediate supervisors or to the Director of Employee Experience & Communications.

Non-retaliation

It is BESCO's policy that there will be no retaliation against any employees who report what they believe in good faith to be a violation of this Code or any law or regulation applicable to BESCO or who assist others in making any such report.

Investigation

Persons reporting potential violations should be aware that, while a BESCO representative receiving a report of a suspected violation will take steps to keep such report confidential, the need to investigate and correct any impropriety may require disclosure of the matter reported.

Violation

Employees who violate this Code will be subject to disciplinary action up to and including termination of employment. Violations also may result in civil or criminal penalties. An employee who witnesses a violation and fails to report it may be subject to discipline, and a manager may be subject to discipline to the extent that a violation reflects inadequate oversight.



BESCO and its employees must obey all applicable laws and regulations that affect BESCO's business. Some of the more common laws and regulations are discussed in this Code. Although BESCO does not expect its employees to be experts in legal matters, it holds each employee responsible for being familiar with the laws governing his or her areas of responsibility. If you have a question concerning the application of any law or regulation to a contemplated action, it is your responsibility to seek guidance.

our greatest asset: our people

Safety and respect are non-negotiable.

Drug-free workplace

Our policy is to provide a working environment free of the problems associated with the use and abuse of controlled substances or alcohol. The distribution, dispensing, possession, or use of illegal drugs or other controlled substances (other than those approved for medical purposes pursuant to BESCO policy) at any BESCO office or job site is strictly prohibited.

Employees must be fit for duty at all times. No employee may report to or remain at work while under the influence of alcohol, illegal drugs, or any substance—legal or prescribed—that impairs their ability to perform work safely and effectively. Employees are responsible for notifying management if they are taking medication that may impact their ability to safely perform their job duties. Alcohol may not be consumed on BESCO premises except as authorized during BESCO-sponsored events approved by the President. This policy applies to all work-related environments, including interactions with subcontractors, vendors, clients, and others on job sites. BESCO's Substance Abuse Policy addresses these requirements in full, including any applicable testing or compliance obligations.

Equal opportunity

BESCO is committed to providing equal employment opportunity and prohibits discrimination based on race, color, religion, national origin, sex, age, physical or mental disability, veteran status, or any

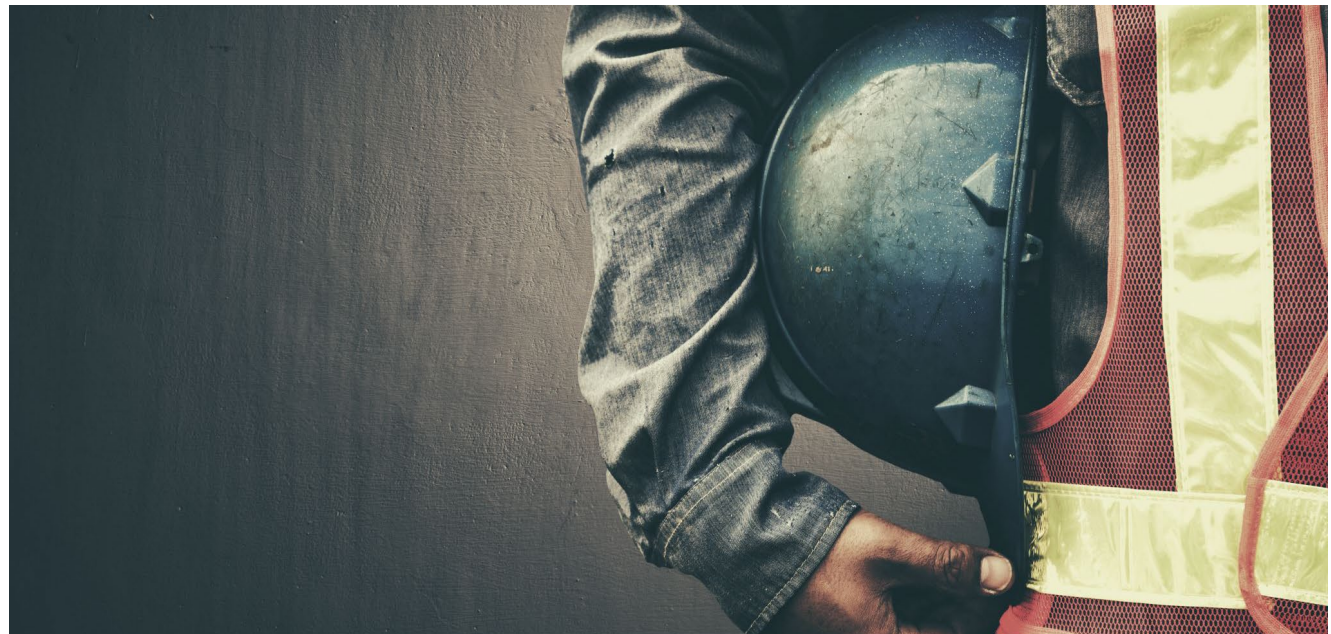
other status protected by applicable law. This applies to all terms and conditions of employment, including recruiting, hiring, transfers, promotions, terminations, compensation, and benefits. Harassment based on any protected characteristic is strictly prohibited and will not be tolerated in any work-related setting.

