



THE HOT LINE WAY TO DO
BUSINESS



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CORE VALUES



1 Incident & Injury Free
Our commitment to safety will always be at the forefront.

2 Integrity & Doing the Right Thing
Always behave in a manner consistent with what is right or moral. Be honest and keep our promises, living our values through action.

3 People as Our Source of Strength
We believe an investment in our people is an investment in our Company's future.

4 Direct, Open & Honest Communication
We communicate in real time, keeping everyone informed and value feedback from everyone. We treat everyone with the utmost respect.

5 Client Focus
We strive for 100% client satisfaction and learn from each and every interaction.

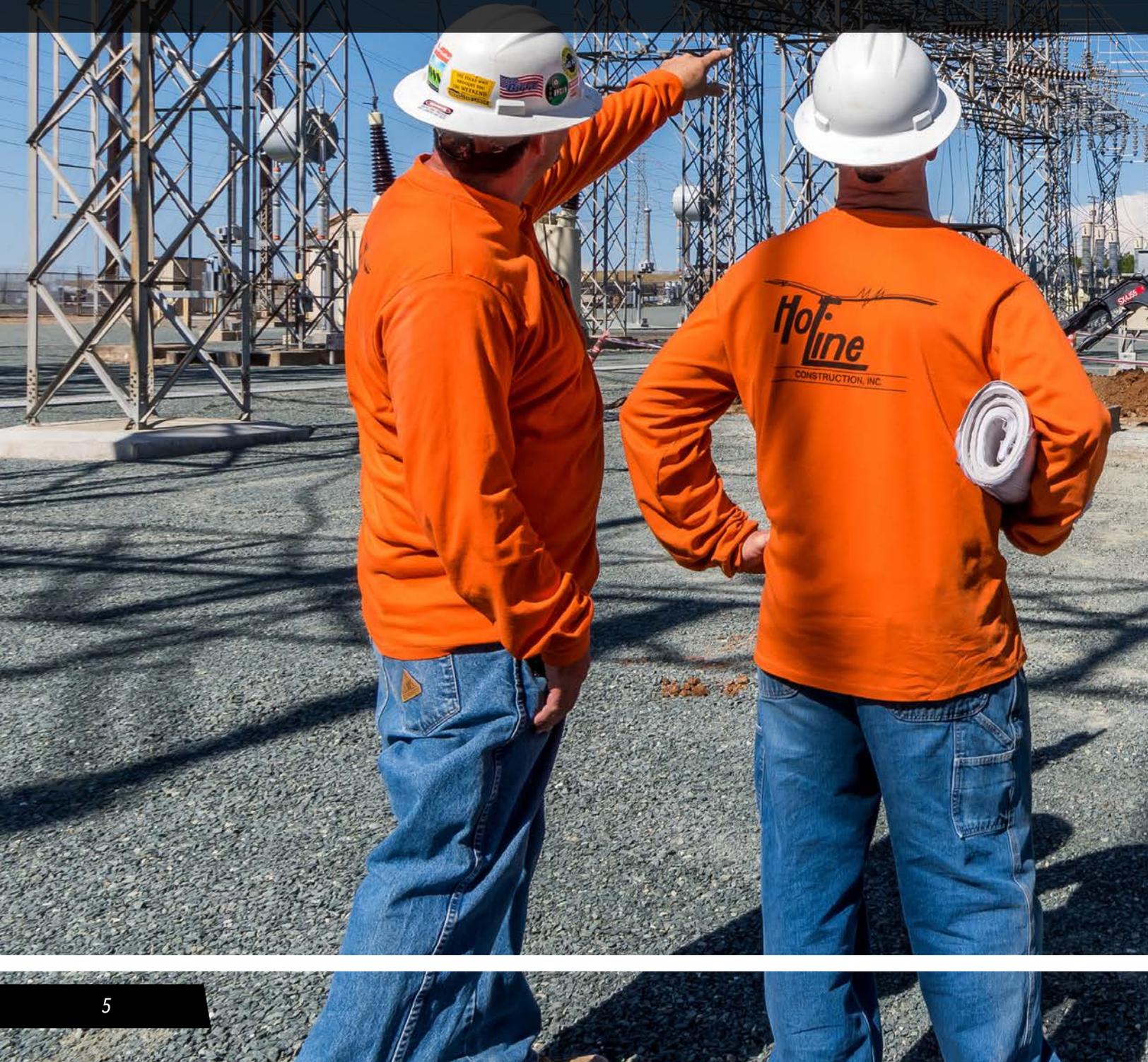
6 Continuous Improvement
Keeping an open mind, listening, and seeking knowledge for the development of the company.

7 High Quality & Value Service
Our GOAL is to be the best high voltage contractor in the business.

8 Strong Work Ethic
We work to ensure the highest quality service and product 100% of the time.

9 In God We Trust

SUPPLIER CODE OF CONDUCT



IMPROPER PAYMENTS

Bribery in any form is strictly prohibited. Employees are forbidden from promising anything of value to gain an improper advantage. Hot Line Construction utilizes a high-tech accounting software program to ensure impeccable financial dealings and records.



REGULATORY EXCELLENCE

In the high voltage industry, there are hundreds of laws and regulations that must be followed. Not only does Hot Line Construction insist on abiding by each of those mandates, but we expect our suppliers and sub-contractors to do the same.



ANTI-MONEY LAUNDERING

Hot Line Construction will only conduct business with legitimate entities. We unequivocally refuse to enter into a relationship with any customer or supplier that is involved in money laundering or any other type of illegal business dealings.



