# Code of Business Conduct

PYE-BARKER FIRE & SAFETY, LLC









## Bart Proctor



#### Dear Team Member,

What makes Pye-Barker unique is how we work as a team to serve our customers and communities with pride, hard work and integrity.

We value the trust that our team members, customers, and business partners place in us. We know that trust is fundamental to our long-term success.

The Pye-Barker Code of Business Conduct ("the Code") establishes the basic principles that are critical to maintaining and protecting such trust.

Please read the Code carefully and follow it completely.

Every one of us is responsible for ensuring that our actions are consistent with Pye-Barker's mission to protect our communities and live our values of trust, respect and commitment to doing right by our customers and fellow team members. The Code also serves as a reminder to all employees to speak up if you see something that does not seem right.

This is our shared responsibility. Thank you for all you do every day to live up to Pye-Barker's high standards of professionalism, respect and integrity.

Sincerely,

Bart Proctor, CEO

## Who We Are

Founded in 1946, Pye-Barker is the U.S. leader in integrated fire protection, life safety, and security services.

Our team of fire and security industry experts is committed to serving our customers and communities with dependability, quick response, hard work, and a dedication to doing the right thing.

Each of our branches nationwide keenly focuses on caring for, engaging with and supporting the local community. This unwavering dedication to keeping businesses, families and communities safe is what inspires our work here at Pye-Barker.







#### **Our Core Values**

Our values reflect how we live out our company mission.



#### **CUSTOMER-BIAS**

We promise to make recommendations that are always in the best interest of our customers and provide service that's responsive and dependable, every time.



#### **TRUST**

You can count on us to care for you—our customer— as we care for each other.



#### RESPECT

We have the utmost appreciation for this industry and each other and are proud to be working together to help our customers and neighbors protect what they've built.



#### COMMITMENT

We're committed to quality craftsmanship, quick response, and taking care of our team members and our customers like family.

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### Compliance is ()ur Shared Responsibility

Protecting Pye-Barker's integrity and reputation is all of our responsibility. The Code applies equally to all Pye-Barker employees as well as to those acting on Pye-Barker's behalf. We believe that every team member is a leader, and each of us has a responsibility to do the right thing, every day, to preserve our culture, brand and reputation. Managers have additional responsibilities to serve as positive role models and help employees review, understand and apply the Code. The Code provides the standards and resources to conduct business ethically and in compliance with applicable law.

Compliance with the Code is mandatory. That means not only taking personal responsibility for doing the right thing but also speaking up about others' conduct that might violate the Code, company policies, or any law.





#### **Reporting Obligations**

If you have a good faith belief that a potential violation of the Code has occurred, you must report the incident promptly to your manager, another manager, your HR Business Partner ("HRBP"), the Pye-Barker Legal Department (legal@pyebarkerfs.com), the Pye Barker Internal Audit Department, or the Pye-Barker Speak-Up Helpline.

The Pye-Barker Speak Up Helpline is managed by an independent third party and enables you to file a report at any time—day or night—via phone at 833-416-5340 or online at pyebarkerfire.ethicspoint.com. The Pye-Barker Speak Up Helpline is a confidential and secure channel that Pye-Barker established for situations where you may not be comfortable reporting compliance concerns to a manager, HR or the Pye-Barker Legal Department. Employees may contact the Pye-Barker Speak Up Helpline on a confidential basis, and confidentiality will be maintained to the extent possible. Further, the Pye-Barker Speak Up Helpline enables anonymous reporting of concerns. We encourage you to provide your name because that allows us to ask follow-up questions to ensure the incident is fully investigated and understood; typically, this also enables us to address the incident in the quickest manner possible. It is therefore helpful, but certainly not necessary, to provide your name when reporting an incident.

#### No Retaliation

Pye-Barker prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a potential violation of the Code or cooperating in related investigations, provided that the report is made in good faith and with a reasonable belief that the information submitted is true. Anyone who engages in any such retaliation will be subject to disciplinary action, up to and including termination of employment.

