

Code of Conduct

WHAT IS EXPECTED OF ALL EMPLOYEES?

Comply with the Code of Conduct at all times. Read, understand and live the Code.

Always use good judgment. We are all responsible for representing the USS brand and for avoiding the appearance of improper behavior. Ask yourself – is this behavior ethical? Is it legal? Is it consistent with USS’s vision and values?

Speak up. Be aware of your actions and the actions of those around you, and speak up if you see or hear something questionable. USS’s ethics reporting hotline, managed by an independent third party, offers three easy options for you to anonymously report issues or seek guidance before an issue occurs. The anonymous reporting services are available 24-hours a day, seven days a week.

- Independently report issues via the Internet at <http://ussalertline.com> in English or Spanish
- You can call toll free [1-800-446-5646](tel:1-800-446-5646) to report the issue with the help of a Convercent call center representative.
- You can text to [508-570-5947](tel:508-570-5947)

Ask questions. If you are uncertain about anything, ask your supervisor, human resources, management or company legal counsel for guidance. You may also utilize the hotline above for questions.

No Retaliation. Individuals who in good faith seek advice or report concerns are demonstrating leadership and are doing the right thing. USS prohibits retaliation of any kind against individuals who raise concerns in good faith.

Obligation to report. It is your responsibility to report any suspected violations of the law, the USS Code of Conduct or USS policies by any employee (regardless of his/her position in Company), contract worker, consultant or supplier.

Failure to report suspected violations, knowingly making a false report, or refusing to cooperate in an investigation may be grounds for disciplinary action, up to and including termination.

COMMON SENSE RULES OF CONDUCT

It is not possible to list all forms of behavior that are considered unacceptable in the workplace, but the following are examples of infractions that may result in disciplinary action, including suspension, demotion or termination.

- Falsification of employment records, employment information, timecard (yours or another employee) or other records;
- Theft or the deliberate or careless damage of any Company property or the property of any employee or client;
- Use of Company materials, supplies, tools or products for personal reasons without advanced permission from management;
- Possessing, distributing, selling, transferring or using or being under the influence of alcohol or illegal drugs in the workplace;
- Provoking a physical fight or engaging in physical fighting during working hours or on premises owned or occupied by the Company;
- Carrying firearms, weapons or dangerous substances at any time, on premises owned or occupied by the Company, unless state law provides otherwise. Note: This prohibition applies only to the extent allowed by applicable state law. In those states that specifically give the employee the right to maintain a lawfully possessed firearm in their own locked vehicle in the employer’s parking lot, employees are strictly prohibited from removing the firearm from their vehicle or carrying it on their person or into a building.
- Using abusive, violent, threatening or vulgar language at any time during working hours or while on premises owned or occupied by the Company;
- Absence of 2 consecutive scheduled workdays without prior notice to the Company;
- Failing to obtain permission to leave work during normal working hours;
- Failing to observe working schedules, including meal and rest breaks;

- Failing to provide a certificate from a health care provider when requested or required to do so in accordance with applicable law;
- Working overtime without authorization or refusing to work assigned hours;
- Violating any safety, health or security policy, rule or procedure of the Company; and
- Committing a fraudulent act or intentional breach of trust under any circumstances.

WHAT IS EXPECTED OF MANAGERS?

Be a model for all employees and promote a culture of ethics and compliance.

Managers should:

- Make sure the employees they supervise understand the Code.
- Create an environment where employees feel comfortable raising concerns without the fear of harassment or retaliation.
- NEVER encourage employees to put business results ahead of safety or integrity.
- Act immediately to stop a violation of the Code, including assisting in prompt and appropriate corrective action when necessary.
- Encourage collaboration in the workplace by removing obstacles and barriers that prevent employees working together.

Answer questions. Always be available to your employees to answer questions or concerns. Listen carefully and do not feel the need to give an immediate response. If you don't know the answer tell them you will get back to them and consult your supervisor or human resources.

QUESTIONS & ANSWERS

Q: My manager told me not to repair a non-functioning light on a truck because we don't want any missed services and there's no time to fix it. What do I do?

A: Refuse to take the truck as requested and talk with your manager. If your manager refuses to address the issue, notify the Area Manager, VP of Operations or call the Ethics Hotline

Q: I noticed that a truck is showing up late at night and removing our units. I asked my manager and he said they were scrap. We are not keeping documentation on these units. What should I do?

