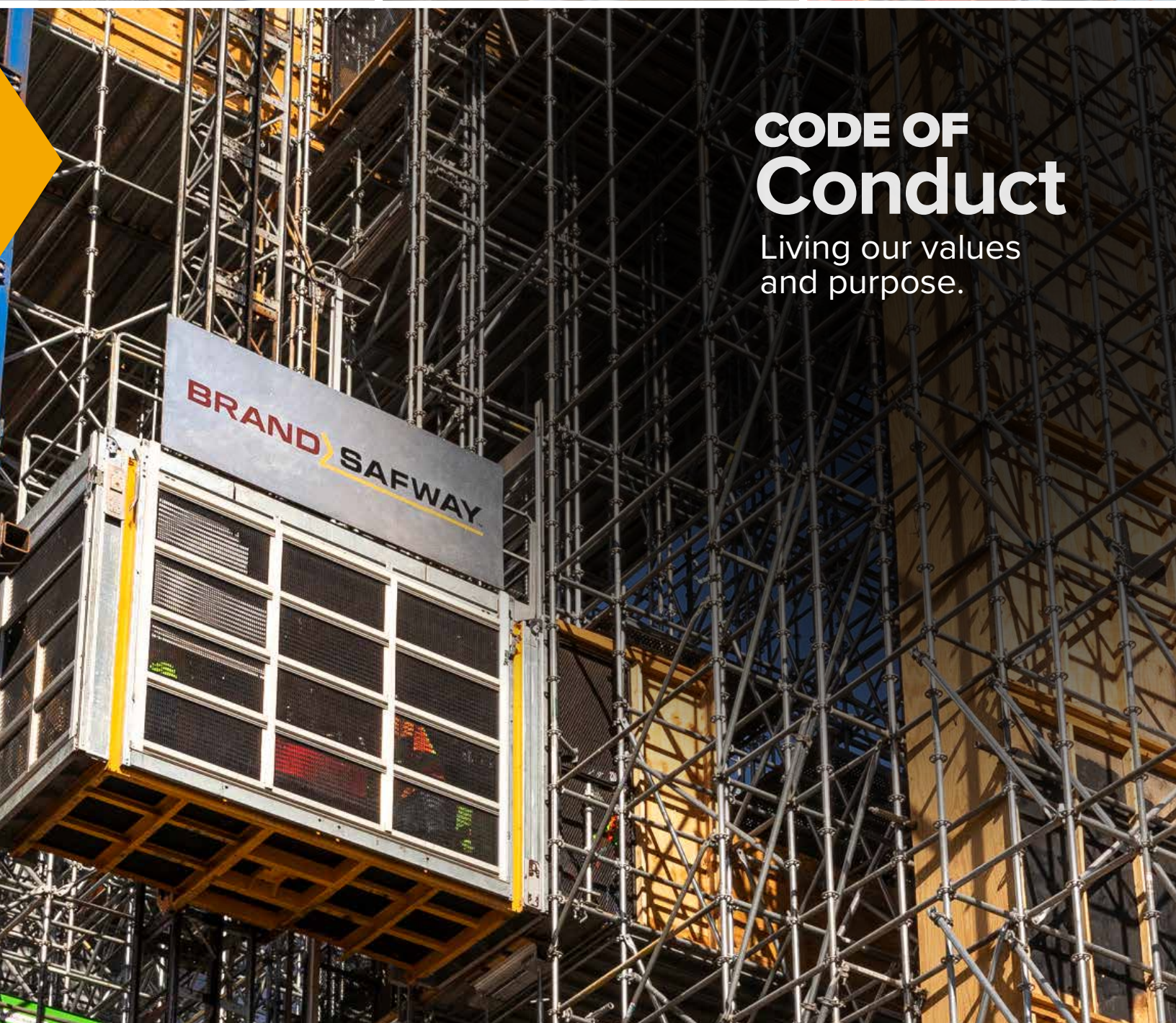




CODE OF Conduct

Living our values
and purpose.



BRAND SAFWAY®

At Work For You®

A Message from the CEO



BRAND > SAFWAY®

At Work For You®



BrandSafway Team Members:

At BrandSafway, our commitment to excellence is not only measured by our business success but also how we achieve it. Our Values – Safety, Integrity, Performance, Innovation and Collaboration – guide our decision-making and support our culture.

The **Code of Conduct** reflects the high standards of integrity, respect, fairness and responsibility that guide our actions every day. It is more than a document or a set of rules — it's a reflection of our shared Values and commitment to doing the right thing. It serves as a guide to ensure we protect our culture, make ethical decisions and remain a company we can all continue to be proud of.

The Code of Conduct applies to all BrandSafway employees and third parties who may represent us. From those who have been with BrandSafway for years to the newest members of the team, each of you can play your part in upholding the high standards that help define our company. Whether it's fostering an inclusive and fair work environment, complying with laws and regulations or simply doing the right thing when no one is watching, our collective actions contribute to our company culture and reputation.

Everyone is expected to read the Code of Conduct and is strongly encouraged to think about how you will apply it in your day-to-day work and interactions with others. We each have a responsibility to uphold these principles and contribute to the culture that makes BrandSafway such a great place to work.

We are committed to a culture where open and honest communication is the expectation, not the exception. If you have concerns or see any violations, it's important you feel comfortable raising them to your supervisor, manager or Human Resources representative. In addition, **EthicsPoint** provides a secure method for reporting integrity issues or concerns.

Together, we will continue to build a company that not only achieves success but does so with integrity and respect. Thank you for being the best part of this company and for embracing the principles outlined in this Code of Conduct and our supporting policies.



Gabe McCabe
President & Chief Executive Officer



Table of Contents

Introduction and Purpose	7
What Is Expected of You	9
What Is Expected of BrandSafway Leaders	11
What Happens When an Integrity Concern Is Raised	12
How Business Must Be Conducted	14
<hr/>	
Compliance with Laws, Rules and Regulations	17
How Information Is Reported	19
Company Property	21
<hr/>	
BrandSafway's Community	23
Environment, Health and Safety	25
Disclosures to the Public	29
Waivers and Conclusion	30





Introduction and Purpose



Integrity

Brand Industrial Services, Inc., including all its subsidiaries and affiliated companies (collectively, “BrandSafway” or the “Company”), is committed to honesty, fair dealing, mutual respect and the highest ethical standards in everything we do. We ask you to join us in embracing our Core Value of Integrity and supporting our culture of compliance.

Our reputation is built every day through our actions and by the conduct of everyone working on behalf of BrandSafway. Therefore, our interactions with customers, suppliers, the public and fellow employees must always be above reproach. For this reason, it is important that the principles outlined herein become second nature to you, along with every person who acts on behalf of BrandSafway.

