

# LeCHASE CONSTRUCTION CODE OF ETHICS

August 2012



## From the CEO & Managing Partner

LeChase Construction has long held the belief that to be successful and respected by our customers, employees, peers and vendors, requires an unwavering commitment to integrity and ethical behaviors.

The “LeChase Way” means that we will build our reputation in a way that requires we each make a personal commitment to follow our guiding principle of “Do the Right Thing.” We are accountable to our customers and to each other to promote and maintain a culture where we hold ourselves to ethical standards that are without compromise.

Every day, we promise our customers that we will act in the best interest of their business and make them our priority. Doing this requires that each and every employee understands and is accountable to “Do the Right Thing,” and at LeChase that means holding ourselves to an ethical standard that we are proud of.

A handwritten signature in black ink, appearing to read 'William Goodrich', written in a cursive style.

William Goodrich  
CEO & Managing Partner  
LeChase Construction

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# 1. “Do the Right Thing”

At LeChase, we live with the commitment to “Do the Right Thing.”

- Be honest and fair in all of your professional relationships and corporate activities.
- Do not compromise the integrity of the company or yourself in any way for any reason.
- Do not put your personal interests ahead of your professional integrity.
- Avoid even the appearance of any conflicts of interest or other wrongdoing. Perceptions matter. Even when on personal time, refrain from actions that could injure the company or its reputation.
- Trust your instincts. If something feels wrong, it probably is.
- Treat your customers and co-workers with dignity and respect.
- Never compromise your principles or those of the LeChase organization, even if requested by a customer.

## 2. Guidelines

We are all stewards of the reputation of LeChase Construction and must foster a culture of ethical behavior and integrity to enhance that reputation.

- Our respect for each other and the integrity with which we conduct our business dealings is a fundamental requirement of our company.
- Owners, officers, directors and other employees are all responsible for meeting or exceeding the requirements of the policies governing ethical behavior.
- All affiliate companies of LeChase Construction and their employees are expected to maintain the same culture of high ethical standards in all of their activities.
- We are each personally responsible to communicate the expectations and requirements of these policies and to make sure we always have compliance within our teams and departments and in working with our subcontractors.
- LeChase has zero tolerance for lapses in ethical behavior or integrity. They simply will not be tolerated and disciplinary action will be taken up to and including discharge upon review by management.

- If you are uncertain about the meaning or expectations of the LeChase requirements, speak up! Be open in asking how they apply to your performance.

### 3. Follow the Law

We must follow the applicable laws and legal requirements at all times. These include, to name a few:

- Antitrust laws prohibiting price fixing, bid rigging, and other improper restraints of trade
- Criminal laws prohibiting theft, embezzlement, bribery, and kickbacks
- Laws regulating political contributions.
- Environmental laws and safety regulations (see the company's safety policies for more details)
- Anti-discrimination and sexual harassment laws (see the Employee Handbook for more details)

### 4. Loyalty to our Customers

We have promised our customers that we will use all of our resources and abilities to meet their expectations. Integrity and ethical behavior are at the forefront of this promise.

- Procurement of materials and services must be done on fair and reasonable terms and without any personal gain

for any individual. Scrap materials must be properly handled and accounted for.

- We must promote positive relationships among the project teams so the value of these relationships accrues to the benefit of our customers.
- Issues with the quality of our work must be addressed appropriately and never covered up.
- Do not allow personal interests to conflict with the interests of our customers.

## 5. Loyalty to the Company

Each of us must be responsible for and held accountable to a standard that is without compromise. Working together with identical commitment to integrity, decency and ethical values is paramount to our success in our relationships.

- The very first priority at LeChase is the safety and well-being of our employees and customers. If you see an unsafe behavior you must immediately move to change it. Do not tolerate or be pressured into tolerating any unsafe activities whatsoever.
- Be truthful and forthright no matter how difficult or challenging it may seem. Financial entries and other

company records must be maintained honestly in accordance with accepted accounting rules. Fraud and misrepresentation are not allowed whether you are trying to make a sale or for any other purpose.

- Respect that co-workers are trying to contribute to our success, and be willing to mentor those who may benefit from it.
- Use of company property for personal advantage or gain is not permitted without the written approval from your immediate supervisor or senior officer. Computer equipment and systems must be handled in accordance with the company's policies included in the Employee Handbook.
- We will not in any way compromise – or exploit for personal advantage or financial gain – the LeChase name or reputation within the community.
- If you do not have the authority to make a decision relating to standards of ethics, discuss it with your immediate supervisor. Do not “guess” or take a chance. Ask.

## 6. Confidentiality

Our customers and our fellow employees rely on our ability as a company to be trusted and protect information we have so that their well-being is not compromised.

- Confidential information received from or relating to our customers or other parties as we build our relationships with them must be protected with the strictest of care. As we become aware of one customer's confidential information we must assure it does not become available to other customers who may be in a competing environment. Study the specific terms of any applicable non-disclosure agreement; make sure that all team members are aware and in strict compliance.
- Information about the internal activities, operations, finances, and other confidential aspects of our business must not be shared with people outside of the company for any reason without proper authorization. We work in an extremely competitive environment and cannot have that information available to our competitors.
- Obtaining confidential information about our competitors through illegal or improper means is contrary to the integrity of the company.
- If you are unsure what is and is not considered confidential, ask your immediate supervisor or the Director of Human Resources.

## 7. Intellectual Property

Respect and protect the intellectual property rights of LeChase and other parties.