A: Immediately report it to your VP of Operations or the Ethics Hotline.

Q: I am a Branch Manager and several of my employees are always coming to me with different complaints. Can I terminate these employees?

A: No. Every complaint must be taken seriously. Part of your job as a supervisor is to be available for your employees. You should do your best to help resolve the issue. When an issue cannot be resolved at the Branch level, have the employee reach out to their Human Resources Business Partner and if this has not resolved the issue encourage them to use the Ethics Hotline.

STRIVE EVERY DAY TO ACCOMPLISH OUR COMMITMENT

"Our commitment to our employees and customers is an Easy, Safe & Clean day-to-day experience."

So, how do we accomplish this?

At the end of our workday, every one of us should ask – did every action I take today help accomplish USS's commitment? If you can't answer "Yes" then you need to ask yourself what you can do differently tomorrow.

Ask yourself – if I were the customer, would I trust USS with my business? If not, figure out why and fix it! USS is built with an entrepreneurial spirit, so if you know how to fix a problem or make a customer's experience better, don't wait. Act. Listen to what a customer needs and exceed expectations.

Ask yourself – if I were a person looking for a job, would I join the USS team? If not, figure out why and fix it! The foundation of USS is our people and our investment in the future, so if you know how to fix a problem or make a coworker's experience better, don't wait. Act.

Be passionate about the USS brand. This starts with making sure every branch and office are clean, efficient and safe for both employees and customers. Have pride in where you work. If you know of ways to improve any aspect of the business, talk with your supervisor and make it happen. Continuously strive to be better.

SHARE OUR VISION

USS's vision is to be the biggest and best in the industry for our employees and customers. We cannot achieve this unless all employees share this vision. So how do we make this vision a reality?

First, we attract and retain the best employees. USS is making a major commitment to selecting, training and empowering the right people in our organization to drive continuous improvement. Hire the best, keep them engaged, develop, reward and recognize performance. Management is responsible for providing a clear roadmap and support for teams to service customers and accomplish goals.

We must all use resources responsibly. Company assets are owned by USS, so opportunities must be shared. Assets must be protected as if they are your own – confidential information, trade secrets, tools, parts, equipment, vehicles, intellectual property, and financials. Computer resources – email and internet access – are provided for business purposes, so there should be no expectation of privacy. The expectation is they should never be used for personal gain or improper use.

INTEGRITY IN EVERYTHING WE DO

DO THE RIGHT THING

We conduct our business with the highest standards of honesty and fairness with others and ourselves. We can be trusted to do the right thing always. We do what we say we're going to do, when we say we're going to do it. Every employee accepts responsibility and holds him/herself accountable for the work performed. By acting with integrity, we must always reflect positively on the USS brand in all the communities where we do business.

CONFLICTS OF INTEREST

We expect all employees to act not in his/her own personal self-interest, but rather in the best interest of USS and our customers. This means that decisions must be made free from any conflicts of interest or even the appearance of a conflict of interest. A conflict of interest arises when your duties or position present an opportunity for personal gain, or when your personal interests could influence your professional judgment for doing what is in the best interest of the Company. This includes any investment, interest, association or relationship that could affect your impartiality in business decisions. The requirement to avoid conflicts of interest also applies to situations involving family members. Employees must disclose potential conflicts of interest to their immediate supervisor.

For example, employees must never compete against USS, use confidential information for personal benefit, provide or accept lavish gifts for the purpose of influencing someone's business decisions. A meal or a gift of nominal value are most likely acceptable, but you should check with your immediate supervisor before giving or receiving anything of value.

POLITICAL ACTIVITY

While USS encourages all employees to be an active part of the political process in your private life, you must engage in political activity on your own time and using your own resources. You are expressly prohibited from engaging in any political activity in the name of USS.

LAWS

We conduct our business within the letter and spirit of all laws. You should immediately contact USS's Legal Department if you have any questions about the legality of any behavior.

