



UNITED PUMPING SERVICE, INC.
Proud to Help Keep America Clean



UNITED STORM WATER INC.
Protecting Our Water Resources

CODE OF BUSINESS ETHICS AND CONDUCT

February 28, 2019

UNITED PUMPING SERVICE / UNITED STORM WATER



PUMPING SERVICE, INC.

Proud to Help Keep America Clean

Dear United Team Member:

In all we do, we never lose sight of our core values. Ethical behavior and respect for everyone are the foundation for how our company conducts business and engages with its customers. Everything we do, every success we have, is built on that foundation.

Adherence to our Code of Ethics and Conduct ensures we maintain our strong culture of compliance. It also ensures we maintain the industry leadership position we hold today.

Our United team is, and must always be, committed to doing business the right way. It makes us who we are as a company and drives our business success. It is the right thing to do for each other, for our customers and for the communities we serve. It is also everyone's responsibility.

Thank you for all that you do and for reviewing, committing to and adhering to United's Code of Ethics and Conduct.

Sincerely,

Eduardo Perry Jr.
President

OUR CODE OF BUSINESS ETHICS AND CONDUCT

Our Code reflects who we are and what's important to us

This Code provides an overview of the laws, regulations and company policies that apply to us and the work we do, but it does more than that. It builds upon our shared values. That is why we count on every employee to follow our Code and make decisions that will preserve the trust that others have placed in us.

We are expecting nothing less from our business partners, including our consultants, distributors and suppliers, as well as our joint venture partners – we understand the responsibility we have to communicate with them about our high standards of integrity and cannot ask them to violate any of our values and operating principles.

Our Code is an important resource, but it does not cover every situation you may face on the job, so it is important to use good judgement in everything you do and to ask for help if you are ever unsure about the right course of action.

KNOW YOUR RESPONSIBILITY

Our good name is in your hands

No matter what job you do or where you do it, you are United. You represent United in every business relationship, every transaction, and every load you carry. It is your obligation to reflect United's values by following our Code and policies as well as applicable laws and regulations of the state, county or city where you are performing work. To stay up-to-date on what is expected of you, it is critical that you complete your assigned trainings.

If you see or suspect anything illegal or unethical, it is your obligation to report the matter promptly. No concern is too minor to report.

Be aware that anyone who violates our Code may face corrective action, up to and including termination of employment with United. If you manage others you have an even greater responsibility. Lead by example, making sure your team members know the Code is a resource for them and there is no difference between what you do and what you expect from others. We each have a duty to help create the kind of workplace where employees feel comfortable coming forward with questions and concerns, and support them when they raise issues. Never retaliate against employees for sharing concerns in good faith, and you should prevent retaliation by others.

SPEAK UP WITHOUT FEAR

United does not tolerate retaliation

As a company we know it takes courage to come forward and share your concerns. United will not retaliate or permit retaliation against anyone who raises questions or concerns about

corporate activities. We do not retaliate or permit retaliation against anyone who makes a good faith report about possible misconduct or legal violations to us or a government authority or assist in an investigation of misconduct or legal violations.

Regardless of who you contact, you can be confident that you are doing the right thing and that your concern will be handled promptly and appropriately. We investigate reports of misconduct thoroughly, disclosing information only to those who need it to resolve the issue.

DISCLOSING VIOLATIONS TO THE GOVERNMENT

The Mandatory Disclosure Rule

Federal regulations require United Pumping Service/United Storm Water to disclose timely to the U.S. Government when it becomes aware of credible evidence that United itself, or one of its subcontractors, suppliers, distributors or vendors, is the recipient of a significant overpayment by the Government or has engaged in conduct that violates the Civil False Claims Act or certain criminal laws involving, among things, fraud, conflict of interest, bribery, or gratuities, related to the award, performance, or closeout of a Government contract.

Our duty to disclose begins when United takes any action in connection with the award of a Government contract, and continues until three (3) years after final payment on the Government contract. In order for United to comply with this disclosure obligation, and also to ensure that United has the opportunity to identify and correct any potential non-compliant conduct, it is critical that United become aware of such situations.

If a United team member believes any of the situations described above could occur or have occurred, that person must immediately notify United's Director of Ethics and Conduct to ensure United takes immediate and appropriate actions. Even if you are unsure what you have observed is a violation, you are obligated to elevate the concern to the Director of Ethics and Conduct immediately.

KNOW WHERE TO GO FOR HELP

There are people ready to support you

Have a question, problem or a concern? In most cases, your manager should be your first point of contact. He or she is likely in the best position to understand your concern and take the appropriate action. If you are uncomfortable speaking with your manager, or if you have already shared a concern and feel it is not being addressed appropriately, you are welcome to reach out to the Director of Business Ethics and Compliance/HR Manager.

United has appointed our Human Resources Manager to also serve as the Director of Business Ethics and Compliance and to lead ethics and compliance activities within United. The Director of Ethics and Compliance has the ability to lead change within the organization and is responsible for operating and auditing/monitoring the compliance program. The Director of Business Ethics and Compliance reports directly to the senior management staff.

You may contact the Director of Business Ethics and Compliance at:

- (626) 238-4909
- ethics@unitedpumping.com
- United Pumping Service/United Storm Water – Attn Ethics Compliance – 14000 E Valley Blvd – Industry CA 91746
- Complaint forms are available through the HR department or in the forms binder on the work counter in dispatch.

