



East Coast Repair & Fabrication (ECR),
it's affiliates and subsidiaries

About Face

Code of Ethics and Business Conduct

Letter from the President



Dear Employees:

Great companies are judged by their actions, not by what they say. I am very proud that East Coast Repair & Fabrication (ECR) is respected as a company that not only delivers on our commitments to our customers but also adheres to the highest of ethical standards in the conduct of our business. We are honest, ethical and fair in dealing with employees, clients, customers, vendors and suppliers. Our continued success depends upon meeting and exceeding our customers' expectations while maintaining our commitment to integrity – in everything we do.

For nearly two decades, ECR has been a successful dominant workforce in the ship repair industry. ECR was created to offer dependable, high quality and

cost-effective welding and fabrication services to diverse businesses in the Hampton Roads area. Success in this market was followed by an expansion of its business model in the Jacksonville, Florida and San Diego, California markets. The company's main goal is to grow into a successful enterprise while achieving the highest degree of respect from fellow industry leaders with integrity.

All ECR employees have a shared responsibility to maintain the highest standard of integrity and ensure we continue to have a place where we are proud to work. If you are faced with an ethical dilemma, you have a responsibility to speak up and seek assistance. We are all expected and accountable for acting with integrity and upholding the values of the company.

In order to maintain our commitment to integrity, we have established a Code of Ethics and Business Conduct and Corporate Compliance Program. The Code of Ethics and Business Conduct is expected to be followed whenever any employee is conducting business at the company, and the Corporate Compliance Program is intended to ensure that all employees are abiding by the Code. You are expected to read both the Code and the Program and to certify annually your commitment to complying fully with them.

About Face, our Code of Ethics and Business Conduct, provides guidance on our expectations for all employees, contract labor, agents, consultants, executive officers, and others when representing or acting for the company. Our Code spells out the values we live by and the standards we set.

ECR does not, and will not, tolerate any form of unlawful or unethical behavior by any person or entity associated with it. At the very least, ECR expects all employees to conduct themselves in accordance with the laws and regulations that apply to our business and not to condone criminal or unethical behavior by others. Each of you is expected to alert your manager, human resources or the Compliance Officer of any information you may have of any unlawful or unethical behavior by any of our employees, prime contractors, subcontractors, vendors, suppliers, or customers. Violation of this program, including failure to report a violation or other unlawful or unethical behavior, can be grounds for discipline, including termination.

This booklet cannot address every situation, and new issues may arise. In those instances where the answer is not clear, there are resources available to provide guidance on doing the right thing. If you observe misconduct or you have a question, you can talk to your manager or human resources.

Thank you for your help in turning

around with About Face for ethics and integrity.

A handwritten signature in blue ink, reading "Rene L. Doiron". The signature is stylized with a large, sweeping "R" and "D".

Rene L. Doiron, **President**

World-Class Repair and Fabrication Services Since 1999

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Our Vision and Values

1.1 Spreading a Culture of Integrity

ECR is committed to dealing honestly and fairly with our employees, customers, vendors, suppliers, and communities in which we live and work. Our success depends on maintaining a culture of integrity and spreading it to the generations that follow.

1.2 Our Vision and Values

In our repair and fabrication work, continuous improvement is not just a good idea, it is a necessity. Our customer's changing needs are the catalysts for the evolution of our capabilities. Our corporate culture is to reinvent ourselves a little each day. A shared vision of excellence and the exhilaration of achievement have combined to create an environment of urgency and opportunity. We are driven by people who radiate a contagious enthusiasm for

building the best repair and fabrication company possible. We bring world-class quality business systems to our team of experts and we are structured to ensure that each employee has a personal stake in whether the company thrives or survives.

ECR holds each supplier partner, officer, director, executive, manager, supervisor, employees, including temporary employees, accountable for upholding Our Vision, Our Values, and our Code. By doing this, we ensure that ECR's business will be conducted consistent with the high ethical standards that we demand and expect from each other, and that others have the right to demand and expect from us.

