

Sevenson Environmental Services, Inc.

2749 Lockport Rd, Niagara Falls, New York 14305
(716) 284-0431

SUBCONTRACTOR/VENDOR CODE OF ETHICS

Sevenson Environmental Services, Inc. is committed to the highest standards of integrity in its business dealings. Accordingly, all Sevenson Subcontractors/Vendors and the Sevenson Employees who work with them are expected to conduct themselves consistent with the highest standards of honesty, integrity and ethical conduct and to comply strictly with all applicable laws. Subcontractors/Vendors should exercise such care in their dealings and practices as to avoid even the appearance of impropriety or conflict of interest.

To ensure that Subcontractors/Vendors are aware of the ethical standards to which they will be held, Sevenson requires all Subcontractors/Vendors to acknowledge the following Code of Ethics and to apply scrupulously this Code in all dealings with Sevenson. Failure to sign and return a copy of this Code with your Subcontract/Purchase Order will delay, and if not returned, ultimately prevent your receipt of a fully executed, and therefore operative, Subcontract/Purchase Order.

For purposes of this Code of Ethics, "Subcontractor/Vendor" means the company, corporation or other entity named as the Subcontractor/Vendor, and its officers, employees, agents, and other representatives.

CODE OF ETHICS

1. Subcontractor/Vendor shall comply with all laws, regulations, standards and policies applicable to Subcontractor/Vendor and its dealings with Sevenson, including government/private customer contractual requirements which flow down to Subcontractor/Vendor through its contract with Sevenson. When the Principal Contract is with the U.S. Government, these laws and rules include the Anti-Kickback Act of 1986 (41 U.S.C. 51-58) and those regarding suspension and disbarment.
2. Subcontractor shall not offer to any Sevenson employee any money, goods, gift, loan, entertainment, future employment, business/investment opportunity, or any other thing of value to obtain favorable treatment from Sevenson. Sevenson employees are similarly prohibited from soliciting such items. This prohibition extends to immediate family members of both Subcontractor/Vendor and Sevenson employees. Provided a gift or entertainment is not intended to obtain favorable treatment for the Subcontractor/Vendor and does not create the appearance of a bribe, kickback, payoff or other prohibited conduct, Sevenson employees are not prohibited from accepting a gift or entertainment if: (1) the gift or entertainment is \$20 or less in value and the total value of all gifts and entertainment in a calendar year is not more than \$50, (2) acceptance is consistent with Sevenson business practices, and (3) acceptance does not violate any applicable law.
3. Subcontractor/Vendor shall not enter into a financial or any other relationship with a Sevenson employee that creates a conflict of interest. A conflict of interest arises when the material personal interests of the Sevenson employee are inconsistent with the responsibilities of his/her position with Sevenson. All such conflicts must be disclosed and eliminated. Even where no actual conflict of interest exists, the appearance of a conflict of interest can be damaging to Sevenson and the Subcontractor/Vendor and therefore must be disclosed to Sevenson management.
4. Subcontractor/Vendor shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of antitrust or anti-competition laws.
5. Subcontractor/Vendor shall furnish services, products and/or materials that conform in all respects of quality and quantity with the requirements of the Subcontract/Purchase Order. Should Subcontractor/Vendor become aware that any such service, product or material previously furnished does not so conform, is defective, or is deficient in some other respect, Subcontractor/Vendor shall promptly notify Sevenson.
6. Subcontractor/Vendor shall promptly notify Sevenson's CEO at arelia@sevenson.com or CFO at wmcdermott@sevenson.com of any conduct believed in good faith to be actual, apparent, or potential violation of this Code by any Subcontractor/Vendor or Sevenson employee. Prompt reporting is in the best interest of all concerned. Reports may also be made by mail addressed to Sevenson's CEO or CFO at the above address or may be made anonymously by calling **1-866-764-9861** or on-line at <https://sevenson.ethicaladvocate.com>. All reports will be treated as confidentially as possible.

VENDOR NAME: _____

BY (SIGNATURE): _____

(PRINT OR TYPE NAME AND TITLE)

DATE: _____