RK SUPPLIER AND EMPLOYEE ETHICS POLICY

CONSTRUCTION.
MANUFACTURING.
SERVICE.

OVERVIEW

RK and its business units are committed to ethical business practices in all interactions with our employees, customers and suppliers. Given our high standards, all suppliers, and the RK employees who work with them, are expected to conduct themselves with honesty and fairness. It is a priority for both suppliers and employees to maintain high ethical standards, adhere to all applicable laws and avoid impropriety, unfair dealings or conflicts of interest.

Who is Included

The RK Supplier and Employee Ethics Policy (the Policy) applies to all RK suppliers and includes all third parties doing business with RK: An individual, business, corporation, non-profit or other entity that sells, or seeks to sell, any kind of goods or services to RK. This Policy includes all employees, agents and other representatives working on behalf of our suppliers.

RK's Commitment to Fair Business Practices for Your Success

RK is committed to strengthening our relationships with our valued suppliers. As a part of this effort, we created this Policy to ensure a level playing field and fair opportunities for all of our suppliers in their business dealings with RK.

As a Supplier, You Acknowledge and Abide by this Policy

As an RK Supplier, you are expected to acknowledge this Policy and to apply it in all interactions with RK and any of its affiliated business units as well as all individual employees and agents working on behalf of RK. This Policy only pertains to individual employees. It is not related to your potential financial or in-kind sponsorship of RK company events, such as our RK Apprenticeship Program Banquet. We appreciate your generous and continued support of our company initiatives!

Suppliers have the opportunity to demonstrate their wares and chat with customers at the RK Trade Partner Expo hosted on-site at RK Denver Headquarters.

RK SUPPLIER AND EMPLOYEE ETHICS POLICY

1) GIFTS SHALL NOT BE OFFERED BY SUPPLIERS NOR ACCEPTED BY RK EMPLOYEES

Suppliers' Commitment

As an RK supplier, we expect that you will not offer, promise or provide to any RK employee any form of kickback, favor, cash, gratuity, entertainment, tickets, trips, discounts or anything of value to obtain favorable treatment from RK. RK employees are similarly prohibited from soliciting such favors from you or your organization. This Policy extends to family members and friends employed by both your organization and RK.

Additionally, we request that you contact Stephan Britz, Director of Supply Chain Management, at sbritz@rkmi.com if any of our employees request favors, gifts, trips, entertainment outings or other perks. If you are uncomfortable contacting Stephan, you can leave a confidential message on our Quality and Safety Hotline at 303-785-6998.

RK's Commitment

RK employees are expected to decline any form of kickback, favor, cash, gratuity, entertainment, tickets, trips, discounts or anything of value that is made or offered by our suppliers. If an employee is given a gift, employees are instructed to either return the gift to the Supplier, or turn it over to RK's Director of Supply Chain Management. RK employees are required to inform you of this policy in situations where warranted, and are also to inform RK's senior leadership about any kickbacks, favors or other gifts made or offered by our suppliers.

Acceptable Perks

- Business meals or snacks, of a reasonable amount, are allowable as we recognize that many business transactions are conducted over a meal.
- Business conferences and trade shows approved by an RK Officer.
- Discounts on products and services granted by your organization are acceptable if they are part of an RK-approved Employee Discount Program, or if the discounts are also being offered to all other business associates.
- Small, low-value items given out at events or trade show exhibits sponsored by your organization are acceptable and include t-shirts, pens, mugs, tradeshow bags and the like.

2) SUPPLIERS SHALL AVOID ALL CONFLICTS OF INTEREST

A conflict of interest arises when the personal interests of an RK employee take precedence over RK's ethical standards and the responsibilities of his/her position within the company. Even the appearance of a conflict of interest can be damaging to both you as a Supplier and to RK. As an RK Supplier, you agree not to enter into a financial or any other relationship with any RK employee or agent that creates any actual, potential or perceived conflict of interest for RK. Your agreement is to disclose any conflicts to RK's Director of Supply Chain Management and eliminate them.

3) SUPPLIERS SHALL ABIDE BY FAIR AND LEGAL BUSINESS PRACTICES

As an RK Supplier, you agree not to fix prices or rig bids with our competitors. You agree not to allocate customers or markets with our competitors, or exchange current, recent, or future pricing information with our competitors. You agree to comply with all applicable anti-trust and competition laws. You agree to comply with all local, state and federal laws as well as all policies of RK. You agree to comply with all contractual requirements which flow down to you through your contracts with RK.

4) SUPPLIERS SHALL PROVIDE TOP-QUALITY PRODUCTS AND SERVICES

As an RK Supplier, you agree to supply products and services that comply in all respects with the requirements of our contracts. Including all applicable quality, safety and schedule requirements. You knowingly deliver both top-quality products and services at competitive prices, along with excellent service to RK.

NEED TO REPORT AN ISSUE OR HAVE QUESTIONS?

If you need to report an issue related to gift giving, conflicts of interest, fair business practices or any other issue resulting from your business interactions with RK, please contact me, Stephan Britz, Director of Supply Chain Management, at 303.785.6811 or sbritz@rkmi.com. If you are uncomfortable contacting me, you can leave a confidential message on our Quality and Safety Hotline at 303.785.6998.

Please contact me directly if you have any general questions or concerns about the RK Supplier and Employee Ethics Policy. Thank you again for your partnership. We look forward to continuing our work together.

Regards,

RK Mechanical, Inc.

Stephan Britz
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