ECR is dedicated to creating quality products for our clients with a level of reliability and customer service that consistently exceeds expectations. We continuously shape and leverage our core competencies to produce dependable quality results. Our experienced project management teams minimize project risks, our skilled craftspeople deliver a superior and timely product, and our agility translates to flexible solutions for our customers. Because we care about our people and we are stewards of the environment, we approach our work responsibly and continuously meet or exceed industry standards and regulations. This is all accomplished within a strong safety culture environment that promotes smart decision making while safeguarding against known and unknown hazards. Every ECR employee and Supplier Partner is a responsible stakeholder in our mission.

ETHICS

We adhere to the highest standards

We do the right thing, the right way, for the right reasons.

FAMILY

We have heart

We value our co-workers, customers, and vendors as family and treat everyone with dignity and respect.

COMMUNITY

We give back

We share with our community and support those in need.

OWNERSHIP

We Own it

We do what is needed to get the job done and we take the initiative to bring about positive results.

EVOLUTION

We are bold

We adapt and overcome, while we chart our course for success and endurance.

1.3 Statement of Policy

It is ECR’s policy to maintain the highest ethical standards and comply with all applicable laws, rules, and regulations. We believe that adherence to this policy will ensure our continued success as well as earn and maintain the confidence of our customers and the community in which we live. In order to ensure that ECR operates pursuant to this policy, we have established our About Face Code of Ethics and Business Conduct. The following general rules apply to the implementation of this Code of Ethics and Business Conduct:

- 1. All employees must comply with this Code of Ethics and Business Conduct. Any supplier partner, officer, director, manager, supervisor, or employee to include temporary employees violating this Code is subject to disciplinary action, up to and including termination.
- 2. All employees have a duty to report all suspected violations of the Code or other potentially unethical behavior by anyone, including officers, directors, managers, supervisors, and employees to include temporary employees, customers, subcontractors, prime contractors, vendors and suppliers, to the Corporate Compliance Officer.
- 3. Employees in management positions are personally accountable for their own conduct and the conduct of those reporting to them. Each management employee is expected to ensure compliance with it. Management must also be particularly careful with their words and conduct to avoid placing, or seeming to place, pressure on subordinates that could cause

them to perform in a way that is contrary to the ethical standards set forth in this Code and company policies.

- 4. No employee has the authority to direct, participate in, approve, or tolerate any violation of this Code by anyone.
- 5. Any employee who has questions about the application of this Code should consult with the designated Corporate Compliance Officer or human resources.

1.4 Definitions

About Face, Code of Ethics and Business Conduct: The written statement of acceptable behavior by ECR’s supplier partners, officers, directors, executives, managers, supervisors, employees, to include temporary employees, that ensures ECR operates according to the highest ethical standards.

Code: About Face, The Code of Ethical and Business Conduct

Corporate Compliance Officer: The company official designated by the President to be responsible for implementing and administering the Code of Ethics and Business Conduct. In the case where there is no Corporate Compliance Officer, or the Corporate Compliance Officer is not available, the Company President will be responsible for implementing and administering the Code of Ethics and Business Conduct.

Corporate Compliance Program: The written procedures and policies used by ECR that are designed to ensure that all

officers, directors, executives, managers, supervisors, employees, to include temporary employees are aware of the Code of Ethics and Business Conduct and adhere to its standards. The Corporate Compliance Program is implemented and administered by the Corporate Compliance Officer.

Program: Corporate Compliance Program

2.1 Building Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from all our employees, including temporary employees, clients, and customers. We gain credibility by adhering to our commitments, displaying honesty and integrity, and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: will this build trust and credibility for ECR? Will it help create a working

environment in which ECR can succeed over the long term? Is the commitment I am making, one I can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

2.2 Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. ECR is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone’s talents go to waste.

2.3 Equal Employment Opportunity

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at ECR will be based on merit, qualifications, and abilities. ECR does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, age, disability, genetic information, or any



other characteristic protected by law.

This policy extends to all phases of employment, including hiring, placement, promotion, transfer, compensation, benefits, training and use of the facilities. ECR is committed to complying with all applicable laws related to equal employment opportunities and to ensure that there is no unlawful discrimination by any officer, director, manager, supervisor, or employee. ECR is committed to a work environment in which everyone is treated with respect, trust, honesty, fairness, and dignity.

