

TORCON BUSINESS PARTNER CODE OF CONDUCT

Torcon is a company built on integrity, honesty, performance, and collaboration. We are dedicated to our clients and to the success of their projects, and are also committed to working closely with every member of our project teams in a fair and equitable way.

First among Torcon's core values is Integrity, which is fundamental to our corporate Code of Conduct and overall business approach. We are fully committed to conducting our operations ethically and in full compliance with local, regional, and international laws, as well as with client requirements.

An essential part of this mission is to communicate our standards clearly with our subcontractors, vendors, and suppliers ("business partners") and the expectation that our business partners uphold Torcon's principles on all our projects. Torcon's Code of Conduct cannot prescribe actions for every situation but is intended to provide guidance for appropriate business behavior.

All Torcon business partners will receive and acknowledge our Code of Conduct policy as a contract document. The policy is publicly available on Torcon's website.

Message from Torcon's Leadership

“Torcon is a family-owned business. For over 60 years, Torcon has conducted its operations to the highest possible standards, and we are committed to those principles in the future.

There are 180 members of our staff, each of whom represents Torcon every day. Our behavior, as individuals, as departments, and as collective project teams, reflects directly on us as an organization. We share a responsibility to treat everyone with respect and kindness, both to ensure the future success of our company and because it is the right thing to do.

Benedict Torcivia, Jr. and Joseph A. Torcivia

COMMITMENT AND RESPONSIBILITY

Torcon's Code of Conduct impacts our business partners in two key ways. First, it reflects our commitment to treat your company and employees fairly and with respect. It is our pledge to behave ethically and to ensure we provide a safe and welcoming work environment. Torcon endeavors to conduct our operations consistent with our Core Values of Integrity, Passion, Family & Community, Trust, Safety and Empowerment.

Second, your company and employees are expected to adopt Torcon's Code of Conduct as true business partners. The basic tenants of our policy include the following—

- We are committed to ethical behavior and honesty
- We treat each other with respect
- Safety is a priority, every day, on every project, for everyone
- No conflicts of interest
- We are each accountable to ourselves and to each other
- We comply with all laws, regulations and customer requirements

Ultimately, if you have any doubt about a particular situation, ask yourself the following questions:

- Is my action legal and ethical?
- Is my action safe?
- Is my action responsible?
- Will my action set a good example for others?

Recognizing the singular importance of our Code of Conduct is critical. Don't ignore conduct you believe may be illegal, unethical, unsafe, or irresponsible. Torcon is committed to protecting all staff and business partners from retaliation resulting from reports of impropriety made.

UN Global Compact

Torcon's commitment to ethical business practices is reinforced through our membership in the United Nations Global Compact. With the goal of engaging and aligning businesses around **ten universal principles** in the areas of human rights, labor, the environment, and anti-corruption, the UN Global Compact affirms Torcon's intent to promote responsible business operations for a more sustainable and inclusive future. The ten universal principles directly align with Torcon's core values and how we conduct ourselves with our clients, colleagues, and business partners.

To demonstrate support of the UN Global Compact's **governance and anti-corruption agenda**, Torcon has joined more than 500 businesses as signatory to the Call-to-Action from Business to Government. The purpose of this effort is to urge governments to promote anti-corruption measures that are aligned with UN Agenda 2030 *Sustainable Development Goal (SDG) 16 - Peace, Justice and Strong Institutions*.



INTERNATIONAL LABOR ORGANIZATION GUIDELINES

Torcon's Code of Conduct is purposeful in its alignment with the Conventions and Recommendations outlined by the International Labor Organization. We acknowledge the eleven fundamental ILO instruments and expect our staff and business partners to adhere to them. These landmark protocols are the foundation of labor relations and workers rights, encompassing the following protections:

- workers and employers right to organize
- protection against anti-union discrimination
- prohibit the use of forced or compulsory labor and the use of child labor
- ensure equal compensation for men and women workers for work of equal value
- prohibit discrimination in employment, occupation and compensation
- support the implementation of occupational safety and health programs that protect workers and ensure a safe work environment
- promote continuous improvement of occupational safety and health to prevent injuries, diseases and deaths



BUSINESS PARTNER REQUIREMENTS

All business partners who are engaged contractually to execute portions of work on Torcon projects must comply with the Code of Conduct requirements below and to all and any applicable laws or legal requirements.