Regardless of business demands and the pressures of achieving commercial success, we do not ever expect you, any BrandSafway employees or anyone else conducting business on behalf of our Company to compromise personal integrity to advance the interests of BrandSafway. Any such compromise would only undermine our best interests.

We would also like you to understand that the BrandSafway Code of Conduct (“Code”) does not and cannot address every situation in which questions of ethical business conduct may arise. Rather, the principles outlined herein are intended to be applied to a wide range of circumstances. If a situation arises that is not addressed in this Code of Conduct or if you want to know more about any policies that would be applicable in your location, please contact your manager, Human Resources representative or the Chief Compliance Officer for guidance.

Please note, for United States employees, nothing in this Code or related communications creates or implies an employment contract or period of employment.

WHO SHOULD FOLLOW THE BRANDSAFWAY CODE OF CONDUCT?

The BrandSafway Code of Conduct outlines important principles that all individuals and entities working for or on behalf of BrandSafway must follow regardless of location or position. Adherence to this Code is the responsibility of every one of our employees. Third parties representing BrandSafway, such as consultants, agents, sales representatives, distributors, suppliers and independent contractors, are also required to conduct themselves in accordance with this Code, our [Global Supplier Code of Conduct](#), and our culture of compliance.

BrandSafway’s Chief Compliance Officer is responsible for administering the implementation and execution of this Code, including:

- ▶ Overseeing consistent administration of and compliance with the Code, applied as necessary and in accordance with local laws;
- ▶ Conducting or overseeing investigations into reported violations of the Code;
- ▶ Coordinating appropriate responses to misconduct and taking action to prevent a recurrence of any misconduct;
- ▶ Ensuring and enforcing any appropriate disciplinary measures, up to and including, but not limited to, suspension and termination of employment, in response to any misconduct or violations of the Code;

- ▶ Coordinating any necessary and approved training programs on topics covered by the Code; and
- ▶ Answering questions and providing guidance to employees regarding the BrandSafway Code of Conduct or to such third parties to whom this Code applies.

WHERE THE BRANDSAFWAY CODE OF CONDUCT AND POLICIES APPLY

To the extent permitted by law, the BrandSafway Code of Conduct and applicable Company policies apply anywhere BrandSafway conducts business. Because BrandSafway does business all over the world, our operations are subject to the laws and regulations of many different countries, governments and agencies.

In addition to this Code, everyone is responsible for knowing and following the local laws and regulations where they work or do business. In addition to local laws, you should also be aware that your local business and actions may be subject to foreign laws. For example, BrandSafway's worldwide operations are subject to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.



What Is Expected of You

If you have any questions about the prevailing laws that apply to your activities, you should contact BrandSafway's Chief Compliance Officer or a member of the BrandSafway Legal Department.

Our culture of compliance and ethical behavior depends on each BrandSafway employee understanding and applying this Code of Conduct. It is extremely important that you understand the importance of your role in maintaining our reputation for integrity and a compliant workplace.

We expect each BrandSafway employee to:

I. Understand and Apply Our Code and Policies:

- ▶ Read, understand and comply with the BrandSafway Code of Conduct. Not every situation can be addressed specifically in the Code, but we expect our employees to apply the principles of the Code, as well;
- ▶ Read, understand and comply with the Company's policies and procedures, including those specific to your job, business unit and location;
- ▶ Attend all Company required training programs; and
- ▶ Consult your manager, Human Resources representative or a member of the BrandSafway Legal Department should you require clarification on any aspect of the Code.

II. Act with Integrity:

- ▶ Account for your activities honestly and accurately;
- ▶ Never request another person to violate this Code, a Company policy or any law or regulation; and
- ▶ Do not compromise your personal integrity even if instructed to do so by another person. Acting at the direction of another person is not a justification for violating this Code.

At all times, we must always comply with the letter and spirit of the Code. Always ask yourself the following *before* acting:

1. Do my actions meet the letter and spirit of this Code, Company policies and applicable laws and regulations;
2. Are my actions consistent with BrandSafway's Purpose and Core Values;
3. Are my actions in BrandSafway's best interest;
4. What would my family, friends and coworkers think of my actions; and
5. How would my actions look if posted on the front page of the local or national newspaper?



SpeakUp

III. Speak Up:

- ▶ Speak up and promptly raise integrity concerns and report suspected violations of this Code and other applicable laws, regulations and our Company policies. When in doubt, speak up!
- ▶ You can speak up without fear of retaliation because BrandSafway absolutely prohibits retaliation against anyone raising or helping to address an integrity concern in good faith.

- ▶ There are several methods you can use to raise your integrity concerns, which are supported by our Global Open Door Policy and our Whistleblower Protection Policy. This includes raising concerns to your manager, Human Resources representative or a member of the Legal Department.
- ▶ You may also raise concerns online or by phone using our third-party [EthicsPoint Hotline](#).
- ▶ Where available and allowed by law, you may make an entirely anonymous report through the [EthicsPoint Hotline](#), but this may make it more difficult for us to investigate the report. We will not be able to advise you of the status of the investigation if your report is anonymous and you do not provide contact details. Rules regarding the anonymous reporting of integrity concerns vary in many countries. For example, many countries (primarily in the European Union) prohibit anonymous reporting or limit anonymous reporting to violations of internal controls for finance, accounting, banking and anti-corruption.
- ▶ For all reports, your personal details will not be disclosed to staff, other than those authorized to investigate the report.
- ▶ Please be aware that knowingly making a false accusation or providing false information may be grounds for disciplinary action up to and including, but not limited to, suspension and termination of your employment and/or initiation of criminal and/or civil proceedings as per applicable law.



What Is Expected of BrandSafway Leaders



Performance

Creating a culture of compliance and embracing the spirit of integrity are key responsibilities of each BrandSafway leader. We need to be able to rely on everyone who is in a leadership role at BrandSafway to model and help us uphold high ethical standards. Whether you are an officer or director or a supervisor or manager of a small team, we expect each BrandSafway leader to:

I. Lead by Example

- ▶ Show through your actions and behavior what it means to act with integrity and to act in accordance with the principles of this Code, our policies and the law;
- ▶ Ensure compliance and integrity are components of leading and evaluating your teams; and
- ▶ Ensure that the pursuit of business results does not compromise the spirit of integrity or compliance with this Code, our policies or applicable laws and regulations.

II. Promote Compliance

- ▶ Establish an environment in which violations of this Code are taken seriously and employees are encouraged to raise their concerns without fear of retaliation;
- ▶ Maintain an active dialog with employees regarding integrity concerns; and
- ▶ Communicate with employees about our expectations regarding compliance with this Code and our policies, as well as any changes to them as they are implemented.