2.4 No Tolerance for Discrimination and Harassment

ECR is committed to providing a work environment that is free from all forms of discrimination and conduct that can be considered bullying, harassing, coercive, or disruptive, including sexual harassment. ECR provides ongoing sexual harassment training to ensure you the opportunity to work in an environment free of sexual and other unlawful harassment.

All allegations of sexual harassment will be quickly and discreetly investigated. To the extent possible, your confidentiality and that of any witness and the alleged harasser will be protected against unnecessary disclosure. When the investigation is completed, you will be informed of the outcome of the investigation.

Any supervisor or manager who becomes aware of possible sexual or other unlawful harassment must immediately advise the Human Resource Department, or up the supervisory chain so it can be investigated in a timely and confidential manner.

Anyone engaging in sexual or other unlawful harassment will be subject to disciplinary action, up to and including termination of employment.

If you are an ECR leader, you have a special responsibility for promoting a positive, diverse, and inclusive work environment where everyone may raise issues or concerns without fear of retaliation.

2.5 Maintain a Healthy and Safe Working Environment

You are responsible for complying with environmental, health and safety laws, regulations, and policies. Observe all posted warnings and regulations. Report immediately to the Safety Director, Manager, Supervisor, or Inspector any accident or injury sustained on the job, or any environmental or safety concern you may have.

ECR management is also responsible for ensuring that all reasonable safeguards and precautions are taken in the workplace including ensuring compliance with the Company's procedures and guidelines, promoting safe work practices, and the use of personal protective equipment.

You may not be under the influence of alcohol or illegal drugs, or abuse legal drugs, in the workplace at any time. Smoking only allowed in designated areas, check with your supervisor at the location you are working at to find out where these areas are located.

2.6 Avoid Personal Conflicts of Interest

As an ECR employee you are responsible to act in a fair and impartial manner in all business dealings, and to place the interests of the company over personal interests in matters relating to ECR business.

You must avoid financial, business, or other transactions or situations in which your personal interests might conflict with, or appear to conflict with, the interests of the company. Such situations may arise from relationships with customers, competitors, vendors and suppliers, present or prospective employees, or from the acquisition or use of company assets for personal gain. An actual conflict of interest does not need to be present to constitute a violation of this Code; you must also avoid activities that create the appearance of a conflict of interest.

A conflict of interest may exist when you use your contacts or position in the company to advance interests other than those of the company's, such as your own private business or financial affairs, or those of a close friend or relative (whether or not at the expense of the company). You should never use company property or information for personal gain or take for yourself personally any opportunity that is discovered through your position at ECR.

Examples of How a Personal Conflict of Interest Could Occur:

- Employment by a competitor or potential competitor, regardless of the nature of employment, while employed by ECR.

- Acceptance of gifts, payment, or services from those seeking to do business with ECR.

- Placement of business with a firm owned or controlled by an ECR employee or family.

- Ownership of, or substantial interest in, a company that is a customer, competitor, or a supplier.

- Acting independently as a consultant to ECR customer or supplier, while employed by ECR.

- Having a personal interest or potential for gain in any company transaction.

- Using company assets, intellectual property, or proprietary information for personal gain.

- Employing or discussing employment with former government employees or using them as consultants or subcontractors in violation of applicable laws or regulations.

- Having a close, personal relationship with a subordinate employee.

- Directly supervising a family member.

You must disclose in writing any situation, transaction, or relationship that might give rise to an actual or potential conflict of interest to your manager or supervisor, who will review the disclosure with legal counsel.

3.1 Limitations on Providing and Accepting Business Courtesies

ECR competes on the merits of its products and services and does not use the exchange of business courtesies to gain an unfair competitive advantage. When people exchange business courtesies it

can create the perception that favors were granted in order to influence business judgment.

