



Badger Daylighting's Code of Conduct: Living Badger's Values

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Message from Paul Vanderberg

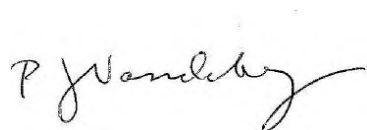
Badger is a people and relationship business. Since inception, this has been our guiding principal. This focus has seen us grow from a small 15 person private company to what we are today: An organization of 2,400 people operating over 1,200 units in over 100 locations throughout North America. Our corporate vision is to be the North American leader in safely and efficiently satisfying our customers' needs. To achieve our vision – only the best will do – the best people and the best equipment. We are a safety company – not only because it is the law, but because we want to ensure that all of us return to our families at the end of the day in the same shape as when we came to work. Badger's Board of Directors and all of us view this as Badger's moral obligation.

We ask that you put our Core Values in practice in everything you do, each and every day. Badger's values are our commitment to you and need to be your commitment to Badger. Together, by implementing and living the Badger values, we are laying the foundation for a strong and sustainable future.

This Code of Conduct is designed to preserve and foster Badger's values, help us avoid misconduct, and guide us in protecting and enhancing our company's reputation. This means complying with legal and regulatory requirements as well as our internal policies and practices.

While this Code of Conduct provides a broad range of guidelines, it cannot address every situation that you may encounter. If at any time you have questions, don't hesitate to ask. It is important that you understand your role, rights, and responsibilities in making Badger the best.

Sincerely,



Paul Vanderberg
President & CEO





Badger Values:

Conducting Business the Badger Way



1 Badger Values: Conducting Business the Badger Way

1.1 Living the Badger Values

Our history includes a long-standing commitment to business excellence in all areas. Our values portray who we are, and include a commitment to integrity and ethical business conduct. In today's business environment, living our values is critical for our continued success.

Our values guide the conduct of all employees, contractors, consultants, officers and directors. It is important that all members of our team embrace these values, as they are fundamental to how we do business.

We live by the following principles:

- Respect people, culture, and the environment
- Frequent, honest, and open communications
- Professional in everything we do
- We are a "safety" company
- Accept individual accountability for results
- Action orientation with long term focus
- Focus on executing our plan and performance
- Flexible company with ability to take advantage of new opportunities and change as required

This Code of Business Conduct expands upon those values and provides guidance on their application. Our business conduct is also guided by our company policies and the following Badger's Rules to Live By. This guides us in our work, how we represent our company's interests and ensures that safety is truly a core value.

1.2 Rules to Live By

Hydro-excavation and associated work can be extremely dangerous. Simple failures in executing certain day-to-day work tasks can and do result in serious injury or death. Badger has identified those "Life Critical" tasks/rules and if not followed could result in serious injury. These are Badger's Rules to Live By:

1. Drive Defensively

- I will always practice defensive driving and obey traffic laws.

2. Boom Safety

- I will always know my boom position and practice safe boom procedures.

3. Stop Work Authority

- I will always exercise Stop Work Authority in unsafe conditions.

4. Fall Protection

- I will always follow fall protection procedures.

5. Safety Devices

- I will always respect and never tamper with or disable any safety device.

6. Incident Reporting

- I will always report incidents immediately, no matter how small.

7. Confined Spaces

- I will always obtain the proper permits before entering any confined space.

1. Defensive Driving:

All drivers of Badger vehicles must ensure that any Badger vehicles in their care or control are operated and driven defensively at all times.

- Follow professional driving standards of the Smith System defensive driver training at all times.
- Only back up when necessary using a spotter if available; and if you must back up, always "Get Out and Look" (G.O.A.L.) before backing.
- Eliminate all distractions while driving.
- Only utilize hands free electronic equipment while driving.
- Obey all applicable traffic laws including seatbelt usage, speed limits and traffic control devices.

2. Boom Safety

Always be aware of the boom position – look up and live.

- Never move the Badger with the boom out of cradle unless authorized by supervisor and noted on FLRA.
- Boom Limiter must be operated in the second/green position unless authorized by supervisor and noted on FLRA.
- Always maintain safe limits of approach with any overhead obstacles.
- For overhead communication lines, guy lines, streetlights, pipe racks maintaining a minimum clearance of 3ft. (1m) at all times.
- Engage boom locks in applications where the boom does not need to move frequently.
- Always utilize remote hose when the boom cannot be safely positioned around obstacles.

3. Stop Work Authority

Stop Work Authority means that we stop any work task when an unsafe condition has been identified.

- Anytime "Stop Work" is exercised, it will be reported immediately to supervisor.

- Work will not resume until the unsafe condition has been corrected.
- Always be concerned with individual safety and the safety of co-worker(s), other job site workers and the public.
- Do not participate in any activities you feel are unsafe.
- Never perform a task that you are not properly trained or authorized to perform.

4. Fall Protection

Always follow Badger safe work procedures for fall protection as is required on top of the Badger and around excavations at or exceeding 4ft. (1.2m) depth.

- Every unit shall have the proper fall protection equipment including a full body harness, a self-retracting lanyard (SRL) and the proper lanyard for on top of the Badger.
- 100% tie off while on top of the Badger at all times.
- Fall restraints will be utilized when soil conditions are unstable or excavations exceed a 4ft. (1.2m) depth.
- All fall protection will be inspected prior to use and noted on the FLRA.
- To ensure the unit will not be moved while workers are using fall protection, a "DO NOT OPERATE" tag shall be placed on the PTO.

5. Safety Devices

Always respect and never tamper with or disable any safety device.

- Tampering with safety devices is strictly prohibited.
- Never alter or disable a safety device including but not limited to, back up alarms, Boom alarms, E-Stops, boom limiters, debris tank body up alarms, Geo-tab, PPE, guards, Lock out Tag out (LOTO) equipment, water heaters, safety cameras, and water pressure regulators.
- Never operate a vehicle or equipment when a defect prevents its safe operation.

6. Incident Reporting

Badger requires immediate reporting of all incidents, no matter how small. This is necessary in order to ensure that if it is an injury, the employee gets the proper care. For all other incidents, immediate notification allows for a proper investigation, to learn what happened and means to prevent from happening again. Incidents that must be reported immediately include:

- Injuries to employees
- Employee Illnesses
- Vehicle accidents (on or off public roadways)
- Property damage
- Oil/chemical spills

7. Confined Spaces

Employees and contractors of Badger Daylighting shall not enter any confined space until all requirements are evaluated per Badger's Confined Space Entry (CSE) Program.

- Never break the plane of a Confined Space area without proper authorization and permitting.
- Hazards are identified, evaluated and reviewed with supervisor and Badger HSE prior to entering.
- Workers entering the space must be trained on CSE hazards, entry procedures and responsibilities.
- Appropriate signage and permits must be posted.
- Proper PPE equipment has been selected, inspected, calibrated and issued to all employees.
- Rescue services are in place, when required.

All reports of non-compliance with these rules will be thoroughly investigated. If these rules are violated, disciplinary action will be taken up to, and including termination, even on the first occurrence.

1.3 Following Our Code

The Code of Conduct is the Code that sets out the behaviours and standards of conduct we expect of ourselves and each other. It provides an overview of the policies and practices that must be followed by anyone who works for, or represents Badger Daylighting including:

- Directors, officers, employees, independent consultants and contractors in all countries where we conduct business (from now on we will refer to these individuals as our employees):

Business partners working with us, including suppliers and joint venture partners, are expected to adhere to the same or similar ethical standards as our people.

We expect our people to take action, up to and including the termination of a contract, upon learning that a business partner fails to abide by our Code and related policies and practices.

Summary

The Code of Conduct provides an introduction to our company policies, Badger's Rules to Live By, and are structured to align with our values. All of the Badger Daylighting policies are reviewed and updated annually.

This Code does not describe every possible scenario you may face. If you are unsure how the Code applies to your situation, please contact your supervisor or Human Resources.

1.4 Our Expectations

Our Employees

We expect our people to share a commitment to integrity, regardless of position, location, business unit or level of seniority. As a member of the Badger team, we have the responsibility to:

- Educate ourselves about the requirements of the Code;
- Acknowledge on an annual basis, that we have read and agree to abide by the terms of the Code;
- Keep up to date on policies relevant to our roles;
- Speak up, ask questions and take action when we encounter acts of wrong-doing; and
- Use good judgement in all business dealings.

Our Leaders

We have higher expectations for our leaders who must also:

- Model appropriate behaviours that are consistent with the Code and our values;
- Understand the link between the Code and the policies that apply to the teams they lead;
- Promote open communication and trust in the workplace so that our people feel secure about raising concerns and identifying improvements and opportunities;
- Foster a positive work environment where principled and respectful actions are the norm; and
- Only ask people to do things they would feel comfortable doing themselves.

1.5 How We Uphold Our Code

Annual Training and Certification

When you start work with us, and annually thereafter, you are required to complete a review and acknowledgement of the Code of Conduct.

Enforcement

Failure to comply with this Code and all other policies and practices may result in disciplinary action, up to and including termination of employment. If any actions are deemed criminal in nature, you will be held liable and accountable.

Legal and Regulatory Compliance

We comply with the applicable laws and regulations in all of our operating jurisdictions. We expect our people to have sufficient knowledge of these laws and regulations in order to identify potential risks and to know when to seek advice.