Preventing workplace violence and harassment

Workplace violence and harassment in any form will not be tolerated. This includes physical acts, threats, intimidation, bullying, verbal abuse, harassment based on protected characteristics, or any conduct that creates a hostile, unsafe, or disruptive work environment. This standard applies across all work-related settings, including offices, job sites, and interactions with clients.

All employees are expected to treat others with professionalism and respect. Supervisors and managers have a heightened responsibility to model subcontractors, vendors, clients, and other third parties. appropriate behavior, address concerns promptly, and escalate issues as necessary.

Concerns or incidents must be reported promptly, and BESCO will take all reports seriously, investigate as appropriate, and take corrective action where warranted. Retaliation against any individual who raises a concern in good faith or participates in an investigation is strictly prohibited. Maintaining a safe, respectful, and accountable workplace is a shared responsibility and a condition of employment.



operational excellence

Operate safely, fairly, and never cut corners.

Safety is one of BESCO's Core Values and a fundamental expectation of how we operate on every project, every task, every day. We are committed to providing a safe and healthy work environment and to preventing injuries through planning, training, and accountability. Every employee, regardless of role or title, is responsible for working safely, following established procedures, and using the proper tools and protective equipment for the task.

Safety is not owned by one department; it is owned by everyone. We expect employees to remain aware of their surroundings, identify potential hazards, and take proactive steps to address risks before work begins and as conditions change. If something does not look right, it is your responsibility to stop and speak up. No deadline, budget, or operational pressure justifies unsafe work. Open communication is essential. Employees are expected to report hazards, near misses, and incidents promptly so that we can learn, improve, and prevent recurrence. Retaliation for raising safety concerns will not be tolerated. BESCO's safety policies and procedures provide a comprehensive understanding of our operations.

Procurement, Subcontractors, & Vendors

Integrity and fair dealing are core components of our business practices. All suppliers, vendors and other business partners should be treated fairly and uniformly in accordance with BESCO's established purchasing policies and procedures. Employees must not engage in any activity prohibited under anti-trust laws, including boycotting, price-fixing, refusal to deal, price discrimination or disparate treatment of suppliers and vendors. Paying bribes, accepting kickbacks, and obtaining or using third-party insider information in dealings with suppliers, vendors and business partners are expressly prohibited and will not be tolerated.

During the conduct of any procurement, BESCO must not solicit or accept from any source any proprietary or source selection information regarding that procurement. This prohibition begins with the development, preparation, and issuance of a solicitation and concludes with award of a contract, a contract modification or extension. As used herein, proprietary information includes information contained in a bid or proposal, cost or pricing data, and any information submitted to the government by a contractor. Such information is designated as proprietary. Source selection information includes such information as listings of offerors and prices, listings of bidders prior to bid opening, source selection plans, technical evaluations of proposals, competitive range determinations, rankings (except for sealed bidding), source selection board

reports and evaluations, source selection advisory board recommendations, and other information determined by the head of the agency or contracting officer to be information that could jeopardize the integrity or successful completion of the procurement if disclosed. Employees must ensure that procurement and vendor selection are conducted fairly, objectively, and in the best interest of the company. Work must be awarded based on legitimate business considerations, including price, scope compliance, safety, schedule, and qualifications, with a preference for the lowest responsive and responsible bidder. Steering work to friends, former colleagues, or preferred vendors without a legitimate, documented, and defensible reason is prohibited. Likewise, employees may not accept or participate in kickbacks, undisclosed incentives, or any form of quid pro quo.