Concerns may be submitted on an anonymous basis via US mail or email to the above addresses.

Nothing in our Code prohibits you from communicating with government agencies about possible violations of federal, state or local laws or otherwise providing information to government agencies.

PROMOTE A SAFE UNITED

We value the safety and security of every employee

We look out for each other. We follow our safety procedures and promote a culture of safety, because our people are our greatest asset. Every employee is empowered to take immediate action for people safety regardless of their role, title or responsibility within United. If you see a situation that could put others at risk, take action, and at all times and in all places, it is your duty to report the issue immediately to help keep yourself and your co-workers injury-free and safe.

United has a zero-tolerance policy when it comes to personal safety of our employees. Be alert to what is going on around you, observe good security practices and speak up about any threats. We prohibit weapons on all company property and vehicles consistent with local law – if you have concerns that someone may have a weapon on our property or vehicle, report it immediately to your manager or the HR manager.

Having, using, distributing or being under the influence of alcohol, marijuana or illegal drugs is also prohibited by our policies as these substances can impair your judgement, your performance and the safety of those who work with or around you.

BUSINESS INTEGRITY

We compete for business on the excellence of our product and services

United is committed to competing for business honestly and with integrity. United strictly prohibits the use of bribes or any conduct that may be perceived as bribery. In addition to maintaining our own business integrity, United is responsible for the actions of any third party who represents us. Remember, a bribe can be something other than cash. A gift, a favor,

even an offer of a loan or a job could be considered a bribe if it is offered in exchange for a decision. When in doubt, please check with the Director of Business Ethics/HR manager for advice.

ACCEPTING BUSINESS COURTESIES

Keep it appropriate and customary

Most business courtesies offered to us in the course of our employment are offered because of our positions at United. We should not feel any entitlement to accept and keep a business courtesy. We may not use our position to obtain business courtesies, and we must never ask for them. Employees who:

- Award contracts
- Can influence the allocation of business
- Create specifications that result in the placement of business
- Participate in the negotiation of contracts

must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a business partner when United is involved in contract negotiations with that partner or under circumstances that would create an impression that offering courtesies is the way to obtain United's business. If you have questions regarding the propriety of a business courtesy, do not hesitate to reach out to your manager or the Director of Ethics and Conduct.

Meals, Refreshments, Entertainment and Gifts

We may accept occasional meals, refreshments, entertainment, gifts and similar business courtesies that are customary and conform to reasonable ethical practices of the marketplace, provided that:

- They are not inappropriate, lavish or excessive.
- They courtesy is \$50 or less in value.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with their manager or co-worker or having the courtesies known by the public.

Customary business entertainment is not prohibited, however, impropriety or the appearance of impropriety may be created when the value or cost is such that is could be interpreted as

affecting an otherwise objective business decision. If there is an chance that impropriety or even the appearance of impropriety may result from the courtesy, it should be declined.

Employees with questions about accepting business courtesies should talk to their manager or the Director of Business Ethics and Compliance or HR Manager.

Offering Business Courtesies

Any employee who offer a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon United. An employee may never use personal funds or resources to do something that cannot be done with company resources.

We may provide non-monetary gifts (e.g., company promotional items such as hats, shirts, pens, travel bags, etc.) to our customers. Further, senior management may approve other courtesies including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The courtesy has a value of less than \$50.00
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of United. See United's accounting department for the appropriate procedure(s).

AVOID CONFLICTS OF INTEREST

We do not let personal interests affect business decisions we make on behalf of United.

A conflict of interest can happen anytime something you do outside of the workplace interferes with the work you do inside the workplace. It is not possible to list every situation that could present a conflict, but there are certain situations where conflicts typically arise. And being able to recognize a potential conflict can help you avoid one.

When making decisions related to United, you have a duty to act in our company's best business interests and avoid even the appearance of a conflict. If you discover that a personal activity, interest or association could compromise – or even appear to compromise – your objectivity or your ability to make impartial business decisions, you should disclose it immediately to your manager, or the Director of Business Ethics and Compliance/HR Manager. Many conflicts can easily be avoided or addressed if they are promptly disclosed and properly managed.

KEEP ACCURATE RECORDS

Integrity in our recordkeeping inspires trust by customers, business partners and the communities we serve.

Our long-term success depends, to a large extent, on how well we manage our business. Our records – and our recordkeeping – help us to fulfill our financial commitments and pay our people, but they also provide a picture of our financial health. That is why records that are clear and complete and accurately reflect our business transactions are critical company assets.

Each of us has an obligation to follow all internal controls in recording and maintaining our company books and records. In every transaction, whether you are complying with disclosure requirements, preparing a financial statement or simply completing a timesheet, be honest, accurate and complete. Be alert for any suspicious financial transactions, know your customers, partners and understand their use of our products and services in order to prevent illegal activity.

You also have a responsibility to know and follow our records management and records retention policies. Take care never to dispose of information that may be relevant to current or threatened litigation until you are notified to do so.



ACKNOWLEDGEMENT PAGE

Please complete this page, remove and return it to the Human Resources department.

*I have received a copy of United's **Code of Business Ethics and Conduct** and I have received training as to the content and meaning of this Code. I understand that it is my obligation to comply with this Code, and that my violation of this Code could result in corrective action up to and including termination of employment with United.*

Name (print)

Name (sign)

Date