#### **Violations**

Employees who fail to comply with the Code, fail to report a potential violation of the Code, deliberately withhold information concerning a potential violation of the Code, fail to cooperate with an investigation into a potential violation, or who knowingly make a false report may be subject to disciplinary action, up to and including termination of employment and appropriate legal action.



### Commitment to Our People

Our employees are our greatest assets. Each day, we strive to keep our workplaces safe and secure, and to foster an inclusive culture where every team member feels a sense of belonging. It is our policy and practice that all employees are provided fair and equitable treatment.





#### **Employment & Equal Opportunity**

Pye-Barker is committed to equal opportunity for all employees and applicants. Our policy is to recruit, hire, train, promote, pay, discipline, and make all other personnel decisions without regard to race, color, creed, religion, national origin, ancestry, citizenship status, age, sex, gender, pregnancy, sexual orientation, gender identity or expression, genetic information, disability, military service and veteran status, or any other characteristic protected by applicable law.

#### No Harassment

Pye-Barker does not tolerate any form of discrimination or harassment in the workplace. Specifically, we do not tolerate any unwelcome conduct—including actions, words, jokes, comments, or other conduct that is harassing, coercive, or disruptive—that is based on protected characteristics, such as age, gender, race, ethnic background, sexual orientation, gender identity, national origin or religious beliefs. This no-tolerance policy applies to interactions with employees, customers, contractors, suppliers, applicants for employment, and any other workplace interaction.

#### Keeping Workplaces Safe, Secure, & Healthy

#### **Safe Workplaces**

Pye-Barker is committed to providing a safe workplace for all employees, and to conducting business in compliance with all applicable environmental, health, and safety laws and regulations. Our goal is to have every employee go home unharmed at the end of the workday. The Pye-Barker safety team is focused daily on sharing best practices, training, safety awareness information, and eliminating workplace hazards whenever possible.

Each employee also has an active role to play to ensure a safe workplace. You must follow all environmental, health, and safety rules, policies, and practices, and you must promptly report all accidents, violations, hazardous material spills, injuries, and any unsafe equipment, practices, or conditions.



#### Keeping Workplaces Safe, Secure, & Healthy (cont.)

#### Safe Workplaces (cont.)

The following must be promptly reported:

- Accidents
- Property Damage
- Violations of policy or law
- Hazardous material spills
- Injuries of any kind
- Inquiries from government agencies
- Unsafe condition

If you have any questions about workplace safety or your specific responsibilities, please contact the Pye-Barker Safety Team (safety@pyebarkerfs.com) for guidance.

#### **Workplace Violence**

Pye-Barker also does not tolerate workplace violence, including but not limited to actual violence, threats of violence, intimidation, or other threatening or hostile conduct towards Pye-Barker employees or property, or against people or property related to our business operations. You must report any acts or threats of violence as set forth in this Code or to the local police department.

#### **Drug-Free Workplace**

To help ensure a safe, healthy and productive work environment for our employees and others, to protect company property, and to ensure efficient operations, Pye-Barker maintains a drug-and-alcohol-free workplace. You must comply with all laws prohibiting or controlling the manufacture, distribution, dispensation, solicitation, sale, purchase, transfer, and possession of illegal drugs and alcohol, including when on Pye-Barker or a Pye-Barker customer's premises or while on Pye-Barker business. Reporting to work under the influence of illegal drugs or alcohol or while impaired by legal prescription medication is strictly prohibited.

#### **Workplace Relationships**

Pye-Barker has no prohibition against the hiring of relatives of employees. Decisions regarding hiring, however, may not be influenced by a family or other significant personal relationship. In addition, no employee shall be supervised or in a position in which progress can be influenced by a relative or other such relationship, unless an employee discloses such a potential conflict, and a limited exception is granted by the Chief Human Resources Officer.



