

Purpose and Scope

This Code of Conduct sets out the standards Berkowsky and Associates, Inc. ("BAI") requires of our subcontractors, suppliers, and consultants. It applies to every firm that provides labor, materials, equipment, or services to BAI, and to that firm's employees while doing BAI work. Where this Code is incorporated into a subcontract, purchase order, or other agreement with BAI, compliance with this Code is a contractual obligation; in the event of a conflict between this Code and that agreement, the agreement controls. Each firm shall use commercially reasonable efforts to require its own lower-tier subcontractors and suppliers to comply with this Code.

What We Require

Follow the law

- Comply with all applicable laws, and hold the permits, licenses, and insurance the work requires.

Environment

- Handle, store, and dispose of waste and hazardous materials legally.
- Control dust, runoff, and noise on site as required by permits and project specifications.
- Reduce waste and recycle where the project allows.
- Supply wood products only from legal sources, and from certified sustainable sources where available.
- Track greenhouse gas emissions associated with BAI work and take reasonable steps to reduce them. BAI may ask its larger trade partners, where appropriate to their size and capacity, to consider setting a science-based emissions reduction target.

Labor and human rights

- No child labor, forced labor, or human trafficking.
- No discrimination or harassment.
- Pay at least the wages, overtime, and benefits required by law, and keep accurate pay records.
- Respect workers' right to join, or not join, a union.

These requirements are consistent with Berkowsky's own Human Rights Policy and Discrimination and Harassment Policy, posted at <https://www.berkowsky.com/human-rights> and <https://www.berkowsky.com/discrimination-harassment>.

Health and safety

- Keep a written safety program and follow OSHA and all site safety rules.
- Give workers the training and personal protective equipment (PPE) the work requires.
- Report injuries and incidents promptly to BAI superintendent.

Business ethics

- No bribes, kickbacks, or improper payments.
- Tell BAI about any conflict of interest.
- Keep accurate records and protect confidential information belonging to BAI and its clients.



Raising Concerns

Report any concern about this Code to your BAI project contact or to Siri Heinrichs, CEO/CFO, at sheinrichs@berkowsky.com. BAI will not retaliate against anyone who raises a concern in good faith.

Acknowledgment and Follow-Up

Each firm shall confirm in writing that it has received and reviewed this Code. Each firm shall respond to BAI's reasonable requests for information about their practices relating to this Code. Where a firm falls short, BAI will first work with it on a correction. Failures not corrected within a reasonable time after written notice, and serious or repeated failures may result in removal from a project or from BAI's bidders list, without limiting any other rights or remedies BAI has under applicable agreement.

Review

This Code is reviewed at least annually, together with BAI's Sustainable Procurement Policy. BAI will give written notice of any update; updates apply to existing agreements as provided in those agreements.