III. Respond to Employee Concerns

- ▶ Treat employee concerns with respect. Take them seriously and address them promptly, either directly or with the support of HR or Legal;
- ▶ Encourage employees to promptly report violations of this Code, our policies or the law. Leaders who have been advised of a violation are responsible for ensuring that it is properly reported if the employee does not do so; and
- ▶ Take approved action, such as disciplinary or remedial measures and compliance trainings, after an investigation has been completed.

IV. Be Accountable

- ▶ BrandSafway leaders play a vital role in upholding BrandSafway's policies and promoting ethical behavior. In some countries, BrandSafway leaders may be held personally responsible to a third party for violations of this Code, our policies or the law by employees under their direction.

What Happens When an Integrity Concern Is Raised

I. Investigations

We are committed to promptly investigating all reported integrity concerns, including suspected violations of this Code. Fair and successful investigations require the cooperation of everyone involved.

- ▶ **Role of the Chief Compliance Officer** — The Chief Compliance Officer is responsible for investigating integrity concerns and may delegate aspects of investigations to others. Information concerning investigations will be held in confidence to the extent legally permitted and reasonably practical. When required by law, or in order to address an issue or defend the Company, on the advice of the BrandSafway Legal Team or as otherwise appropriate, the Chief Compliance Officer may report the matter under investigation and provide relevant information to external authorities or to others inside BrandSafway who require such information. The Chief Compliance Officer is also required to report the status of investigations and applicable trends to the Audit Committee of the Board of Directors on a regular basis.
- ▶ **Role of our employees** — The cooperation of employees is essential to the effective implementation of this Code. All employees are expected to cooperate in the investigation of any integrity concern and to maintain the confidentiality of the investigation as instructed by investigators and in accordance with the law. The request to maintain confidentiality is to (1) ensure the integrity of the investigation; (2) protect witnesses and prevent retaliation; and (3) preserve evidence. It does not prevent you from engaging in discussions or conduct protected by the law, such as, in the United States, the National Labor Relations Act.

II. Prohibition on Retaliation

BrandSafway does not tolerate retaliation of any kind against anyone who reports a concern or supports the investigation of a concern in good faith. Discouraging others from reporting an ethics concern is also prohibited. If you feel that you have been retaliated against for reporting a concern, speak up and advise your manager, Human Resources representative, a member of the Legal Department or report using our 24/7 Ethics Hotline at brandsafway.ethicspoint.com. Reporting an issue in good faith will not get you in trouble, even if you make an honest mistake. However, knowingly reporting false information is contrary to our Core Values and may be subject to disciplinary action.

III. Penalties for Violations of this Code

We take this Code very seriously. Violations of the Code may be grounds for disciplinary action, subject to local law, up to and including, but not limited to, suspension and termination of employment and/or initiating appropriate criminal and/or civil proceedings under applicable law. Where and when appropriate, violations of the Code may be referred to the relevant authorities for investigation, prosecution or restitution.



Integrity

How Business Must Be Conducted

The way we conduct business is an important reflection of who we are as a Company. We must always deal with BrandSafway's key stakeholders, including our customers, suppliers, competitors and employees, with honesty, fairness and integrity. Manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing or practice may not be used to take advantage of others while acting as a representative of BrandSafway.

I. Social Responsibility

BrandSafway believes in its role as a good corporate citizen and expresses its support for fundamental human rights and its commitment to avoid business practices that abuse human rights, including illegal discrimination and human trafficking. This means carefully managing issues such as workforce welfare, environment, safety and health and the potential impacts of our activities on local communities.

BrandSafway encourages, but does not require, employees to be active in their local community in ways such as charitable activity or political involvement to the extent that the employee's work is not impaired. No employee, however, should be pressured or required to be active in the local community or to contribute time or money to charitable or political activities. Charitable donations and political contributions of BrandSafway funds or assets may be made only in accordance with our Company policies.

II. Dealings with Contractors and Suppliers

BrandSafway expects that its contractors, suppliers, agents and representatives will comply with this Code, our [Global Supplier Code of Conduct](#), the applicable laws and other relevant BrandSafway policies. All third parties with whom BrandSafway conducts business or intends to conduct business, including all contractors, suppliers and customers, are required to undergo risk-based due diligence prior to entering into any binding agreements.

All BrandSafway employees must deal fairly with suppliers, customers and other current or potential business partners. We are accountable for providing only honest and accurate information regarding our products and services, avoiding any misleading statements intended to gain a competitive advantage and refraining from making any disparaging or untrue statements about competitors.

III. Improper Payments, Corruption and Bribery

Any improper payments such as bribes, kickbacks, facilitation payments, unjust gratuities or gifts to gain advantage in any situation is never acceptable. BrandSafway expressly prohibits improper payments in all business dealings, in every country around the world, in both government and private sectors. Improper payments include "facilitation payments" made to facilitate transactions, often with government agencies, regardless of whether such facilitation payments are legal or customary in the local jurisdiction.

Improper payments should not be confused with reasonable and limited gifts, business entertainment and customer travel and living expenses directly related to the promotion of BrandSafway business, unless the beneficiary has a policy which restricts such practices. Certain gifts and entertainment are acceptable if they comply with this Code, Company policies and any regional policies. Remember, offering or arranging any items of personal inducement to secure business is strictly prohibited.

Tips or gratuities for services may be given in accordance with legal and local practice; however, you must be sensitive to the context in which such gratuities are paid so that they cannot be misconstrued as bribes. Fees or commissions must not be paid if the amount or method of payment suggests that a bribe will be paid. All payments must be clearly and accurately recorded on BrandSafway's books. If any payment is requested under circumstances that you believe are ambiguous, you should seek guidance from your manager, a member of the Human Resources or Legal Department or the Chief Compliance Officer.

BrandSafway will never require or ask for any fee or favor from you in exchange for being considered, hired, promoted, transferred or having ongoing employment. It is a violation of this Code for anyone to request or make such a fee or favor in exchange for employment consideration and any such request or payment should be reported as a Code violation.

IV. Conflicts of Interest

BrandSafway employees must disclose any activity that is or produces the appearance of a conflict of interest to their Human Resources business partner or a member of the Legal Department.

A "conflict of interest" occurs when an individual's private interests interfere with or are inconsistent in any way with the interests of BrandSafway. When an employee, officer or director takes actions or has interests inconsistent with the objective and effective performance of his or her work, a conflict of interest may arise. Possible conflicts of interest may include, but are not limited to:

- ▶ Representing BrandSafway in dealings in which you have a personal or financial interest;
- ▶ Directing business to suppliers in which you or close family members have a personal or financial interest other than a less than 1% investment in a publicly held corporation;
- ▶ Working on behalf of, or seeking personal benefits or gifts from, customers, contractors or suppliers that could influence your business judgment;
- ▶ Using your position, influence or Company resources for inappropriate personal benefit or to promote outside activities or interests that are inconsistent with the interests of the Company;
- ▶ Competing with BrandSafway or working on behalf of a competitor of BrandSafway;
- ▶ Certain secondary or supplementary employment;
- ▶ Engaging in insider trading; or
- ▶ Engaging in other circumstances in which your personal interests might diverge from the best interests of BrandSafway.

