

# Code of Ethics and Business Conduct



**PRECISION WALLS, INC.®**  
*Partners in driving your job.*

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# Message from our President

Precision Walls is committed to the highest possible standards of ethical and legal conduct at all times. To help ensure these high standards, resources are available to our employees to raise flags about possible violations, including an anonymous 24-hour Ethics Hotline.

As employee-owners of Precision Walls, Inc., if you are aware of, or have a strong reason to suspect fraudulent, unethical or illegal activities or anything that might be considered sensitive or relevant in preserving the Company's good reputation, you have an ongoing responsibility to help protect our team by promptly and honestly reporting it in good faith to one of the following:

- Your immediate Manager
- An HR representative
- Any member of our Senior Leadership Team
- Our 24-hour Ethics Hotline at **(919) 452-3492**, where you can choose to remain anonymous

Types of reportable unethical behavior include:

- Destruction, removal or unauthorized use of equipment, tools, or vehicles
- Accepting or seeking anything of value from customers, contractors, vendors, or anyone who provides services to Precision Walls
- Disclosing Company-confidential information to outside parties or competitors
- Misuse in the handling or reporting of money or financial transactions
- Falsifying documents, timecards, expense reports, etc.
- Falsifying subcontractor hours/invoices for work performed.
- Serious concerns regarding questionable accounting or auditing practices

- Violations of Federal, State, or Local laws or regulations.

We pride ourselves on our ethical business practices and strive to only employ individuals who have similar high standard and ethics. When an employee decides to violate our team and our trust with unethical behavior; whether by stealing, fraud, bribery, destruction of Company property or other serious violations, it hurts all of us. It damages our team's good reputation, and it impacts each of us financially. Be aware -- each dollar stolen in money or materials from our Company reduces our incentive bonus/Walls-up payout pool by 30 cents. Do not hesitate to report perceived or real theft because they may be stealing from YOU!

All employees are tasked with promoting ethical behavior in the work environment, following our Mission Statement, and practicing our Principles to Live By – every day! Treat customers, vendors, and co-workers with respect at all times. Integrity is who we are – we do what we say we will do.

Consequences and Protections (malicious intent vs. good faith reporting): Anyone who makes a false report *with malicious intent* may be subject to disciplinary action up to and including termination of employment. Individuals reporting suspected misconduct in good faith can do so with the assurance of their protection from retaliation (retaliation is prohibited and will not be tolerated). All reports are will be investigated and taken seriously.



Brian C. Allen  
President/CEO



# Our Mission

Our passion is building strong customer relationships and being the partner that helps drive your job.

## Principles To Live By

- We make Safety, Quality and Customer Service our number one priorities.
- We treat our customers, vendors, and co-workers with respect at all times.
- Integrity is who we are - we do what we say we will do.
- We work as a TEAM to achieve our goals.
- We follow all policies and procedures together in order to change together.
- We under promise and over deliver.
- We only book profitable jobs.



# Business Practices

## Compliance with Laws and Regulations

Precision Walls, Inc. is committed to full compliance with the laws, rules and regulations of the countries in which it operates. Our employees must also comply with all applicable laws, rules and regulations when performing their duties.

## Accurate Accounting and Financial Records

Precision Walls, Inc. keeps true, accurate and complete business records of all matters related to business. All company business transactions must be properly authorized and be accurately recorded and described in the Company's books and records in accordance with generally accepted accounting principles and our Company's financial policy. Compliance with accounting procedures and internal control procedures is required at all times. Company associates should never participate in false or misleading Company financial statements and should not withhold any information necessary to make the statements accurate.

## Anti-corruption / Anti-bribery

Precision Walls, Inc. does not tolerate bribery, corruption, or unethical practices of any kind. Precision Walls, Inc. prohibits anyone acting on behalf of Precision Walls, Inc., whether directly or indirectly, from making or receiving bribes or kickbacks, or by any other means that is considered unethical, illegal or harmful to our reputation of honesty and integrity.

Our team members shall not accept gifts, discounts, favors or services from a customer, potential customer, competitor, or supplier if it benefits the individual and could in any way disadvantage the Company. Employees and representatives of the Company are expected to decline any opportunity that may cause suspicion regarding fairness. In the event that a team member receives an unsolicited gift that may appear to give rise to a conflict of interest, guidance should be requested from a supervisor or Human Resources.