Definition of Business Courtesy

ECR defines the term business courtesy broadly to mean a gift, gratuity, favor, benefit, loan, commission, discount, forbearance, or other tangible or intangible item having monetary value for which fair market value is not paid by the recipient. Such courtesies include but are not limited to, cash, honoraria, entertainment and recreation (tickets to sporting, recreational or other events, passes, fees, etc.), services, training, transportation, discounts, promotional items, lodging, meals, drinks, door prizes, or use of a donor's time, material, equipment or facilities.

Appropriate – Gift

- Unsolicited.
- Not cash or usable as cash (for example, a gift certificate is not acceptable).
- Of moderate value
- For Commercial: No more than \$100 in face value in a calendar year to or from the same company for Non-Government persons
- For Government personnel: Business courtesies cannot exceed \$20 per person per gift or a total of \$50 per recipient in a single year from the entire organization

Appropriate – Entertainment

- Unsolicited.
- Offered or accepted in the normal course of business.
- Attended by both an ECR employee and a business provider's employee and be an

occasion where business is discussed.

- Not unduly lavish (e.g., charging more than would be reasonable or customary for a business dinner or lunch);
- At a venue and conducted in a manner that does not violate other provisions of this Code or harm the company's reputation (e.g., an event at an adult entertainment venue is not acceptable).
- The same dollar limitations as for Gifts above
- A Government official cannot accept meals of any kind, coffee and donuts only

Prohibited Exchanges

Even if the gift or entertainment meets the above standards, you must not exchange it if: (a) it is intended to influence another person's business judgment; (b) it might create the appearance of undue influence, unfairness or impropriety; or (c) you are participating in, conducting, or directly supervising a formal procurement process (such as a request for bids) on ECR's behalf.

Bribery and Kickbacks

All forms of bribery and kickbacks are illegal and expressly prohibited. Any employee caught participating in such activity will be promptly terminated. Any employee who knows about, or reasonably should know about, any such activity and fails to report it to the Corporate Compliance Officer will be disciplined.

Special Rules for Government Officials

It is important to remember that special rules apply to domestic government officials. Laws, rules and regulations

concerning appropriate gifts and entertainment for government employees are complex and can vary depending on government branch, state or jurisdiction. All ECR employees who, on ECR's behalf, interact with government officials are responsible for complying with applicable laws and regulations.

Special Rules for Foreign Officials

The Foreign Corrupt Practices Act and other countries' laws restrict the exchange of gifts and entertainment with foreign officials. Before offering meals, gifts, gratuities, entertainment or anything of value to any foreign government personnel, official, political party or party official or candidate, you must consult in advance with the Corporate Attorney, DSS, the State Department and Homeland Security to make sure that you are in compliance with applicable U.S. and foreign laws and ECR standards.

Special Rules for Private Employees

Despite our policies permitting small gifts or business courtesies, many companies prohibited the giving or receiving of any gifts in any amounts. We respect all such rules and never try to press others to accept things if they tell us that their company or agency policies preclude accepting any gifts.

3.2 Maintain Accurate Business Records

ECR's reputation and credibility depends on all of us maintaining accurate business records. We are committed to operating in an environment of open

communication, while not compromising proprietary and confidential information.

You must ensure the accuracy of any business or financial records for which you are responsible. These include not only financial accounts, but other records such as quality reports, time records, expense reports, resumes, and submissions to the company.

If you are responsible for the preparation of any business or financial records on behalf of the company, you must ensure that all information contained in such records or communications is full, fair, timely, accurate, and understandable.

3.3 Accurately Charge Labor and Other Costs

ECR customers place special trust and confidence in us when they award us work. We must honor this special trust by ensuring the integrity of our accounting and company records.

You and your supervisor (or manager) are responsible for understanding and complying with the labor recording policies and procedures at your location. You are also responsible for properly accounting for labor, travel, material and other costs, and ensuring that they are accurately recorded and charged to the company's records. These costs include, but are not limited to, normal contract work, and bid and proposal work.

Knowingly mischarging the time that you work or falsifying your time keeping violates company policy and the law. No employee shall knowingly approve such

mischarging. Shifting costs to improper accounts also is prohibited.

Transactions between the Corporation and outside individuals and organizations must be promptly and accurately entered in our books in accordance with generally accepted accounting practices and principles in the United States. Under no circumstances should you misrepresent facts or falsify records.