In all cases, if you are unsure how to proceed, contact your supervisor or call the ConfidenceLine™ (1-800-661-9675) listed in the *Raise Concerns and Speak Up: ConfidenceLine™* section of this Code.

1.6 Raise Concerns and Speak Up: ConfidenceLine™

Our Policy

At Badger, we all share a common goal – a safe and healthy workplace. We also share a commitment to the highest standards of honesty, integrity and respect in our day-to-day jobs. As part of this goal, we have developed a *Raise Concerns and Speak Up Policy* and engaged a third-party hotline reporting service called ConfidenceLine™.

We are committed to conducting business ethically while promoting a work environment that fosters mutual respect, open communication and integrity. We are expected to speak up, ask questions and raise concerns about business practices that may indicate illegal or unethical behaviour. This includes raising concerns about actual or suspected violations of this Code, company policies, and/or legal or regulatory standards.

We are committed to investigating all good faith concerns raised in accordance with this Code. This includes protecting those who come forward to report such activities. Retaliation against a person who reports such a concern will not be tolerated and may be subject to disciplinary action. The same applies to any intentional abuse of our reporting process, including the raising of malicious or knowingly false allegations.

Reporting

It is important that everyone be provided with an avenue to report any issues that are detrimental or counterproductive. We encourage this reporting at the supervisor, manager, human resources, or executive level, but should a situation arise where an employee is uncomfortable using any of these regular channels, we have engaged the third-party hotline reporting services of ConfidenceLine™. This gives everyone access to an independent third-party to help maintain confidentiality and security of anonymity without fear of personal or professional reprisal.

Summary

ConfidenceLine™ provides you with an anonymous, confidential means for reporting sensitive workplace information relating to many issues, including fraud/theft, workplace violence, substance abuse, discrimination, harassment, conflict of interest, safety violations, malicious damage, and regulatory violations.





Badger Values:

Accept Individual Responsibility



2 Badger Values: Accept Individual Responsibility

2.1 Avoiding Conflicts of Interest

Our Policy

We must avoid all situations in which our personal interest conflicts with our professional responsibilities and ensure that all business transactions are conducted with the best interests of our company in mind.

Conflicts of interest may be actual or perceived and often their impact on the business may be unclear or complicated. For this reason, all conflicts of interest must be disclosed promptly to your supervisor and as part of your annual acknowledgement of this Code.

Disclosing all conflicts of interest that may influence your business decisions, whether actual or perceived, allows your management team to mitigate risks.

A conflict of interest exists where you are in a position to influence a Badger business decision that may result in a personal gain for yourself, a relative or someone living in your household.

A conflict of interest is not necessarily a violation of this Code but failing to promptly disclose the conflict is always a violation.

Your Responsibilities

You should:

- Disclose any personal or family relationships that might create an actual, perceived or potential conflict of interest.
- Disclose material investments and other financial interests you have in a company or commercial enterprise that is a competitor to, supplier to, or does other business with us.
- Obtain approval from your supervisor before engaging in outside or secondary work that may interfere or conflict with your duties at Badger, including board or committee work for outside organizations.

Exclude yourself from the following:

- Hiring, promoting, or supervision (in the same line of authority) as a family member.
- The process of selecting managing or influencing a relationship with a contractor, supplier or other business partner if they employ or are controlled by someone with whom you have a family connection.

Do not:

- Accept business courtesies other than of a nominal value from suppliers, customers or competitors – especially if we are seeking requests for proposals for products and/or services offered by that supplier.
- Accept personal discounts or other benefits from suppliers or customers if they are not available to the general public or your colleagues.
- Use Badger resources, intellectual property, or facilities for outside activities unless you have previous approval from your supervisor and their use is permitted by our policies.

Summary

You have a duty to ensure that nothing interferes with your ability to make all business decisions in the best interest of our company.

If you have any questions about this policy please contact Tracey Wallace, VP Human Resources, or for more information refer to the Gifts and Bribery Policy.

2.2 Insider Trading

Our Policy

We are committed to fair and open markets for publicly traded securities. We never purchase or sell securities of any entity on the basis of material non-public information, which we acquire through our work.

We do not share non-public information with anyone outside of our company, including spouses, friends and relatives, and we only share non-public information with co-workers on a need-to-know basis.

Non-public information is information that has not been disclosed to the public. It is material if a reasonable investor would consider it important in deciding to buy, hold or sell securities, or if its publication would likely affect a company's share price.

Your Responsibilities**Avoid:**

- Trading Badger securities around the time of a significant announcement.
- Discussing confidential Badger business with family and friends.
- Sharing material, non-public information with anyone outside of Badger, unless:
 - o It is necessary for our business activities; or
 - o Proper controls are in place, such as non-disclosure agreements with business partners.

Do not:

- Buy or sell shares of Badger or any other company while you are aware of material non-public information.
- Recommend or suggest that anyone buy or sell the securities of any company (including Badger's) based on material non-public information about that company. This is tipping and it is against the law.
- Share material non-public information with others except in the necessary course of business where the recipient of the information is advised of its confidentiality, obligations and its restrictions under securities laws from trading on such information.

Summary

We may not use or disclose material non-public information about Badger or other companies. If you have any questions about this policy, please contact Darren Yaworsky, CFO.

2.3 Protecting Confidential and Personal Information

Our Policy

We must treat confidential information about our business plans, operations and/or other activities as proprietary to the company. Confidential information including but not limited to trade secrets, innovations equipment designs, processes, computer codes, data, know how, improvements, discoveries, developments, techniques marketing plans, strategies costs, pricing, orders, contracts, customers, and client lists, or any other information that Badger would like to treat as confidential for any purpose.

During the course your employment you will come into contact with or produce confidential information. In conjunction with this policy, you may be required to sign a separate confidentiality agreement, which shall be maintained in your Employee file.

We may not communicate or disclose confidential information unless we have the authority to do so.

Your Responsibilities

Follow the Clean Desk Policy when handling sensitive information:

- Shred or otherwise destroy all documents containing confidential information when they are no longer necessary.
- Promptly remove confidential information from conference rooms, work areas or other communal work areas after meetings have concluded.
- Sending confidential information through internal or external mail should be marked as such.
- If you need to leave your laptop, phone or tablet for any length of time, lock it so no one else can access it.

- For desktop computers, shut down the system when not in use or lock your screen.

Do not:

- Read, display or discuss confidential information in places where the discussion may be overheard or the information viewed (such as in elevators, hallways, restaurants, bathrooms, stairwells, airplanes or taxis).
- Disclose confidential information, unless specifically authorized to do so.

Summary

Confidential information must always be protected and should only be disclosed when you have the authority to do so.

If you have any questions about this policy or what is considered confidential information, please contact Tracey Wallace, VP Human Resources.

2.4 Clean Desk Policy

Our Policy

Sensitive Information: The Information Classification Standard can be used to identify the level of information's sensitivity level. Information classified as Confidential, Highly Confidential, or Personal is protected by this policy.

This policy will also apply to information classified as "General" when the individual's workspace is publicly visible. E.g. working in public spaces like airports, coffee shops, inside a truck parked in a public place, etc.

To meet basic security and privacy obligations:

- Documents must not be left unattended between work days (e.g. overnight)
- Personnel should turn work papers face-down before temporarily leaving their work area
- Access to IT systems is locked when personnel leave their work area
- Sensitive information is disposed of in a secure manner (e.g. shredded).
- Individuals are advised to take steps against unauthorized eavesdropping of sensitive information, eg: position computer screens away from casual observation.

Your Responsibilities

Whenever a work area (e.g. desk) is unoccupied for an extended time, the following will apply:

- All sensitive information must be removed from the work area and be physically locked away (e.g. a drawer, filing cabinet, vehicle trunk).

- o This includes electronic media such as USB Thumb Drives, External Hard disks, and CD/DVDs.
- o This includes portable computing devices such as Laptops, Tablets, and Mobile Phones

Whenever a work area (e.g. Desk) is unoccupied for a short time, the following will apply:

- All sensitive information should be protected from casual observation (e.g. turned over, placed in folder)
- Computer systems (laptops, desktops, tablets, mobile phones) will have their screens locked or be shutdown

At all times:

- Use the Information Classification Standard to classify and label information sensitivity. Manage the information consistent with its classification,
- Computer Access codes (e.g. passwords, PINs) are not shared, or written down in an accessible location
- Whiteboards and other presentation materials containing sensitive information must be cleaned when no longer needed
- Access badges, keys, etc. for accessing locked away sensitive information must not be accessible to unauthorized people
- All wastepaper which contains sensitive information must be shredded or placed into bins designated for the purpose
- Printers and fax machines should be treated with the same care under this policy:
- Any print jobs containing sensitive information should be retrieved immediately.

If you have any questions about this policy or what is considered confidential information, please contact Tracey Wallace, VP Human Resources.

2.5 Gifts and Bribery

Our Policy

As a responsible North American citizen, we take steps to ensure that corruption does not occur within our operations. We never offer, attempt to offer, promise or accept payments, gifts or anything of value that could influence a business decision. This includes improper payments or other incentives made with a corrupt intent whether the exchange is made by our people or a business partner.

We ensure that all interactions with public officials comply with the law. We never offer or give small payments to public officials or others to secure or speed up the performance of actions to which we are legally entitled.

