



Supplier Code of Conduct

“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.”

Rene Doiron, President

ECR’s Mission and philosophy guides the development of its operational policies. Our mission provides the framework within which our Ethics Program and Code of Conduct is built around.

MISSION

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 that safeguards against known and unknown hazards. Every ECR employee and Supplier Partner is a responsible stakeholder in our mission.

ECR is committed to conducting its business dealings with its suppliers in an honest and ethical manner. We hold ourselves accountable for being aware of, and following, the rules that apply to the work we do. In turn, ECR expects its suppliers to also follow the rules and adhere to high ethical standards. This Supplier Code of Conduct details the specific standards of conduct that ECR requires of its suppliers.

ECR personnel are encouraged to apply our internal Values in their dealings with ECR’s suppliers. Our employees are not permitted to subject our suppliers to deceptive or misleading information or treatment. ECR personnel are also prohibited from promising or providing anything to a supplier in exchange for any inappropriate advantage, whether for the benefit of the employee or ECR.

ECR’s Values provides the environment for employees and its suppliers to embrace and participate in its 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.

ECR's Procurement Department is a committed customer-oriented team that strives to continuously support and improve ECR's supply chain network. We continuously seek quality materials and subcontract service at the best possible price and lead time, and we value the development of effective supplier partnerships.

ECR's suppliers are expected to comply with the laws and regulations applicable to their business, make ethical decisions, and abide by this Supplier Code of Conduct. In addition, we seek out suppliers who embody ECR values.

The U.S. Government is one of ECR's most important customers. The Government requires its suppliers to abide by specific laws and regulations ensuring ethical business conduct. These requirements apply at both the prime contract and subcontract level. ECR expects its suppliers to always act with integrity in dealings with the Government and comply with all applicable requirements.

Human Rights – ECR expects its suppliers to treat people with dignity and respect and to be truthful and considerate. ECR suppliers must promote equal opportunity and an inclusive environment, where diversity in people, ethics, and perspectives is valued.

Maintain Accurate Records – All supplier records must be complete, accurate, and never altered to conceal or misrepresent any transactions. All records must be made available, regardless of format, as evidence of a business transaction, to the extent required by the terms of the contract between ECR and its supplier or in accordance with applicable laws and regulations.

Human Trafficking – All suppliers and their employees, and any person acting on behalf thereof, must adhere to the regulations prohibiting human trafficking, FAR 52.222-50. We expect our suppliers to have a compliance plan in place that at minimum includes awareness training, process for reporting, recruitment and wage plan, prevention, monitoring, detection, termination measures for human trafficking.

Child Labor – ECR expects its suppliers to ensure that illegal child labor is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed.

Employment Practices –

Equal Opportunity: We expect our suppliers to offer equal employment opportunities to all people without regard to race, ethnicity, color, religion, national origin, sex, sexual orientation, age,

gender identity, genetics, disability, protected veteran status, marital status, or any other status protected by law.

Harassment: ECR will not tolerate harassment of any type, including verbal, physical, emotional, visual, or sexual. This prohibition extends beyond co-workers and includes suppliers, customers, and anyone else who does business with ECR. Harassment can diminish the dignity of a person, create an offensive or otherwise hostile work environment, and interfere with work performance.

Drug, Alcohol, and Tobacco Free Workplace: The use of prohibited drugs, unauthorized prescription drugs or alcohol abuse can create serious safety risks. The possession, sale, or use of prohibited drugs and/or unauthorized prescription drugs, or being under the influence of such drugs, on ECR property, or at ECR-sponsored events is prohibited. ECR expects its suppliers to maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

Anti-corruption, Anti-Trust, and Lobbying-

Anti-corruption: Our suppliers must comply with anti-corruption laws, regulations, or directives in all countries they perform business. We expect our suppliers to comply with all applicable anticorruption laws and ECR prohibits its suppliers from offering, soliciting, or accepting any bribe, illegal gratuity, or kickback.

Anti-trust: Our suppliers must not engage in bid suppression, complementary bidding, bid rotation, price fixing, or sharing of bids with competition.