3.4 Compete Fairly for All Business Opportunities

ECR's continued long-term success depends on our upholding the integrity of the procurement process in bidding, negotiating, and performing contracts for all of our customers. We compete fairly and ethically for all business opportunities.

You are responsible for dealing fairly with the company's customers, suppliers, competitors, and employees. If you are involved in proposals, bid preparations, or contract negotiations, you must be certain that all statements, communications, and representations to prospective customers and suppliers are accurate and truthful. Once awarded, all contracts must be performed in compliance with specifications, requirements, and clauses.

You must refuse any offers to provide ECR with any unauthorized contractor bid and proposal information or source selection and immediately report the offer to the Ethics Office. You may not use, obtain, accept, or receive any information to which ECR is not clearly and legitimately entitled. If you ever have reason to believe that the release or receipt of any information

is unauthorized, or you are uncertain as to ECR's legal right to use the information, to not copy, distribute or use it until you have obtained guidance from the Ethics Office, which will consult with legal counsel.

3.5 Anti-Trust Policy

ECR is fully committed to compliance with the anti-trust laws, which are designed to promote free and open competition in the marketplace. Not only does the customer benefit by getting the best product or service at the lowest price, but the Company also benefits by being able to compete on a fair level playing field with competitors. The anti-trust laws are complex and must be complied with strictly.

3.6 Relationships with Affiliates

In order to ensure that the ECR's organizational structure is not used unfairly, all transactions between and among the ECR companies (also called "affiliates") must comply with company policy and all federal and state laws and regulations. Permissible inter-company transactions must be priced at a level that complies with company policy and any applicable laws, and appropriately documented to reflect this pricing. Affiliates that conduct joint marketing or share resources and company information (including Customer Proprietary Information) must do so in accordance with applicable laws, third party agreements and company policies. If you have any questions regarding an inter-company transaction or affiliate relationship, you

should consult the Corporate Attorney.

4.1 Protecting Sensitive Information

ECR customers, suppliers and sub-contractors trust us to protect sensitive information. We generate sensitive information in our day-to-day work for the company and our customers, and we regularly receive sensitive information from our customers, suppliers, and others. Our obligation to protect sensitive information extends beyond our employment with ECR.

You may not disclose or receive sensitive information, including proprietary company information, without proper authorization. You must keep sensitive information, including proprietary documents, protected and secure. You may only disclose sensitive information if you have the proper authorization to do so.

ECR uses an email encryption method to protect our data. You must use this method of encryption when sending sensitive data to any recipient, inside the company or out. Sensitive data includes, but is not limited to, personally identifiable information (PII), contract information, financial information, specifications, drawings, or any other such document stamped controlled.

In the course of normal business activities, suppliers, customers, and competitors may sometimes divulge to you information that is proprietary to their business. You may only accept or use the proprietary information of a supplier, customer, or competitor if such use or acceptance complies with

company policy. If you receive proprietary information from a supplier, customer, or competitor, without proper authorization, such as a non-disclosure agreement, you must immediately bring this to the attention of the Facility Security Officer or the Ethics Officer.

4.2 Protect Personal Information

ECR employees, contract labor, agents, consultants, customers, business partners and affiliates entrust to us personal information. To continue building and sustaining a culture of trust, we must protect this sensitive data and use it only for authorized purposes.

You must not access personal information unless you have a "need-to-know" such information for legitimate business purposes and have prior authorization.

If you have access to personal information (including personnel or medical records), you may not disclose such information without proper authorization. You must keep personal information protected and secure in accordance with all company policies, laws and applicable third-party agreements. You must never use personal information for any purpose for which it was not intended or for personal gain.

If you collect or access personal information on behalf of ECR, you are responsible for knowing and complying with all applicable laws and policies that govern such activities.

If you become aware or believe that personal information has been accessed by an unauthorized person, disclosed

inappropriately, used for purposes other than ECR business, or gathered in violation of company policy or the law, you must immediately bring this to the attention of the Facility Security Officer or the Ethics Officer.