Your Responsibilities

It is your responsibility to:

- Report all requests for bribes, facilitation and other improper payments or incentives.
- Monitor the activity of all business partners engaged to act on our behalf.
- Take special care when engaging in the following:
 - o Ensure that business courtesies offered to public officials comply with our policies and applicable laws and regulations.
 - o Notify and receive permission from your Supervisor prior to accepting any gift, trip, etc. of value over \$500.00. The gift would not be prohibited if deemed to also be a benefit to Badger.

Do not:

- Solicit gifts, gratuities, etc. from vendors, contractors, etc.
- Accept meals, entertainment, travel, gratuities merchandise or promotional material that could influence your objectivity in making business decisions.
- Allow an improper payment or incentive in order to influence a business decision.
- Pay a bribe.
- Engage a business partner to act on our behalf without performing thorough due diligence.

Summary

Do not permit or engage in the exchange of any kind of improper payment or incentive. Make sure our business partners adopt this practice when acting on our behalf.

If you have any questions about this policy please contact Tracey Wallace, VP Human Resources.

2.6 Progressive Discipline

Our Policy

We live the Badger values when our words and actions are consistent with the expectations in the Code of Conduct and other policies and procedures. When employee behaviours are not consistent with Badger's expectations, corrective action will be taken to reduce the risk of the inappropriate behaviour being repeated. The corrective action supports our goal that our employees, customers, suppliers, and members of the public experience the best of what Badger has to offer.

Responsibilities

As a Badger employee, you must:

- Ensure your behaviour is consistent with the expectations of the Code of Conduct and other policies and procedures;

- Speak up and take action when you encounter behaviour that is not consistent with Badger's expectations;
- Participate in the investigation of alleged inappropriate behaviour when asked to do so;
- Demonstrate improved behaviour; and
- Ask your manager to clarify policies, procedures, expectations, etc.

As a Badger manager, you must also:

- Set the example by modeling appropriate behaviours that are consistent with the Code of Conduct and the Badger Values;
- Investigate alleged inappropriate behaviour within the teams they lead;
- Seek advice from your Human Resources Business Partner (HRBP) to ensure corrective action is consistently applied throughout Badger;
- Decide on appropriate corrective action in response to inappropriate behaviour, including employee discipline up to and including termination; and
- Communicate discipline to employees who have behaved inappropriately.

Summary

All members of the Badger team and those we interact with expect us to act in a safe, respectful and professional manner. We must uphold our Code of Conduct and other policies and practices by taking corrective action when employees behave in a manner that is inconsistent with Badger's expectations.

For further detail, please refer to the full Progressive Discipline Policy.

If you have any questions about this policy please contact Tracey Wallace, VP Human Resources.



Badger Values: Professional in Everything We Do



3 Badger Values: Professional in Everything We Do

3.1 Protecting Badger's Assets

Our Policy

We are responsible for the security of all Badger assets whether they are physical or intangible. This means we are responsible for protecting them from theft loss, damage, waste and improper use.

Our people protect the confidentiality associated with intellectual property during their tenure and after their departure from our company.

Innovations created during the course of employment or service at our company become Badger property and remain with the firm.

Your Responsibilities

- Use Badger's assets and resources only for legitimate business purposes and for the benefit of Badger. The company provides for limited personal use of IT systems and assets.
- Protect Badger's assets and resources from misuse and harm by others.
- Badger's assets include its confidential information.

Do not:

- Use Badger assets to support an outside business or other unauthorized activities.
- Remove Badger assets from our facilities unless you have authority to do so.

Summary

We all have a responsibility to safeguard Badger's assets.

If you have any questions about this policy please contact Darren Yaworsky, CFO.

3.2 Ensuring Accurate Record Keeping and Reporting of Information

Our Policy

Our financial records must be accurate, complete and comply with professional accounting and financial reporting standards.

We ensure that an effective system of internal controls exists to protect our assets, transactions and financial reporting practices. Our financial records are supported by adequate documentation. We ensure that we meet our financial reporting and public disclosure obligations by complying with applicable securities laws and regulations.

We report all accounting, purchasing, or auditing irregularities and any circumvention or overriding of internal controls in accordance with the Speaking Up section of this Code.

Your Responsibilities

- Follow processes as directed by those charged with managing controls. Operate all controls that you are assigned to you.
- Ask questions about incomplete, unusual or misleading information regarding the nature of a business transaction.
- Watch for results that seem inconsistent with performance.
- Cooperate with internal and external auditors, investigators, accountants or other financial advisors, especially when allegations of wrong-doing are under investigation.

Do not:

- Create false or misleading records or take actions to circumvent or override internal controls.
- Approve a financial transaction or expenditure that exceeds your approval authority or which you think may be incorrect.

Summary

Never prepare false or misleading records or take actions to circumvent or override internal controls. Creating false or misleading results is against the law and is a serious offence. Speak up if you have concerns about how a financial transaction is being recorded.

If you have any questions about this policy please contact Darren Yaworsky, CFO.

3.3 Computing Resources Policy

Our Policy

We use our information technology systems and assets (such as computers, mobile phones, tablets and IT networks) responsibly and in accordance with our company practices. This includes using them for legitimate business purposes and requires that we take adequate precautionary steps to protect against potential cyber risks. We never use these resources to perform illegal or unethical activities.

Each employee has an obligation to use the provided equipment for business purposes in a responsible, ethical manner, as outlined by this policy.

This policy is organized into four areas:

1. Computer and Network Usage
2. Internet Access
3. Email Usage
4. Cell phone Usage

1. Computer and Network Usage

The network infrastructure and attached devices (servers, computers, printers, etc.) are provided to Badger Daylighting employees to facilitate their daily job requirements. All computers, networking and related equipment, software and company information generated using these resources are the licensed to, or property of Badger Daylighting. As such, each employee has an obligation to use the provided equipment for business purposes in a responsible, ethical manner as outlined by this policy.

Computer Usage

Each Badger Daylighting employee will be provided with the necessary hardware, software and network access to function in their job. It is the responsibility of the employee to take reasonable precautions to safeguard the equipment that has been assigned to them. You may be allowed to use a personal device for Badger applications, please review the Bring Your Own Device policy. Follow the Clean Desk Policy for managing computing devices. If a company device is lost or stolen, it must be reported to IT and HR immediately.

Badger may hold the Employee responsible for the replacement of equipment lost or damaged due to negligence or carelessness. This equipment will be supported, maintained, and monitored by the company's Information Technology department. This equipment is intended to be used for company business related purposes with limited personal use permitted. Employee are forbidden from circumventing security and access controls (e.g. disabling anti-virus, creating unauthorized accounts, weakening password rules, etc.) without CIO approval.

Software

Software in use on Badger Daylighting equipment must be approved by the CIO.

Data Access and Passwords

Security is a serious consideration in a corporate network environment. Badger Daylighting production software and data storage systems are protected by User ID and Access Code (e.g. Password, PIN, etc.) combinations. Users are responsible for the following:

- All computer activities occurring under their User ID in a given system.
- Having an Access Code that meets appropriate complexity requirements.
- Keeping their Access Codes secret.

- Changing their Access Codes (passwords are changed at a minimum of every six months).
- Reporting and changing a compromised Access Codes immediately.

Malware (including viruses and spyware)

Viruses are malicious pieces of software designed to harm computer systems and replicate itself through one or more processes without the knowledge of the user. Spyware applications are similar to viruses except that they generally do not self-replicate or cause malicious damage, they are used to track usage. The best way to avoid virus and spyware infection is prevention. Badger Daylighting provides centralized antivirus protection solution to prevent the proliferation of viruses. In addition to the software provided, each user has a responsibility to help prevent virus and spyware infection by:

- Not downloading or installing unauthorized software.
- Scanning outside files before use.
- Reporting any suspected virus activity immediately.
- Not using a virus infected computer.

Network Access

Access to Badger Computing resources is approved by the CIO. Badger devices are permitted on Badger networks (the guest network being an authorized exception). Obtain approval from the CIO when connecting a non-Badger device to the Badger network.

E.g. Personal laptops, iPhones etc. that connect to the Badger Daylighting wifi would be in violation of this policy. A personal storage device connected to a Badger Daylighting laptop would be in violation of this policy. A storage device provided and owned by Badger Daylighting would not be a violation of this policy.

2. Internet Access

Internet Access is governed by the following:

1. Internet access is a privilege.
2. Internet access is intended for business use.

Employee using the Internet represent the company. Employee are responsible for using the Internet in an effective, ethical, and lawful manner. This applies to Internet access via mobile, corporate and guest networks that are provided by Badger Daylighting.

1. Email Usage

Email has become one of the most common forms of business communication in the workplace. All illegal communications, including text and images, can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver. In addition, once email

communications reach the Internet from Badger Daylighting systems, it is considered unsecured communication. As such, employees using email must:

- Be responsible for all email communication sent from their computer or user id.
- Ensure that all communications are for professional reasons and that they do not interfere with the employee's productivity.
- Be responsible for the content of all text, audio or images that the user places or sends over the Internet. All communications should have the employee's name attached.
- Not transmit copyrighted materials without permission.
- Know and abide by all applicable policies dealing with security and confidentiality of company records.
- Avoid transmission of non-public customer information. If it is necessary to transmit non-public information, employees are required to take steps reasonably intended to ensure that information is delivered to the proper person who is authorized to receive such information for a legitimate use. Not auto-forward email to an external email system.
- Not forward or send mass mailings, chain letters or other non-business related and unsolicited communications (SPAM).
- Not solicit for religious, political or other non-business related activities.