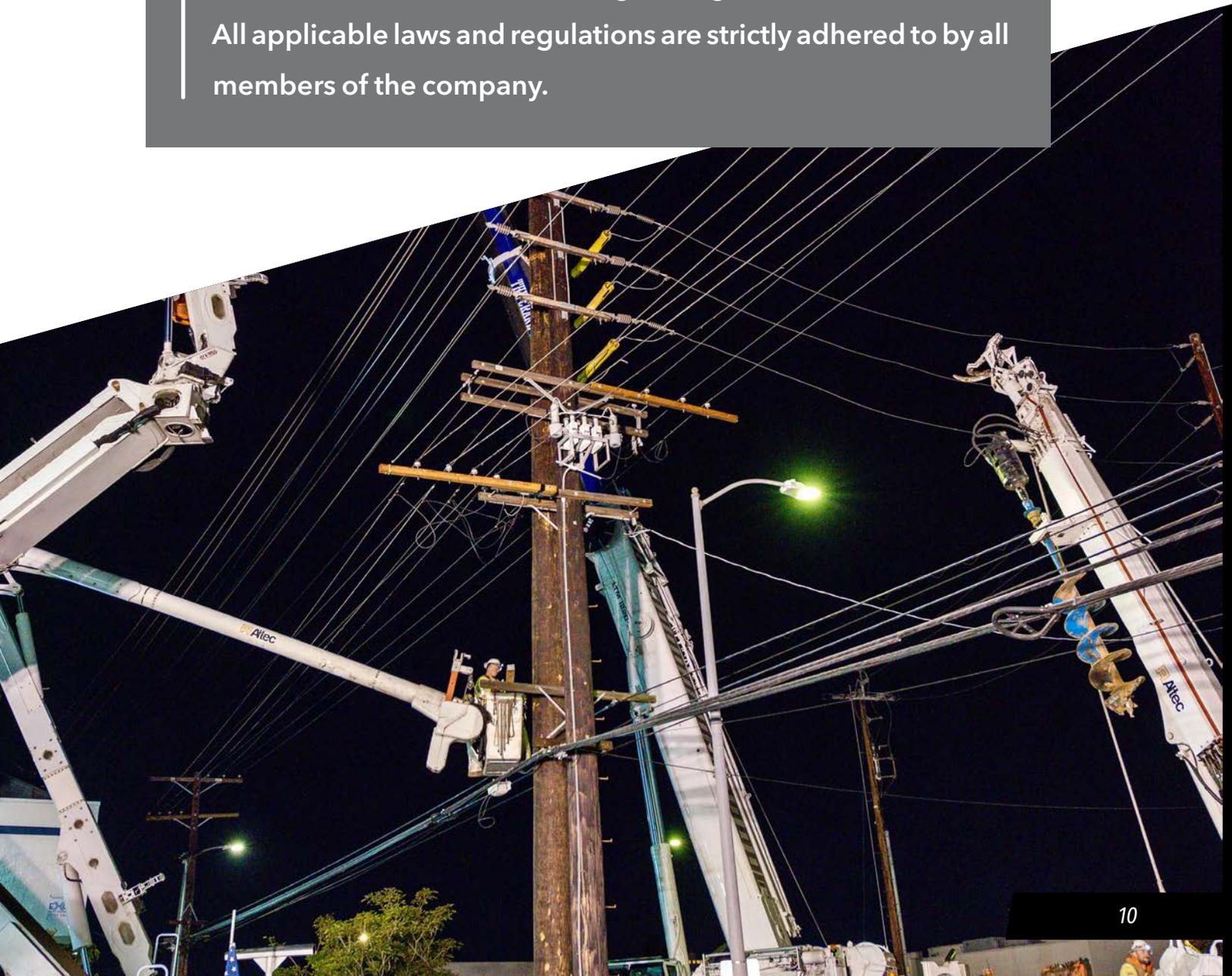
SUPPLIER RELATIONSHIPS

Hot Line Construction's high level of integrity is directly tied to the suppliers and sub-contractors that we choose to do business with. It is of the utmost importance that our company maintain relationships built on and maintained by strong business ethics and standards.



WORKING *WITH* GOVERNMENTS

When conducting business with any government entity, Hot Line Construction insists on following the highest ethical standards. All applicable laws and regulations are strictly adhered to by all members of the company.



