



CODE OF BUSINESS CONDUCT AND ETHICS FOR OUR BUSINESS PARTNERS

December 31, 2024



INTRODUCTION

IPS-Integrated Project Services, LLC (IPS) shares a long-standing commitment to high ethical standards and compliance with all applicable laws and regulations that govern our business. Accordingly, IPS strives to conduct business with Business Partners who share our commitment to high ethical standards and conduct business in an ethical, legal and responsible manner. This Code of Conduct (this "Code") sets out IPS's expectations of our Business Partners regarding business ethics and codes of conduct when interacting with IPS or acting on behalf of IPS.

Unless the context otherwise requires, for purposes of this Code, the terms "IPS" and the "Company" refer collectively to IPS-Integrated Project Services, LLC and its subsidiaries. The term "Business Partners" refers to all third parties with whom we do business, including any supplier, service provider, vendor, customer, contractor, consultant, representative or agent.

While this Code provides general guidance about the standards of integrity and business conduct, no code can address every situation that you may encounter. The fact that an issue is not specifically addressed herein does not relieve our Business Partners of their obligation to maintain the highest ethical standards under any and all circumstances.

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Section 1 – INTEGRITY AND COMPLIANCE WITH LAWS, RULES AND REGULATIONS

IPS strives to comply with the law wherever we conduct business. We expect each of our Business Partners to work diligently to conduct its business in full compliance with applicable laws, rules and regulations.

Section 2 – WORKPLACE ENVIRONMENT AND CONDUCT

Our Business Partners are expected to uphold the human rights of workers, and treat them with dignity and respect. The labor requirements for third parties include the following

2-1 Involuntary Labor

Our Business Partners will not use forced labor of any type, including bonded, indentured or involuntary prison labor.

2-2 Child Labor and Young Workers

Our Business Partners will not use child labor. The employment of young workers below the age of 18 will only occur in non-hazardous work and when young workers are above a country's legal age for employment or the age established for completing compulsory education.

2-3 Working Hours and Wages

Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

2-4 Fair Treatment

Our Business Partners will provide a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers or any threat of such treatment.



2-5 Discrimination and Harassment

Our Business Partners must not discriminate against any worker on the basis of race, color, national origin, ancestry, citizenship status, creed, religion, religious affiliation, age, sex, pregnancy, maternity caring responsibility, marital status, genetic information, disability, veteran status or any other status protected under applicable law.

2-6 Freedom of Association

Suppliers must comply with applicable laws and regulation governing legal rights of their employees to join or not to join worker organizations, including trade unions, and the right to collectively bargain, if they chose to be represented.

2-7 Health, Safety and Security

It is IPS's policy to comply with all applicable health and safety laws and regulations and to ensure that all work is performed in a safe and responsible manner. Our Business Partners are expected to support this policy at their own locations and when on-site at IPS.

Unless otherwise authorized by the Company, IPS prohibits the possession and/or use of any type of weapon by any Business Partner while on-site at IPS or while conducting business with or for IPS.

2-8 Substance Abuse

Our Business Partners may not use, possess or be under the influence of illegal drugs or inappropriate or excessive controlled substances while on-site at IPS for while conducting business with or for IPS.

Section 3 – CONFLICTS OF INTEREST

3-1 Outside Interests and Activities

We expect our Business Partners to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with IPS. We expect our Business Partners to report to IPS any situations of potential or apparent conflicts between their personal interest and the interest of IPS.

3-2 Corporate Opportunities and Conflicts

Our Business Partners may not take advantage of a business opportunity that is intended for IPS which arise in the course of our relationship. Our Business Partners may not act as a competitor by providing or attempting to provide similar products or services directly to IPS customers, provided however, that nothing in this Code precludes our Business Partners from purchasing goods or services from entities that are in competition with IPS.

Our Business Partners must monitor the activities of their employees and must ensure that they do not use IPS's name, property, facilities, relationships or other assets for personal benefit or for outside work or activities.

Section 4 – BRIBERY AND CORRUPTION

Our Business Partners are expected to fully comply with requirements of the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and all other applicable anti-bribery and anti-corruption laws. Our Business Partners must not take any action on behalf of IPS that would be perceived as an attempt to bribe, accept a bribe, or engage in corrupt activity, including, but not limited to, fraud, money laundering, embezzlement or extortion.

Section 5 – ANTI-TRUST LAWS AND COMPETITION

5-1 Anti-Trust

Our Business Partners are expected to comply with applicable anti-trust and fair competition laws and not to participate in any activity that could be considered a violation of anti-trust laws.

