

3B Inspection Code of Conduct

3B Inspection, LLC's Corporate Policies and Code of Conduct describes our values and sets our standards for business conduct and decision making. It details the high expectations we set for employee behavior, guides our work and helps us build an organization we are proud to be a part of.

Open, honest and respectful communication is key to maintaining a positive work environment where everyone who works for 3B Inspection can freely share ideas, raise concerns, and ask questions without risk of harassment, intimidation, retaliation or discrimination. That is a standard we adhere to and enforce.

Our expectations are high, but so is our confidence in you. We truly appreciate your commitment to our high standards, and all that you do every day to ensure that 3B Inspection continues to safely provide pipeline integrity and field inspection services with pride and integrity.

VALUES

Safety

We respect, value and safeguard people, property and the work environment.

Teamwork

We share responsibility for 3B Inspection's mission and the resources entrusted to us. We value our communities, our business partners and the stakeholders we serve.

Innovation

We leverage knowledge and creativity to continuously improve our operations and increase our efficiency.

Integrity

We hold one another to the highest ethical standards. We focus on maintaining the operational integrity of 3B Inspection and the integrity of business practices.

3B Inspection's Culture

Organizational culture - Simply put, it's how we do things here.

There are four behaviors that are essential for our future success. These four actions – when exercised daily by every individual and every team – complement each other, and work together to create exceptional performance.

The four attributes are:

Make sound decisions – We bring the right focus, involve the right people, use the right data, and follow the right processes to achieve sound and timely decisions.

Learn, improve and innovate – We learn from our experiences, innovate to overcome challenges and seek to constantly improve our business.

Accept responsibility – We take responsibility. We speak up about concerns, opportunities and ideas. We take action to resolve issues.

Act with discipline – We consistently work to the highest standards; we don't cut corners.

Sustaining a high-performance culture is essential to our success. Safely providing field inspection and integrity services every day is what we do. Our work is critical. Our livelihoods, 3B Inspection's sustainability and economic health, all depend upon how we do things here.

Behaving in an Ethical Manner

- Abide by confidentiality agreements
- Not accepting gratuities of any kind that may be perceived to affect judgment in the work being performed as an Inspector; if gratuities are offered, this information should be reported to the Company
- Endeavor to be fair, reasonable, and objective towards performing work requirements at all times
- Do not make assumptions; consult with the Construction Manager / Chief Inspector (or designate) if there are uncertainties in the requirements
- Accept or reject the work performed by the Contractor based on the quality of the work
- Comply with all relevant codes, standards, systems, permits, contracts, agreements, specifications, procedures, approved drawings, line lists
- Document all deviations and when required, escalate in an appropriate manner for approval

Professional Approach to Inspection/Field Work

- Be knowledgeable of and understand the relevant parts of the construction process
- Be knowledgeable of and understand Client Company's standards and specifications
- Be knowledgeable of and understand relevant industry and government standards
- Ensure all applicable permits required to execute the work are in place and on-site prior to commencing the work
- Uphold Client Company's industry practices to ensure safety, minimize risk, and avoid hazards in the workplace

- Comply with Client Company's construction timelines and understand Client Company's construction schedule, costs, and components of the work
- Understand the role relative to other Stakeholders in the construction process and engage other expertise accordingly
- Make accurate decisions by being well informed and familiar with all contract documents and design requirements
- Arrive on site before and/or with the Contractor's crew and remain until after the crew leaves the site for the day
- Take breaks when the Contractor's crew takes breaks and remain on site during construction activities that require inspection
- Obtain all applicable documents before the start of inspection
- If questions arise that cannot be answered, seek those that have the authority to resolve
- Be proactive in problem solving and raise issues/concerns to the attention of the Construction Manager / Chief Inspector (or designate)
- Project a Positive Image in Representation of Client Company
- Behave in a courteous manner
- Conduct oneself in a respectable manner during off-time hours
- Show respect through good driving habits on the right of way (ROW) or public roads
- Check the work area for good housekeeping and tidiness (e.g., equipment and consumables should be correctly handled, stored, and maintained)

CORPORATE POLICIES

Business Conduct

3B Inspection employees and contractors will conduct business operations in a manner that conforms to the highest ethical and legal principles. Inappropriate behavior will not be tolerated and will result in appropriate discipline.

Compliance

3B Inspection employees and contractors will comply with all applicable laws and regulations, State and Federal Right-of-Way agreements, permits, other binding agency agreements and authorizations and with all 3B Inspection policies and procedures.