## Commitment to Ethical Business Practices





#### Keeping Accurate Books & Records

Pye-Barker is committed to maintaining complete and accurate records to help run the business lawfully, effectively and efficiently. You must never falsify, or ask or cause someone else to falsify, company books or records or client documentation by making false entries through deliberate omission, or by creating records without knowledge of their accuracy. All expense reports, accounts payable, invoice transmittals, inventory summaries, accounts receivable, client billing data, timekeeping records, payroll data, and any other similar documents or records must be complete, accurate, honest, and timely. Among other things, all Pye-Barker employees must help maintain the integrity of company records by doing the following:

- Reporting time worked accurately and promptly
- Submitting accurate reimbursement and expense reports, in compliance with the Pye-Barker's Travel & Expense Policy
- Following company retention and record-keeping requirements
- Avoiding misstatements, exaggeration or guesswork in company records
- Creating and maintaining books, invoices, expense reports, and receipts that accurately reflect financial transactions
- Recording all assets, liabilities, revenues, expenses, and business transactions completely, accurately, and in a timely manner
- Adhering to applicable general accepted accounting standards (e.g., US GAAP), internal control standards (e.g., COSO), and all relevant laws and regulations
- Responding promptly and accurately to requests for records from internal and external auditors and legal counsel
- Reporting any concern that a record is inaccurate, false or misleading to your manager, Pye-Barker's Internal Audit Department, the Pye-Barker Legal Department (legal@pyebarkerfs.com), or the Pye-Barker Speak Up Helpline

Further, you may not open or maintain any undisclosed or unrecorded corporate account, fund, or asset or any account with a misleading purpose.

Unauthorized financial systems or financial systems with limited access for the Pye Barker Accounting department are prohibited.



#### Dealing Fairly & Honestly

Pye-Barker takes pride in providing world-class service to its customers. We compete and win business on the basis of such excellence and by maintaining a reputation for reliability, integrity and trust. All Pye-Barker employees, and those acting on Pye-Barker's behalf, must deal fairly and honestly with Pye-Barker customers, suppliers and other business partners by:

- Making only true statements about Pye-Barker's services and capabilities
- Communicating honestly with Pye-Barker's customers, suppliers and business partners
- Avoiding any and all misrepresentations of competitors' products or services
- Advertising in a way that complies with applicable laws and regulations
- Avoiding actual or perceived conflicts of interest
- Refraining from offering or accepting anything that could appear to be a bribe, a kickback, or that can otherwise inappropriately influence a decision about our business
- Conducting business in accordance with applicable laws, regulations and contractual commitments

Further, in signing certifications or making other statements to a government entity on behalf of Pye-Barker, you are responsible for acting diligently and conducting a reasonable investigation, when necessary, to ensure the truthfulness and accuracy of such communications and representations. Inaccuracy or misleading statements can result in criminal and civil penalties for the individual employee and the company. For any questions about such certifications or representations, an employee should reach out to the Pye-Barker Legal Department (legal@pyebarkerfs.com).

#### **Avoiding Conflicts of Interest**

Employees must not allow their outside interests to interfere with their job duties. Therefore, you must avoid any situation that creates a real or perceived conflict of interest. Conflicts of interest can occur when the personal interests, activities, or financial investments of you or your family members, a romantic partner, or a close personal relationship could affect—or appear to affect—your judgment or decision-making (or the judgment or decision-making of others) on behalf of Pye-Barker.



#### **Avoiding Conflicts of Interest (cont.)**

For example, a conflict of interest may arise if a Pye-Barker employee has a substantial holding in, or a professional affiliation with, a supplier, customer, or competitor. A conflict of interest may also occur when an employee is in a position to influence a decision that may result in a personal gain for the employee or the employee's family member as a result of Pye-Barker's business dealings. A family or other personal relationship with a Pye-Barker supplier or competitor may also present a conflict of interest. Pye-Barker prohibits all employees from using their position with Pye-Barker or Pye-Barker's relationship with its customers, suppliers, or other business partners for private gain or to obtain benefits for themselves, their relatives, their friends, or their private enterprises.