Conflicts of interest must be avoided without specific approval. When in doubt about whether a transaction is appropriate or if a conflict is a possibility, consult with your manager or the Chief Compliance Officer.

Employees who are engaged in actions or relationships that could result in a potential conflict of interest must disclose the potential conflict as soon as it arises for review and approval by management in order to protect the best interests of BrandSafway. Employees must disclose any actual or perceived conflict using the Conflict of Interest Disclosure Form located on the Compliance SharePoint site.

V. Outside Employment

Supplemental or secondary employment for full-time employees is discouraged. Where not prohibited by law or by employment terms, supplemental or secondary employment may be permitted if that employment does not interfere with your duties to BrandSafway or otherwise conflict with the interests of BrandSafway.

Full-time BrandSafway employees are not permitted to work for competitors, suppliers or customers of BrandSafway while employed with BrandSafway.

VI. Outside Interests

BrandSafway employees responsible for transactions with third parties are prohibited from having any economic interest in companies or businesses with which BrandSafway deals or competes, unless they obtain prior written approval from the Chief Compliance Officer, which will not be unreasonably or arbitrarily withheld. Stock interests in publicly traded companies are not considered a violation unless they are of such value that they could influence an employee's judgment on BrandSafway matters.

VII. Outside Directorships

Our employees are forbidden from serving as directors or trustees or advisors or consultants of any other for-profit entity (excluding not-for-profit or charitable entities) unless they obtain prior written approval from the Chief Compliance Officer, which will not be unreasonably or arbitrarily withheld.

VIII. Corporate Opportunities

Employees owe a duty to BrandSafway to advance its legitimate interests when the opportunity to do so arises and are prohibited from:

- ▶ Taking opportunities for themselves that are discovered through the use of corporate property, information or position;
- ▶ Using corporate property, information or position for personal gain; and
- ▶ Competing with BrandSafway.

IX. Gifts and Entertainment

Business gifts and entertainment can interfere with the conduct of sound and objective business relationships and must be approached with caution. Where not otherwise prohibited by law or regulation, no employee shall give or accept any excessive gifts, unusual hospitality, lavish

entertainment or other favors from third persons that are illegal, unsavory, in cash or cash equivalent form without appropriate approval, on a quid pro quo basis, are offered in exchange for personal gain or an unfair business advantage, violate our commitment to treat others with respect and dignity, or which may otherwise influence or give the impression of influencing the recipient's business judgment. Business decisions should never be based on gifts and entertainment received or provided through our business relationships with third parties. Employees must avoid even the appearance of making business decisions based on gifts and entertainment.

Gifts and entertainment for government officials may be prohibited or restricted by law or regulation. Please consult with the Chief Compliance Officer before giving a gift to or entertaining a government official and obtain all necessary approvals in advance, including from the Chief Compliance Officer.

Gifts and entertainment may be given to others at BrandSafway's expense only if they meet the following criteria:

- ▶ They are given for a legitimate business interest or purpose, such as building goodwill between our Company and business partners;
- ▶ They are given or received openly and transparently, without any intentions to conceal;
- ▶ They are not intended to influence a business decision;
- ▶ They are not lavish or excessive and are appropriate under the circumstances;
- ▶ They are not given to a government official without prior approval by the Risk & Compliance Committee, acting in an advisory capacity to the Chief Compliance Officer;
- ▶ They are consistent with applicable laws, regulations or restrictions with regard to government officials;
- ▶ They are not knowingly in conflict with any policies for the giver and/or receiver; and
- ▶ They are not solicited by the receiver.

X. Loans

Loans of money from BrandSafway to any employee of the Company require preapproval from the Board of Directors or its designee.

Compliance with Laws, Rules and Regulations

BrandSafway is committed to free, fair and ethical business practices and compliance with all applicable laws. Failure to observe applicable laws could cause operational delays, damage our reputation and subject BrandSafway to criminal and civil fines and/or loss of export privileges. It is also important to note that you, along with all other BrandSafway employees, could be fined or face criminal consequences for violations of applicable laws. For all these reasons, it is critical that you are mindful of applicable laws, rules and regulations, and that you remain in compliance.

I. Competition and Antitrust Laws

Competition and antitrust laws protect free enterprise and prohibit behavior that limits trade or that restricts fair competition. These laws apply to every level of our business. They combat practices such as misuse of market power, price-fixing, market-sharing or bid-rigging. BrandSafway employees are strictly prohibited from discussing or entering any arrangements or understandings with our competitors in relation to things such as the pricing of our services or products, allocating markets, territories or customers, boycotting certain customers or suppliers, limiting or otherwise controlling production, or otherwise restraining trade or engaging in predatory or anti-competitive economic practices prohibited by law. Significant penalties may apply to companies and company employees involved in this type of behavior, including substantial monetary penalties and imprisonment.

II. Trade Control, Sanctions and Anti-Boycott Laws

Many countries where BrandSafway operates have laws regulating imports and exports and/or laws dealing with economic sanctions or economic boycotts. To comply with export control and import laws, it is important to understand what you are shipping/receiving, to or from whom you are shipping/receiving and where a shipment will go. BrandSafway is prohibited from conducting business or financial transactions with any person or entity identified on an applicable Prohibited Parties List or Sanctions Lists. For this reason, prior to doing business with or making a commitment to do business with any third party, employees must conduct risk-based due diligence. Anti-boycott laws prohibit companies and individuals from participating in any sanctions or boycotts opposed by that country. Boycott requests can come in any number of forms but are often seen in invitations for bids, draft contracts, purchase orders, letters of credit and shipping documents or instructions. While some boycott requests are obvious, other boycott language is not.

III. Dealing with Governments and Government Representatives

BrandSafway may conduct business with national governments or government-owned enterprises. In every interaction, BrandSafway employees must apply the highest ethical standards and comply with applicable laws and regulations that address dealing with representatives of government including the UK Bribery Act and the U.S. Foreign Corrupt Practices Act (“FCPA”), which prohibit giving anything of value directly or indirectly to officials of foreign governments or foreign political candidates in order to obtain or retain business.

BrandSafway employees doing business outside of the United States must be familiar with the requirements of, at a minimum, the UK Bribery Act and the FCPA. In dealing with legislators, regulatory agencies, government field agents or other public officials, political parties, party officials or political

.....