Employee Relations

We will provide competitive compensation, benefits, training, and development programs to attract, retain and motivate employees.

Employment decisions are based on skills and performance, while providing equal employment opportunity to all employees and qualified persons without regard to race, color, sex, sexual orientation, gender identification, age, national origin, religion, physical or mental disability, marital status, pregnancy or parenthood for purposes of employment promotions, wages, benefits and all other privileges, terms and conditions of employment.

Environment

3B Inspection employees and contractors will conduct business with a commitment to preserve and be good stewards of the natural surroundings in which we and our clients work.

Open Work Environment

We are committed to an open work environment in which all individuals working for 3B Inspection work together to make safety, integrity and environmental protection our overriding priorities. An Open Work Environment allows and encourages workers to freely speak up and step up by providing constructive criticism, spotting opportunities, sharing ideas and concerns, and taking actions on solutions, without fear of harassment, intimidation, retaliation or discrimination from management or peers. Conduct that creates a hostile work environment will not be tolerated. 3B Inspection's procedures permit disciplinary actions, up to and including immediate termination for engaging in behaviors found to be harassing, intimidating, retaliatory or discriminatory or for creating a hostile work environment. Retaliation against any worker for reporting in good faith a suspected violation of federal or state law or regulation is prohibited. We are committed to honest communication with all workers. We encourage all workers to bring questions and concerns to our attention.

Definitions:

Hostile Work Environment: Harassment, intimidation, retaliation or discrimination that permeates the work environment and interferes with an employee's ability to perform his or her job.

Harassment: Unwelcome or offensive verbal or physical conduct toward a person that adversely and unreasonably affects the employment relationship or working environment.

Intimidation: Conduct or actions with the intent or purpose of generating fear in an employee or preventing or discouraging the employee from raising, in good faith, a concern or engaging in legally protected activity.

Retaliation: An adverse employment action taken to deter or punish an individual for raising, in good faith, a concern or engaging in legally protected activity.

Discrimination: Treating a person, or class of persons, differently than similarly situated people based on protected status.

Bullying: A form of harassment characterized by repeated verbal, physical, social or psychological mistreatment against an individual or group with the intent to intimidate, degrade, humiliate or undermine work performance

Safety

Safety and Loss Prevention

We will conduct our business in accordance with the highest field inspection and integrity industry safety standards.

Safety is our first priority and everyone's responsibility.

- Learn and follow established safety procedures and practices.
- Be alert for hazards.
- Be attentive to the safety of those around you.
- Question practices that you believe may be unsafe.
- Protect yourself, your co-workers and the public from unsafe work conditions.
- Communicate potential health and safety hazards and near losses.
- Immediately report any accident or injury sustained on the job.
- Always take precautions for unlikely events with severe consequences. Just because it hasn't happened here or hasn't happened in a long time, doesn't mean it can't happen here.

Health and Wellness

3B Inspection is committed to providing a work environment that encourages employees to lead healthy lifestyles.

- Ensure you are adequately rested and alert to engage in work activities.
- Establish daily routines that ensure workplace productivity is maintained.
- Stay home if you are sick.
- Report unhealthy conditions.

Substance Abuse

Substance abuse increases the potential for accidents, poor work performance, absenteeism and damage to 3B Inspection's reputation.

3B Inspection protects the health and safety workers by insisting on a drug and alcohol-free workplace.

3B Inspection prohibits employees from being under the influence of alcohol, illegal drugs or legal drugs that could create a safety concern while performing their assigned duties, or while on our clients' facilities, or in an 3B Inspection owned/leased/rented or contracted vehicle.

State and local initiatives legalizing marijuana for medical or recreational purposes do not change 3B Inspection's requirement for a drugfree workplace.

3B Inspection employees and contractors will face disciplinary actions, up to and including immediate termination if they violate 3B Inspection's substance abuse policies.

- Seek treatment for substance abuse problems.
- Do not report to work or work under the influence of alcohol or any drugs that impact safe work performance.
- Do not possess, sell, purchase, deliver, use or transfer alcohol or drugs while on project facilities or in your vehicle while on a 3B Inspection project.
- Never endanger people or property by working when your performance is impacted by alcohol or other drugs, legal or illegal.

Security

3B Inspection is committed to providing a safe and secure work environment for all 3B Inspection employees, contractors and visitors.

