



## **ETHICS HOTLINE POLICY**

### **SCOPE:**

This policy applies to all Garner Environmental Services, Inc. ("Garner") employees, full time and part time. Garner's ethics hotline is also available to its business partners, thus this policy would be applicable to those reports as well. Because ethical conduct and transparency are core values of Garner, this policy aims to provide an additional avenue for employees to raise ethical concerns with reassurance that they will be protected from reprisals or victimization for making good faith reports.

### **PURPOSE:**

Garner is committed to the highest possible standards of ethical, moral and legal business conduct. If you are aware of or suspect any violation of law, regulation, or Company policy, including, but not limited to the ethical standards articulated in the Code of Conduct, the Company's Employee Handbook, or the Company's accounting or finance policies, you must immediately report the matter to your supervisor, the General Counsel's Office at 1717 W. 13<sup>th</sup> Street, Deer Park, Texas 77536, or through Company hotline provided in this policy. While, your supervisor is typically the best place to start with a compliance or integrity concern, all employees are encouraged to seek advice or report concerns to a manager or the General Counsel's Office at any time. In those instances where an employee does not feel comfortable speaking with any supervisor, manager, or the General Counsel's Office, Garner provides a third-party hotline service to give its employees an additional avenue of reporting. The earlier a concern is expressed; the easier it often is for us to address.

### **ANTI-RETALIATION:**

Harassment or victimization of individuals reporting concerns and/or submitting hotline reports (whether anonymous or otherwise) will not be tolerated, and any person participating in such conduct may be disciplined, including termination of their employment with the Company.

### **CONFIDENTIALITY:**

This policy permits employees to report concerns anonymously, at their discretion. Trained personnel who are not Company personnel operate the hotline. Please note that any information provided in the course of a report may be the basis of an internal and/or external investigation into the matter. Your anonymity will be protected to the extent possible. However, your identity may become known during the course of the investigation because of the information you have provided. Reports are submitted by Garner's hotline provider to the Director of Human Resources, and may or may not be investigated at the sole discretion of the Company. Regardless of whether the reporter's identity is known, every practicable effort will be made to protect his or her identity by the Company's hotline vendor.

### **PROCEDURE:**

If you choose to report via Garner's hotline, a report may be made in one of the following ways:

Placing a toll free call to:           English Speaking (855) 840-0070  
  Spanish Speaking (800) 216-1288

Submitting a written report through the following website: <https://www.lighthouse-services.com/garner-es>

Emailing a report to: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (*must include company name with report*)

Faxing a written document(s) to: 215-689-3885 (*must include company name with report*)

### **HOW THE REPORT WILL BE HANDLED:**

Garner's Director of Human Resources receives a copy of each report received by its vendor. The action taken will depend on the nature of the concern. The reports shall remain confidential to the maximum practicable extent. The Director of Human Resources, working in conjunction with the General Counsel's Office, will make an initial determination as to whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed-upon action without the need for an investigation, while outside counsel and the Board of Directors may be made immediately aware of other allegations. All employees shall cooperate with any investigation performed by, or on behalf of, the Company or risk disciplinary action, including termination of their employment with the Company.

### **FEEDBACK TO THE REPORTER**

Whether reported directly to Garner personnel or through the hotline, in non-anonymous situations, the individual submitting a report may be given the opportunity to receive follow-up information on their concern. Such follow-up will depend on the nature of the issue, applicable law, and a determination by Garner, as to the utility of such feedback.