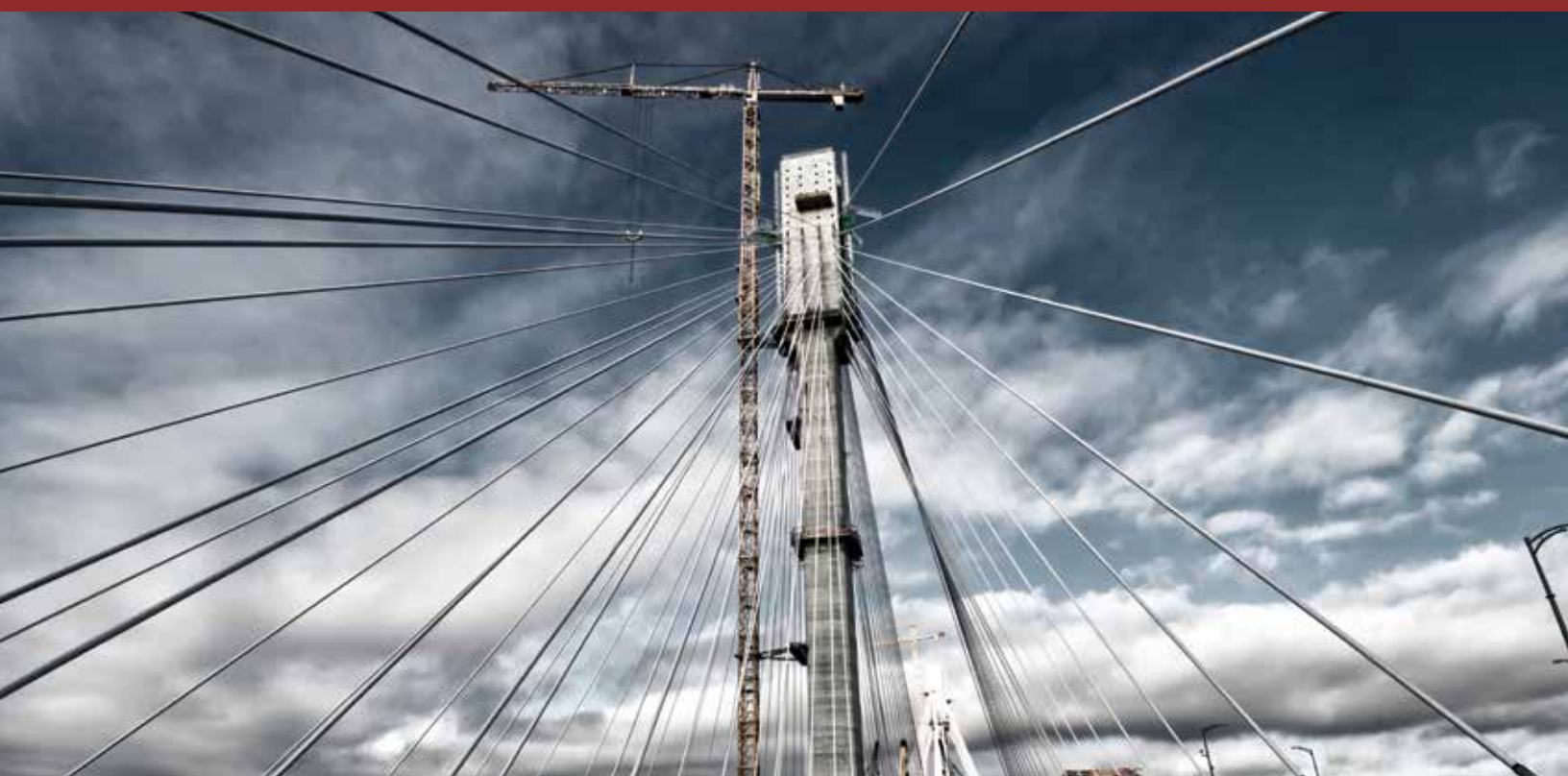
candidates of any country, BrandSafway employees must not engage in any conduct intended to obtain, retain or direct business, improperly influence any such persons or their associates into taking improper actions or to avoid taking required ones or otherwise in the conduct of their duties. As a general proposition, payments, gifts or other things of value are not to be given to any legislative, judicial or other governmental official for any reason whatsoever. This holds true everywhere we operate, even though payment by BrandSafway employees to foreign governmental or quasi-governmental representation to facilitate or expedite the performance of routine governmental actions not involving diversion to award business to or continue doing business might be customary and permitted by local law. BrandSafway expects that its third-party agents, distributors and representatives will comply with this Code, our [Global Supplier Code of Conduct](#) and our policies when representing BrandSafway.

IV. Inside Information, Insider Trading and Tipping

“Insider trading” laws prohibit the purchase or sale of securities by persons who are aware of material non-public information about a company as well as the disclosure of material non-public information about a company to others who then trade in the company’s securities. These transactions are commonly known as “insider trading” or “tipping.” Engaging in insider trading or tipping can expose

BrandSafway and the individuals involved in such activities to severe civil and criminal liability including damages, penalties and imprisonment.

No employee of the Company who is aware of material non-public information relating to the Company may, either directly or through family members or other persons or entities, buy or sell the Company’s securities (other than pursuant to a pre-approved trading plan that complies with Rule 10b5-1 under the Securities Exchange Act of 1934, as amended), or engage in any other action to obtain a personal benefit through the use of material non-public information, or pass that information on to others outside the Company, including family and friends. In addition, no employee who, in the course of working for BrandSafway, learns of material non-public information about a company with which BrandSafway does business, such as a customer or supplier of BrandSafway, may trade in that company’s securities until the information becomes public or is no longer material. Information is “non-public” until it has been made available to investors, both existing and prospective, e.g., disclosed in a press release or published on a platform available to existing and prospective investors. “Material information” includes, but is not limited to, information related to significant new markets, sales and earnings figures, major contracts, changes in management, regulatory and legal developments, and plans for acquisitions and mergers.



How Information Is Reported

I. Documents and Records

Our business records, reports and tax returns must be prepared accurately, truthfully and completely, which means we need you to report and record all business-related information honestly and completely.

BrandSafway employees must ensure that:

- ▶ All billings, payments or any other accounting or internal transactions are in conformance with customer contracts and approval mechanisms.
- ▶ No undisclosed or unrecorded fund or asset is established for any purpose.
- ▶ No withdrawals are made from any disbursement account except by check or other acceptable means of transfer customarily used by major banks and then only by authorized employees. No check shall be made payable to “cash” or another unidentifiable payee.
- ▶ No false or artificial entries are made in the books and records of BrandSafway or any subsidiary for any reason, and no employee shall engage in any arrangement that results in such entry.
- ▶ No payment is approved or made with the intention or understanding that any part of such payment is to be used for a purpose other than that disclosed by the documents supporting the payment.
- ▶ Documents and records are retained in accordance with applicable record retention policies.