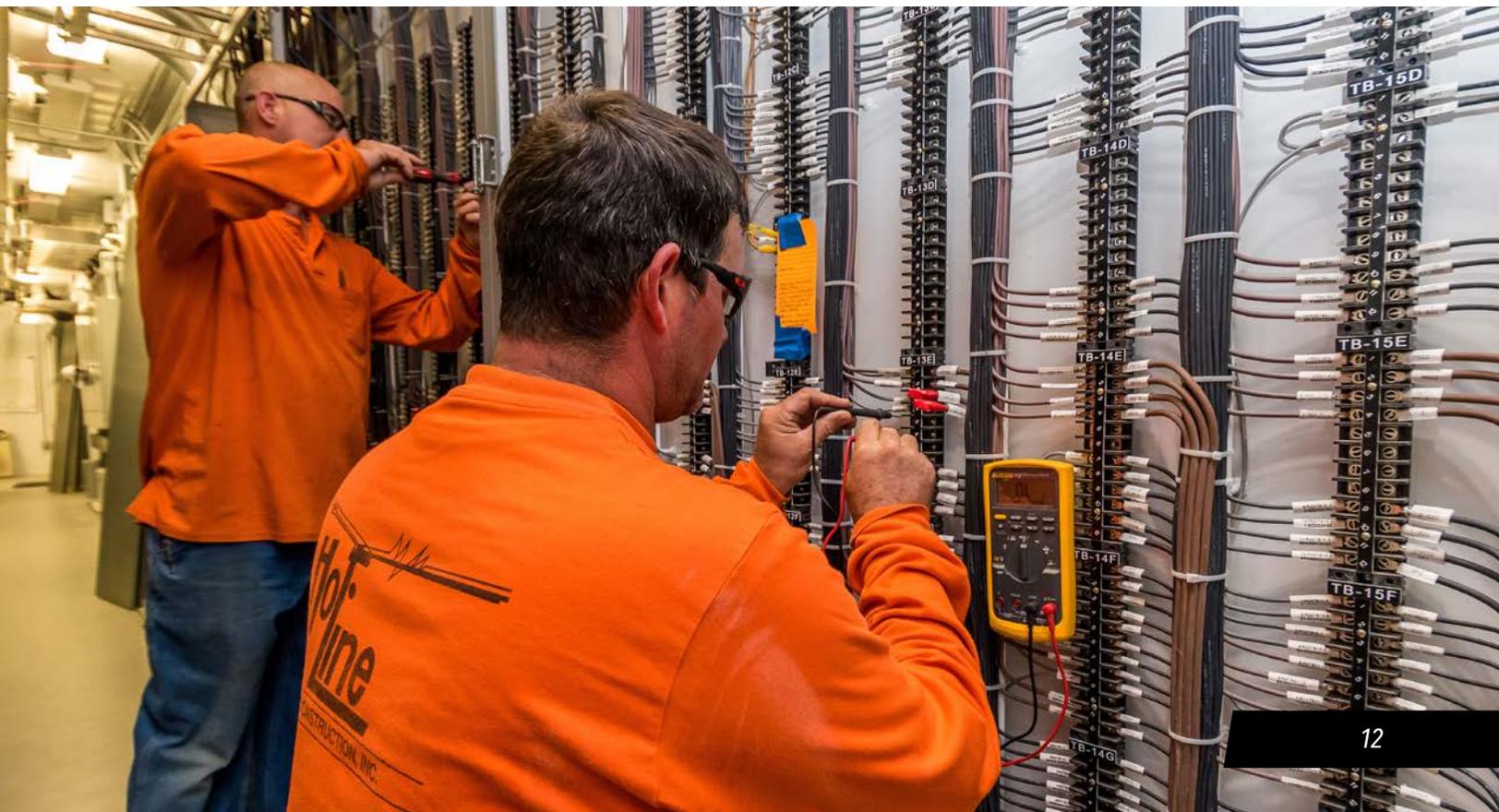
COMPETITION LAW

Hot Line Construction recognizes the importance of competition laws. All employees hold a duty to comply with all regulations and orders related to competition laws. Collusion of any sort between Hot Line employees and other companies with the goal of manipulating pricing or the bidding process is strictly forbidden. All employees must be aware of the appearance or existence of inappropriate business relationships with other companies' representatives.



FAIR EMPLOYMENT PRACTICES

Hot Line Construction strives to maintain an open and honest working environment, whether in the office or in the field. We staunchly prohibit any retaliatory action from being taken against any employee that raises a concern regarding policy, regulations, or laws.



SAFETY, HEALTH & ENVIRONMENT

Here at Hot Line Construction, safety has always been and remains our number one value. The Hot Line Safety, Health & Environmental Handbook was developed and is maintained with the goal of safety and health for all employees.



CONTROLLERSHIP

Integrity is a Hot Line Construction company core value. All employees, from administrative staff to management, are expected to conduct themselves in a manner consistent with this value. Employees are encouraged to raise concern if they feel that any transaction, accounting or reporting issue has been in violation of our controllership values and reputation.

CONFLICT *OF* INTEREST

Conflicts of interest are bound to arise in any business. That alone is not a violation, but failing to recognize and report that conflict is a violation. When an employee discloses a potential conflict of interest, it gives management an opportunity to address it and prevent any risks that might arise from the conflict.



ENVIRONMENTAL SUSTAINABILITY

Hot Line Construction understands that there are inherent environmental risks and responsibilities associated with our line of work. We also expect all suppliers to recognize and address those same issues. Suppliers should have their own set of processes in place to ensure that they are abiding by all environmental sustainability laws.

BEST PRACTICES



1 TEST IT HOT BEFORE YOU TEST IT DEAD

Prior to de-energizing UG lines, verify the line is energized & test points are operating correctly, whenever possible.

2 CHECKING 3Ø VOLTAGES & ROTATION TAKES TWO

When checking 3Ø voltage & rotation, a second qualified person shall be present to verify phase markings and record test results.

3 IDENTIFY, ISOLATE, TEST & GROUNDS

"Identify" all lines or equipment to be worked.

"Isolate" them from potential sources & back feed.

"Test" for voltage.

"Ground" all lines and equipment to be worked.

4 FOREMEN SHALL LEAD BY EXAMPLE

Leadership starts with the expectations you set for your crew. These must be clear, concise, and, without question, consistent. You must hold yourself, as well as each member of the crew, to the same standard. To be a foreman, you must provide strong leadership; if it's their friendship you are concerned

about, then send them home safe at the end of each day.

5 THREE-WAY COMMUNICATION

Any action with the potential to put you or another crew member in harm's way, shall be preceded by 3-way communication.

Step 1: Sender Initiates - "Coming Hot"

Step 2: Receiver acknowledges - "Coming Hot"

Step 3: Sender confirms - "Coming Hot"

6 CHECK AMPERAGE BEFORE DROPPING LOAD

Test line current before any line or equipment is de-energized to ensure the proper load dropping tool is utilized.

7 VERIFY FINAL TORQUE BY HAND

All bolt tightening on strain holding hardware, such as dead-end shoes, shall be torqued to ASTM specifications, or applicable standards, for the task being performed. They shall also be inspected for proper fit.

8 VISUALLY INSPECT LINES & EQUIPMENT PRIOR TO CHANGING STRAIN

Prior to changing strain inspect the structure to be worked as well as adjacent structures, conductors, &



clearances for potential hazards (i.e. automatic splices, broken or rotten arms, damaged conductor(s), etc.)

All unsupported conductor crossings within (2) spans of the worksite involving one or more energized conductors, (i.e. flying taps, mid-span crossings, etc.) shall be identified and documented on the tailboard form along with the measures utilized to mitigate any potentially hazardous reductions in clearance. *Example: There is a 4kv line that crosses under the 16kv line 1 span S/O of the pole being replaced. Insulated protective cover will be installed on the 4kv & 16kv conductors at the crossing prior to changing strain.*

9 IDENTIFY & MARK CONDUCTORS PRIOR TO OPENING

Prior to opening multiple conductors, primary or secondary, identify and mark each conductor with colored phasing tape.

10 ALWAYS TAKE A HAND LINE, IT MAY BE YOUR LIFELINE

Anytime work is to be performed from the pole or out of an aerial platform, such as an insulated bucket, a Hand Line must be taken. *(Note: Not only does it minimize wasted moves and save fuel, but actually using the hand line as it was intended, aids in the training of apprentices and keeps*

ground personnel focused on the task at hand. This helps minimize risk from unseen hazards for personnel in the air.)

11 REPORT ALL INCIDENTS, ACCIDENTS & INJURIES

Report all potential customer complaints, equipment damage, utility damage, switching issues, etc. to your general foreman, as soon as reasonably possible.