Specifically, business partners must—

- comply with all applicable labor laws and uphold internationally recognized human rights wherever operations are located, including taking reasonable steps to identify, prevent, mitigate, and address potential human rights risks within their operations.
- comply with all applicable child labor laws and take steps to prevent child labor in their operations and supply chain.
- not permit children to perform work that interferes with their schooling or vocational education or exposes them to risks that can harm their physical, mental, or emotional development.
- provide immediate notification if they find any evidence of child labor in their operations or supply chain.
- prohibit all forms of modern slavery and human trafficking. This includes any form of slavery or forced, bonded, indentured, or involuntary prison labor. Human trafficking involves the transportation, harboring, recruitment, transfer, or receipt of people by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.
- provide immediate notification if they suspect any instance of modern slavery or human trafficking is taking place in their business or supply chain.
- Business partners shall ensure that all employment is voluntary and that workers are free to terminate their employment in accordance with applicable laws and contractual obligations.

Additionally—

- Business partners may only employ workers who meet the minimum legal age requirement in the jurisdiction in which they are working, but in no event may employ workers younger than the age for completing compulsory education.
- All labor used by business partners must be voluntary, and workers must be provided, in advance of their employment, accurate and understandable information about the basic terms of their employment.
- Business partners may not allow any practice that would restrict free movement of workers, such as requiring employees to relinquish any personal identification or travel or immigration documents as a condition of employment. In addition, business partners must not use fraudulent or misleading recruiting tactics or require workers to pay fees or deposits in order to gain or maintain their employment.
- Workers must be paid at least the minimum legal wage, or a wage that meets local industry standards, whichever is greater, and be provided with breaks, time off, and sickness allowance in accordance with applicable law. Business partners must also contribute to all statutory social security and welfare funds to which employers are required by law to contribute, including medical and injury insurance.
- Business partner employees shall have freedom of association and the right to raise workplace concerns without fear of retaliation, intimidation, or harassment.
- Business partners must comply with health and safety regulations and provide a workplace that minimizes risk of injury.
- Business partners must comply with applicable environmental laws, regulations, permits, and contractual commitments and strive for continuous environmental improvement.
- Business partners must not participate in any form of price-fixing, bribery, or any other similar corruptive activities.

REMEDIATION, CORRECTIVE ACTIONS, AND ENFORCEMENT

Torcon expects all business partners to cooperate in the identification, assessment, investigation, and remediation of any non-compliance with this Code of Conduct or applicable laws and regulations. Business partners are expected to assess and manage risks related to human rights, labor practices, health and safety, environmental compliance, and ethical business conduct within their operations and cooperate with Torcon in addressing identified concerns.

Business partners must promptly notify Torcon of any actual or suspected violations of this Code of Conduct and cooperate in any resulting investigation or remediation efforts.

Where a potential violation is identified, business partners are required to:

- Promptly investigate the issue;
- Develop and implement a corrective action plan within a defined and reasonable timeframe;
- Provide transparency into actions taken upon request; and
- Cooperate with Torcon in monitoring the effectiveness of corrective actions.

Torcon actively monitors compliance through project oversight, performance evaluation, and issue-based reviews and reserves the right to conduct targeted assessments where appropriate. Failure to address identified issues may result in escalation, including suspension of work, removal from a project, may impact eligibility for future work opportunities, or termination of the business relationship.

Torcon is committed to continuous improvement and expects its business partners to uphold the same standard in addressing human rights, labor, safety, environmental, and ethical compliance obligations. Business partners are encouraged to communicate these principles and expectations throughout their supply chains.

WORKER COMMUNICATION AND NON-RETALIATION

Business partners shall provide workers with established reporting channels appropriate to the size and nature of their organization to raise workplace concerns regarding labor practices, human rights, health and safety, discrimination, harassment, environmental matters, or ethical conduct without fear of retaliation, intimidation, reprisal, or harassment.

Business partners are expected to investigate reported concerns appropriately, maintain confidentiality where practical and permitted by law, and take corrective action where necessary. No worker shall be subject to adverse treatment, discipline, discrimination, or retaliation for making a good-faith report, raising a concern, or participating in an investigation.

REPORTING

Torcon prohibits retaliation against any individual who, in good faith, reports a concern or participates in an investigation.

To report an anonymous concern, please click [here](#) or follow the path via the QR code.