2. Cell phone Usage

Badger relies upon its client relationships and as such takes great care to protect those relationships. Badger recognizes that mobile communications is an important tool used to foster those relationships that also must be protected. Where Badger decides that mobile corporate bring your own device communication is required for an employee to do their job, Badger will issue a suitable mobile device to the employee and the phone # will remain with Badger. Only Badger issued phone numbers are to be used for any Badger related communication.

There are many security risks associated to mobile communications. As such, mobile communications are governed by the following:

- Mobile communications are a privilege.
- Mobile communications are intended for business use only.

Acceptable Use

Employees using the mobile communications represent the company. Employees are responsible for using the mobile communications in an effective, ethical, and lawful manner.

Unacceptable Use

Employees must not use the Badger mobile devices for purposes that are illegal, unethical, harmful to the company, or non-productive. Examples of unacceptable use are, but are not limited to:

- Excessive personal calls.

- Excessive data consumption for non-business purposes.
- Excessive non-business text communications.
- Using the mobile device to harass others.
- Downloading non-business related apps or any copyrighted materials belonging to third parties, unless this download is authorized.
- Undertaking deliberate activities that waste staff effort or networked resources.

3.4 Limited Personal Use of IT Systems and Assets

Overview

Badger allows our people to make limited use of Badger IT resources for personal purposes, in accordance with the provisions herein. Please be aware that none of these provisions modify the requirements of our people contained within the Code of Conduct or apply when our people are using IT resources to carry out their official duties and responsibilities.

Your Responsibilities

- Our people may use Badger IT systems and assets for personal purposes, but only where such use:
 - o Involves negligible additional expense to Badger
 - o Does not interfere with the mission or operations of the company
 - o Is permissible under applicable State, Province, and Federal laws and regulations
- Understand use of Badger IT systems and assets in support of or in connection with a private business is not considered a personal purpose, and is not authorized by these provisions
- Be aware that the privilege may be revoked at any time. Circumstances that may result in curtailing or halting limited personal use of IT systems and assets include uses that:
 - o Result in a loss of productivity
 - o Interfere with official duties
 - o Compromise the mission of the organization
 - o Exceed negligible expense to Badger
 - o Violate other policies, or regulations/legislation
 - o Are inconsistent with the guidance contained in these provisions
- Accept that Badger monitors, logs, and restricts use of IT systems and assets to ensure compliance with policy, regulation, legislation, contractual obligation and to help ensure the systems perform to service levels (e.g. problem diagnosis, performance monitoring). In the course of delivering these objectives, details of personal use may be revealed. It is advised that people who wish their personal activities remain private should not conduct such activities using Badger IT resources.

Examples of inappropriate personal use include, but is not limited to:

- Used to download unauthorized software.

- Violation of copyright when downloading or streaming content (music, video, or similar services).
- Personal use that impairs IT performance (e.g. saturates network bandwidth, exceeds storage quotas).
- Personal use that triggers additional costs to Badger (e.g. exceeds data limits on cellular contracts).
- Activities that are illegal, inappropriate or offensive to a reasonable person with knowledge of all the relevant facts, including hate speech; material that ridicules others on the basis of race, creed, religion, color, sex, disability, national origin, or sexual orientation; and harassing or threatening activities.
- Creating, downloading, viewing, storing, copying or transmitting sexually explicit, or sexually oriented materials.
- Creating, copying, disseminating chain letters, or other mass mailings, regardless of the subject matter.

3.5 Bring Your Own Device

Definitions:

- "Mobile Device" / "Device" includes portable devices with wireless data plans (cell phones, smart phones, tablets, etc.) capable of running applications that grant access to Badger Daylighting electronic resources.
- "Badger provisioned application" are Applications or services used by the Mobile Device to access Badger Daylighting information systems.
- "BYOD" Bring Your Own Device. A personally owned device that can also be used for work purposes through installation of company provisioned applications and services. (Exception: SMS text messages like those sent by dispatch do not require a Badger provisioned application are exempt from this policy).

Our Policy

1. Badger provides BYOD capability for convenience of Employee. If mobile access is essential to the individual's job-function then a company provisioned Mobile Device should be used to help guarantee service/support levels.
 - a. Badger is not obligated to reimburse Employee for the cost of the Mobile Device or cost of operation. Individuals are liable for all costs associated with their device.
2. Mobile Devices that are supported for BYOD usage are solely determined by Badger Daylighting IT Services. The company reserves the right to change the support status of a Mobile Device at any time.
3. Employees accept that the company may require the Mobile Device have security configuration/security software installed upon it as a condition to use company provisioned applications. Examples include:

- a. Device locked by PIN or biometric (e.g. fingerprint).
 - b. Company applications are accessible only after successful authentication (e.g. PIN, password, fingerprint).
 - c. Mobile Device may not be permitted access to company electronic resources if "jail-broken"/ "rooted" and/or running at software levels missing critical security patching.
 - d. The company may require company provisioned applications be updated when new versions are required.
 - e. Note: Individuals will not to try to circumvent security controls placed upon company electronic resources.
4. The company will provide best-effort support to fix BYOD issues. However, this cannot be guaranteed.
5. Innovations created during the course of employment or service at our company become Badger property and remain with the firm.
 - a. The company will only access information associated with company provisioned applications. The individuals personal email accounts, instant messages, photos, etc. remain private.
6. Employees understand that they do not own company provisioned applications or data.
7. Employees understand the company reserves the right to monitor and audit company provisioned applications for security/support/maintenance reasons and to ensure compliance with company policies
8. Individuals are responsible for all use of the Mobile Device. Use of company provisioned applications is restricted to Employee.
9. Employees will report a lost or stolen Mobile Device immediately. Contact the IT Help Desk for assistance.
10. Badger may revoke BYOD privilege at any time (e.g. due to change of employment, lost or stolen device). The company is authorized to remove/wipe company information/applications (including the option of doing so remotely and without warning). Efforts will be made to preserve non-company information, but the company will not be held responsible/liable for data or function loss. Employee are advised that use of these services is at their own risk. Employee are advised to take precautions, such as performing regular backups.
11. Badger Daylighting provides no guarantee that company provisioned applications will not break, disrupt or degrade functionality of the Mobile Device. Employee are advised that use of these services is at their own risk.
12. Badger safety rules apply while using company provisioned applications

If you have any questions about this policy please contact Cheryl Moody, CIO.

3.6 Controlled Substance Use and Alcohol Misuse

Note: This section covers substances that can impair functions specifically; cannabis is considered a "controlled substance" for the purpose of this section.

Badger is committed to maintaining a drug-free workplace to promote both the quality of its services and the safety of its employees, its customers, and the public. Every Badger employee is subject to the rules issued in this Controlled Substance Use & Alcohol Misuse Policy and shall follow the Policy as defined.

Every Badger employee:

1. Is prohibited from using, possessing, selling, purchasing, manufacturing, distributing, or transferring alcoholic beverages and/or controlled substances and/or other performance impairing substances while on duty and/or on Badger property; and,
2. Is prohibited from being on Badger property and/or reporting to work or performing work with a measurable amount of alcohol and/or controlled substance and/or performance impairing substance in his/her system; and,
3. Is prohibited from the consumption of alcohol within four hours of the employee's scheduled time to report for work, or within eight hours following an accident or until the employee takes a post-accident alcohol test, whichever occurs first; and,
4. Is required to submit to an alcohol and/or drug test when directed by the Badger; and,
5. Is prohibited from tampering (adulteration and/or substitution) or attempting to tamper with any alcohol and/or drug test and/or interfering with the testing/collection process; and,
6. Is required to notify his/her supervisor immediately of any conviction for a drug or alcohol related crime; and,
7. Is responsible for informing his/her physician when being prescribed medication(s) that he/she is covered under the terms of this Policy to determine if the prescribed medications can be used safely for performing the job functions for the Badger. The employee shall only use medically authorized drugs by their physician and/or over-the-counter medications in a manner which will not impair job performance; and,
8. Shall promptly report to his/her supervisor whenever he/she is prescribed and/or uses an over-the-counter medication that might cause job performance impairment.

Searches of employees and their personal effects, desks, work areas, lockers, and vehicles (while on Badger property) may be conducted at such times and places as necessary to determine compliance with this Policy.

Violation of this Policy shall result in disciplinary action, up to and including termination, even for a first offense.

This testing program will be conducted in accordance with the standards of the U.S. Department of Transportation (DOT), 49 CFR Part 40, PROCEDURES FOR TRANSPORTATION WORKPLACE

DRUG AND ALCOHOL TESTING PROGRAMS except when those standards are in conflict with this Policy or when not applicable to a non-DOT testing program (example: custody and control form used for specimen collection). 49 CFR Part 40 procedures, which will be applied to this testing program, include, but are not limited to, use of a specimen collection/alcohol testing site with trained Employee, split specimen collection, use of a laboratory certified by the Department of Health and Human Services (DHHS or HHS), and use of a Medical Review Officer (MRO) to investigate laboratory positives.

Badger has adopted the following Policy regarding controlled substance use and alcohol misuse. Each Badger employee shall read the Policy and must sign the EMPLOYEE ACKNOWLEDGEMENT RECEIPT and agree to comply with the terms of the Controlled Substance Use & Alcohol Misuse Policy as a condition of continued employment.

Badger will implement and meet all other federal regulated program such as FMCSA, PHMSA and Non-regulated for exposed/safety sensitive employees provide copies of such programs to exposed employees per regulatory requirement.