## Money Laundering

Precision Walls, Inc. does not and shall not accept, facilitate, or support money laundering.

## Conflict of Interest

Precision Walls, Inc. prides itself on an ethical approach to business, and as such will only employ individuals who have a similar high standard of ethics and avoid a conflict of interest with their employment. Below are examples of activities which may be perceived as a conflict of interest:

- Accepting a gift of value from a supplier, contractor, and/or customer that would not normally be reciprocated and/or the intent or effect of which compromises objectivity in representing the Company (or knowledge of someone who does the same).
- Using/knowledge of someone using the Company Name or Logo for personal gain not associated with the Company.
- Involvement/knowledge of Company employee involved in a business that is a direct competitor or supplier of the Company.
- Investing/knowledge of company employee investing in a closely-held competitor or supplier of the Company.
- Knowing of someone or individually awarding a Company business contract to a relative or a Company where a relative will receive direct benefit from same contract.
- Knowledge of a co-worker's conflict of interest.

We consider the above, and any other violation of our ethics, a conflict of interest of extreme concern to our Company and any incidents will be investigated thoroughly with the potential of disciplinary action up to and including termination.

## Company Property and Resources

Precision Walls, Inc.'s Company property and resources must be used for business objectives and shall not be used for personal gain or illegal purposes.

## Taxation

Precision Walls, Inc. shall comply with all federal and state tax laws and regulations.



## Sales Practices and Advertising

Precision Walls, Inc.'s communication with customers and potential customers must be truthful and accurate. When we speak about our products and services and their performance, we must not make false statements or provide misleading information.

## Fair Competition

Precision Walls, Inc. is committed to dealing with our customers, employees, suppliers, and competitors fairly and lawfully. It is our responsibility to ensure that our efforts in the marketplace comply with all applicable anti-trust and competition laws and regulations and never engage in illegal anticompetitive activities. Improper use of proprietary information, manipulation, concealment or abuse of any information and misrepresentation of material facts are all prohibited, whether or not such actions are considered unlawful.

## Insider Trading

Precision Walls, Inc. complies with federal and state security laws and does not tolerate insider trading. Insider trading involves the purchasing or selling of securities by persons who are aware of material nonpublic information about a company, as well as the disclosure of material, nonpublic information about a company to others who then trade in the company's securities.

## Political Involvement

Precision Walls, Inc. must not promote any personal political views or beliefs (including by posting or distributing notices or other materials) on or around Precision Walls, Inc. premises. Precision Walls, Inc. shall observe neutrally in regards to political views, political parties, and candidates for public office.

We respect the right of employees to engage in political activity to support political groups, government officials or candidates. Any such activity must be voluntary and performed in the employee's own time, at the employee's own expense. It must be clear that the employee is acting independently and not as a representative of the Company.

# Workplace Environment

## Human Rights

Precision Walls, Inc. shall respect the human rights of all employees.

## Workplace Health, Safety and Security

Precision Walls, Inc. is committed to maintaining a safe and healthy work environment for all of its employees. In order to provide a safe workplace, the Company is dependent on all of its employees to be safety conscious. We communicate to each employee that they have an obligation, not only to Precision Walls, but to their families, co-workers, and themselves, to perform their daily tasks in a safe manner. We want all employees to return home every day accident free.

All employees and visitors are responsible for keeping safety and health top of mind and should:

- Follow all safety policies and procedures; to act safely and to report unsafe conditions to their supervisors or hosts in a timely manner.
- Report any injury, accident, or safety hazard immediately to their supervisor.
- Comply with all Company policies, standards and procedures relating to workplace health and safety.
- Comply with all applicable workplace health and safety laws and regulations.

## Non-discrimination

Precision Walls, Inc. adheres to federal, state and city laws and regulations regarding non-discrimination and Affirmative Action in employment. It is company policy to recruit, employ, retain, and promote employees without regard to race, color, religion, gender, national or ethnic origin, disability, marital status, sexual orientation, or military status.



## Anti-harassment

It is the policy of Precision Walls, Inc. to maintain a working environment that is free from unlawful harassment based on race, color, religion, sex, national origin, age, veteran status, disability, or any other basis prohibited by applicable law, at all levels of the organization.