Also, Pye-Barker officers, directors and employees may not act as employees, consultants, agents, or representatives for other companies or entities when doing so might present a conflict of interest with such individual's role at Pye-Barker.

#### Importantly, a conflict of interest is normally not a violation, but failure to disclose it is.

If you think you may have a conflict of interest, or if you are aware of a potential conflict of interest involving you or another employee, customer, or supplier, immediately disclose the situation to your manager, your HRBP, or to the Pye-Barker Legal Department (legal@pyebarkerfs.com) so that Pye-Barker can evaluate the situation.

#### **Anti-Bribery & Corruption**

Pye-Barker complies with anti-bribery and corruption laws in every jurisdiction in which the company operates and prohibits any payment to anyone who may influence a business decision. Employees may not enter into any agreement or arrangement involving commissions, rebates, bribes, kickbacks, or other payments if you know or suspect that the likely result of such payment is to:

- Influence an act or decision that may appear to give Pye-Barker an improper advantage
- Improperly reward anyone in connection with existing or prospective business



#### Anti-Bribery & Corruption (cont.)

Employees shall avoid even the appearance of impropriety. If you have any questions, please raise those to your manager, your HRBP or the Pye-Barker Legal Department (legal@pyebarkerfs.com) so that Pye-Barker can evaluate the situation.

Providing gifts and entertainment to government employees, even if lawful, may create an appearance of impropriety and requires prior approval by the Pye-Barker Legal Department. Government employees include any and all officers or employees of government agencies, government-controlled companies (e.g., hospitals or schools), political parties, or officials of a party or candidate for political office.

All consultants, agents, or other third parties acting on behalf of Pye-Barker must also adhere to these anti-bribery and corruption requirements.

#### **Gifts & Entertainment**

Providing gifts or entertainment to clients or suppliers or accepting gifts or entertainment from clients or suppliers can create the appearance of a conflict of interest. Although certain forms of entertainment (such as ordinary and reasonable business meals or attendance to local events with clients) can be a productive part of a business relationship, you must ensure that such entertainment is modest, reasonable, and does not create an appearance of impropriety.

All consultants, agents, or other third parties acting on behalf of Pye-Barker must also adhere to the gift and entertainment requirements of this sub-section.

#### **Customer Relations**

Pye-Barker employees may not make or offer to make direct or indirect payments or exchanges of anything of value (e.g., compensation, gifts, employment opportunities, or contributions) to any persons or firms employed by or acting on behalf of a customer (private or governmental) for the purpose of rewarding favorable actions in a transaction. All employees and management should exercise sound judgment and discretion when seeking authorization for or approving business expenses.



#### Gifts & Entertainment (cont.)

#### **Customer Relations (cont.)**

Government employees are prohibited, with limited exceptions, from accepting gifts, gratuities, or entertainment from contractors. Generally speaking, government employees may only accept modest refreshments (e.g., coffee and donuts) incidental to a business meeting. This concept applies to U.S. government employees as well as to many state and municipal employees. Pye-Barker supports these rules and Pye-Barker employees must comply with both the letter and spirit of these directives. Accordingly, Pye-Barker employees are prohibited from offering government employees anything beyond modest offerings incidental to a business meeting without prior approval from the Pye-Barker Legal Department.

Any employee who is asked to authorize, make or agree to a payment that may be contrary to the Code must immediately report the payment to their manager, HRBP, or the Pye-Barker Legal Department. Similarly, if an employee learns that another employee is making or offering to make improper payments or exchanges of value, the employee must immediately report the conduct in accordance with the Code. Pye-Barker will promptly and thoroughly investigate all concerns regarding such improper payments and determine what action should be taken, up to and including termination of employment and appropriate legal action.

When there is any doubt about the permissibility of a payment or any exchange of value under the Code or applicable law, you must consult the Pye-Barker Legal Department (legal@pyebarkerfs.com).

