

The Danella Companies

Code of Business Conduct and Ethics

The Danella Companies is committed to the highest standards of business ethics, professional conduct and safety in all aspects of their business activities. These aspects include relationships between and among employees and relationships with our business partners and suppliers, as well as the general public. This commitment requires that we conduct ourselves, at all times based upon the ideals of honesty, integrity, respect, compliance with applicable laws, good faith and fair dealing. We do not tolerate dishonesty, harassment or discrimination. We encourage free and open communication while maintaining confidentiality. We are committed to personal and public safety at all times.

We have implemented this Code of Business Conduct and Ethics which applies to all employees of The Danella Companies. All employees will be expected to be fully familiar with the Code and adhere to it in all respects. Failure to do so may result in disciplinary action including, but not limited to, termination of employment. We thank you for your compliance with this Code.

I. Employee Conduct

All employees are at all times required to conduct themselves with honesty and integrity. They are to treat each other and our business partners and suppliers with dignity and respect. The Company maintains separate written policies on anti-harassment and non-discrimination which all employees are obligated to acknowledge and abide by. The Company maintains separate written policies with respect to substance abuse and alcohol misuse, which all employees are obligated to acknowledge and abide by. Employees shall abide by all applicable laws and regulations when acting on behalf of the Company.

II. Conflicts of Interest

All of our business partners (those organizations we work with and for) maintain separate codes of ethics and business conduct which include, among other things, dealing with issues that may arise in their relationships with us. These issues are often called conflicts of interest. It is the responsibility of each employee who has direct relationships with our business partners to be familiar with the business partners' policies concerning conflicts of interest. At Danella Companies, all conflicts of interest are strictly prohibited. Some examples of conflicts of interest include, but are not limited to: giving or receiving of lavish gifts, unusual or excessive business entertainment, giving or receiving of services at a discount, having a financial interest in a business relationship with a business partner, employment of family members, excessive socializing with the purpose of obtaining financial gain, receiving or performing of favors that could appear to influence business decisions, receiving or giving of kickbacks, or, in general, any conduct which may lead to even the appearance of influencing or attempting to

influence decisions dealing with business relationships. These actions, and others like them, are strictly prohibited. If you ever have any questions about whether any particular activity is a conflict of interest or if you believe someone is attempting to influence you, you should immediately report it as outlined in Article 9.

III. Confidentiality of Company and Business Partner Information

During the course of your employment, you may become aware of confidential information of The Danella Companies and/or its business partners. Confidential information includes:

- a. any and all financial information;
- b. the identity of business partners, customers, suppliers, subcontractors and others with whom the company does business;
- c. contract terms, bid terms, pricing, costs or profits information relating to any business relationships with any business partners, customers, suppliers, subcontractors and others with whom the company does business;
- d. marketing methods and strategies;
- e. proprietary products, software, technology or procedures, personal information of employees or consultants, business plans, proprietary software or other electronic information or business development plans;
- f. any other information which the Company determines and identifies as confidential; and,
- g. any information which our business partners consider confidential.

All such information is to be used only for the benefit of The Danella Companies and/or its business partners. It is not to be given to or discussed with anyone outside the course of your work related duties and responsibilities. The confidential information you learn “stays here when you leave here.” The maintenance of confidentiality includes not only direct discussion, but also the safe guarding of written and electronic documents as well. Unauthorized dissemination of confidential information via social media is strictly prohibited. You agree that this condition of maintaining confidentiality shall continue even after you leave our employment.

IV. Public Conduct

All employees of The Danella Companies are directly and indirectly representatives of the image of The Danella Companies in the public eye. Accordingly, all employees of The Danella Companies are expected to maintain and exhibit appropriate conduct in public when engaged in work on behalf of the company, as well as, when not, such as before and after work, weekends, holidays and vacations.

V. Internal Policies and Procedures and Customer Contract Compliance

The Company maintains, and from time to time initiates and implements, various policies and procedures relating to its business operations. These may be related to both office administration, as well as field operations. All employees are obligated to strictly comply with all such policies and procedures. All employees involved in customer contract administration and project performance and management are expected to be fully familiar with all terms, conditions and procedures of applicable contracts and to strictly comply with the same. Failure to do so may result in disciplinary proceedings including, but not limited to, termination of employment.

VI. Employment

This Code is not an employment contract or an assurance of continued employment. Compliance with this Code is a condition of employment.

VII. Company Funds and Assets

All employees must safeguard company funds, assets and property of which they have use and to which they have access. Any misuse, unauthorized use, or theft of such funds, assets or property may result in disciplinary proceedings including, but not limited to, termination of employment and referral to the appropriate criminal justice authorities. Employees may not use company property for personal purposes.

VIII. Government Compliance

All employees must, at all times, be familiar with and comply with any and all government laws and regulations. Those include, but are not limited to, those relating to health and safety, wage and hour, non-discrimination and anti-harassment, construction, and environmental codes. State and local laws and regulations may vary from jurisdiction to jurisdiction.

IX. Reporting Violations of this Code

If you become aware of a violation of this Code or think that any violations may have occurred, it should immediately be reported either verbally or in writing to your supervisor or in the alternative, Danella's outside human resources consultant, Tom McGoldrick at 610-238-0880 or tmcgoldrick@davisbucco.com. Strict confidentiality of such reporting will be maintained. In consideration of your reporting the alleged violation, the Company maintains a strict non-retaliation policy.