Timekeeping

Each employee must record accurately his or her time on a daily basis in accordance with BESCO's established timekeeping policies and procedures. Each employee is expected to read, fully understand, and follow those policies and procedures. In reporting your time electronically, you are certifying that your time is being charged in accordance with those policies and procedures. Improperly shifting cost from one contract to another, improperly charging labor or materials and falsifying timecards are strictly prohibited. If you have any questions or doubts regarding how to charge time or record costs, it is your responsibility to seek guidance.

accountability & field conduct

Report concerns, act responsibly, and lead by example.

Personal relationships & favoritism

Employees must avoid personal relationships or loyalties that interfere, or appear to interfere, with objective decision making. This includes favoritism in hiring, staffing, supervision, promotions, discipline, vendor selection, subcontract awards, or other business decisions. Family relationships, close personal relationships, or prior business relationships that could affect impartiality must be disclosed so the company can evaluate whether safeguards are needed. No employee may use his or her position to secure a personal benefit for friends, relatives, or favored business partners at the expense of fair process or the company's best interests.

Reporting concerns & escalation

Employees are expected to raise concerns promptly when they become aware of misconduct, unsafe conditions, policy violations, suspected fraud, retaliation, harassment, conflicts of interest, or other activity that may place people or the company at risk. Concerns may be reported through a supervisor, Human Resources, Safety, Legal, executive leadership, or any other designated reporting channel. Employees are not required to report a concern only through the normal chain of command when doing so would be ineffective, uncomfortable, or inappropriate. Those who receive concerns are expected to take them seriously, escalate them appropriately, and avoid any action that could discourage reporting.

Leader accountability

Leaders set the tone for ethical conduct and are held to a heightened standard of accountability. Managers and supervisors are expected to model compliance, reinforce expectations, address concerns promptly, and create an environment where employees can speak openly without fear of retaliation. A leader's failure to act on known misconduct, repeated disregard of policy, tolerance of favoritism, pressure to cut corners, or indifference to safety, quality, or legal obligations may itself constitute a violation of this Code. Leadership responsibility includes not only personal compliance, but also active oversight, sound judgment, and timely intervention when issues arise.



conflicts of interest

Stay objective and avoid divided loyalties. Protect trust.

It is your responsibility to act in the best interests of BESCO. That means that business decisions should be made impartially and free from conflicts of interest.

Personal conflicts of interest

Each employee has the legal duty to carry out his or her responsibilities with the utmost good faith and loyalty to BESCO. A "personal conflict of interest" occurs when your own interests (for example, financial gain, career development, or reputation advantage), or those of your immediate family, interfere in any way or even appear to interfere with BESCO's legitimate business interests or your ability to make objective and fair decisions when performing your job. Immediate family members include your spouse or former spouse; parents, step-parents, and grandparents (of both you and your spouse); children, stepchildren, and grandchildren (of you and your spouse) and their spouses; siblings and their spouses; and any others living in your household. To avoid potential conflicts of interest, employees should avoid any activity that could reasonably be expected to put them in a conflict situation.

The following examples of personal conflicts of interest are prohibited:

- Competing against BESCO.
- Serving as a consultant to or as a director, trustee, officer or employee of a BESCO, organization or government

agency that competes or deals with or is a supplier or vendor to or customer of BESCO.

- Accepting gifts, gratuities or entertainment from any customer, competitor or supplier or vendor of goods or services to BESCO, except to the extent they are lawful, consistent with marketplace practices, infrequent and nominal in amount (no greater than \$100.00 per occurrence or \$300.00 annually per Supplier), except as approved by the President or CEO and are not in cash or offered in consideration for an improper action or in a manner that could hurt BESCO's reputation for impartiality and fair dealing.
- Using for personal gain any business opportunities that are identified through your position with BESCO.
- Using BESCO property, information or position for personal gain,
- Having a personal interest or potential for gain in any BESCO transaction (excluding commissions or bonuses payable in accordance with a BESCO-approved compensation plan or agreement).
- Maintaining employment or any other relationship with another organization, or engaging in any other business or activity, that adversely affects your job performance at BESCO.

If you are in doubt as to whether a situation or certain activity constitutes a conflict of interest, it is your responsibility to seek guidance.



Organizational conflicts of interest

An "organizational conflict of interest" may result when the nature of work performed by BESCO under one contract (such as developing a specification) creates an actual or potential conflict of interest on a future procurement or contract opportunity. It is the responsibility of each employee to recognize and report to their supervisors any activities or relationships that might create an organizational conflict of interest so that BESCO can take appropriate actions to avoid any such organizational conflict.

company records

Accurate, complete, and honest. No exceptions.

Recordkeeping

Our books and records must be prepared and maintained accurately and honestly, both by those who prepare the records and those who contribute to the creation of business records (e.g., time sheets, expense reports, job costs).