12 TREAT TOOLS & EQUIPMENT AS IF YOUR LIVES DEPEND ON THEM

Always treat company tools and equipment the same way you would treat your own. Broken or damaged tools should immediately be returned for replacement or repair. Properly store and secure tools when not in use.

13 QUALIFIED PERSONNEL SHALL BE FAMILIAR WITH UTILITY SWITCHING POLICIES

All Hot Line personnel qualified to take clearances on SCE facilities must be familiar with "Standard Operating Bulletin 302" ("SOB 302"). SOB 302 outlines SCE rules for contractors working on energized lines & equipment. *(page 142 in SCE's "Distribution Operations Maintenance Policies & Procedures Manual" located in the "Foremen Reference" folder of Dropbox).*



14 VERTICAL CONSTRUCTION REQUIRES ADDITIONAL PRECAUTIONS

Minimize potential hazards associated with vertical construction, before performing any task that may affect conductor sag on energized primary lines. *(Keeping in mind that you must always work from the bottom up, stagger conductors on adjacent poles by moving out on a hot arm or to another position on x-arm. Properly placed "snubs" can also reduce risk, inherent to vertical configurations.)*

15 TEACH APPRENTICES THE RIGHT WAY, EVERY DAY, EVERY TIME

Linemen and Foremen must not forget that the habits formed by apprentices, while under your direction, will stay with them for the rest of their career. It is our responsibility to teach them the right way. We owe it to their families, friends, and to our trade.

16 NEVER DIG WITHOUT A VALID USA TICKET

Ensure, prior to any excavation, that valid USA markings are in place and the ticket is updated. Ensure all utilities have their markings in place. Understand the colors.

17 DO NOT ENTER UNTIL HEAT SCAN & ATMOSPHERE TEST ARE PERFORMED

Prior to entering all UG structures containing upgrounded and/or energized lines or equipment, a thermal scan shall be performed on all components, splices or apparatus, in addition to the required atmosphere testing, voltage tests, etc.

18 VERIFY APPARATUS CONFIGURATION PRIOR TO INSTALLATION

Always verify transformer primary voltage requirements & secondary voltage output prior to installation, by reading the nameplate. This includes new transformers, as well as those being replaced.

19 CHECK SECONDARY VOLTAGE PRIOR TO CONNECTING LOAD

Always check secondary voltage & rotation, if applicable, prior to connecting load to new transformers or existing transformers that have been reworked in any manner that has the potential for human error.

20 ALWAYS SECURE TOOLS & MATERIAL WHEN WORKING FROM AN ELEVATED POSITIONS

All loose objects, including tools, hardware, etc., shall be properly secured when work is performed more than 6' from the ground. Items

placed outside of bucket tubs must be in properly secured grunt bags, attached to rated carabiners, or tether. No object shall be placed on the edge or lip of a bucket, on top of controls, or any other unsecured location.

21 ONLY USE TOOLS & EQUIPMENT DESIGNED AND/OR RATED FOR THE TASK

Never perform any task or operation with a tool or piece of equipment that it is not designed and/or rated for.

22 CREWS SHALL CARAVAN WHEN LEAVING AND RETURNING TO THE YARD

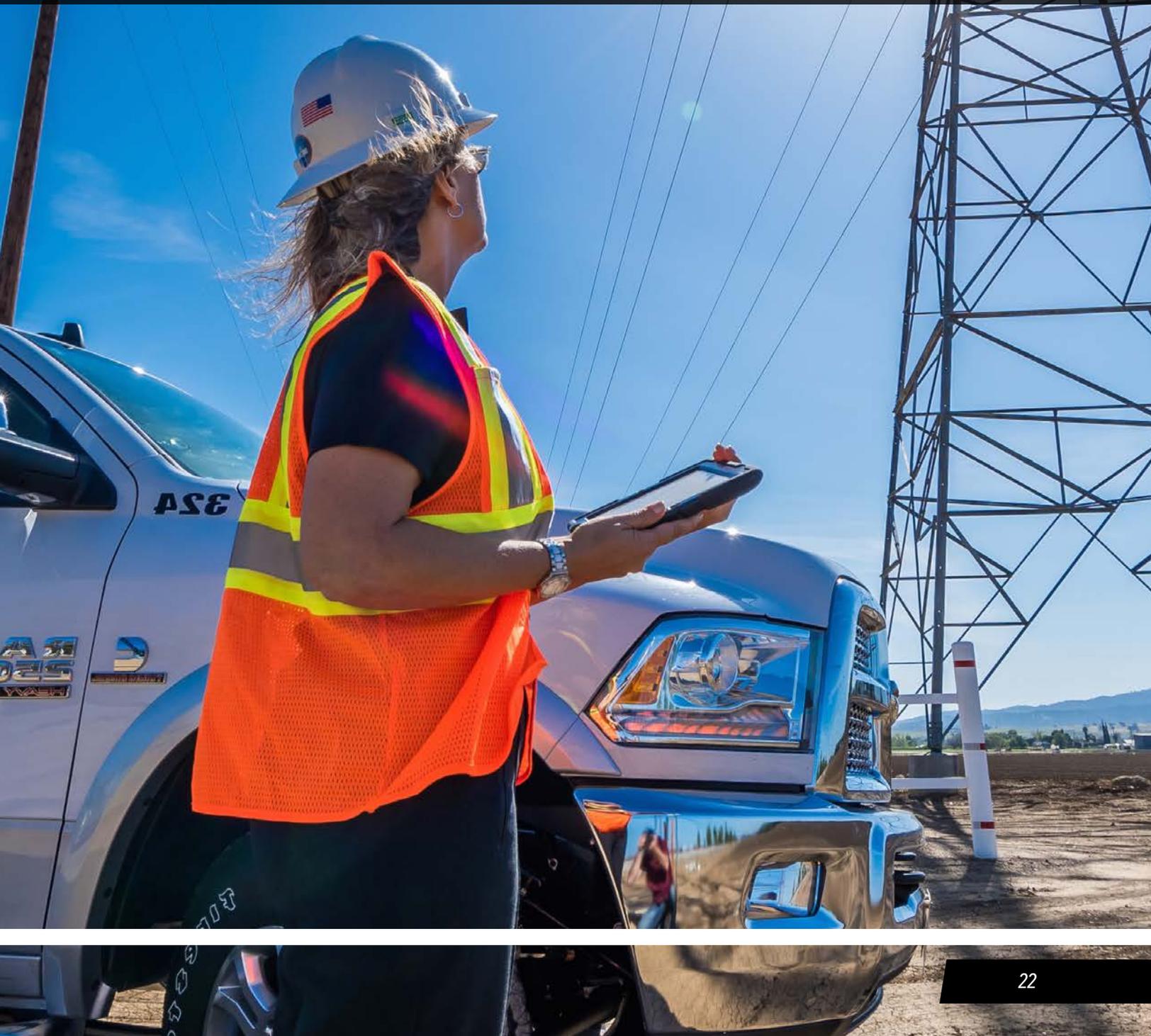
The crew shall leave the yard and travel to the work location together whenever possible, with the most experienced driver leading. This same directive applies to when the crew returns to the yard at the end of the day. Apprentice drivers shall be accompanied by an experienced crew member whenever possible. The crews shall obey all traffic rules and drive safely.