#### **Supplier Relations**

Pye-Barker employees are also prohibited from accepting anything of value from a supplier or other business partner, except in accordance with Pye-Barker's compliance policies and procedures. These procedures generally permit acceptance of gifts of nominal value (e.g., swag bag from a conference; t-shirt bearing the supplier's logo) from a supplier or other business partner. Gifts of larger value must be reported to your manager for evaluation under the Code and applicable laws. Similarly, employees may accept invitations to social events (e.g., working luncheons or other business-related events) if there are sound business reasons for accepting and the value is reasonable. All employees, particularly those involved in the procurement of supplies or services on behalf of Pye-Barker, must avoid any appearance of impropriety.

If there is any doubt about the value or the advisability of accepting a gift or anything of value, you must consult the Pye-Barker Legal Department (legal@pyebarkerfs.com).



#### **Gifts & Entertainment (cont.)**

#### **Political Contributions**

Pye-Barker will not make any contributions to any political party or candidate for political office in violation of federal or state law. Political contributions to federal election campaigns made directly or indirectly from Pye-Barker funds are prohibited. The legality of political contributions to state or local campaigns or causes must be determined on a state-by-state basis and, therefore, must be approved in advance by the Pye-Barker Legal Department. Political contributions include any donation, gift, or loan of company funds, assets, or property, directly or indirectly, to or for the benefit of any political party, committee, or candidate, and any use of company funds, assets, or property, directly or indirectly, to candidate or officeholder. This includes: (a) donations, gifts, or loans of funds, assets, or property which are made by employees or third persons, such as agents, or consultants, who are reimbursed in any way by the company; (b) the uncompensated use of company services, facilities, or property; and (c) loans, loan quarantees, or other extensions of credit.

Employees who engage in political activities must do so on their own time as private citizens, not as Pye-Barker representatives. Employees who seek public office may use vacation time or request leaves of absence to campaign or hold office.

#### **Money Laundering**

Money laundering is the process of concealing illicit funds or making them look as though they are legitimate. This includes concealing the criminal origin of money or other property—sometimes called the proceeds of crime—within legitimate business activities. Money laundering also includes the use of legitimate funds to support criminal activities, including sanctions violations and terrorism. Money laundering and the financing of illegal activities are criminal acts. Any Pye-Barker employee that engages in such activity is subject to appropriate legal action and discipline up to and including termination.

#### Antitrust, Collusion, & Unfair Competition

Individuals who violate antitrust and unfair competition laws are subject to fines and imprisonment and can also subject Pye-Barker to liability and reputational harm.

All employees, and others acting on behalf of Pye-Barker, must comply with laws that prohibit unfair business practices and promote vigorous competition that is free from collusion.



#### Antitrust, Collusion, & Unfair Competition (cont.)

#### **Price Fixing & Unlawful Restrictions on Competition**

Antitrust laws forbid competitors from entering into arrangements and agreements that fix prices or otherwise restrict competition, including agreements not to compete in certain areas, geographies or lines of business. You may not enter into any arrangement or agreement (express or implied, formal or informal, written or oral) with any competitor restricting any of the following conditions or business offerings:

- Prices
- Cost
- Profits
- Offerings of products or services
- Terms of sales conditions
- Production or sales volume
- Production capacity
- Marketing share
- Quote decisions
- Customer selection
- Sales territories
- Distribution methodology

You must also not take any action that fosters, directly or indirectly, the unlawful exercise of control over resale prices.

#### **Conferences & Trade Shows**

Employees must be cautious when attending conferences, trade shows or other meetings where you may have contact with competitors. If a topic related to current or potential clients is mentioned at any meeting with any competitor, you must remove yourself from the situation immediately and report the incident to the Pye-Barker Legal Department (legal@pyebarkerfs.com). Areas of concern include but are not limited to pricing, costing, bidding, territorial or customer allocation, or refusal to deal.