Lobbying: Lobbying activities are subject to specific rules that cover a wide range of activities. "Lobbying" involves communications with legislators, regulators, or their staff in an effort to influence legislative or certain other administrative actions. For this reason, it is important that all contacts with officials that may influence a government contract, as all lobbying activities are regulated at the local, state and federal levels and are subject to disclosure (Public Law 101-121 and FAR 52.203-12). It is the Suppliers responsibility to certify to ECR that they have not used appropriated funds to influence the award of federal contracts or financial transactions.

Gifts, Entertainment, and Conflicts of Interest-

Gifts/Business Courtesies: The exchange of business courtesies may not be used to gain an unfair advantage. In any business relationship, our suppliers must ensure that the offering or receipt of any gift of business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practices.

Conflicts of Interest: Suppliers must avoid all actual or apparent conflicts of interest in their dealings with ECR. We expect our suppliers to provide notification to all affected parties in the event that an actual or potential conflict of interest arises, whether personal or organizational.

Global Trade Compliance-

Import and Export: ECR expects its suppliers to ensure that their business practices are in accordance with all applicable laws and regulations governing the import or export of items, services, or

information. If applicable, suppliers must register with the U.S. State Department's Directorate of Defense Trade Controls.

Anti-Boycott: Congress has passed laws prohibiting companies from participating in foreign boycotts that the U.S. does not sanction because they run counter to U.S. policy. ECR's suppliers must not comply with, further, or support any unsanctioned boycott.

Quality-

Delivering quality products and services that meet our customers' requirements is critical. Our suppliers must have a quality assurance process in place and will be required to meet or exceed our contract requirements.

Safety/Environmental-

We continuously strive to create an atmosphere that promotes measured and smart decision-making that guards against potential hazards. We adhere to the highest standards, doing the right thing, the right way, for the right reasons. We believe that every incident is preventable and a target of zero injuries is achievable each and every day.

We are committed to conducting operations and activities in a manner that provides and maintains safe and healthful working conditions, protects the environment and conserves natural resources. In meeting this commitment, it is ECR's policy that no one shall engage in any conduct that violates any environmental, health, or safety laws, or is otherwise

ECR is committed to safety and the continuous improvement of our organization by leveraging our leadership, our training, and the work practices that our superior craftspeople employ. We embrace safety leadership at all levels of our organization, and we are committed to ensuring that health and safety at work is paramount to our business processes.

ECR is committed to conducting operations and activities in a manner that protects the environment and conserves natural resources. ECR's policy is that no Supplier shall engage in conduct that violates environmental laws or regulations.

Confidential and Proprietary Information Protection and Security-

ECR expects its suppliers to properly handle, store and secure sensitive information such as confidential or proprietary information or personally identifiable information. Suppliers must comply with applicable data privacy laws. Additionally, ECR's suppliers must use appropriate physical and electronic security measures to protect information against unauthorized access, use, destruction, modification, or disclosure and ensure compliance with DFARS clause 252.204-7012 – "Safeguarding Covered Defense Information" when applicable. Such information should not be used for any other purpose than the specific business purpose for which it was provided.

Intellectual Property Protection-

ECR requires its suppliers to comply with all laws governing use, disclosure and protection of intellectual property, including patents, copyrights, trademarks and service marks.

Counterfeit Parts-

ECR expects its suppliers to develop, implement, and maintain policies, procedures and methods to detect and avoid introducing counterfeit parts and materials into deliverable products, including complying with DFARS 252.246-7007 as applicable. Our suppliers must promptly notify us and recipients of counterfeit parts when appropriate.

Ethics Program-

ECR's suppliers must have effective systems in place to comply with laws, regulations and the standards set forth in this Supplier Code of Conduct, including systems that ensure compliance with FAR 52.203-13 Contractor Code of Business Ethics and Conduct, as applicable. We expect our suppliers to provide their employees with reasonable avenues to raise legal or ethical concerns without fear of retaliation and take preventative or corrective action when warranted.

Consequences for Violating Code-

ECR reserves the right to pursue corrective action to remedy any violation of any of these standards. In the case of a violation of law or regulation, ECR may be required to report such violations to the proper authorities.