The use, expenditure and disposal of BESCO resources must be documented as required by BESCO procedures. Documents and other records must be maintained in accordance with the applicable requirements of law, contractual obligations, and BESCO policies, and shall not be used for personal gain or benefit. No employee or anyone acting on BESCO's behalf shall take any action to circumvent BESCO's system of internal controls or provide misleading information in BESCO documents and records.

Audit

Audits performed by internal and external auditors help ensure compliance with our established policies and procedures. All employees are expected to comply fully with internal and external audits, which means cooperating and providing clear and truthful information.

Fraud

Any attempt to defraud anyone of money, property, or services, is a violation of law and carries penalties. This may result in disciplinary action, up to and including termination of employment, if such a determination is made by the company

based on the nature and seriousness of the conduct. Fraudulent activities include falsifying records, including expense reports, time records, job costs, invoices, change order documentation, payroll records, or any other company or project documentation. Fraud may also expose both the company and the individual employee to civil or criminal penalties.

Truth in Negotiations Act (TINA)

As a U.S. Government contractor, BESCO must comply fully with TINA in the conduct of its U.S. Government business. The purpose of TINA is to give the U.S. Government an effective means of negotiating a fair and reasonable price.

TINA requires disclosure of cost or pricing data and certification that such data are accurate, complete, and current. Employees involved in negotiating U.S. Government contracts and subcontracts must ensure that all cost and pricing data, communications, and representations of fact are accurate, complete, current and truthful.

False Claims

Knowingly making a false claim or false statement to the Government is a violation of law and can subject both BESCO and individual employees to civil and criminal sanctions including fines, suspension, debarment and prison sentences. It is the responsibility of each employee to ensure that all claims and statements submitted to the U.S. Government are truthful and not misleading. In addition, the highest

standard of honorable and ethical conduct shall be observed in all relationships with BESCO's competitors. The advancement of BESCO's business interests through the dissemination of unverified information or other unfair actions intended to damage competitors is prohibited, as are any other dishonorable activities.



We rely on the integrity of our records to make decisions, meet our obligations, and maintain trust. Every employee plays a critical role in ensuring that company records are accurate, complete, and maintained with honesty and care.

bribery & anti-boycott laws

Zero tolerance for improper influence or illegal agreements.

Prohibition of bribery

Bribery and anti-competitive conduct undermine trust, distort fair markets, and expose both individuals and the company to serious legal and reputational risk. We are committed to conducting business ethically and in full compliance with all applicable anti-bribery and competition laws. Every employee is expected to act with integrity, exercise sound judgment, and speak up when something doesn't feel right. Winning the right way isn't just optional, it's the standard.

We conduct business ethically and in full compliance with anti-bribery, anti-boycott, and antitrust laws. We compete on merit and do not engage in improper payments, collusion, or restrictive agreements.

Understanding anti-boycott laws

Any request to participate in any activity that could have the effect of promoting a boycott or restrictive trade practice fostered by a foreign country against customers or suppliers located in a country friendly to the United States or against a U.S. person, firm or corporation may be a violation of law and must be reported promptly to your immediate supervisor.

Antitrust/Competition

Employees are expected to conduct themselves and BESCO's business in such a manner as to be in compliance with federal and state antitrust laws that prohibit monopolies and agreements that unreasonably restrain trade. Antitrust laws can be understood as competition laws. They are designed to promote market competition, protect consumers, and prevent monopolies. A key federal statute is the Sherman Antitrust Act, which prohibits monopolies, conspiracies, and agreements that unreasonably restrain trade, like price fixing or bid rigging.

BESCO will not enter into a subcontract or teaming agreement that unreasonably restricts sales by the other party directly to the U.S. Government of items made or supplied by the other party and will not otherwise act to restrict unreasonably the ability of any other party to sell directly to the U.S. Government. Conversely, BESCO will not enter into agreements where, as a subcontractor or teaming partner, we are subject to any un-reasonable restriction to sell our products or services directly to the U.S. Government.

Finally, BESCO must independently develop its pricing on all bids and proposals for government contracts and subcontracts without any consultation, communication, or agreement with any other competing offeror, and BESCO shall not disclose its prices to any other competitor before bid opening or contract award.

Foreign Corrupt Practices Act (FCPA)

The FCPA is intended to prevent bribery of foreign officials by representatives of U.S. companies for the purpose of securing a business advantage. It prohibits the payment or offering of anything of value directly or indirectly to a foreign government official, political party, party official or candidate for the purpose of influencing an official act of the person or the government in order to obtain such an advantage.

