It is the policy of MODEC, Inc. and its subsidiaries (MODEC Group) to conduct all business activities in a responsible manner, which assures the health, safety and security of people, preservation of the environment, quality of the products/services and compliance with all applicable health, safety, environmental, security, legal, quality and regulatory requirements in countries where we operate.

To achieve this business ethic and culture, we utilize an integrated Health, Safety, Security, Environmental, and Quality Management Systems (HSSEQ- IMS) that is designed to:

• Demonstrate and promote leadership commitment and personal involvement thus ensuring the health and safety of our employees, the protection of the environment and the delivery of quality products and services;
• Set Quality & HSSE performance objectives, measure results, assess and continually improve processes, services and product quality, through the use of an effective integrated management system;
• Empower and support all employees and subcontractors with the right to STOP WORK or refuse to work in situations where conditions or practices are deemed unsafe;
• Maintain vigilance and readiness to prevent and, when necessary, respond to and effectively manage Health, Safety, Security, Environmental and Quality risks, threats, incidents and/or emergencies;
• Meet specified customer requirements and applicable codes and standards, thus ensuring continuous customer satisfaction; and
• Contribute to sustainable development through environmental protection, social responsibility and economic progress, thus benefiting the communities where we work.

These will be the guiding principles in our execution philosophy, procedures and commercial agreements. This policy is applicable to MODEC Group Companies and their subcontractors, as appropriate.

Yuji Kozai
President & CEO
March 2019