#### Antitrust, Collusion, & Unfair Competition (cont.)

#### **Fair Competition**

Pye-Barker is committed to competing fairly and honestly, in compliance with applicable law. Employees must deal fairly with customers, suppliers, competitors, and other employees. You must not engage in manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

Unfair methods of competition include:

- Theft or misuse of proprietary, confidential, or trade secret information
- Commercial bribery or payoffs to induce business or breaches of contracts by others
- Making false or deceptive claims or comparisons regarding competitors or their services or products
- Mislabeling products or services
- Making affirmative claims concerning Pye-Barker's products or services without a reasonable basis for doing so

Seek guidance when you are unsure or could benefit from an additional perspective.





# Commitment to Protecting Company Assets & Confidential Information





#### Company Assets, Privacy & Information Security

All employees, and others working with or acting on behalf of Pye-Barker, must act responsibly to safeguard Pye-Barker assets and when handling confidential information of Pye-Barker, its employees, customers, suppliers and business partners. Pye-Barker assets include, but are not limited to, cash, inventory, property (including intellectual property), equipment, and proprietary information, as well as our name, brand and customer relationships. You must take good faith measures to keep Pye-Barker assets safe from theft, loss, fraud, waste, and abuse. You must also not use Pye-Barker assets for personal gain; doing so may subject you to disciplinary action or criminal prosecution.

Pye-Barker collects certain personally identifiable information ("PI") for the purpose of running its business and providing services to its clients. PI is any information that can be linked to a person, whether held electronically or in paper records. Pye-Barker is committed to protecting confidential and proprietary information entrusted to us by our employees, customers, suppliers, business partners, and others. Pye-Barker considers all PI to be confidential information. Pye-Barker's policies are designed to comply with privacy, data security, and other laws and industry practices when handling personal and sensitive information.

We are all accountable for protecting Pye-Barker's assets and PI, and all employees must adhere to the below basic principles:

- Follow Pye-Barker's published privacy and security policies
- Access confidential company information only in accordance with Pye-Barker policies, only if authorized to do so, and only for legitimate business purposes and to the extent required to perform your job duties
- Do not provide confidential company information to unauthorized people (in or outside of the company) unless you have the necessary approvals and agreements in place
- Never allow unauthorized persons to use company assets or confidential company information
- Ensure that confidential company information is stored securely and with restricted access—for example, sensitive and hard copy files must be locked and secure; sensitive digital files must be password protected; PI and otherwise sensitive information sent over email must be encrypted; laptops and other devices must be locked and secure when not in use, on and off company premises
- Protect user IDs and passwords—you must never share (or ask others to share) personal passwords, including with managers or other members of the work team



#### Company Assets, Privacy, & Information Security (cont.)

- Ensure that information regarding current and former employees is not disclosed out side of the company and that any inquiries about employees are referred to the Pye-Barker HR Department
- Report promptly any abuse or misuse of company assets or disclosure of confidential or proprietary information of Pye-Barker or Pye-Barker's employees, customers, suppliers, business partners, or others
- Upon termination of your employment relationship or other affiliation with Pye-Barker, return all Pye-Barker assets and all confidential and proprietary information of Pye-Barker, its employees, customers, suppliers, business partners, or others

If you suspect the occurrence of an information security incident, you must report such concern to your manager, your HRBP, the Pye-Barker Chief Information Security Officer (directly or to itsecurity@pyebarkerfs.com), or a member of the Pye-Barker Legal Department (directly or to privacy@pyebarkerfs.com). An information security incident includes loss or theft of information or data in the control or custody of Pye-Barker; unauthorized use, disclosure, destruction, alteration or access to such data; or the unauthorized access to or use of, the inability to access, or malicious infection of a Pye-Barker information technology system (e.g., computer, network, storage device).

#### Computer, Email, & Internet

Pye-Barker's computers, mobile devices, network access, and information systems (including email, Teams chat, Podium, other messaging collaboration platforms, and the Internet) are provided to employees and certain other authorized personnel for business purposes only. All documents, email, and messages created or received by these systems are considered Pye-Barker property. Pye-Barker may review your email, messages, and Internet usage in the event of a possible security breach, policy violation, or other unauthorized or illegal activities.