It is the responsibility of each employee involved in international business activities to become familiar with the requirements of the FCPA and to seek guidance prior to engaging the services of any foreign consultant or marketing representative or making any offer or payments that might be in violation of the FCPA.



government affairs

We comply, fully and without exception, with all Federal Laws and Regulations.

Hiring of government and former government employees

Special concerns apply to hiring or retaining a government or former government employee as an employee or consultant of BESCO. In addition, there are special constraints regarding any communication concerning possible employment of government employees who are designated as “procurement officials.” BESCO employees shall not conduct any discussions regarding, or make any offer of, future employment to any government employee without first clearing such action with BESCO’s President and General Counsel.

Lobbying & Gifts to Public Officials

BESCO is prohibited from using federal funds to pay persons, such as lobbyists or consultants, to influence or attempt to influence executive or legislative decision-making in connection with the award or modification of any government contract. No employee may hire such a lobbyist or consultant without the President’s prior written authorization.

Business courtesies such as gifts, entertainment, services or favors should not be offered to any government employee or representative. When dealing with non-government personnel in connection with government contracts or subcontracts, similar restrictions apply. It is a crime to offer, provide, solicit or accept anything of value either in return for favorable consideration on a government contract or subcontract or because of an official act performed or to be performed. Business courtesies offered to commercial, nongovernment customers must demonstrate good business judgment, must be consistent with marketplace practices, infrequent, nominal in amount (less than \$50) and legal, and must not be in cash or offered in a manner that could hurt BESCO’s reputation for impartiality and fair

dealing. When in doubt regarding the appropriateness of a business courtesy, seek guidance, and always err on the side of caution.

Making political contributions

Corporations are prohibited from making contributions of money or other resources to candidates, officeholders and political parties at the federal level. BESCO respects the right of employees to be involved in political activity and to contribute their own time and resources. Such activity, however, must not take place on BESCO time or property nor involve BESCO’s name, and BESCO will not reimburse employees for any contributions they may make. Laws and regulations governing contributions to state and local candidates vary from state to state, and all employees shall act in accordance with all such laws and regulations.

Government furnished property

Government-furnished property shall be used, maintained, accounted for and disposed of in accordance with the applicable contract requirements and government regulations.

Commissions and other contingent fees

BESCO shall not employ or retain any person or agency to solicit or obtain any U.S. or Foreign Government contract for BESCO upon an agreement or understanding for a commission or other contingent fee, except for employees or established commercial agencies that neither exert nor propose to exert improper influence to solicit or obtain government contracts nor hold themselves out as being able to obtain any government contract through improper influence. No employee shall enter into an agreement to pay a commission or other fee contingent upon award of a government contract without first obtaining the

President’s permission to do so. (See also “Foreign Corrupt Practices Act (FCPA)”).

Combatting Trafficking in Persons

The Federal Government has adopted a zero-tolerance policy regarding its contractors and their employees who engage in or support forms of trafficking in persons, procurement of any sex act on account of which anything of value is given or received by any person, or use of forced labor. No BESCO employee shall violate this policy.

Foreign Corrupt Practices Act (FCPA)

The FCPA is intended to prevent bribery of foreign officials by representatives of U.S. companies for the purpose of securing a business advantage. It prohibits the payment or offering of anything of value directly or indirectly to a foreign government official, political party, party official or candidate for the purpose of influencing an official act of the person or the government in order to obtain such an advantage.

It is the responsibility of each employee involved in international business activities to become familiar with the requirements of the FCPA and to seek guidance prior to engaging the services of any foreign consultant or marketing representative or making any offer or payments that might be in violation of the FCPA.

Our Conduct

We conduct international business with integrity. Employees must avoid facilitation payments, undisclosed intermediaries, and conflicts of interest, and exercise diligence in selecting partners, agents, and suppliers to protect our reputation worldwide.

information protection & data privacy

Protect data, respect privacy, and ensure responsible use of AI.

Protection of intellectual property & confidential information

It is essential for all employees to safeguard BESCO's trade secrets and confidential information and to refuse any improper access to trade secrets and confidential information of any other BESCO or entity, including our competitors. BESCO proprietary information must not be discussed with others within BESCO, except on a strict need-to-know basis. If there is a need to disclose BESCO trade secrets or confidential information to any person outside BESCO, such disclosure must be done only in conjunction with an enforceable non-disclosure agreement. Similarly, BESCO's rights in its technology and products must be protected by use of appropriate agreements whenever such technology and/or products are used, transferred or disclosed. For the purposes hereof, "confidential information" also includes information relating to BESCO employees and other persons or entities that BESCO is obligated by law or agreement to maintain in confidence.