- Keep unauthorized firearms, weapons, ammunition, explosives and all other prohibited items out of 3B Inspection project facilities, parking lots and vehicles.
- Protect 3B Inspection equipment including GPS, Geo Phones, tracking or any other equipment used on field projects.
- Report unusual, suspicious or threatening activities and behaviors.
- Do not tolerate workplace violence of any kind, including the threat of harm – direct or indirect – against an employee.
- Employees who are violent or make threats of violence in the workplace will be subject to disciplinary action and possible criminal prosecution. Acts of violence can include physical force or a communication that causes a reasonable person to fear for his or her own safety or the safety of others.

Environmental Protection

3B Inspection workers must comply with all environmental laws and regulations, as well as 3B Inspection environmental policies and procedures. All workers are expected to be responsible stewards of the resources for which we are accountable.

- Be aware of the laws, regulations and procedures that pertain to your work and follow them.
- Avoid or minimize environmental impacts to air, water, habitat, fish and wildlife.
- Safely oversee use, transport and dispose of all materials and waste.
- Immediately report all spills.
- Make sure permits are in place prior to allowing work to be performed work.
- Understand and comply with environmental laws and regulations.

Diversity

3B Inspection fosters and develops diversity through recruiting practices, company training and professional development. We value diversity in the workforce and create a culture of success for all our employees.

3B Inspection actively looks to enhance the representation of minorities and women as set forth in the Federal Agreement and Grant of Right of Way Sections 28 and 29.

- Make decisions based on facts rather than personal biases.

- Welcome and learn from differing viewpoints and opinions.
- Promote equal opportunity for all.
- Report any discrimination concerns.

Equal Employment Opportunity

3B Inspection offers all qualified individuals equal opportunity in all employment-related decisions including but not limited to selection, promotion, transfers, compensation, discipline, layoffs, return-to work, training, and education. Discrimination based on race, color, sex, sexual orientation, gender identification, age, national origin, religion, physical or mental disability, marital status, change in marital status, pregnancy, parenthood, and/or genetic information, or any other basis protected by law will not be tolerated. Understand and celebrate our cultural diversity.

Avoid Conflicts of Interest

Conflicts of Interest

3B Inspection is committed to the highest standards of ethical business conduct. Business decisions and actions on behalf of 3B Inspection must not be influenced by personal interests or relationships. A conflict of interest can arise if your personal activities or relationships influence or appear to influence your professional judgment or ability to act in 3B Inspection's best interests.

- Approach suppliers, contractors and other persons doing or seeking to do business with 3B Inspection in a completely impartial manner.
- Always disclose both actual and potential conflicts of interest to your supervisor.
- Do not use company property, information or position for personal gain or family benefit.

Gifts, Gratuities and Business Courtesies

3B Inspection, LLC is committed to competing solely on a merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by 3B Inspection was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom 3B Inspection does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of 3B Inspection or customers, or would cause embarrassment or reflect negatively on 3B's reputation.

Stakeholders

There are many individuals and groups who affect or can be affected by our actions. They include:

3B Inspection workers: Our most valuable asset is the talent of people who work for us.

Clients: The companies and organizations for whom we supply our inspection and integrity services.

Other contractors: Other companies who are on location at our job sites.

Communities: The landowners and people at our project locations and where we stay.

Regulators: Representatives of various federal, state and local governments.

Regulatory agencies are entrusted with oversight of our activities and act on behalf of the general public and the government to ensure that 3B Inspection operates in compliance with all applicable laws, regulations and agreements.

Suppliers: Contractors that provide services and vendors that supply goods and materials.

Understand the interests of those who depend on us to provide our services.

We want 3B Inspection stakeholders to know they can count on us to:

- Provide a safe, environmentally responsible, cost-effective and reliable means to pipeline inspection and integrity services.
- Interact with government personnel and fellow workers in a professional and respectful manner.
- Deal honestly and fairly with our contractors and vendors.
- Maintain high ethical standards.

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to *say* what we must do, but the proof is in our *actions*. Ultimately, we will be judged on what we do.

ACKNOWLEDGEMENT OF CODE OF CONDUCT

I hereby acknowledge that I have received and read 3B Inspection, LLC. Employee Code of Conduct and that I am fully aware of its terms.

I also agree to read and comply with all policies adopted by 3B Inspection. I understand that compliance with this Code is a condition of employment. I understand that if I fail to comply with this Code or other published policies of 3B Inspection or applicable laws, it will be addressed, and I may be subject to disciplinary action, including a warning, revision of responsibilities, suspension, or dismissal.

I understand that 3B Inspection, LLC. from time to time may issue policies which also govern employee conduct. All of these other policies are incorporated by reference into this Code of Conduct. I confirm that I will comply with all provisions of the Code of Conduct.

Name: _____

Signature: _____

Date: _____