II. Accounting Procedures and Controls

Employees responsible for recording financial transactions are expected to uphold the highest standards of integrity, accuracy and compliance. They must ensure that all entries are complete, accurate and timely, adhering to BrandSafway’s Accounting Policies, which are aligned with either U.S. generally accepted accounting principles (“U.S. GAAP”) or local accounting principles, and applicable laws and regulations. Employees should maintain confidentiality of data, avoid conflicts of interest and report any discrepancies or unethical behavior promptly. Transparency, honesty and accountability are paramount in fostering trust and safeguarding the organization’s financial integrity.

All BrandSafway employees are prohibited from coercing, misleading or fraudulently influencing any independent accountant involved in auditing or reviewing BrandSafway’s financial statements.

III. Supporting Documentation

Supporting documentation for transactions such as invoices, check requests and travel expense reports must accurately and fully describe the actual transactions. BrandSafway funds may not be paid with the intent or understanding that any part of such payment is to be used for a purpose other than that described by the document supporting such payment. Supporting documentation should be accurate and retained as provided by law or BrandSafway’s policies.

BrandSafway employees are strictly prohibited from altering, destroying or falsifying documents or records with the intent to impede, influence or obstruct the investigation or proper administration of any matter within the jurisdiction of any governmental agency.

IV. Misrepresentations, Falsifying Records, Anti-Money Laundering and Fraud

It is important that any fraud be detected, reported and most of all, prevented. No one should rationalize or even consider misrepresenting facts or falsifying records. Violations of this Code and other Company policies may be grounds for disciplinary action up to and including, but not limited to, suspension and termination of employment and/or initiating appropriate criminal or civil proceedings under applicable law.

It is also the Company's policy to comply with applicable anti-money laundering ("AML") laws, regulations and enforcement guidance in all jurisdictions in which the Company conducts business. The Company prohibits any involvement, direct or indirect, in money laundering or terrorist financing.

V. Delegation of Authority Policy

All employees must adhere to the limits of authority defined in the Delegation of Authority ("DOA") Policy.



Company Property

Taking care of Company property is essential to running a safe, cost-effective business, and safeguarding our assets is the responsibility of all BrandSafway employees. BrandSafway employees must use and maintain Company assets and property with care and respect while guarding against waste and abuse.

BrandSafway property includes not only physical property, equipment and inventory, but other tangible assets such as securities and cash, office equipment, supplies and information systems. It also includes intellectual property, such as customer lists, pricing information, software, patents, trademarks, copyrights and other proprietary information and know-how.

I. Products and Services

Our products and services are the property of BrandSafway. Contributions made by employees during their employment to the development, improvement and implementation of BrandSafway products, services or other property are BrandSafway property and remain so following termination of that employee.

II. Funds

Employees are personally accountable for any BrandSafway funds that have been entrusted to them. BrandSafway funds include, but are not limited to, currency, checks, credit or charge cards, money orders, postage, bills, reimbursement claims, payables, receivables, estimates, paychecks, expense reimbursements and invoices. Employees must exercise care in the protection, use and recording of BrandSafway funds by:

- ▶ Abiding by BrandSafway policies for the security of Company funds;
- ▶ Ensuring that BrandSafway receives good value in exchange for Company funds or personal funds that will be reimbursed by the Company;
- ▶ Only seeking reimbursement for expenses that are reasonable, actual and authorized; and
- ▶ Ensuring records that we approve reflect appropriate use of BrandSafway funds and are accurate, honest and prepared timely.

III. Computers, Servers and Software

BrandSafway's computers, servers, electronic media systems and all information entered into BrandSafway's computer systems are BrandSafway's property, subject to applicable law. BrandSafway's e-mail system, electronic communication systems and Internet access are provided and intended to be used in an effective, ethical, non-offensive and lawful manner for the conduct of Company business. BrandSafway may allow occasional personal use of the e-mail and internet services, provided such use is effective, ethical, non-offensive and lawful and does not interfere with the conduct of Company business or the fulfillment of employees' work-related obligations.

Employees are expected to follow applicable BrandSafway policies or policies specific to your region or business and to use good judgment and restraint in their personal use of these resources. Failure to do so is a violation of this Code and may result in the discontinuance of access to some or all resources for personal use. Any attempt to disable, defeat or circumvent BrandSafway's computer security protections is prohibited.

.....

A growing number of countries are more stringently regulating the collection, processing and use of “personal data” (name, home and office contact information, etc.). BrandSafway employees must comply with applicable laws and regulations of jurisdictions from which the personal data is collected and in which it is processed or used in addition to any BrandSafway policies and any applicable contractual obligations.

The use of social networking can be a valuable tool. However, if not done properly, social networking may expose you and BrandSafway to additional risk. It is important to abide by all Company policies on the proper use of social media. If you see anything posted on social networking that violates these terms, please notify your manager or the Chief Compliance Officer.

IV. Confidential Information

All employees have a duty to safeguard BrandSafway’s confidential information and protect it from unauthorized disclosure. If the Company is bound by stricter obligations under any contract, employees must comply with such stricter obligations. This duty continues after termination of employment for any reason.

Confidential information as defined in BrandSafway’s policies, includes all non-public information pertaining to BrandSafway, including unannounced product, business or financial information, acquisition and divestiture plans, competitive position, business strategies, customer information, product costs and includes proprietary information, such as trade secrets, as well as all other non-public information that might be of use to competitors or harmful to BrandSafway, our customers or suppliers if disclosed. Unauthorized disclosure could eliminate its value to us and give an unfair advantage to others.

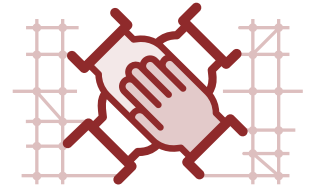
Confidential BrandSafway information may not be disclosed without proper authorization in accordance with the Company’s policies. Keep confidential documents protected and secure. In the course of normal business activities, suppliers, customers and competitors may sometimes divulge to you information that is proprietary to their business. These confidences must be respected.

Generally, it is not improper or illegal to accumulate public information about a competitor or make use of it in conducting our business. Competitive intelligence must be gathered ethically and in accordance with the laws and regulations that protect competitors’ proprietary information. For example, it is appropriate to collect such intelligence from public sources, including websites, advertisements, brochures or public presentations, but it is inappropriate for employees to use confidential information of a former employer, whether that former employer is a competitor or not. BrandSafway respects our competitors’ confidential information and expects our employees to guard against receiving such confidential information. If you are uncertain whether a particular source of competitive information is appropriate, please contact the Chief Compliance Officer or a member of the Legal Department.