Personal use of Pye-Barker computers, devices and email is permitted as long as it is incidental and does not involve any prohibited activity, interfere with productivity, or deplete system resources or storage capacity.

You may not use company equipment or access websites in violation of the Pye-Barker Social Media Policy.



#### **Social Media**

When using social media for business purposes (including but not limited to online platforms that facilitate activities such as professional or social networking, posting commentary or opinions and sharing pictures, audio, video, or other content), all employees and others acting on behalf of Pye-Barker must follow the Pye-Barker Corporate Communication and Social Media Policies. Only designated company spokespeople are authorized to speak on behalf of Pye-Barker. If you are authorized to use social media on Pye-Barker's behalf, you must clearly identify yourself as a Pye-Barker employee speaking on the company's behalf.

When using social media for personal reasons, you may not represent or suggest that your posts are approved, sponsored, or authorized by Pye-Barker, or that you are speaking on behalf of Pye-Barker or any Pye-Barker client or affiliate. Employees expressing opinions that could be tied to the company or making social media postings about the company's services or products, must expressly state, "The postings on this site are my own and do not reflect the views of Pye-Barker Fire & Safety, its subsidiaries, or its affiliates," or a substantially similar statement to this effect.

#### Copyright Infringement & Software Piracy

Pye-Barker respects the intellectual property rights of others and permits the use of copyrighted materials only as allowed by law or through an agreement. You may not use copyrighted materials (including third-party logos or brand names) without the copyright owner's express consent. You are also not permitted to make copies, reproduce, resell or transfer software or its supporting documentation unless you are authorized to do so by the license agreement for that software.

If you have any questions, please email the Pye-Barker Legal Department (legal@pyebarkerfs.com).



# Commitment to Our Communities

Pye-Barker values the communities in which we operate. We strive to minimize our environmental impact and encourage our employees to seek opportunities to allow us to contribute positively to society—as a company and as individuals.







#### Community & Charitable Cifts

Pye-Barker strives to be a good citizen and encourages positive community involvement and activities. However, no Pye-Barker employee shall use his or her position with the company to unduly influence or force such participation by others. Employees who hold public office or serve on commissions or advisory groups must be alert to potential conflicts of interest and be prepared from abstaining from or participating in any deliberations or voting on issues involving Pye-Barker directly.

All requests for monetary donations (including requests from customers) that are made on behalf of Pye-Barker, or in an individual's official capacity as an employee or representative of Pye-Barker, must be submitted to and reviewed by Pye-Barker Legal and Marketing Departments. Such donations may not be made in a manner that could be or could reasonably create the appearance of being a bribe, kickback or other corrupt practice.

#### **Engagement of Lobbyists**

You must receive written approval from the Pye-Barker Legal Department (legal@pyebarkerfs.com) prior to hiring, or making any payments to, a lobbyist or other government affairs consultant for any work on behalf of or for the benefit of Pye-Barker.

"There is no power for change greater than a community discovering what it cares about."

- Margaret J. Wheatle



# Compliance & At-Will Employment Status

Failure to comply with the Code subjects all Pye-Barker employees to disciplinary action, up to and including termination of employment. Nothing in the Code alters an employee's at-will employment status, meaning that an employee's employment with Pye-Barker may be terminated by the employee or Pye-Barker, at any time, with or without cause, and with or without notice, unless otherwise prohibited by applicable law.

From time to time, Pye-Barker may add to or revise this Code to reflect changes in our policies and to incorporate applicable legal requirements and industry standards. Please visit pyebarkerfs.com/conduct-code for the most up-to-date version of the Code.

Material changes will be communicated to employees.

The Code does not apply to communications or activities by employees, not made on behalf of Pye-Barker, concerning a labor dispute or other concerted communications for the purpose of mutual aid or protection protected by the National Labor Relations Act.

Please direct any questions about the Code to the Pye-Barker Legal Department (legal@pyebarkerfs.com).



Please visit was a large of the most up-to-date version of the Pye-Barker Fire & Safety, LLC ("Pye-Barker") Code of Business Conduct.