I. Policy Statement

Because of our concern for the safety of our employees, our property, the public and our concern about the productivity of our workforce, the Badger has adopted a Controlled Substance Use & Alcohol Misuse Policy that is applicable to all employees. Our purpose in adopting this Policy is to further the "Badger's" objective of establishing and maintaining a work environment free from the adverse effects of drug use and alcohol misuse.

II. Prohibited Conduct

Badger strictly prohibits reporting to or being at work with a measurable amount of illegal drugs and/or alcohol in the body. The manufacture, distribution, dispensing, possession, sale, purchase, and/or use of drug paraphernalia, and/or a prohibited controlled substance and/or alcohol while on Badger property or Badger business is a violation of this Policy. Further, the unauthorized use or possession of prescription drugs or over-the-counter drugs while on Badger property or Badger business is a violation of the Policy. The use of any substance which causes or tends to contribute to unacceptable work performance is also prohibited.

The use of alcohol at Badger approved functions (business meals, employee gatherings, celebration events, cocktail hours at conferences, etc.) is acceptable if (1) The activity and/or an employee's involvement in an activity is pre-approved by the Badger management and (2) Such consumption is done in moderation so as to protect the safety of the employee, fellow employees, clients and the public in general.

a. Illegal Drugs

The presence of a detectable amount of an illegal drug(s) in an employee while performing Badger business or while in a Badger facility and/or on Badger property is prohibited (see full policy for levels - Controlled Substance Use & Alcohol Misuse Policy, Rev 12/2016). Any employee who has a lab confirmed "positive" test for any of the foregoing drugs is in violation of this Policy, unless the employee demonstrates to the MRO a medical explanation for the presence of the drug(s) (in which case the MRO will rule the test result as "negative").

Badger reserves the right to alter the testing panel and threshold levels as substance usage and availability patterns suggest the need for change.

All specimens will also undergo validity testing. Validity testing is the evaluation of the specimen to determine if it is consistent with normal human urine. The purpose of validity testing is to determine whether certain adulterants or foreign substances were added to the urine, if the urine was diluted, or if the specimen was substituted.

b. Alcohol

Employees will be tested for alcohol with an alcohol testing device listed on the National Highway Traffic Safety Administration's Conforming Products List. An alcohol concentration of 0.04 or greater will be considered a "positive". An alcohol concentration of 0.02 to 0.039 will have consequences where the employee will be sent home until their next shift of at least 8 hours or until they can provide a breath test that has an alcohol concentration below 0.02.

III. Disciplinary Action

Zero tolerance policy

Violation of this Policy shall result in disciplinary action, including termination, even for a first offense.

IV. Searches

Badger may conduct unannounced searches for illegal drugs, and/or drug paraphernalia and/or alcohol in Badger facilities and/or on Badger property. Entering the Badger's property constitutes consent to searches. Employees are expected to cooperate in the conducting of such searches.

Searches of employees and their personal property which includes, but is not limited to, lunch containers, brief cases, desks, work areas, lockers, and company vehicles (while on Badger property) may be conducted when there is reasonable suspicion to believe that an employee is in violation of this Policy and/or when circumstances and/or workplace conditions justify them.

An employee's consent to a search is required as a condition of continued employment and the employee's refusal to consent shall result in immediate termination.

No employee will be touched as part of the search or detained without his/her consent. Employees being searched may be asked to empty pockets and remove hats and outer clothing including jackets, coveralls or slickers.

Drugs discovered on Badger property will be turned over to the appropriate law enforcement agency. Any action taken by law enforcement agencies will be completely independent of this Policy.

V. Testing

a. General

1. Drug and alcohol testing will be performed by an independent drug/alcohol testing service. Employees will comply with all procedures and protocols established by the independent testing service. An employee's failure to submit to a drug and/or alcohol test or to comply with all procedures and protocols established by the independent testing service is a violation of this Policy and may result in discipline, up to and including termination.
2. A medical review officer (MRO) will review the results of the drug testing process. The primary responsibility of the MRO is to review and interpret lab positive drug test results. It is important to remember that a positive laboratory test result does not automatically identify an employee/applicant as a user of prohibited drugs. The MRO must review lab positive drug test results and determine whether any legitimate alternative medical explanation could account for the positive result.
3. When an employee is notified to go to the collection site for a specimen collection and/or alcohol test, they will be allotted 30 minutes plus reasonable travel time to report in at the collection/testing site.

b. Drug and Alcohol Testing will be conducted in the Following Situations

Post-Offer of Employment

All applicants who have received a conditional offer of employment will be required to submit to drug testing only (no pre-employment alcohol test will be conducted). Badger will withdraw the conditional offer of employment to any applicant who tests "positive" for the presence of a substance prohibited under this Policy.

Post-Accident

The employee is involved in a work-related accident which results in one or more recordable injuries, as defined by the Occupational Safety and Health Administration (OSHA), an environmental incident, damage to your property or a clients' property, or a combination of these events, and it is suspected that drugs or alcohol may have played a role in the accident.

The employee is involved in an incident (including near misses) in which safety rules and regulations may have been violated, and it is suspected that drugs or alcohol may have played a role in the incident. For purposes of this part "incident" means an incident that caused, or could have caused, personal injury requiring medical treatment beyond first aid administered at the work site, and/or property damage of more than \$1000, estimated in good faith at the time of the incident.

Testing will be required only if in accordance with applicable state law. If drug testing cannot be completed within 32 hours of the accident or incident, and alcohol testing within 8 hours of the accident or incident, Badger should place a written explanation of the circumstances, in the employee's file. This written explanation needs to include details of the accident/incident/near miss and reason(s) for not testing the individual.

Post-Accident/Incident tests shall be conducted immediately after determination has been made that suspect of drugs or alcohol may have played a role in the accident.

Reasonable Suspicion

An employee may be tested for drugs and/or alcohol when supervisors have reason to believe that the employee may be in violation of this Policy. A decision to test will be generally based on two supervisors' evaluation of contemporaneous physical, behavioral, or performance factors which may cause the supervisors, in the exercise of their discretion, to suspect possible drug use and/or alcohol misuse. For instance, repeated errors on the job, rule violations or unsatisfactory time and attendance patterns, or a specific contemporaneous event that indicates possible drug use and/or alcohol misuse, could provide a basis to test an employee. Alcohol testing may be conducted based solely on breath or body odor detected by one supervisor.

In all cases of reasonable suspicion testing, Badger shall provide transportation to and from the collection/testing site as well as to the employee's place of residence or other mutually agreeable location should the testing outcome be positive or unknown.

In the event that the results are unknown in a reasonable suspicion testing situation, the employee will be temporarily suspended until the results are known.

Employees are subject to unannounced en masse drug and/or alcohol testing. Such tests will be scheduled at the sole discretion of the Badger. The Badger discretion includes the determination of the scope for such testing (group of employees, department(s), facilities, etc.) in addition to the timing of such testing. Such testing shall include all employees of the named group. Additionally, such group of employees may include, but is not limited to, all employees on a job site at the time of testing or employees by shift and/or craft.

Post-Rehabilitation (Badger option)

Employees who have "self-identified" (prior to testing or being told they have to take test) as having a controlled substance and/or alcohol use problem, may be eligible to return to work or may be considered for employment with Badger, if the individual can demonstrate successful compliance with a rehabilitation program and is certified by a Substance Abuse Professional. Any person, who is allowed to return to work after having tested positive, in connection with this Policy ("self-identified"), will be subject to a return-to-duty test and follow-up testing. The length of time for post-rehabilitation drug and/or alcohol testing will be left to the discretion of a Substance Abuse Professional and Badger.

Testing of the Split Specimen

An employee or applicant whose drug test was reported as positive by the MRO may request a test of the split specimen, if the employee submits a written request to the MRO within seventy two (72) hours after being made aware of the test results. The employee or applicant must pay for the cost of the split test. If the results of the split test are "negative", the Badger will reimburse the individual. The split test may be conducted at the same DHHS laboratory where the specimen was initially tested or at another DHHS certified laboratory. Selection of the laboratory will be determined by the MRO with input from the employee.

VI. Employee Admission of Controlled Substance Use and/or Alcohol Misuse

1. Employees who admit to controlled substances use and/or alcohol misuse are subject to the referral, evaluation and treatment requirements of this Policy, that is; evaluation by a Substance Abuse Professional, required treatment, follow-up testing, etc.
2. An employee is not permitted to self-identify in order to avoid testing under the requirements of this Policy.
3. An employee must make an admission of alcohol misuse or controlled substances use prior to reporting for duty.
4. The employee will not be permitted to return to work until Badger is satisfied that the employee has been evaluated and has successfully completed education and/or treatment requirements as directed by a Substance Abuse Professional.
5. Prior to the employee returning to work, the employee shall undergo a return-to-duty test with a result indicating an alcohol concentration of less than 0.02; and/or a return-to-duty controlled substance test with a verified negative test result for controlled substances.

VII. Cost

The cost of all testing, except the testing of the split specimen (see Section V.B.6.), will be paid for by the Badger. All cost associated with a SAP evaluation and required rehabilitation are the responsibility of the employee.

VIII. Confidentiality

Badger will carry out this Controlled Substance Use & Alcohol Misuse Policy in a manner which respects the dignity and confidentiality of those involved.

IX. Definitions

Words or phrases used in this Policy.

Adulterated specimen means a specimen that contains a substance that is not expected to be present in human urine, or contains a substance expected to be present but is at a concentration so high that it is not consistent with human urine.