V. Preventing Theft

Limit losses due to theft or misappropriation of BrandSafway property by taking normal precautions and by handling Company assets in a prudent manner. Lock up equipment, supplies and materials, report suspicious persons or activities and avoid discussions of confidential BrandSafway information in the presence of unauthorized persons.

BrandSafway's Community



Collaboration

BrandSafway is committed to developing and maintaining a work environment free from discrimination where employees treat each other with respect. By working together, we can help create a non-discriminatory world, built on a deeper understanding, mutual respect and a commitment to human decency and fairness.

I. Fair Employment Guidelines

We make all employment and other business decisions without discriminating on the basis of age, ethnicity, citizenship, disability, gender, race, religion, national origin, marital status, sexual orientation, military service, veteran status or other characteristic protected by law. We prohibit discrimination regarding terms and conditions of employment.

II. Positive Work Atmosphere

We prohibit all forms of harassment. This includes any demeaning, insulting, embarrassing or intimidating behavior directed at any legally protected status.

In addition, BrandSafway employees should not engage in any assaults, hostile physical contact or intimidation, fighting, unlawful bullying, verbal threats of physical harm or violence, or any other actions that are threatening, hostile or abusive in nature while on BrandSafway property or on BrandSafway business. Anyone who commits or condones harassment may be subject to disciplinary action up to and including, but not limited to, suspension and termination of employment.

III. Sexual Harassment

We are committed to the principle that no employee, officer, director or any person affiliated with BrandSafway should be subject to any form of harassment, including sexual harassment. We strive to provide a workplace environment that promotes respect, equal opportunity and is free from illegal discriminatory practices, including sexual harassment.

We prohibit unwelcome sexual advances / sexual harassment, requests for sexual favors and other verbal or physical conduct of a sexual nature, as well as sexually offensive displays in the professional setting or in any other manner or form.

IV. Inappropriate Relationships

Consensual sexual or romantic relationships raise concerns of abuse of power when they involve a member of management and individuals over whom they have authority. Even when negative consequences to the participants do not result, such romantic liaisons can potentially create a conflict of interest or expose the participants to accusations of unfair or preferential behavior from fellow employees. All employees should recognize the possible negative consequences of sexual or romantic liaisons in the workplace. Such relationships should be carefully considered by the participants and any concerns from other parties about the behavior of the participants or the effect their relationship may be having on the workplace should be reported to your Human Resources representative where not otherwise prohibited by law or regulation.

V. Privacy in the Workplace

We respect employees' privacy rights. Personnel records, personally-identifiable information and other private information regarding our employees are retained only for business, legal or contractual purposes, and only as long as they are actually required by law, governmental regulation or are useful. Access to employee records is limited to authorized BrandSafway employees who have a legitimate and pertinent business requirement to access such records. Personal employee information will not be provided to anyone outside of BrandSafway without proper authorization. While seeking to maintain employee privacy, BrandSafway reserves the right, in accordance with applicable law, to monitor use of Company property, including, but not limited to, offices, desks, lockers, bags and vehicles, in accordance with applicable law. In addition, BrandSafway communications and computer systems such as computer networks, data files, e-mail, internet usage and voicemail may be monitored or accessed in accordance with applicable law by the Company to ensure the integrity of the technology, protect against fraud and abuse, detect unauthorized access or use and for other business purposes.

VI. Unions and Labor Representation

BrandSafway is committed to upholding the rights of employees to freely associate, organize and bargain collectively in accordance with applicable labor laws and international standards. We recognize labor unions as legitimate representatives of employees and value constructive dialogue and collaboration. We believe that positive labor-management relations contribute to a productive and respectful workplace. BrandSafway encourages open communication and mutual respect in all dealings with labor unions and their members.



Environment, Health and Safety



Safety

Safety is a Core Value at BrandSafway. Nothing is more important to us than your safety along with the safety of your co-workers and our customers. We are dedicated to establishing and maintaining a safe and healthy workplace and to managing our business to minimize any impact on the environment. BrandSafway is committed to meeting or exceeding all regulatory requirements regarding employee health and safety and the protection of the environment.

Each BrandSafway employee has an important role in helping to promote a culture of safety and, therefore, every BrandSafway employee is expected to:

- ▶ Observe posted warnings and regulations.
- ▶ Immediately report to appropriate management any incident or injury sustained on the job or any environmental or safety concern you may have.
- ▶ Understand and comply with our Environment, Health and Safety (“EHS”) policies and manuals and periodic Safety Bulletins and Alerts that will be issued from time to time.
- ▶ Exercise their Stop Work Obligation any time they identify a task or operation where there are concerns that the control of EHS is at risk or there are potential Life-Saving Rules (“LSR”) violations.

I. Safety Policies and Programs

We embrace an uncompromising commitment to protecting the environment and preserving the safety, health and wellness of our employees, customers, other contractors, the public and the environment.

Our culture of caring and engaging all employees in our EHS programs will inspire safe behavior and the proactive elimination of hazards. Our Company is committed to:

- ▶ Enabling excellent EHS performance from our employees by providing specialized training, proper equipment and industry-leading procedures.
- ▶ Empowering employees to ensure BrandSafway provides safe products and services to our customers, to participate in our EHS successes and to reinforce safe work practices and behaviors.
- ▶ Observing and auditing our workplaces and human performance, including reinforcing positive behaviors and intervening as needed to ensure EHS objectives and ideals are achieved.
- ▶ Monitoring our EHS performance, using leading and lagging indicator data, trend analysis, employee input, health and safety committee feedback and industry best practices.
- ▶ Communicating our EHS performance results, corrective actions and preventive measures to employees, customers and other stakeholders.
- ▶ Improving our EHS Program and processes continuously to maintain industry-leading performance.

II. Alcohol and Drugs in the Workplace

The misuse or abuse of alcohol and other drugs represents a significant concern to our employees and BrandSafway in terms of safety, the losses in productivity in the workplace, accidents, absenteeism, lateness and disputes, as well as human and health costs to individuals, their families and the community.

We are dedicated to providing a safe work environment free of substance abuse. Employees must report to work fit to perform their duties, free from the influence of illegal or unauthorized drugs or alcohol in accordance with the Company's applicable policies. The use, possession, or distribution of illegal or unauthorized drugs or alcohol on Company time, BrandSafway premises or customer locations is prohibited. BrandSafway may be obliged to report illegal activity. Employees must also ensure that any medication which they may be taking does not in any way effect or impede them in the performance of their duties. Employees requiring accommodation must contact their Human Resources representative.