## Workplace Violence

Precision Walls, Inc. maintains a safe and healthy work environment for its employees. Open communication and positive working relationships among our employees are crucial to our overall success. Acts or threats of physical violence, including intimidation, harassment, and/or coercion will not be tolerated. Any individual violating this policy will face disciplinary and/or legal action, up to and including termination. Employees are expected to report any violation of this policy to their supervisor or the Human Resource Department.

## Domestic Violence

Precision Walls, Inc. will not tolerate acts of domestic violence committed by or against any employee while on Company property or while conducting Company business. This includes the display of any violent or threatening behavior by the perpetrator (verbal or physical) that is likely to result in physical or emotional injury or otherwise places a victim's safety or productivity at risk. Such acts may be ground for immediate dismissal.

## Forced Labor/Human Trafficking

Precision Walls, Inc. will not tolerate the use of forced labor in our organization and will not accept products or services from Suppliers that employ or utilize child labor or forced labor in any manner. Human trafficking and slavery are crimes under state, federal and international law.

## Child Labor

Precision Walls shall not employ a child at any stage in the provision of services. The term “child” refers to any person under the age of 15, under the age of completing compulsory education, or under the minimum age for employment in the country. In compliance with the Department of Labor, Precision Walls, Inc. requires employees to be at least 18 years old to operate:

- Company motor vehicles
- Power-driven machines and tools
- Power-driven hoisting apparatus (ex. forklifts, boom trucks, scissor lifts, manlifts, cranes, etc.)
- Manufacturing of brick, tile and related products
- Power-driven circular saws, band saws, guillotine shears, chain saws, reciprocating saws, wood chippers, and abrasive cutting discs
- Working on demolition projects
- Roofing operations and work performed on or about a roof
- Trenching and excavation operations

## Freedom of Association

Precision Walls, Inc. shall uphold the freedom of association and the right to bargain collectively or individually. All employees have the right to freely form and join groups for the promotion and protection of their employment interests to the extent permitted by law.

## Working Hours and Wages

Precision Walls, Inc. is committed to following all applicable wage and hour laws and regulations.

## Prohibiting Alcohol & Drug Abuse

Precision Walls, Inc. does not tolerate the presence nor use of alcohol, illegal drugs nor the illegal use of legal drugs in our workplace. The use, possession, distribution, or sale of controlled substances such as drugs or alcohol, or being under the influence of such controlled substances is strictly prohibited while working, while on the Company's premises or worksites, or while operating the Company's equipment or vehicles. In the event that an employee is prescribed with a prescription drug that affects the employee's ability to perform their job duties, the employee should inform their supervisor. Violation of this policy will result in disciplinary action, up to and including termination.

Precision Walls, Inc. requires Pre-Employment drug testing for all applicants including rehires. In addition, we reserve the right to test, For Cause, Random, Post Accident, or upon Customer Requirement, testing (drug and alcohol) as a condition of continued employment.

In addition, we will conduct thorough investigation of drug or alcohol related issues that may include a search of the employee's workplace, person, and personal belongings on Precision Walls, Inc. premises. Refusal to submit to a search will result in termination.

## Ethics Hotline

Precision Walls provides several options for employees to ask questions, raise a concern or report a suspected violation of our Conflict of Interest and Code of Ethics Policy. It is important to report all potential ethics and code of conduct violations promptly and honestly. We encourage you to report issues or concerns of misconduct without fear of being reprimanded or penalized for doing so. Retaliation against employees who report good faith concerns is prohibited and will not be tolerated. However, anyone who makes a report with malicious intent may be subject to disciplinary action up to and including termination of employment. Call or text the 24-hour Ethics Hotline at **(919) 452-3492** – where you can choose to remain anonymous.

# Environmental Practices

## Environmental Responsibility

Precision Walls, Inc. is committed to lessening the environmental impact of our business and products and increase awareness of how each of us can make a difference every day. With LEED (Leadership in Energy and Environmental Design) certified experience, Precision Walls, Inc. has the expertise and experience to construct buildings that meet the highest standards for energy efficiency and environmental impact. Our team works with suppliers to bring our customers “Green” alternatives, and environmentally friendly products.

Green building (also known as green construction) refers to a process in which environmentally-friendly and resource-efficient measures are incorporated throughout a building's life-cycle – from design to execution. Precision Walls, Inc. pursues environmentally sound practices and complies with applicable laws, regulations and other environmental standards and guidelines. We are all held accountable for reporting any practice that is harmful to the environment, is unsafe, or does not comply with our Company's policies, applicable laws, or any other rule or regulation.