Alcohol means the intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohol including methyl and isopropyl alcohol.

Alcohol concentration (or content) means the alcohol in a volume of breath expressed in terms of grams of alcohol per 210 liters of breath.

Alcohol use means the consumption of any beverage, mixture, or preparation, including any medication, containing alcohol. [Caution: many cough medicines contain alcohol].

CFR means Code of Federal Regulations.

Confirmation (or confirmatory) drug test means a second analytical procedure performed on a urine specimen to identify and quantify the presence of a specific drug or drug metabolite.

Confirmed drug test means a confirmation test result received by an MRO from a laboratory.
Dilute specimen means a specimen with creatinine and specific gravity values that are lower than expected for human urine.

Drug means any substance or chemical that has mind or function altering effects on the human body, including prescription and over-the-counter medications.

Drug paraphernalia means any item used for the administering, transferring or snorting of a drug.

Illegal drug means a controlled substance included in Schedule I or II, as defined by section 802(6) of Title 21 of the United States Code, the possession of which is unlawful under chapter 13 of that Title. The term "illegal drug" does not mean the use of a controlled substance pursuant to a valid prescription or other uses authorized by law.

Invalid drug test means the result of a drug test for a urine specimen that contains an unidentified adulterant or an unidentified interfering substance, has abnormal physical characteristics, or has an endogenous substance at an abnormal concentration that prevents the laboratory from completing or obtaining a valid drug test result.

Laboratory means a laboratory certified by HHS under the National Laboratory Certification Program as meeting the minimum standards of the HHS Mandatory Guidelines for Federal Workplace Drug Testing Programs.

Licensed medical practitioner means a person who is licensed, certified, and/or registered, in accordance with applicable Federal, State, local, or foreign laws and regulations, to prescribe controlled substances and other drugs.

Medical Review Officer (MRO) means a licensed physician responsible for receiving laboratory results and who is knowledgeable of controlled substance use. The MRO must have appropriate medical training to interpret and evaluate test results in conjunction with medical history and any other bio-medical information.

Possession means on one's person, in one's personal effects, in one's vehicle, or under one's control.

Primary specimen means the urine specimen bottle that is opened and tested by a first laboratory to determine whether the employee has a drug or drug metabolite in his or her system; and for the purpose of validity testing. The primary specimen is distinguished from the split specimen, defined in this section.

Refuse to submit (to an alcohol or controlled substances test) means that an employee (or applicant):

- Fails to appear for any test (except a pre-employment test) within a reasonable time (generally 30 minutes plus reasonable driving time after notification to go for a test), as determined by Badger after being directed to do so by Badger;
- Fails to remain at the testing site until the testing process is complete. Fails to remain at the testing site for a pre-employment test or an applicant leaves once the specimen collection kit has been opened;
- Fails to provide a urine or breath specimen for any drug or alcohol test required by this Policy. An applicant who does not provide a urine specimen because he/she left the testing site before the testing process commences for a pre-employment test is not deemed to have refused to test;
- Fails to provide a sufficient amount of urine or breath when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure;

- Declines to submit a second specimen when directed to do so by Badger or collector. A second urine specimen is required when the first specimen is not within the acceptable temperature range. The second collection is by direct observation;
- Fails to cooperate with any part of the testing process (e.g., refuses to empty pockets when so directed by the collector, behaves in a confrontational way that disrupts the collection process); or
- Is reported by the MRO as having a verified adulterated or substituted test result. Sale means any exchange, transfer, or sharing whether for money or otherwise.

Screening test (or initial test) means:

- In drug testing, a test to eliminate “negative” urine specimens from further analysis or to identify a specimen that requires additional testing for the presence of drugs.
- In alcohol testing, an analytical procedure to determine whether an employee may have a prohibited concentration of alcohol in a breath or saliva specimen.

Split specimen means a part of the urine specimen that is sent to a first laboratory and retained unopened, and which is transported to a second laboratory in the event that the employee requests that it be tested following a verified positive test of the primary specimen or a verified adulterated or substituted test result.

Substance Abuse Professional (SAP) means a person who evaluates employees who have violated the drug and alcohol Policy and makes recommendations concerning education, treatment, follow-up testing, and aftercare. Must be a licensed physician (Doctor of Medicine or Osteopathy); or licensed or certified social worker; or licensed or certified psychologist; or licensed or certified employee assistance professional; or a drug and alcohol counselor certified by the National Association of Alcoholism and Drug Abuse Counselors Certification Commission (NAADAC) or by the International Certification Reciprocity Consortium/Alcohol and Other Drug Abuse (ICRC).

Substituted specimen means a specimen with creatinine and specific gravity values that are so diminished that they are not consistent with human urine.

Verified test means a drug test result or validity testing result from an HHS certified laboratory that has undergone review and final determination by the MRO.

Use means any form of consumption, ingestion, inhaling, or injecting.

Summary

The use of illicit drugs, and other mood altering substances, plus the inappropriate use of alcohol and medications can adversely affect job performance, productivity, the work environment and the well-being of employees.

For further detail, please see the full Controlled Substance Use & Alcohol Misuse Policy, Rev 12/2016. If you have any questions about this policy please contact Tom Powers, Director, Health, Safety and Environmental.



Badger Values: Honest and Open Communication



4 Badger Values: Honest and Open Communication

4.1 Corporate Disclosure

Our Policy

We are committed to providing clear, factual and timely information to the public that meets our legal and regulatory requirements.

We have authorized specific individuals to communicate to the market through our website, news releases, financial documents, media interviews, social media, presentations and one-on-one meetings.

The only persons authorized to communicate for Badger, or about Badger, to the public, including to the financial community, shareholders, potential investors and the media (including, but not limited to trade journals) are:

- The President & CEO or the CFO;
- VP Financial Operations; and
- Persons authorized by the President & CEO or the CFO from time to time.

The reputation of a company is an important asset. We all play a role in ensuring that our reputation is protected and continues to grow in a positive way. We encourage our people to engage with us on social media and share our content in a reasonable and respectful way while keeping our reputation in mind.

Sub-Certification Process

- Corporate and operations management including corporate officers, divisional officers, general managers, managers of finance and accounting, corporate controller, divisional controllers and the corporate secretary will be required to, from time to time, sub-certify financial and non-financial information included in any regulatory filings.
- The purpose of this sub-certification process is to ensure that each individual understands the importance of and is aware of our disclosure policies and that any potential areas of disclosure risk are disclosed and resolved.

Your Responsibilities

- Forward requests from media, investors, government and regulators to the President & CEO or the CFO unless you are authorized to respond.
- All presentations to security analysts and institutional investors and generally all other external corporate communications must be reviewed and approved by the President & CEO or the CFO.
- Remember that when you post on social media, you represent yourself and the company and both reputations are on the line.

Do not:

- Make public statements or respond to inquiries about Badger unless you are authorized to do so.
- Allow a business partner to speak on our behalf.

Summary

Never respond to inquiries concerning our company unless you are authorized to speak on the company's behalf. If you have any questions about this policy please contact Darren Yaworsky, CFO.



Badger Values: Have an Action Orientation



5 Badger Values: Have an Action Orientation

5.1 Adopting Fair Competition and Anti-Trust Practices

Our Policy

We are committed to fair competition and do not engage in anti-competitive practices. We never collude with other companies on prices or terms offered to our customers, agree with competitors to allocate markets or customers, or manipulate bid processes.

Unfair-competitive practices can include agreements with competitors to fix or control prices, allocate customers or markets or restrict access to products and services. Competition laws (anti-trust laws in the United States) restrict businesses with a dominant position in a marketplace from using their position in a manner that lessens or prevents competition.

Violations of the competition and anti-trust laws can result in substantial legal consequences for the company and its employees.

Your Responsibilities

- Comply with the fair competition and anti-trust laws of the countries in which we conduct business.
- Communicate honestly in your business relationships.
- You can buy and sell products from a competitor.
- Gather competitive information in a way that is ethical, legal and publicly available.
- Avoid contact with competitors that could create the appearance of improper agreements or understandings.
- Seek advice (from the applicable Competition & Anti-Trust Compliance Officer) exposed to anti-competitive or unfair business practices.

Do not:

- Collude with competitors and trade associations to divide markets, regions or customers, control prices, boycott suppliers or restrict products.
- Engage in misleading advertising or make false claims about competitors' offerings.
- Attempt to gain an unfair advantage through the disclosure of incomplete, inaccurate or misleading information.
- Exchange information about price, market share or other conditions with competitors, customers or other business partners.
- Give to competitors, or seek from competitors, confidential and unpublished commercial information.

Summary

Some of the most serious anti-competition offences occur between competitors. These include bid rigging, collusion, price fixing or agreeing to divide territories or markets. We do not participate in these types of activities.

For further detail, please see the full Competition & Anti-Trust Law Compliance Policy. If you have any questions about this policy, please contact Darren Yaworsky, CFO.

6 Badger Values: Respect People and Cultural Differences

6.1 Anti-Discriminatory and Anti-Harassment

Statement of Commitment

We promote and maintain a workplace culture of inclusion and respect. We value our individual differences, our unique perspectives and backgrounds, and the variety of contributions each of us brings to work. Every worker is entitled to a working environment that promotes equal employment opportunities, prohibits discriminatory practices, and is free of harassment.