23 TAKE OR REQUEST A NO-TEST/ ONE-SHOT WHEN WORKING ON ENERGIZED LINES/EQUIPMENT

Whenever possible, reclosing devices should be disabled prior to performing work on or near lines or equipment energized above 600v in accordance with facility owner procedures.



BUSINESS ETHICS POLICY



STANDARDS *OF* BUSINESS PRACTICES

Hot Line Construction is committed to the highest ethical standards in each and every one of our business dealings.



BRIBERY & CORRUPTION

Hot Line Construction is resolutely opposed to bribery and corruption in any form whatsoever. Any payments or gifts made by or on behalf of Hot Line Construction and which induce or are intended to induce someone to act improperly or influence them in the performance of their duty are matters which will be investigated and may result in disciplinary action, including summary dismissal, against employees concerned. Gifts or entertainment may only be offered to or accepted from a third party if they are consistent with customary business practice in the relevant territory, are appropriate in value and cannot be interpreted as inducements. Should any doubt arise about proper way to proceed in any ethical situation,

senior level management and/or Hot Line Construction's legal counsel will be consulted. Sales of Hot Line Construction's services and products, and purchases of services and products from suppliers will be made based on the benefit to Hot Line Construction in terms of service, quality, performance, price, value and strong customer relationships. They will never be based on giving or receiving in the form of payments, gifts, entertainment, favors or any other form of inducement.

COMPETITION

Hot Line Construction will always compete vigorously and in a fair and ethical way. Competitive success is built on providing good value and excellent service. When in contact with competitors, employees will avoid discussing confidential information and will never attempt to improperly acquire competitors' trade secrets or any other confidential information. Employees must not publicize, discuss, or share with competitors (even indirectly) intellectual capital, pricing information or engage in any conduct or practices which would conflict with Hot Line Construction's policies and procedures.



POLITICAL CONTRIBUTIONS

Hot Line Construction does not make contributions to political parties, political candidates or political organizations. This policy is to be followed company-wide. Any exceptions to this approach must be approved in advance by the Hot Line Construction Board of Directors. Contributions and payments are not limited to cash donations, event sponsorship, in-kind gifts, etc.



TREATMENT *OF* SUPPLIERS

Our suppliers are entitled to fair treatment. It is our policy to pay suppliers in accordance with agreed terms of trade. We set high standards for our suppliers in the context of our own ethical policy. All suppliers are expected to comply with these standards or ensure that there is a clear timeline for full implementation within their own organization, their associated suppliers, and subcontractors.

TREATMENT *OF* CUSTOMERS

Mutual trust and confidence between Hot Line Construction and our customers is vital. All employees should strive to consistently deliver excellent service, and value meeting customer's expectations. An accurate understanding of both the customer's expectations and the company's obligations are vital and depend on open and clear communication between all involved parties. Our goal is to understand the customer's needs and work jointly to deliver them. If during contract discussions we consider that a customer's interests are not well served in the long term by our proposals, we will make this clear even if it negatively impacts Hot Line Construction. Being open and honest with our customers also means that we will raise concerns with them if we become aware of any business practices or processes in their business which we believe are contrary to their values or may compromise our own values.

OUR APPROACH TO CORPORATE GOVERNANCE

Compliance with the Law

Hot Line Construction complies fully with all relevant local, state, and federal laws and regulations. It is the responsibility of all managers to ensure, by taking legal or other expert advice where appropriate, that they are informed of all local laws and regulations that may affect any business engagements.

Accounting Standards & Records

Hot Line Construction accounting and reporting will reflect the economic substance of the Company's business activities, consistent with generally accepted accounting principles, standards, and regulations for accounting and financial reporting. Hot Line Construction will comply with all Company policies and applicable laws and regulations relating to the preservation of documents and records.

External Reporting

Hot Line Construction may be required to make statements or provide reports to regulatory bodies, government agencies or other government departments. Hot Line Construction will ensure that these statements or reports are correct and accurate. Senior management must be made aware of any sensitive disclosure before it is made.

Policies & Procedures

Hot Line Construction recognizes that there are risks associated with carrying out any business activity. Management is responsible for ensuring that policies and procedures are in place to manage risks and that these policies and procedures are complied with. Employees should ensure that they are aware of the risks associated with their activities and that they comply with policies and procedures in place to manage those risks.