The Foreign Corrupt Practices Act ("FCPA") is a federal law that prohibits bribes to government officials in order to

influence their acts or decisions. Bribes can mean cash, but it can also include gifts, trips, products or anything else of value. All employees are strictly prohibited from providing bribes to anyone – whether a US or foreign official, or in the private sector. Violating this prohibition subjects you, and USS, to possible severe civil and criminal penalties as well as your immediate termination from USS. Before providing anything of value to any governmental official (Federal, State, County, Municipality, or City) you must receive the prior written approval of USS’s legal department. This prohibition includes giving any governmental official something as simple as a USS branded item.

Antitrust laws are meant to protect fair competition and the integrity of the industry. USS seeks to beat our competitors by offering a superior customer experience, not by engaging in behavior that attempts to illegally limit competition. Working with a competitor, regardless of the competitor’s size, to reduce or eliminate competition is illegal and strictly prohibited. If a competitor begins discussing with you a topic that might be considered anti-competitive (for example, setting the price of portable restrooms in a certain market), you must immediately stop the conversation and notify USS’s Legal Department.

CONFIDENTIALITY

In the course of our work, we have access to non-public, confidential information regarding USS, its employees, customers and other third parties. The unauthorized use or release of this information could harm USS and potentially violate the law. Confidential information includes, but is not limited to, Company, customer, employee and competitive data as well as intellectual property, which generally refers to proprietary information, ideas, writings, designs, artworks, computer programs and software, processes, and the like. Those employees who have access to confidential information must strictly protect this information. Confidential and personal information should be used only for the purposes for which it was collected, kept secured at all times and disclosed only when authorized or legally mandated. If there is a need to discuss confidential or personal information with third parties, such discussions must occur with a written non-disclosure agreement, which can be provided by the Legal Department.

OUTSIDE EMPLOYMENT

Employees should use good judgment in determining whether outside employment or other activities may conflict, or appear to conflict, with the Company’s business, or impact our ability to satisfactorily and independently perform our duties for USS. Conflicts of interest may arise if the outside company provides similar products or services to USS, is a customer or supplier of USS or could affect USS’s interests. Employees may not work for or own a competing organization, or use USS’s time, material, personnel, facilities or other resources in connection with outside employment. Outside activities must not interfere with your primary professional loyalty, which must remain at all times with USS.

CONTACT WITH THE MEDIA

To ensure that USS communicates with the media in a consistent, timely and professional manner about matters related to the Company, you should notify marketing@unitedsiteservices.com that you have been contacted by the media whenever you are asked to speak on behalf of the Company so that we know that a media inquiry has been made. Do not respond to media inquiries on USS’s behalf without authorization. This rule does not prevent you from speaking with the media, but you should not attempt to speak on behalf of USS unless you have specifically been authorized to do so by an officer of the Company.

EASY TO DO BUSINESS - CUSTOMER CENTRIC

We are in the service industry. We are here to serve our customers. We strive to have the best reputation in the industry, so we must listen to our customers and deliver results. Our customers demand flexibility and availability so we must be responsive. Every USS employee must always act with the highest ethical standards and do what is right for the customer. If you become aware of an employee who is not living up to this standard, you must report it immediately.

As a company we are dedicated to providing a superior customer experience. Our field employees are directly responsible

for developing customer relationships and servicing their needs. Our corporate employees are directly responsible for supporting our field employees, providing the necessary backing so our field employees can do their jobs effectively.

We will deal fairly with our employees, customers, business associates, partners, suppliers, competitors and the governments of all jurisdictions in which we operate. We will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. In order to compete fairly and to avoid even the appearance of improper agreements and understandings, we will act in accordance with applicable laws and accepted ethical industry practices regarding gathering competitive data.

We respect our local communities and strive to be a good neighbor by conducting business in a manner that meets or exceeds all applicable environmental laws and regulations. We will diligently promote compliance with environmental laws and regulation through proper identification and reporting of those issues and concerns.

SAFE: DRIVE FOR ZERO

ZERO INJURIES: Our employees are our most important resource so every employee's primary goal must be to get home safely at the end of each workday. Pay attention to what's going on around both you and your colleagues. If it isn't safe, don't do it.

ZERO DOT VIOLATIONS: We are all responsible for compliance with the law. No driver should be on the road in a company vehicle unless he/she is absolutely certain all DOT rules and laws are being followed. For your safety and the safety of those around you, make sure your vehicle is in proper working order and anything you are hauling is properly secured.