At Badger Daylighting Ltd. ("Badger"), we do not tolerate any behaviour that interferes with our well-being and work such as discrimination, harassment, or violence. We are committed to eliminating exclusion including all forms prohibited by law and we all share in this responsibility.

Any conduct that does not align with our standard is taken seriously; it is thoroughly investigated and promptly acted upon.

Badger assesses concerns and conducts an appropriate investigation in a timely manner, including complaints of victimization/retaliation against anyone who raises a concern, ensuring resolution of each situation. Where necessary, Badger works in conjunction with security and law enforcement and takes whatever precautionary steps are necessary to ensure the safety of our people.

Scope

This policy applies to all Badger directors, officers, employees, contractors, and consultants (collectively, "Badger employees".) This practice also applies to customers, suppliers and all other individuals ("third parties") while they are conducting business with Badger or when they are participating in company-sponsored events. The guidelines outlined in this document apply to behaviour on Badger premises, in the field, on a client's premises, during travel related to your work, at conferences, training sessions and seminars attended by you for work, and during work-related telephone, electronic and other communications. Employees should not be subject to harassment or discrimination by co-workers, management and superiors or those who enter the employment context, such as suppliers or clients of Badger.

Purpose

The purpose of this practice is to:

1. Ensure that Badger's work environment is inclusive and respectful.
2. Maintain a working environment that is accessible for all and free from acts of any form of discrimination, harassment, or violence.
3. Provide individuals with effective mechanisms for responding to potential violations of the practice in a timely manner.

Management Responsibilities

Managers are responsible for creating a safe and open working environment that emphasizes inclusion and respect as a standard of performance for all of Badger Daylighting. Management must encourage individuals with concerns to raise them and are obliged to protect, and prevent retaliation against, any individual who reports a concern or assists in a Badger investigation.

Managers who are advised of a complaint of discrimination or harassment should immediately contact Human Resources to discuss the matter. Managers who become aware of a threat or incident of violence must immediately contact appropriate resources (for example, such as security, Human Resources, and/or law enforcement) to support the security of all individuals and Badger property.

Your Responsibilities

We all play a role in ensuring an inclusive and respectful workplace. We treat colleagues and business partners in a considerate and professional manner, and question any inappropriate behaviour we observe or are a party to. If the behaviour continues, we report it using the procedures under the Complaints and Investigations section in this practice.

If, as a means of resolving a personal or domestic problem, it is necessary for an individual to seek a restraining order, injunction, or other court order, they are strongly encouraged to notify their supervisor and Human Resources so that appropriate measures can be taken to support and maintain a secure workplace.

Do not:

- Engage in or condone discrimination or harassment in the workplace.
- Create an unwelcoming work environment.

Definitions

Inclusion: Inclusion is the achievement of a diverse workforce in an environment in which all people are treated fairly and respectfully, have equal access to opportunities and resources, and can contribute fully and freely to Badger's success.

Discrimination

Discrimination is an action or a decision that treats an individual or a group negatively in matters related to employment based on protected grounds. Discrimination does not need to be intentional to be illegal. For example, a rule or policy may be developed for good business reasons but may also have an unintended, significant negative effect on a certain group of employees. Legally protected grounds vary across global jurisdictions; however, Badger recognizes the following protected grounds:

- Age
- Ancestry
- Colour
- Criminal conviction unrelated to employment or a pardoned conviction
- Family and/or marital status
- Family medical history
- Gender identity and/or expression
- Health and/or illness
- Mental and/or physical disability
- National and/or ethnic origin
- Nationality and/or citizenship
- Place of origin
- Political beliefs
- Pregnancy and/or breastfeeding
- Race
- Receipt of public assistance
- Religion and/or creed
- Sex and gender
- Sexual orientation
- Social condition
- Source of income
- Union affiliation
- Association with an individual with any of these listed attributes

Harassment

Harassment is defined as unwanted physical or verbal behaviour that offends or humiliates an individual, such as intimidation, bullying, or derogatory comments.

Sexual harassment is defined as unwelcome or offensive sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature.

Examples of harassment include, but are not limited to:

- Creating an intimidating, degrading, humiliating, or hostile environment.
- Degrading, graphic, or offensive comments or material.
- Implying or threatening that cooperation or refusal of a sexual nature will affect the individual's employment, compensation or career opportunities
- Inappropriate physical contact.
- Persistent unwanted contact or attention after the end of a consensual relationship.
- Stalking or persistent attempts to contact another person.
- The display of suggestive or pornographic material causing embarrassment or offense is carried out after the person showing the material has been informed that it is embarrassing or offensive.
- Undermining or deliberately impeding an individual's work.
- Unwelcome and/or offensive sexual flirtations, advances, or propositions.

- Verbal or written abuse.

The definition of harassment does not include the legitimate exercise of supervisory authority.

Violence

Violence is the threatened, attempted or actual conduct of an individual that causes or is likely to cause injury. Examples of violence include, but are not limited to, uttering threats, intentionally damaging property, throwing objects at or near others, stalking, displaying weapons, and physical assault. Firearms are prohibited in company property or in company vehicles.

Complaints and Investigations

Confidentiality

A complainant's identity and situation is kept confidential to the greatest extent possible. However, anonymity cannot always be fully guaranteed as, in the course of an investigation, an alleged respondent is entitled to understand and respond to complaints made against them, witnesses may be interviewed, and limited members of management may be required to participate in determining consequences. Badger protects personal information by complying with the relevant regional Badger Privacy policy as well as all requirements of the privacy legislation in the applicable jurisdiction.

Reporting Discrimination or Harassment

1. Any individual who believes they are being harassed or discriminated against:
 - a. Is encouraged to speak immediately and directly with the respondent indicating that the behaviour is not acceptable, and
 - b. Should make notes in case action may have to be taken. Dates, times, the nature of the behaviour and witnesses, if any, should be included.
2. If the individual does not wish to discuss the problem with the respondent or feels that they are unable to, or if the discussion does not resolve the problem, the individual is strongly encouraged to:
 - a. Promptly bring it to the attention of their supervisor and/or Human Resources either verbally or in writing, and/or
 - b. Call the ConfidenceLine™ 1-800-661-9675.
 - c. HR will notify the Senior Leadership team if needed.
 - d. The complainant must be prepared to provide sufficient detail to allow for appropriate follow-up.
3. Where the alleged discrimination is an organizational practice or procedure, that practice or procedure will be investigated immediately. Where the investigation finds systemic discrimination within the organization, that practice or procedure will be changed promptly.

4. Human Resources, or an external party contracted by Human Resources, expeditiously investigates and assesses the complaint by conducting confidential interviews with the complainant (if identity is known), the alleged respondent, and witnesses (if required). As necessary, Human Resources consults with management to resolve the issue. The facts and the resolution are documented and kept on confidential record.
5. Where the discrimination or harassment has been substantiated, Badger will take appropriate corrective action to resolve the complaint, up to and including termination of the respondent.
6. Human Resources keeps the complainant apprised of the situation and its general outcome, though all details of the investigation and/or any specific disciplinary action taken are not always shared.

Documenting the Complaint

All meetings, discussions and steps taken in a mediation or investigation with respect to the complaint will be documented. Documents relating to a complaint will be kept in a secure location. If the investigation fails to find evidence to support the complaint, no documentation concerning the complaint will be placed on the respondent's file.

Badger will retain all documentation regarding the complaint, mediation and investigation for two (2) years for informational purposes in the event that there is an internal appeal or a complaint filed with an outside agency.

How to Report Violence or Threat of Violence

In the event that an individual either directly affected by, or a witness to, any violent or potentially violent situation taking place on Badger's premises or at a Badger-related business or social function, it is imperative they report the incident immediately to any member of management or Human Resources, or call:

CONFIDENCELINE 1-800-661-9675 www.badgerinc.confidenceline.net

Toll Free 24/7, Confidential

If necessary, call: 911

Employee & Family Support

Employees are encouraged to access regional community resources or their Badger employee and family assistance program should they require additional support to deal with a perceived incident of discrimination, harassment, or violence.

Non-Retaliation / Non-Victimization

Badger takes steps to protect any individual submitting a complaint of harassment, discrimination, bullying or violence in good faith, and takes disciplinary action against any Badger person who retaliates against an individual expressing a concern or participating in an investigation.

Summary

A work environment based on mutual trust and appreciation of others' skills and abilities supports us as engaged and productive members of our team. The diversity of our people makes us stronger, enabling us to serve our communities and customers more effectively.

If you have any questions about this policy please contact Tracey Wallace, VP Human Resources.

6.2 Privacy

Our Policy

We respect the privacy of individuals and act responsibly in respect to the collection, use, retention, disclosure and disposal of their personal information. We are committed to maintaining the accuracy, confidentiality and security of the personal information of our people, our business partners, customers and other parties.

All private information obtained from any person, including our customers, partners, company individuals and candidates must be accompanied by disclosure for the reason of collection, consent for its use, and a guarantee that the information will be safeguarded and only used for the purposes of original collection.

We comply with the privacy laws and regulations within each jurisdiction in which we operate.

Your Responsibilities

- Collect, use, retain, disclose or dispose of personal information in accordance with our Privacy Policy.
- Safeguard personal information ensuring that it is only shared for legitimate and authorized purposes.
- Consult with Human Resources or the Privacy Officer before implementing new or modifying processes that use personal information (including new systems or software upgrades).
- If you view personal information that you would not normally have access to, report it to the Privacy Officer.