INTELLECTUAL PROPERTY

Intellectual property (IP) is among Hot Line Construction's most valuable assets and our employees create, use, access or have access to IP every day. IP includes patents, trade secrets, trademarks, copyrights and designs and helps protect Hot Line Construction's inventions, manufacturing processes, brands, business plans, marketing documents, graphics, software, product shapes, proprietary information, and many other things. Proprietary information is information that is undisclosed, for example, not publicly known or generally available, and that is held in confidence. Hot Line Construction limits and/or grants access to certain information to authorized individuals who need it for legitimate business purposes. Hot Line Construction respects individual privacy rights. Hot Line Construction is committed to collecting, handling and protecting personal information responsibly, and in

compliance with applicable privacy and information security laws and with Hot Line Construction's Commitment to the Protection of Personal Information (Hot Line Construction's Binding Corporate Rules), where applicable. Hot Line encourages all employees to assist in the prevention of cyber security breaches. To prevent unauthorized access, accidental loss, disclosure, or destruction of Hot Line Construction's information:

- Secure physical copies and storage areas.
- Use strong passwords and don't share your password with anyone.
- Use only approved systems and tools for storage, transmission, and backup of Hot Line Construction information.
- Do not use personal email, unapproved devices, or software to conduct business.
- When posting information online, do not disclose personal information, trade secrets, proprietary or other commercially sensitive information.
- Know the signs of phishing and reports any incidents to IT immediately.

CYBERSECURITY & PRIVACY

As technology advances, the occurrence of cyber security breaches is at an all-time high. Hot Line Construction seeks to protect its networks, systems, devices, and information in our possession. It is our policy to use information only for legitimate purposes and to maintain appropriate access controls.

Cyber Security & Privacy incidents can happen in a number of ways. Employees are to report any risks or incidents the IT Department, including:

- Possible loss or theft of data, including lost laptops and other computing equipment.
- Loss, misuse, or improper access to data.
- Security issues involving a Hot Line product or system.

OUR COMMITMENT TO OUR EMPLOYEES

Hot Line Construction is committed to supporting individual and business performance through employing the best people at all levels and creating an environment in which they want to and can contribute to the Hot Line Construction's success. Hot Line Construction will strive to achieve a working environment in which commitment to the goals and values of Hot Line Construction are maintained. Hot Line Construction will always ensure that individual employees are treated fairly with dignity and respect.



EMPLOYMENT SCREENING

If an employee of Hot Line Construction is found guilty of any offense relating to dishonesty or is sentenced to a probationary order or spend time in law enforcement custody, action may be taken. This includes termination, depending on the circumstances of the case in accordance with Hot Line Construction's disciplinary policy.

Continued employment will be subject to satisfactory completion of Hot Line Construction's screening procedures. Our employees are expected to maintain these standards for the duration of their employment. Should an employee fail to do so, such that he or she no longer meets the qualification requirements, their employment will be terminated, with or without

notice, as appropriate. Some Hot Line Construction positions legally require that the employee obtain and maintain a formal license or qualification. In the event that an employee is unable to obtain a license or qualification required for their role as set out in their contract of employment, or the license or qualification is withdrawn or revoked, his or her continued employment will be reviewed and may be terminated depending on the circumstances, including the availability of jobs which the company considers to be suitable alternatives. In order to protect the interests of its employees and customers, and because of the nature of its business, Hot Line Construction will apply rigorous pre-employment screening and selection techniques.

EQUAL OPPORTUNITY

Hot Line Construction values all its employees for their contribution to the business. Opportunities for advancement will be equal and will not be influenced by considerations other than their performance, ability, and aptitude. Employees will be provided with the opportunity to further develop their skills, potential and, if appropriate, their positions within the company.