ZERO VEHICLE ACCIDENTS: Always practice defensive and non-distracted driving.

ZERO DRUGS IN WORKPLACE: USS strives to provide a safe environment for employees and others and to minimize the risk of accidents and injuries. Accordingly, each employee has a responsibility to co-workers and the public to deliver services in a safe and conscientious manner. Continuing research have proven that even limited quantities of illegal drugs, abused prescription drugs or alcohol can impair reflexes and judgment. This impairment, even when not readily apparent, can have catastrophic consequences. For these reasons, USS has adopted a policy that all employees must report to work and remain completely free of illegal drugs, abused or non-prescribed prescription drugs and alcohol.

Safety is our first priority – we take extraordinary measures to protect our employees, customers and communities. Please take time to read and understand policies from USS's Safety Department. Failure to follow these policies will result in disciplinary action up to and including the termination of your employment with USS.

CLEAN: CONTINUOUS IMPROVEMENT AND RESULTS DRIVEN

So we can provide value for our customers, we must be focused on operational excellence. USS is committed to fostering a workplace where problem-solving, teamwork and leadership results in the ongoing improvement in our organization. Simply put, we have to be the best if we want to provide for our current customers or attract new customers.

USS uses various analytics to constantly evaluate our business. Therefore, we expect our employees to make a positive and measurable impact each day. Every USS employee is accountable for his/her actions. Your supervisor will clearly communicate expectations and will hold you responsible for achieving them, with success being duly rewarded.

All employees must protect USS's assets and ensure their efficient use. Theft, loss, intentional damage, misuse and waste of corporate assets can have a direct impact on our profitability. No employee will knowingly:

- Engage in theft, fraud or embezzlement affecting Company property, funds or other assets of the Company, employees and customers;
- Willfully damage or destroy property or materials belonging to the Company, its employees or customers;
- Remove Company equipment, property, material or money from the Company, its premises, its employees or its customers without authorization;

- Remove, publish, destroy or alter physical or electronic Company records, except in accordance with established USS policies; or
- Copy, reprint, duplicate, recreate in whole or in part, computer programs or related systems developed or modified by USS personnel, or acquired from outside vendors, except in accordance with established USS policies

OUR PEOPLE

At USS, we are proud of our commitment to diversity and inclusion. We provide equal opportunity to any applicant or employee and prohibit discrimination based on any legally-recognized basis, including, but not limited to: race, color, religion, sex (including pregnancy, lactation, childbirth or related medical conditions), sexual orientation, gender identity, age (40 and over), national origin or ancestry, citizenship status, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed service member status or any other status protected by federal, state or local law. Our commitment to equal opportunity employment applies to all persons involved in our operations and prohibits unlawful discrimination by any employee, including supervisors and co-workers.

We foster a culture of teamwork and empowerment by providing clear guidance and then holding individuals accountable. USS rewards excellence with competitive compensation packages and opportunities to progress in the organization. Our goal is to attract and retain the absolute best in the industry.

USS strictly prohibits actual or threatened violence or harassment in the workplace. Any USS employee who feels he/she is being harassed, threatened, coerced or who believes someone else is being harassed, threatened or coerced – whether it's a colleague or customer – should report it immediately.

We are required to report to work in an appropriate condition to perform our duties satisfactorily whether on or off USS property. The use, possession or distribution of alcohol, drugs or any controlled substances while on USS premises or operating USS equipment is prohibited. Throughout benefits package, resources are available to assist employees with drug or alcohol problems.

We expect all employees representing USS to conduct themselves in a professional and ethical manner.

OUR COMMITMENT

When a situation is reported that violates this Code, we are committed to reviewing all reported concerns, conducting proper, fair and thorough investigations tailored to the circumstances, and taking appropriate remedial and concluding steps as warranted. All action taken by USS in response to a concern will depend on the nature and severity of the concern. This may include initial inquiries and fact-gathering to decide whether an investigation is appropriate and, if so, the form and scope of the investigation. Note that an investigation into concerns raised is not an indication that they have either been confirmed or rejected. USS complies with the law in conducting investigations and expects that employees will cooperate with an investigation, except when voluntary compliance with an investigation is being requested. We also expect that employees will provide truthful information when participating in an investigation.

Remember, all good faith concerns and reports raised under this policy will be taken seriously.