Do not:

- Disclose personal information to a person who does not have a business need to know it, the authority to see it or, where required, the subject's consent to access it.
- Ask employees of our customers, competitors or suppliers to disclose personal information.
- Disclose personal information regarding current or former members of our team without their approval, unless legally required to do so.
- Release customer information unless it is for legitimate business purposes and you have the authorization to do so.

Summary

You must treat personal information confidentially. The information should not be shared with anyone, including colleagues or business partners, unless they have a business need to know and you have the authority to share it with them.

If you have any questions about this policy please contact Tracey Wallace, VP Human Resources.

6.3 Safety

(Also refer to the Badger Daylighting 2018 HSE Goals)

Our Policy

Badger Daylighting is committed to the health and safety of all employees, contractors, clients, the public and to the protection of the environment as it applies to our operations. Badger will work with their employees to promote a healthy and safe work environment. The ultimate goal of our health and safety policy is to have an accident free environment and protection from accidental loss. All employees of Badger Daylighting are responsible for ensuring that the safety program is developed and maintained. Employees at every level are responsible and accountable for Badger Daylighting's overall safety initiatives. Management is committed to protect people and property to provide and maintain a safe and healthy work environment. We ask our employees to take responsibility in upholding this commitment by applying the following guiding principles:

Your Responsibilities

- Ensure you are adequately prepared; follow proper procedures and practices by complying with all regulatory requirements and exercise sound judgement and common sense when undertaking any work related tasks.
- Take an active approach to understanding any potential health, safety or environmental issues that may pertain to work undertaken as an employee or contractor of Badger Daylighting.

- All employees must work in a safe manner, with a safe attitude in order to avoid personal injury and so as not to injure their fellow workers.
- Approach management about any issues relevant to the safety program that you feel would improve the health or safety of Badger Daylighting employees, contractors, or the environment.
- Remain sensitive to the concerns of the public.
- Identify and report any safety hazards and unsafe work conditions or inadequately equipped or trained Employee to management immediately.
- All workers have the right to work in a safe and healthy environment.
- Read, understand and follow the requirements of the Company Safety Manual.

Do not:

- Do not participate in any activities you deem unsafe; you have the right to refuse unsafe work. You are not expected to sacrifice the safety or well-being of Employee for expediency or any other reason.
- Do not tamper with any safety equipment or device.

Summary

All Badger Daylighting employees are responsible for obeying all safety rules, following recommended safe work procedures, wearing and using personal protective equipment when required, participating in safety training programs and informing supervisors of any unsafe work conditions.

The safety information in this policy does not take precedence over the OSHA/OH&S or Federal, State, Provincial or local regulations.

If you have any questions about this policy please contact Tom Powers, Director, Health, Safety and Environmental.

6.4 Employment of Family

Our Policy

This policy has been developed to ensure that all employees of Badger maintain their right to fair treatment and equal opportunities in the workplace without the potential for perceived or actual conflict arising from familiar relationships. Badger aims to provide a workplace that is free from favoritism or personal conflicts.

Scope

This policy applies to all current Badger employees and all candidates for employment with Badger.

Purpose

Badger may hire or consider other employment opportunities for family members of current employees only if:

- The candidate for employment is qualified for the position;
- The candidate for employment will not be working directly for or supervising a family member; and
- The candidate for employment will not occupy a position in the same line of authority in which employees can initiate or participate in decisions involving a direct benefit to the family member.

Such decisions include hiring, retention, transfer, promotion, wages and leave requests.

For the purposes of this policy, “family member” means:

- Parent, child, grandparent, grandchild, brother, sister, uncle, aunt, nephew, niece, first cousin;
- Husband, wife, common-law partner, significant other;
- Parent, child, grandparent, grandchild, brother, sister, uncle, aunt, nephew, niece, first cousin of a person referred to in section 2 above.

Sons and Daughters Program

Human Resources (HR) is developing a summer student program whereby the children of employees will be considered for employment while they are on a break from their post-secondary institution.

Your Responsibilities

All employees are responsible for immediately reporting any changes to their manager or supervisor and Human Resources. Failure to disclose a relationship in a timely fashion will be addressed by applying the Progressive Discipline Policy and can lead to disciplinary action, up to and including termination.

Summary

Badger will hire relatives of employees only under certain conditions (as outlined above).

If you have any questions about this policy please contact Tracey Wallace, VP Human Resources.

6.5 Fraternizing

Our Policy

This policy has been developed to ensure that all Badger and Badger’s employees are not negatively affected by relationships in the workplace. This policy identifies when certain relationships are acceptable and appropriate and when they are not.

Purpose

Badger encourages employees to develop friendships and share a spirit of teamwork and camaraderie both in the workplace and outside of work. This Policy is not meant to interfere with or prohibit the development of co-worker friendships or other appropriate relationships. Badger employees may develop friendships and dating relationships both inside and outside of the workplace as long as the relationships do not interfere with or negatively impact work assignments for either employee. Any relationships or behaviours that interfere with Badger's company culture of teamwork, harmonious work environment or the productivity of employees will not be tolerated. Employees who disregard this policy will be addressed by applying the Progressive Discipline Policy which may lead to disciplinary action, up to and including termination.

It is never acceptable or appropriate for two employees to engage in a close relationship or to fraternize if one of the employees is in a position of power or seniority over the other employee. In this policy, "fraternize or fraternizing" includes but is not limited to dating, romantic involvement, and sexual relations.

Management Responsibilities

Fraternizing between managers or supervisors with any employee who reports to such manager or supervisor or, whose terms and conditions of employment such as pay raises, promotions, and advancement are potentially affected by the manager or supervisor, creates a serious problem for Badger and is strictly prohibited.

Under no circumstances, may a manager or supervisor fraternize with an employee that reports, directly or indirectly, to that manager or supervisor. Fraternizing amongst managers or supervisors with other employees may appear as an inappropriate use of a position power. Managers and supervisors must recognize that personal relationships with employees who report to such manager or supervisor may be perceived as favoritism, misuse of authority, or potentially, sexual harassment.

Your Responsibilities

Fraternizing amongst employees can adversely affect the careers of both employees with regard to advancement opportunities, choices of jobs, and assignments. Even if no improper conduct occurs, fraternizing may cause gossip, hard feelings, dissatisfaction and distraction among other employees in the workplace.

If employees decide to pursue a relationship that is more than a friendship and one employee is in a position of power or seniority (including but not limited to managers or supervisors), such employees must inform their manager or supervisor and Human Resources immediately. Badger

will consider the potential effect in the workplace and decide what, if any, actions are necessary to take in regard to assignments and jobs.

Badger recognizes that employees have different definitions and understandings about what constitutes a friendship, close relationship, or romantic involvement. If you have any questions, concerns or need further clarification regarding this Policy please contact Human Resources. Also, please refer to Badger's Anti-Discrimination and Anti-Harassment Policy specifically as it relates to sexual harassment.

Summary

Badger employees are encouraged to develop friendships and work together as a team. However, if employees decide to pursue a relationship that is more than friendship and one employee is more senior, then the employees must inform their manager or supervisor and Human Resources immediately.

If you have any questions about this policy please contact Tracey Wallace, VP Human Resources.

6.6 Social Media

Our Policy

This policy has been developed to ensure that Badger promotes open and honest communication and maintains a positive and professional image in the communities where we do business.

Purpose

This policy is designed to ensure that Badger's image and branding are maintained and that Badger's intellectual property and confidential information are protected. This policy is not intended to interfere with your private life or impede your right to freedom of speech. Use of personal social media may not conflict with any of Badger's company policies.

You are required to be familiar with and act in accordance with these rights and responsibilities:

- Information shared or learned internally is for internal use and reference only – it is not acceptable to share outside of the Badger organization. This includes (but is not limited to) information found on the internal website, shared in training, heard in town hall meetings or, disseminated via email or any other form of communication chosen by Badger.
- You are personally responsible for the content that you publish or share on any social media platform. Information shared on the internet is out there forever and therefore you must use common sense before posting or sharing any information.
- You are prohibited from posting any negative or disparaging comments regarding Badger or its employees.

- If you mention Badger, include a disclaimer stating that any opinions expressed are your own opinions and do not represent Badger's positions, strategies, or opinions.
- You are expected to conduct yourself professionally both on and off duty. If you publically associate with Badger, all materials may reflect on the company. Inappropriate comments, photographs, links, etc. must be avoided.
- You are prohibited from using Badger's copyrighted materials, corporate logos, and other forms of branding and identity without prior express written permission.
- You are prohibited from speaking on behalf of Badger except in accordance with Badger's Corporate Disclosure Policy.

Your Responsibilities

All employees are responsible for acting in accordance with the above rights and responsibilities.

Summary

Your personal social media activity and your employment are directly connected. Remember that what you say on social media will reflect on you and the company.

If you have any questions about this policy please contact Cheryl Moody, CIO.

EMPLOYEE SIGN OFF ON POLICIES AND CODE OF CONDUCT

I, _____ of the City of _____, am employed by Badger Daylighting or one of its subsidiaries. I acknowledge that I am subject to and am required to comply with the Company's policies and procedures. I have read the policies outlined in the Code of Conduct and understand that compliance with the program is a condition of my continued employment with Badger Daylighting and that failure to comply may result in disciplinary action, including termination of employment.

I have been made aware that additional information is available on some of the policies contained within this document and that I am able to view them at any time.

Date: _____

Employee Signature: _____