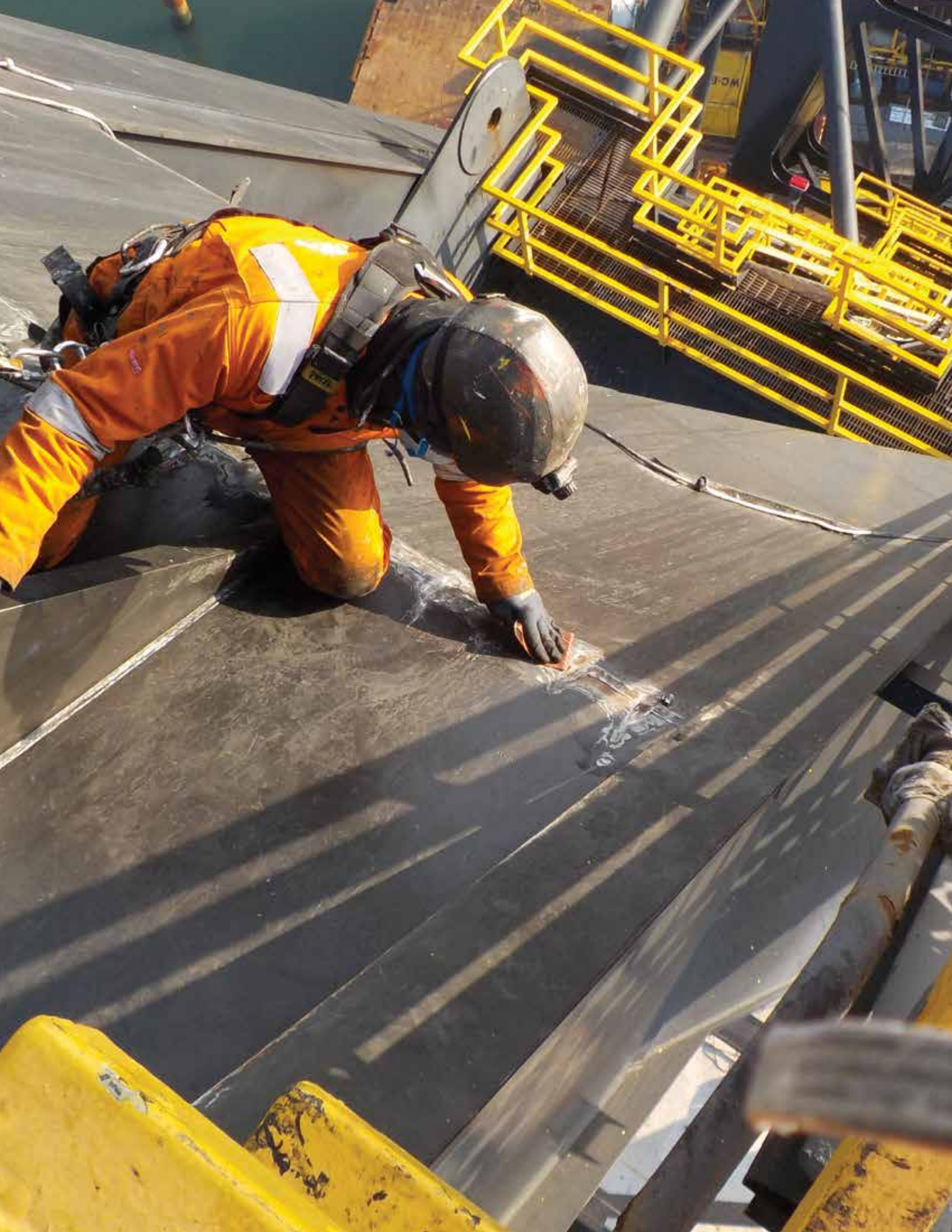
III. Protecting the Environment

At BrandSafway, we believe that a sustainable future is a basic right of all and that environmental stewardship is a critical component of that future. BrandSafway leverages data-driven investments to gain a deeper understanding of its environmental footprint and is committed to exploring initiatives and processes that reduce our environmental impact. A key part of that commitment includes taking all appropriate measures to ensure that BrandSafway's products, services, transportation and waste management activities are consistent with environmental best practices and local laws. This includes assigning qualified personnel to manage BrandSafway's environmental controls programs, cooperating with government and industry groups to develop appropriate standards, managing our operating facilities to reduce or eliminate the release of pollutants, informing employees and community residents about relevant environmental matters, dealing only with reputable waste disposal contractors and complying with all applicable laws and regulations. Therefore, it is our expectation that employees, contractors and those working with us will operate in an environmentally responsible manner and take steps to protect and preserve our shared natural resources by complying with all applicable laws, rules and regulations pertaining to the protection of the environment.

In some jurisdictions, there are substantial penalties which apply to activities which harm the environment. These can apply to BrandSafway and to the employees involved.







Disclosures to the Public

All public disclosures of BrandSafway information, including, but not limited to, information relating to financial performance, material contracts, and other information important to investors, regulators and the general public, must be accurate and in full compliance with applicable laws and regulations. All such disclosures are to be made only through specifically established channels. Unless you are specifically authorized to do so, BrandSafway employees and or third parties to whom this Code applies are prohibited from discussing BrandSafway affairs with any third party, including, by way of example, securities analysts, representatives of the press, or other media and government officials.

I. Press Inquiries and Media Contact

Corporate spokespersons are available to respond to all media inquiries and to guard against the inadvertent disclosure of confidential or sensitive information. Employees should always direct media inquiries to BrandSafway's Vice President of Marketing, Communications and Branding. Employees should never discuss BrandSafway matters with national or local media unless specifically authorized to do so.

II. Government Inquiries and Investigations

It is our policy that all employees cooperate with all lawful requests for information from government and quasi-government investigating authorities or agencies. Employees should always deal honestly and truthfully with such officials and promptly report any such inquiries or investigations to a member of the Legal Department. If you are uncertain of the extent of your obligation to comply with a request for information from a government agency, you should seek guidance from our Chief Compliance Officer or a member of the Legal Department.



Waivers & Conclusion

WAIVERS

Waivers of this Code are not typically granted. Employees may submit written requests for waivers to the Chief Compliance Officer.

CONCLUSION

Evaluating the proper course of conduct in every situation is neither simple nor mechanical. This Code does not aim to address every circumstance where ambiguity may exist or where questions may arise. Every employee is encouraged to actively approach such situations, exercise good judgment, thoroughly inform themselves and promptly report any suspected violations. Only by following the guidelines in this Code can we maintain and continue to grow our hard-won reputation for integrity and ethical conduct.





BRAND > **SAFWAY**®

Global Corporate Headquarters
600 Galleria Parkway SE, Suite 1100
Atlanta, GA 30339

©2025 Brand Industrial Service, Inc. All rights reserved.

BSW-0825

800-558-4772
BrandSafway.com