



Introduction

Austin Industries and its operating companies, Austin Bridge & Road, Austin Commercial and Austin Industrial ("Austin"), are committed to integrity, transparency and high standards of conduct in all dealings with vendors, subcontractors and service providers ("business partners"). Austin expects the same high standards from its business partners that it demands from its employee-owners.

**Austin's Expectations of
Business Partners**

- All business activities are conducted in an honest and ethical manner and in compliance with all federal, state and local laws and regulations. Austin is an equal opportunity employer and expects the same from business partners.
- All business partners who work on an Austin job site are expected to comply with Austin's Safety, Health and Environmental policies and procedures in execution of the work. This includes Austin's Drug-free Workplace requirement.
- All business partners are expected to comply completely with the terms and conditions of their agreement with Austin, and conversely, business partners can expect the same from Austin.
- Any payment in cash to an employee-owner of Austin is strictly prohibited. Providing merchandise to an employee-owner of Austin to obtain favorable treatment in securing or retaining business or to obtain special concessions is also strictly prohibited. This is not intended to prohibit modest gifts (under \$100 in value) openly presented in the normal course of business or occasional business entertainment done on an ordinary and customary basis. Frequent or lavish expenditures on business entertainment that are likely to be perceived by the business partner as establishing an expectation of future favorable treatment are not acceptable.
- Recreational activities such as golf, hunting, fishing, sports and entertainment events and business travel funded by business partners are acceptable in moderation and only if such activities further important business relationships without establishing for the business partner an expectation of future favorable treatment. Such activities costing more than \$200 are presumed to be excessive.
- Misconduct by Austin employee-owners involving diversion of materials, services or cash to personal use is expected to be reported immediately by the means outlined below. Examples of such misconduct include, but are not limited to:
 - Delivery of materials purchased by Austin to addresses other than that indicated on the subcontract or purchase order executed by Austin as the project site;
 - Payment for excess project materials in cash to an employee-owner or by check made payable to anyone other than Austin;
 - Performing construction or other services for the personal



benefit of an Austin employee-owner either at the project site or at another location; or

- Solicitation of merchandise, services or cash by an Austin employee-owner for the employee-owner's personal benefit.

**What Business Partners can
Expect from Austin**

- All business partners are expected to compete fairly and vigorously for Austin's business and Austin will make its selection decision strictly on the merits of proposals received.
- Austin and its employee-owners will not solicit from its business partners cash, merchandise, lavish business entertainment, recreational activities (golf, hunting, fishing and similar activities) or other consideration as a condition of being considered for business, as a condition of being awarded business or to obtain special or favorable treatment.
- Austin will not disclose pricing or other competitive information to competitors of our business partners
- All business partners are treated fairly and are expected to fully meet the terms of their agreement with Austin.
- Austin will pay business partners timely and in accordance with their agreement with Austin, provided the business partner has performed the work billed and has complied with the terms of their agreement.

Violations and Reporting

Austin expects its business partners to report any violations or suspected violations of the above by Austin or its employee-owners. Violations of the above expectations may be reported:

- To the project manager of the project involved.
- To Austin's General Counsel, Steve Henry, at (214) 443-5500.
- To an independent third party. Austin maintains a confidential hotline where a live operator from an external company staffs the hotline 24 hours a day, seven days a week. At any time, concerns or complaints of any nature may be reported via the Austin Hotline at (800) 880-4991. Identities are kept confidential unless the caller agrees to have it disclosed to Austin and/or the employee-owner(s) involved with the complaint.

Reported concerns or complaints will be investigated as fully as possible with the information provided. The investigator's ability to resolve the issue will be based, in part, on the completeness of the information provided and the investigator's ability to verify that information. Austin's goal is to resolve each reported concern or complaint to the caller's full satisfaction; however, it may not be possible to do so in each case. Callers can check back with the Austin Hotline to determine the results of the investigation.



Neither Austin nor Austin employee-owners will take any action against anyone for reporting or threatening to report a concern, complaint or violation, or cooperating with investigations provided that the person acted in good faith and with a reasonable belief that his or her information is true. However, if a caller believes to have been the subject of retaliation, the caller is encouraged to contact the Austin Hotline.

This policy applies to all Austin Employee-owners, vendors, subcontractors and service providers. Failure to report violations by Austin subcontractors, vendors, and service providers may result in termination of current business relationships, removal of the business partner from consideration for future work, and/or legal action where the actions or omissions of the business partner so warrant.