

VENDOR CODE OF CONDUCT

Updated: February 28, 2022

1. PURPOSE

OmniTRAX has established standards for its business-related practices that are set out in our Code of Conduct (“Code”). The Code reflects our commitment to our values of Safety, Honesty, Ownership, Respect and Teamwork. OmniTRAX expects that its vendors also share and embrace these values as well as our commitment to regulatory compliance.

While we understand that vendors are independent entities from OmniTRAX, the business practices and actions of a vendor could significantly impact and reflect upon us. Because of this, OmniTRAX expects all vendors and their employees, agents, and subcontractors to follow our high ethical standards set forth in these guidelines while they are conducting business with us or on our behalf.

2. GIFTS, ENTERTAINMENT AND IMPROPER PAYMENTS

Our employees are allowed to accept gifts of nominal value, such as promotional items like pens, mugs, etc. and entertainment that is not lavish or excessive. Any gifts or entertainment in excess of \$25 requires pre-approval by our General Counsel.

3. CONFLICTS OF INTEREST

No employee should engage in a practice or enter into a transaction that would influence him or her to act other than in the best interest of OmniTRAX.

4. RESPECTFUL, HARASSMENT-FREE WORKPLACE

Our organization is committed to maintaining a positive work environment, free from discrimination and any form of harassment, including harassment based on gender, ethnic background, race color, national origin, age, disability, religion, sexual orientation, or any other protected category. Any conduct or comments that create or encourage a hostile or intimidating environment for employees, contractors, suppliers, customers, or others will not be tolerated.

5. KEEPING ACCURATE RECORDS

We expect vendors to provide honest and accurate invoices. Invoices should be itemized, quote the PO number (where relevant), be supported by appropriate documentation and comply with all other requirements as set out in the relevant contract(s). Invoices may not be split to circumvent approval requirements.

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For our trusted steel and iron vendors: If you plan to participate in any OmniTRAX project that involves the use of Federal Aid funding you could be subject to certain “Buy America” requirements. Please retain documentation reflecting that the manufacturing and production of your products occurs within the United States, and be prepared to submit a Certificate of Compliance, along with this supporting documentation, upon request.

6. PROTECTING ASSETS AND PREVENTING FRAUD

When procuring goods and services on behalf of OmniTRAX, all Employees must obtain multiple competitive bids when required by law, and whenever possible otherwise to support full and fair competition. Suppliers must develop their bids independently without consulting other bidders.

7. CONFIDENTIAL INFORMATION

Suppliers must not post in any format of social media about OmniTRAX business unless specifically authorized by OmniTRAX’s Marketing Department.

8. ENVIRONMENT, HEALTH, SAFETY AND PRODUCT/SERVICE INTEGRITY

Our organization is committed to protecting the natural environment and the health and safety of our employees, anyone in our work environment, and the communities in which we operate. We are also committed to ensuring our products and services are safe and healthy for our customers and communities.

We accomplish this by promoting and maintain a strong safety culture and complying with all environmental, health, safety, and product-related laws and regulations, such as requirement for internal record keeping and reporting to government agencies for certain suspect or actual workplace injuries or illnesses.

To ensure the security of our employees and everyone who visits our work environment, we have a zero-tolerance policy for workplace violence, threats, and intimidation.

Suppliers who perform work on OmniTRAX property are required to have a contract in place for work being performed and are responsible for complying with all applicable OmniTRAX safety rules, regulations and policies.

9. SUPPLIER DIVERSITY

Supplier diversity is an integral part of OmniTRAX’s overall commitment to diversity. We seek to develop mutually beneficial, long-term partnerships with certified women, minority owned and historically underutilized businesses.

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10. LAWS

Suppliers must comply with all applicable laws, including data-privacy laws, and regulations and must document compliance with regulatory requirements and service-level agreements.

If you wish to participate in an OmniTRAX project that involves the use of Federal Aid funding, you may be subject to additional requirements by law.

11. REPORTING VIOLATIONS

If an OmniTRAX employee suggests that a supplier could obtain business in return for personal benefit (financial or otherwise) or if you suspect other fraud by an employee or third party, immediately report the incident to the OmniTRAX Hotline.

Ethics-Employee Reporting Hotline Hotline Number:

1-866-921-6714

<https://omnitrax.i-sight.com/external-capture>

Callers to the hotline may remain anonymous, if desired.

IN CONCLUSION, we value the important contributions our suppliers make to OmniTRAX. You play a crucial role in ensuring the safety, reliability and efficiency of the service we provide to our customers. For this reason, we expect our suppliers to deliver high quality products and services and demonstrate integrity and commitment to high ethical standards.