- Unauthorized duplication of copyrighted computer software violates the law and is contrary to our organization's standards of conduct. We disapprove of such copying and recognize the following principles as a basis for preventing its occurrences:
  - We will neither engage in nor tolerate the making or using of unauthorized software copies under any circumstances.
  - We will provide legally acquired software to meet the legitimate software needs in a timely fashion and in sufficient quantities for all our computers.
  - We will comply with all license or purchase terms regulating the use of any software we acquire or use.
  - We will enforce reasonable internal controls to prevent the making or using of unauthorized software copies, including effective measures to verify compliance with these standards and appropriate disciplinary measures for violation of these standards.
- Similar guidelines will be applied to other intellectual property, including patents, trademarks, trade secrets, and other categories of copyrighted material.

- Work by staff members in the normal course of business is work for hire and the property of the company; any benefits from such work rightfully belong to LeChase.

## 8. Conflicts of Interest

Each of us has a responsibility to perform with the company's best interest being our first priority. Engaging in activities that create conflicts of that interest are detrimental to the well-being of LeChase and affiliated companies.

- A conflict of interest is a situation which creates or appears to create a bias which may either cause you to favor someone other than our company or otherwise affect your performance within LeChase.
- A conflict of interest can occur when an employee of our company develops any type of relationship with a person or company outside of LeChase where there is a commitment of time or activities that prevents an employee from meeting his/her obligations to LeChase.
- We must avoid any form of conflict of interest between our work and our personal affairs. Our employment at LeChase is primary to other arrangements. Company first!
- Conflicts of interest may initially seem harmless but can evolve into an issue that requires it be resolved. Any

activity that creates or appears to create a conflict must be disclosed to a higher authority within the company.

- All activities that adversely affect your ability to perform in the best interest of the company or of our customers should be avoided.
- Employees of LeChase should not accept or offer gifts of money, tickets, entertainment, travel or other favors for the purpose of influencing judgment or decisions of procurement. Accepting or offering such gifts is permissible if in keeping with normal business practices, as outlined below.
- As guidelines for gifts and entertaining, the following examples are normally permitted:
  - Items of nominal value printed with company logos
  - Holiday gift baskets
  - Business-related social events where an employee is representing LeChase's interests
  - Sporting events or concerts, provided a person from the company is in attendance with those being entertained

The following are normally not appropriate:

- Giving or receiving cash gifts
- Gift items having a value in excess of \$100

- Overnight trips to resort destinations
- Be mindful of conflicts that arise from family connections. For example, where a gift to a LeChase employee is prohibited, a gift to that employee's close family member would raise similar ethical concerns.
- Obtain, review, and follow any government or customer ethics policies; when in doubt, adhere to the most strict policy.

## 9. Reporting Ethical Challenges and Using the Ethics Hotline

Every person employed by the company has an obligation to the company and him/herself to report concerns relating to integrity or ethical behavior. Doing so protects our reputation for integrity.

- A confidential *Ethics Hotline* has been established that provides you with the ability to share your concerns anonymously . That number is:

**1-855-4-LECHASE**

The [ethics@lechase.com](mailto:ethics@lechase.com) email address is also available for you to report any concerns, again while remaining anonymous if you choose. You should also feel free to bring any issues forward to your supervisor (who must assure that it is elevated to management as may be

appropriate), to any member of the LeChase Executive Management Team, or to the Vice President for Health & Safety, the General Counsel, or the Director of Human Resources.

- Concerns regarding ethical behavior or integrity will be investigated by the management, maintaining to the maximum extent appropriate the confidence of the persons bringing the matter forward.
- Retaliation will not be tolerated. Anyone retaliating against a person for reporting bona fide integrity or ethics concerns will be subject to disciplinary action up to and including discharge. Everyone should feel free and comfortable to report any possible issues or concerns at any time without fear of dismissal or retaliation.
- Maintaining our culture and “Doing the Right Thing” is rooted in integrity and sound ethics practices. The company’s success and reputation is paramount to holding these principles to the highest possible standard, without exception.

## 10. Passing the Red Face Test

If you are unsure about a certain behavior, request or offer, or if you are in a situation where you question the integrity or ethics of what is being done, ask yourself:

1. If I do this and someone finds out, can I discuss it without being embarrassed or ashamed?
2. Would I want to see a story about this on television with my name being mentioned? Would that embarrass me?
3. Would my family be proud of me if I do this and the community finds out? What would I say to my children if one of them did the same thing?
4. Is it consistent with my personal values of integrity?
5. Can I stand in front of my peers and explain what I did without a feeling of guilt or wrongdoing?
6. Can I stand in front of any and all members of LeChase and explain and be confident in my actions?

The company was founded and has prospered since 1944 on the basis of integrity, honesty and fair dealing. Maintaining impeccable ethical standards has been a founding principle from day one.

As LeChase employees, we are accountable to each other and the company as a whole to follow these practices. It is what we do. We “Do the Right Thing.” We owe it to ourselves, our peers at LeChase and to every one of our professional friendships.

The leadership of LeChase is committed without compromise to these principles. The company will continue to be seen as a leader in our industry and our community as long as we hold ourselves to these standards.

Thank you for helping us meet our commitment to achieve the highest standard of ethics.

**EMPLOYEE DISCLOSURE STATEMENT REGARDING CODE OF ETHICS**

I have read and understand the LeChase Construction Code of Ethics. I understand that as an employee of LeChase or its affiliates, I am required to state that I am in compliance with the Code or that I have disclosures to make in accordance with the Code.

I have no disclosures to make relative to my compliance with the LeChase Construction Code of Ethics, except for the following:

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Signature

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Printed Name

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Date