4.3 Using Company and Customer Assets

We have a special responsibility to protect ECR’s resources and assets. We have the same special responsibility to protect all customer resources and assets that are entrusted to ECR for use and safeguarding.

You are responsible for the proper use of company and customer property, electronic communication systems, information resources, materials, facilities, and equipment. You must use and maintain these assets with the utmost care and respect, guarding against waste and abuse, and you must never borrow or remove them from company or customer property without management’s permission.

Company assets are intended to be used for the conduct of ECR business. You may occasionally use company assets for personal use if you obtain written permission from your supervisor or manager and your use is in accordance with company policy. You may not use the company’s resources to support a personal business or for an illegal act or purpose which would cause embarrassment to our company.

Use of a company credit card for personal use is strictly prohibited.

Social Media

- You are the public face of the Company and what you publish reflects on our reputation and brand.
- Comply with our policies when using social media and be clear that you do not speak on behalf of the Company, unless authorized to do so.
- Take every precaution not to disclose any confidential information about ECR.

Marketing Integrity

- Do not use any company logos and trademarks without express consent.
- Make only truthful and accurate claims about the Company.
- Create materials that comply with ECR brand and guidelines.
- Understand that our brand is more than a logo. It is a promise to our customers that they can always rely on us to handle their business needs in a way that is easy and effortless for them.

5.1 Report Violations of this Code

You have different channels to report violations or potential violations of this Code, including your manager, human resources, security, the energy, environment, safety and health organizations, and ethics, as appropriate.

If you have good reason to believe that a violation of the Code or a contract provision occurred, or you are asked to violate the Code or contract provision, don’t remain silent. Report such violations, or suspected violations; depending on

the circumstances, failure to report may itself violate this Code. Remember that no unethical or illegal acts can be justified by saying that they benefited the company, or that they were directed by a higher authority in the company.

In addition to reporting violations, you are encouraged to contact the Corporate Compliance Officer to discuss any ethics question or concern. When faced with an ethical dilemma, it is always better to obtain guidance before acting.

You may contact the Corporate Compliance Officer to report a concern or seek guidance. The following are some of the confidential ways that you can communicate with the Corporate Compliance Officer, currently Marie V. Rivera Rivera (Vice President of ECR)

Contacting the Corporate Compliance Officer

Write: Corporate Compliance Officer
East Coast Repair and Fabrication, LLC
Attn: Marie V. Rivera Rivera
P.O. Box 13687
Chesapeake, VA 23325
Call: 757-452-6310
Fax: 757-452-6679
Email: mvriviera@ecrfab.com

What can you expect when you contact the Compliance Officer?

- Your concern will be treated seriously and fairly.
- You will be treated with dignity and respect.

- You need not identify yourself.
- Whether you identify yourself or not, your communication will be kept confidential to the greatest extent possible.
- If your concerns are not resolved at the time you call, you will be informed of the outcome.
- Due to privacy considerations, you likely will not be informed of the details of any discipline that may result from an investigation into your concerns.
- The company takes its obligations very seriously and will take appropriate action in response to violations of this Code, even if these actions are not always visible to you.
- Remember, there is never a penalty for contacting the Compliance Officer in good faith. People in a position of authority cannot stop you; if they try, they are subject disciplinary action up to and including termination. **ECR will not tolerate retaliation against employees who raise concerns to any source in good faith.**

Amendments to Our Code of Conduct

Sr. Management Team is responsible for approving and amending the Code.

Our Code is reviewed periodically by Company management to determine whether revisions are required due to changes in the law, Company policies or business practices.

5.2 Responding to Investigations and Legal Action

ECR values the trust placed in our

company. We face a significant risk of damaging that trust and our reputation when we are involved in an investigation or litigation. We must pay particular attention to conducting our business and ourselves according to the highest standards of business ethics.

You must cooperate completely in any investigation relating to ECR. You must always be honest and forthcoming during an investigation, and you must provide any investigator with full, accurate, timely and truthful information. Misrepresenting facts or failing to disclose facts during an investigation is strictly prohibited. You may never interfere with or obstruct an investigation conducted by the company, by any third party on the company's behalf or any government agency. In addition, you may never disclose or discuss an ongoing investigation unless specifically authorized to do so.