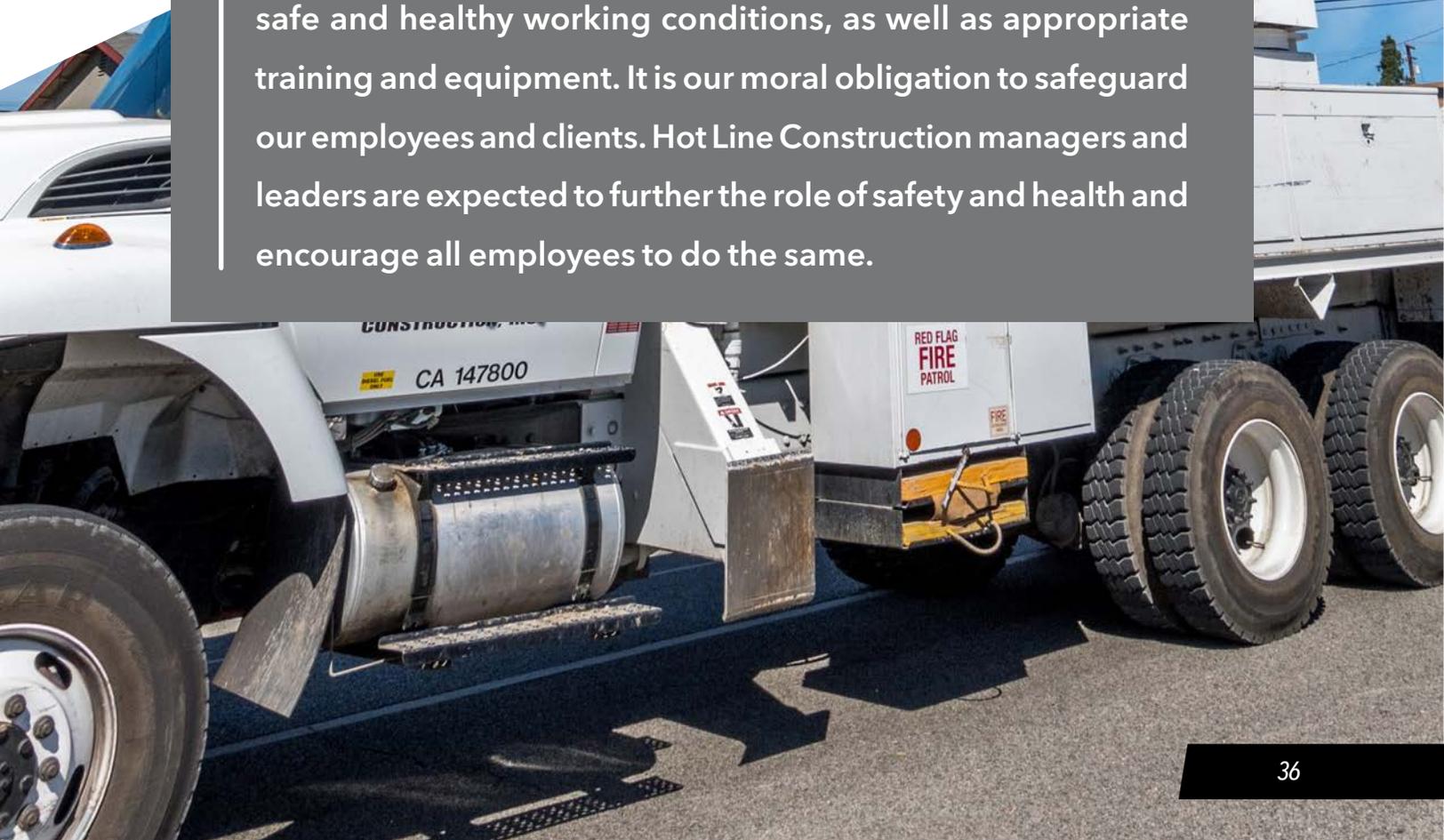
HARASSMENT

All employees are to be treated with integrity and respect. Harassment of any kind will not be tolerated. Harassment can be defined as unwanted behavior, which is intimidating, upsetting, embarrassing, humiliating or offensive. Harassment (racial, sexual or of any other kind) of any employee is unacceptable. Should an employee believe, in good faith, that he or she has been harassed, they are to contact Hot Line Construction's Human Resources Manager immediately. A thorough investigation of all raised matters will be conducted swiftly and fairly.



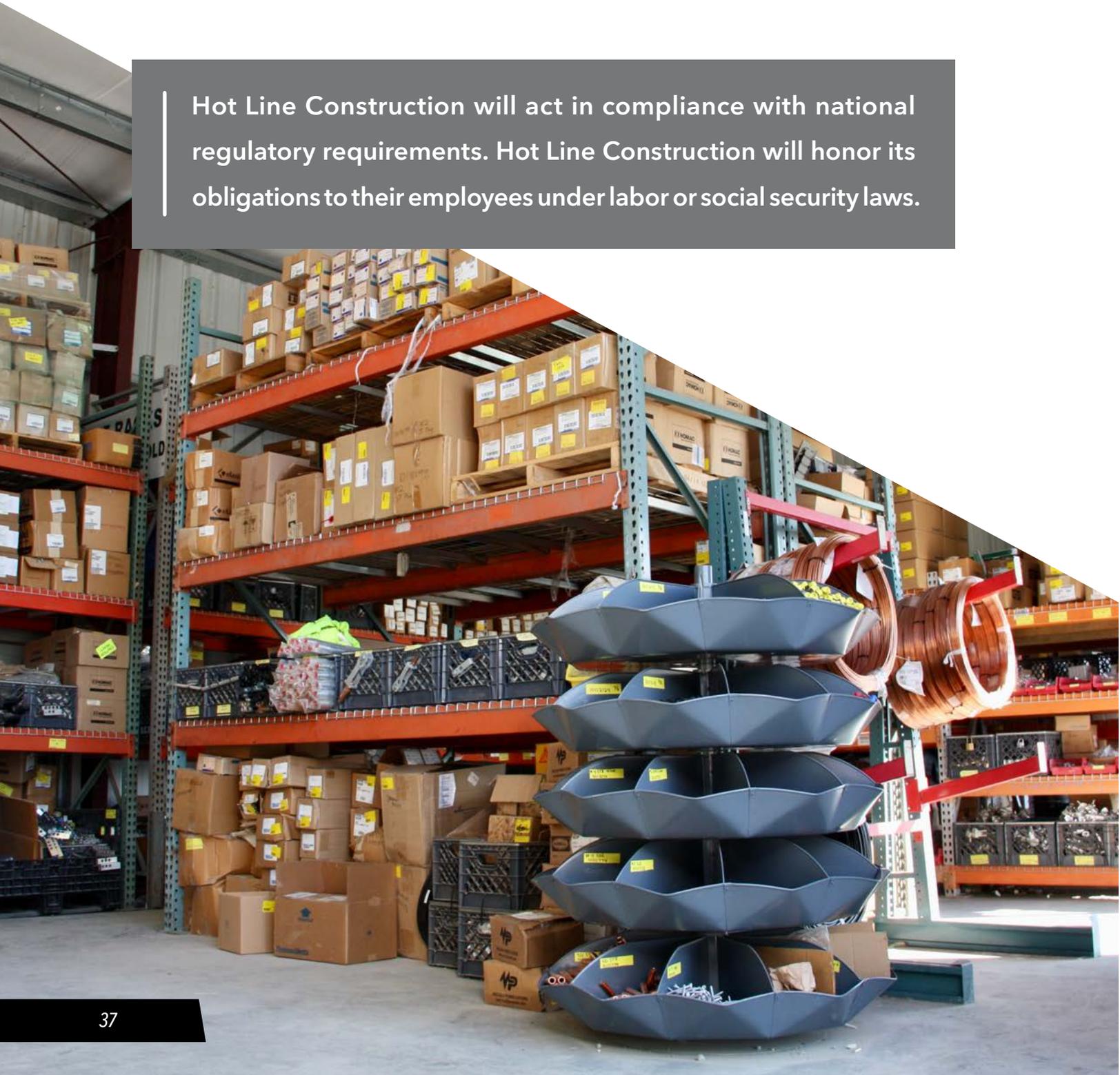
HEALTH & SAFETY

Hot Line Construction is passionate about working safely and taking great care to protect our employees and customers from harm. Our policies and procedures focus on health and safety risks at Hot Line Construction. All companies that Hot Line Construction does business with must meet these standards in addition to complying with the relevant laws and our customer's health and safety requirements. This includes consulting employees on health and safety matters, providing them with safe and healthy working conditions, as well as appropriate training and equipment. It is our moral obligation to safeguard our employees and clients. Hot Line Construction managers and leaders are expected to further the role of safety and health and encourage all employees to do the same.



NATIONAL REGULATION

Hot Line Construction will act in compliance with national regulatory requirements. Hot Line Construction will honor its obligations to their employees under labor or social security laws.