5-2 Competition and Fair Dealing

Our Business Partners must deal fairly with IPS's customers, suppliers, contractors, royalty owners, competitors, employees and other stakeholders. Suppliers must not take unfair advantage of anyone through manipulation, abuse of privileged or confidential information, misrepresentation, fraudulent behavior or any other unfair practice.

Section 6 – INTEGRITY OF FINANCIAL AND OTHER COMPANY RECORDS

Our Business Partners must not make any false representations in connection with any IPS transaction including, but not limited to, oral misrepresentations of fact or the promotion or utilization of false or inaccurate documentation.

Section 7– SAFEGUARDING OF INFORMATION AND RESOURCES

7-1 Proprietary and Confidential Information

Our Business Partners must protect IPS's information, not disclose it to any unauthorized third party unless required by law or legal process and use it only for conducting business with or for IPS and in compliance with applicable data privacy laws.

7-2 Insider Trading

Our Business Partners must ensure that any non-public information obtained as a consequence of a relationship with IPS is not used for the personal benefit of the Business Partners, their employees or other persons.

7-3 Intellectual Property

Our Business Partners may only use IPS's intellectual property, such as trade secret information, copyrights, patents and trademarks, in a manner permitted under their contract with IPS and may not misappropriate or infringe the intellectual property rights of others. Our Business Partners must not misuse any trade secrets or proprietary or confidential information of IPS or of others for their own purposes or disclose such information to unauthorized third parties.

Section 8 – INTERNATIONAL BUSINESS PRACTICES

Our Business Partners must strictly comply with all applicable trade laws, including laws that control the import, export and re-export of IPS products and information and laws that restrict dealings with entities and individuals located in countries subject to trade embargoes or economic sanctions.

Section 9– ENVIRONMENTAL STANDARDS

Our Business Partners shall operate in an environmentally responsible and efficient manner, and they shall minimize adverse impacts on the environment. The environmental elements include the following:

9-1 Environmental Authorizations

Our Business Partners will comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained and their operational and reporting requirements followed.

9-2 Waste and Emissions

Our Business Partners shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.

9-3 Spills and Releases

Our Business Partners shall have systems in place to prevent and mitigate accidental spills and releases to the environment.

Section 10 – RESPONSIBLE SOURCING OF MINERALS

IPS intends to demonstrate compliance with the Dodd-Frank Wall Street Reform and Consumer Protection Act's ("Dodd-Frank") provisions and corresponding enabling regulations regarding conflict minerals, as defined therein, including regulations promulgated by the Securities Exchange Commission. To support such compliance, our Business Partners are expected to:

- Exercise all due diligence required by the Dodd-Frank Act to enable accurate reporting on the source and chain of custody of conflict minerals.
- Make their due diligence measures available in the format specified by IPS and respond to a request for compliance information in a timely manner.
- Have a policy to assure compliance with this section and reasonably assure that the tantalum, tin, tungsten and gold in any products that any third parties manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country.



Section 11 – REPORTING CONCERNS

Any time you suspect or observe a violation of this Code or any unethical behavior by an IPS employee, you should report the suspected or actual violation. Because your IPS contact will generally be in the best position to address your concerns, we encourage you to reach out to them first. However, if you are uncomfortable speaking with your IPS contact, or you do not believe the issue has been addressed, you may voice your concerns or report violations through the independently run ethics and compliance hotline and web reporting tool provided by NAVEX Global.

The toll-free number for anonymous reporting in the United States, Canada, Puerto Rico and other U.S. territories is **1-800-261-8651**.

For calls made outside of the United States, Canada, Puerto Rico and other U.S. territories, dial your Country's AT&T Direct Code and when prompted enter **800-781-6271** to reach the ethics and compliance hotline.

For a listing of the AT&T Direct Access Code for your country, visit <http://www.business.att.com/bt/access.jsp>.

You can also visit <https://www.BRK-Hotline.com> to make a report online through the NAVEX Global website.

Anonymous reporters are provided with a case number and password and instructed to check back within a certain time frame to receive an update or to provide additional information that may be necessary to properly investigate their concern. It is important for individuals who chose to report their concerns anonymously to check the report regularly, using the case number and password that will be provided by NAVEX for information requests from the investigation team. We prohibit retaliation against any person who in good faith voices concerns, reports violation or participates in an investigation.