If a police officer, other law enforcement personnel or government employee from any agency requests access to company premises or to company or customer information, you must immediately notify the Compliance Officer for appropriate

guidance. Any documents, information, or testimony you provide in response to a request by a government agency must be full, fair, accurate and timely, and reviewed in advance by legal counsel via the Compliance Officer. If you discover or suspect any misrepresentation, misstatement, misunderstanding, omission or other mistake by yourself or another employee, you must immediately disclose it to the legal counsel via the Compliance Officer so that the company can take prompt steps to remedy the situation. The requirements of this subsection do not apply to providing information or testimony, in your individual capacity, to a governmental body or agency on behalf of yourself or co-workers where protected by applicable laws.

To the greatest extent possible, ECR shall cooperate with government agencies responsible for investigating suspected violations of the law. If requested by ECR, you also are required to cooperate with investigations conducted by the government. You must notify the Compliance Officer immediately if you learn that a government agency or any

third party is conducting such an investigation or asking for information pertaining to a suspected violation of the law. The Compliance Officer or legal counsel will help you to review information before it is released to the investigative organization.

5.3 Mandatory Disclosures:

Federal Law requires that companies who do significant amounts of business with the Federal Government disclose to the Federal Government any credible knowledge or belief of unethical or illegal actions or of Government overpayment to the contractor. Such disclosures must be made promptly and may be made after allowing reasonable time for internal investigation by the contractor. We take such requirements seriously and will make all required Mandatory Disclosures including disclosure of unethical or illegal actions by our employees and subcontractors. We need your help in discovering any such violations so that we may timely investigate and report such activities.

5.4 Small Business Size Status:

ECR is a Small Business in the NAICS classification code that it performs work in as defined by the United States Government's Small Business Administration. We currently intend to remain a small business with less than the 1250 employee count as established by the Small Business Administration. We also will attempt to utilize other small and disadvantaged business to ensure them a reasonable share of the

available commercial and governmental business available.

5.5 Diversity and Inclusion

ECR is an equal opportunity employer committed to the principle of diversity.

ECR recognizes that all employees bring different qualities, abilities, skills, knowledge, experiences, perspectives and attitudes to work and that valuing and making the most of these differences can improve the workplace for individuals and enhance ECR's overall performance.

Diversity includes, but is not limited to, differences in gender, age, language, cultural background, sexual orientation and gender identity, health / medical condition, religious beliefs, physical ability, appearance, working style, educational level, professional skills, work and life experiences, socio-economic background, job function, marital status and family responsibilities.

Our differences can be our strengths. Different people have different perspectives on issues, and that can be valuable for solving problems or generating new ideas. Being unable to understand why someone holds a viewpoint does not mean that they are wrong.

We therefore agree to:

- Value and embrace diversity in all aspects of ECR activities and respect others without regard to race, color, religion, sex, national origin, age, disability, sexual orientation, or political affiliation.
- Support affirmative action and equal



employment opportunity programs.

- Refuse to engage in or tolerate any other form of discrimination or harassment

5.6 Community Involvement

Our Company is dedicated to being a good neighbor in the communities in which we live and work.

- Be a good neighbor through customer engagement, philanthropic giving, volunteerism and operating in accordance with the highest ethical standards.
- Your outside activities must not interfere with your job performance.

ACKNOWLEDGMENT

Be aware of ECR's Code of Ethics, Employee Handbook and the Policies and Procedures Manual for an understanding of the rules governing business conduct and expected behaviors. Employees can access these documents at any time requesting them from their supervisors or the HR department.

I acknowledge that I have received, reviewed, and understand ECR's About Face Code of Business Ethics.

I agree to strictly comply with the Code and understand that I will be subject to disciplinary action if I violate the Code. I also understand that each ECR employee, consultant, or contract worker is responsible for knowing and adhering to the principles and standards of the Code.

Signature: _____ Print Name: _____

Date: _____



Corporate Address.

P.O. Box 13687
Chesapeake , VA 23325

P. 757-455-9600 E. mail info@ecrfab.com
www.ecrfab.com