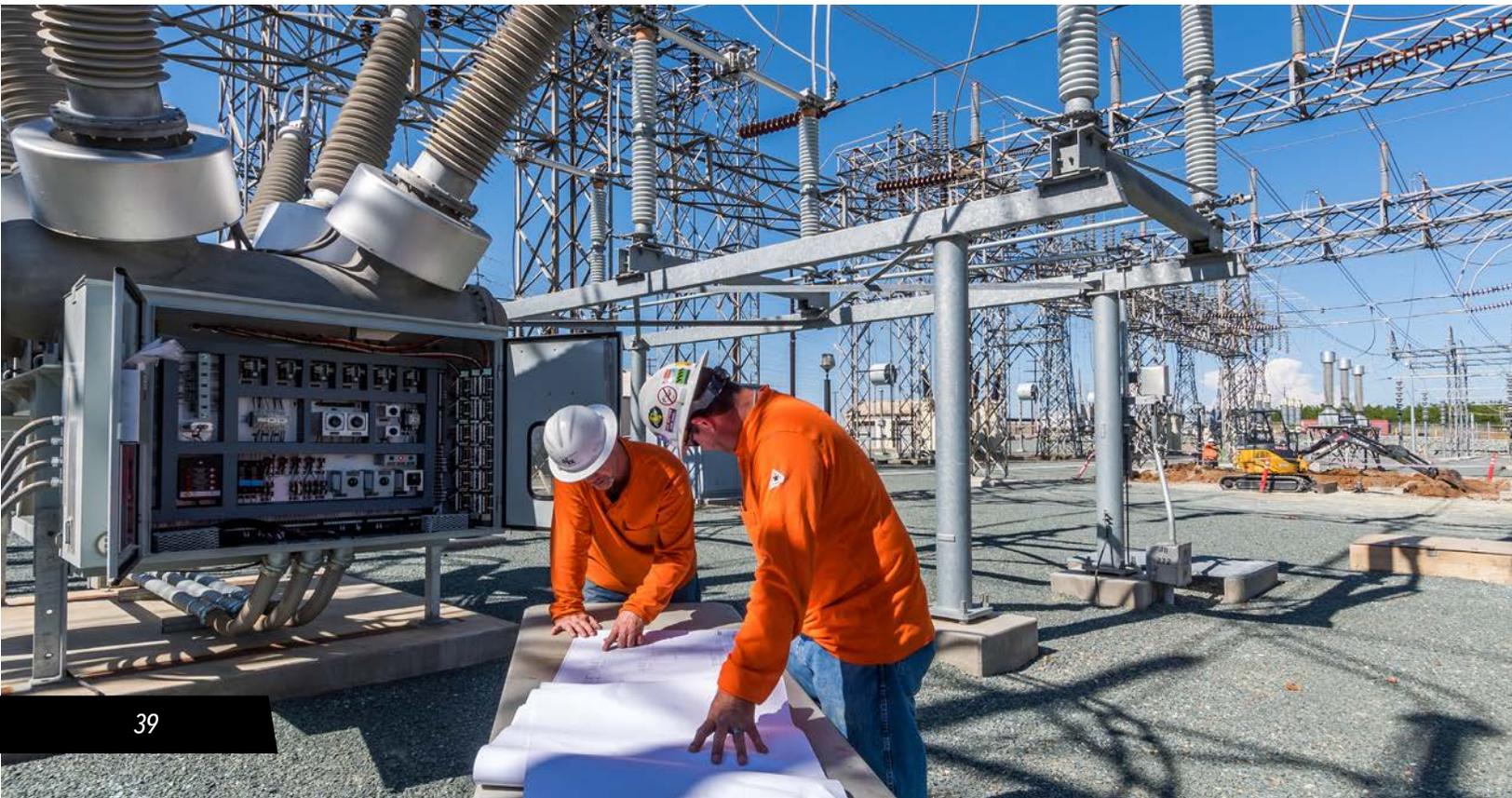
TERMS *OF* EMPLOYMENT

Hot Line Construction and their employees will strive to create long-term relationships. Employees will work the hours and be paid at least as favorable as the terms established by national legislation, agreements, or industry standards. Where none exist, Hot Line Construction will set standards by ensuring wages paid are based on current market conditions and that the hours worked are not excessive, regardless of local practices.



INTERNATIONAL LABOR ORGANIZATION (ILO) DECLARATION ON FUNDAMENTAL PRINCIPLES

Hot Line Construction supports the four fundamental principles in the ILO Declaration. Thus, in accordance with local legislation and practice we will respect freedom of association and the right to collective bargaining. Employment will be freely chosen with no use of forced or child labor, and we will not discriminate on the basis of gender, color, ethnicity, culture, religion, sexual orientation or disability and will abide by all anti-discrimination legislation in every jurisdiction where Hot Line Construction operates.



OUR APPROACH TO GOOD CORPORATE CITIZENSHIP

Hot Line Construction is committed to fulfilling its responsibilities in all human rights matters. The Guiding Principles affirm four international standards that have achieved broad international consensus as a human rights baseline for all businesses:

- The Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Convention on Economic, Social and Cultural Rights
- The International Labor Organization Declaration on Fundamental Rights at Work

Hot Line Construction will conduct its business with respect and consideration for the environment. We will strive actively to reduce Hot Line Construction's overall impact on the environment by lessening our carbon footprint and the management of waste, water, vehicle emissions and energy consumption. Hot Line Construction is fully committed to supporting and assisting the communities in which it operates through charitable fundraising, sponsorship of community projects and voluntary work by employees. We will also serve local interests by providing good employment opportunities and effective services and products and paying a fair wage which supports a reasonable standard of living for our employees and their families.

IIF: INCIDENT & INJURY FREE POLICY

I AM ACCOUNTABLE

- I am accountable for safe outcomes and for helping my colleagues achieve safe outcomes.
- Empower my teams and hold them accountable for safety.
- I role model safety leadership.
- I exercise integrity, in moments of truth.
- I follow up and follow through.

SAFETY FIRST

- Safety is our highest priority - safety is first in all of our business reviews and decisions.
- Be safe or get out - we do not compromise safety, irrespective of the market or the business opportunity.
- We have clear targets and milestones to continuously improve safety.

EVERY INCIDENT IS PREVENTABLE

- We demand and develop safety skills, behavior, and attitudes in everyone we work with.
- We reduce the need to rely on individual behaviors through planning and design.
- We invest appropriately in safety.
- We follow simple, clearly communicated minimum standards.
- We implement best practices.



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