Protection & use of BESCO assets

All employees are responsible for the protection and appropriate use of BESCO assets, which include physical assets as well as intellectual property and confidential information. Although BESCO assets are intended to be used only for legitimate business purposes, it is recognized that occasional personal use by employees may occur without adversely affecting BESCO's interests. For example, employees may occasionally use BESCO computers to send and receive personal e-mail and BESCO telephones to make or receive personal, local telephone calls, so long as such activity does not interfere with BESCO's business and adheres to BESCO's policies for appropriate communication.

BESCO reserves the right to access, review, delete, disclose or use any employee personal communications and other material stored in BESCO computers or telephones, and thus you should not have any expectation of privacy with respect to such communications and material.

Use of software & artificial intelligence

Employees shall use all software only in accordance with the terms of BESCO's license agreements or other contracts under which the software is supplied. BESCO licensed software may not be copied or provided to any third party unless authorized under the applicable license agreement.

Employees may use artificial intelligence and other technology tools to improve efficiency, but they remain fully responsible for the accuracy, appropriateness, and integrity of their work. Confidential company, project, or customer information (which may include but not be limited to personal information of employees, clients, or affiliates), may not be entered into unauthorized systems or platforms. AI-generated output must be independently reviewed and verified, and employees may not rely on such tools to make decisions that require professional judgment.

Classified Information

Classified or protected national security information must be handled, stored, and protected in strict accordance with all U.S. Government requirements.

communication & business practices

Communicate responsibly, compete fairly, and protect the company.

Social media & public communication

Employees must use sound judgment when communicating about BESCO, its customers, its projects, and its people. Only authorized individuals may speak on behalf of the company to the media, issue public statements, respond to inquiries on company matters, or post official company content. Employees may not share confidential, proprietary, or nonpublic information online or through any public channel, including project pricing, customer information, internal disputes, safety incidents, contract issues, photos of restricted work areas, or information that could damage customer relationships or BESCO's reputation. Even on personal accounts, employees are expected to conduct themselves professionally and not represent personal views as those of the company.



Gifts, meals, & entertainment

Business meals, entertainment, and other courtesies in commercial settings must remain reasonable, infrequent, lawful, and consistent with good judgment. They must never be offered or accepted in exchange for favorable treatment, pricing, awards, approvals, or any improper business advantage. Employees must avoid situations that create an appearance of influence or obligation, particularly when bidding work, negotiating changes, evaluating vendors, or working with customers, clients, inspectors, or project representatives. Cash, cash equivalents, extravagant hospitality, and undisclosed favors are prohibited. When there is any uncertainty, employees are expected to seek guidance before proceeding.



Estimating & bidding integrity

BESCO competes honestly and expects all estimating, bidding, and proposal activity to be conducted with integrity. Employees may not engage in bid shopping, bid peddling, collusion, bid rigging, price signaling, or any other improper practice that undermines fair competition. Estimates and proposals must be prepared independently, based on accurate scope understanding and sound assumptions, and may not intentionally omit material scope, manipulate quantities, misrepresent exclusions, or use misleading pricing strategies to gain an unfair advantage. Employees must protect bid information, honor confidentiality obligations, and avoid using competitor information that was obtained improperly.



A final note

Doing the right thing is not always the easiest path, but it is the only acceptable one. This Code is not just a set of expectations; it reflects who we are as a company and how we choose to operate. Each of us is responsible for upholding these standards, making sound decisions, and speaking up when something does not feel right.

BESCO's General Counsel will administer this Code of Business Ethics and Conduct. All questions relating to this Code and BESCO's business practices in general should be directed to the General Counsel. If any employee believes that a waiver of this Code is necessary or appropriate, including, but not limited to, any potential or actual conflict of interest, a request for a waiver and the reasons for the request must be submitted to the General Counsel for a decision by the President. Any waiver of this Code for officers and directors may be made only by the Board of Managers.

Reports may be made confidentially or anonymously, where permitted by law. BESCO strictly prohibits retaliation against anyone who raises a concern or participates in an investigation in good faith.

We are all accountable for protecting the integrity of our workplace. When in doubt, ask. When something is wrong, say something. That is how we maintain trust and continue to build a company we are proud to stand behind.



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