

Delta Companies, Inc. - Policies and Procedures Manual

SECTION: Code of Conduct and Core Values

1060

General Statement

Delta Companies Inc and its subsidiaries (collectively referred to as the "Company") has adopted the Code of Conduct and Core Values contained herein ("Business Principles"). These Business Principles embody the vision of the Colas Group and encompass the business values that have been and will continue to be vital to the future growth and success of the Company.

Business Principles

The Business Principles provide overall guidelines and expectations for all employees in all business units. Our business conduct must be guided by the highest level of integrity when dealing with our customers, suppliers, local communities and employees. While it is impossible to have an exhaustive list addressing every specific situation, we have identified the Business Principles to help define who we are as an organization. Our Business Principles are the following:

1. People are our greatest resource so be proud of your work and accountable for your actions and attitude.
2. Be honest, fair and trustworthy in all of your daily activities and business relationships.
3. Do not engage in any activity that could call into question the Company's honesty, impartiality or reputation.
4. Do not engage in any conduct that creates a conflict of interest or even an impression of a conflict of interest for you or the Company.
5. Foster an environment in which all employees are treated fairly and with dignity and respect.
6. Conduct business fairly, impartially, in an ethical manner and in complete compliance with all applicable laws.
7. Promptly report any improper, illegal or unethical conduct to management or through other appropriate channels set forth by the Company.
8. Strive for excellence recognizing that the process followed in attempting to achieve the end results (How we do things) is just as important as the results obtained.
9. Maintain the highest level of integrity when dealing with our customers, suppliers, competitors, local communities and employees.
10. Conduct all operations in a safe manner that minimizes risk of injuries to employees, the traveling public and minimizes the overall impact on the environment.

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Conclusion

Each employee bears the responsibility and is empowered to ask questions, seek proper guidance and immediately report suspected violations of these Business Principles through any of the proper channels provided. The Company will not tolerate any retaliation against employees who raise genuine concerns. Such retaliation is cause for disciplinary action up to and including termination of employment for those who engage in or encourage any such retaliation.

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