**www.TURNSTILES.us, Inc. Universal Company Policy**
2023 Human Resources Department

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Universal Declaration of Human Rights

www.TURNSTILES.us, Inc. Company Policy upholds the values set forth herein and performs measures to detect and ensure compliance with due diligence.

Preamble

Whereas recognition of the inherent dignity and of the equal and inalienable rights of all members of the human family is the foundation of freedom, justice and peace in the world, Whereas disregard and contempt for human rights have resulted in barbarous acts which have outraged the conscience of mankind, and the advent of a world in which human beings shall enjoy freedom of speech and belief and freedom from fear and want has been proclaimed as the highest aspiration of the common people, Whereas it is essential, if man is not to be compelled to have recourse, as a last resort, to rebellion against tyranny and oppression, that human rights should be protected by the rule of law, Whereas it is essential to promote the development of friendly relations between nations, Whereas the peoples of the United Nations have in the Charter reaffirmed their faith in fundamental human rights, in the dignity and worth of the human person and in the equal rights of men and women and have determined to promote social progress and better standards of life in larger freedom, Whereas Member States have pledged themselves to achieve, in cooperation with the United Nations, the promotion of universal respect for and observance of human rights and fundamental freedoms, Whereas a common understanding of these rights and freedoms is of the greatest importance for the full realization of this pledge, Now, therefore, The General Assembly, Proclaims this Universal Declaration of Human Rights as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance, both among the peoples of Member States themselves and among the peoples of territories under their jurisdiction.

Article I
All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.

Article 2
Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.

Article 3
Everyone has the right to life, liberty and the security of person.

Article 4
No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.

Article 5
No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

Article 6
Everyone has the right to recognition everywhere as a person before the law.

Article 7
All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.

Article 8
Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law.

Article 9
No one shall be subjected to arbitrary arrest, detention or exile.

Article 10
Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him.

Article 11
1. Everyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which he has had all the guarantees necessary for his defense.

2. No one shall be held guilty of any penal offence on account of any act or omission which did not constitute a penal offence, under national or international law, at the time when it was committed. Nor shall a heavier penalty be imposed than the one that was applicable at the time the penal offence was committed.

Article 12
No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honor and reputation. Everyone has the right to the protection of the law against such interference or attacks.

Article 13
1. Everyone has the right to freedom of movement and residence within the borders of each State.
2. Everyone has the right to leave any country, including his own, and to return to his country.

Article 14
1. Everyone has the right to seek and to enjoy in other countries asylum from persecution.
2. This right may not be invoked in the case of prosecutions genuinely arising from non-political crimes or from acts contrary to the purposes and principles of the United Nations.

Article 15
1. Everyone has the right to a nationality.
2. No one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality.

Article 16
1. Men and women of full age, without any limitation due to race, nationality or religion, have the right to marry and to found a family. They are entitled to equal rights as to marriage, during marriage and at its dissolution.
2. Marriage shall be entered into only with the free and full consent of the intending spouses.
3. The family is the natural and fundamental group unit of society and is entitled to protection by society and the State.

Article 17
1. Everyone has the right to own property alone as well as in association with others.
2. No one shall be arbitrarily deprived of his property.

Article 18
Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.

Article 19
Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.

Article 20
1. Everyone has the right to freedom of peaceful assembly and association.
2. No one may be compelled to belong to an association.

Article 21
1. Everyone has the right to take part in the government of his country, directly or through freely chosen representatives.
2. Everyone has the right to equal access to public service in his country.
3. The will of the people shall be the basis of the authority of government; this will shall be expressed in periodic and genuine elections which shall be by universal and equal suffrage and shall be held by secret vote or by equivalent free voting procedures.

Article 22
Everyone, as a member of society, has the right to social security and is entitled to realization, through national effort and international co-operation and in accordance with the organization and resources of each State, of the economic, social and cultural rights indispensable for his dignity and the free development of his personality.

Article 23
1. Everyone has the right to work, to free choice of employment, to just and favorable conditions of work and to protection against unemployment.
2. Everyone, without any discrimination, has the right to equal pay for equal work.
3. Everyone who works has the right to just and favorable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.
4. Everyone has the right to form and to join trade unions for the protection of his interests.

Article 24
Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.

Article 25
1. Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.
2. Motherhood and childhood are entitled to special care and assistance. All children, whether born in or out of wedlock, shall enjoy the same social protection.

Article 26
1. Everyone has the right to education. Education shall be free, at least in the elementary and fundamental stages. Elementary education shall be compulsory. Technical and professional education shall be made generally available and higher education shall be equally accessible to all on the basis of merit.
2. Education shall be directed to the full development of the human personality and to the strengthening of respect for human rights and fundamental freedoms. It shall promote understanding, tolerance and friendship among all nations, racial or religious groups, and shall further the activities of the United Nations for the maintenance of peace.
3. Parents have a prior right to choose the kind of education that shall be given to their children.

Article 27
1. Everyone has the right freely to participate in the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits.
2. Everyone has the right to the protection of the moral and material interests resulting from any scientific, literary or artistic production of which he is the author.

Article 28
Everyone is entitled to a social and international order in which the rights and freedoms set forth in this Declaration can be fully realized.

Article 29
1. Everyone has duties to the community in which alone the free and full development of his personality is possible.
2. In the exercise of his rights and freedoms, everyone shall be subject only to such limitations as are determined by law solely for the purpose of securing due recognition and respect for the rights and freedoms of others and of meeting the just requirements of morality, public order and the general welfare in a democratic society.
3. These rights and freedoms may in no case be exercised contrary to the purposes and principles of the United Nations.

Article 30
Nothing in this Declaration may be interpreted as implying for any State, group or person any right to engage in any activity or to perform any act aimed at the destruction of any of the rights and freedoms set forth herein.

Anti-Bribery and Corruption Policy

Purpose, scope, and responsibility

The Anti-bribery and corruption policy establishes principles that must govern our conduct in order to: a) conform to the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and similar anti-corruption laws worldwide and b) more broadly, reinforce our intention and obligation to act honestly and ethically in all of our business dealings.

This policy applies to all business partners and wholly and majority-owned entities of www.TURNSTILES.us, Inc. The Compliance Committee oversees the assessment of bribery and corruption risks across the enterprise, as well as, evaluating controls, consulting, and reporting to senior management and the board of directors regarding anti-bribery and corruption (AB&C) risks.

Policy

Bribery and corruption are not only against our company values; they are illegal and can expose both the employee and the company to penalties, legal and reputational.

At Principal, bribery is never permitted. We will not seek to influence others, either directly or indirectly, by offering, paying, or receiving bribes or kickbacks, or by any other means that is considered unethical, illegal, or harmful to our reputation of honesty and integrity. Employees and representatives of the company are expected to decline any opportunity which would place our ethical principles and reputation at risk. While certain laws apply only to bribes to government officials (domestic and foreign); this policy applies to non-government business partners as well.

Definitions

People want to work with companies they can trust. TURNSTILES.us has built a longstanding reputation for being an ethical, trustworthy company. Each of us has a responsibility to protect that reputation by demonstrating honesty and integrity as we interact with customers, business partners, and each other.

Bribery is offering, giving, or receiving anything of value with the intention of inducing a person to act or to reward a person for having acted. This includes kickbacks—giving a payment to someone who helps facilitate a transaction. It’s important to understand that a corrupt act has occurred even if a bribe does not go through.

“Anything of value” includes, but is not limited to:

* Cash, cash equivalents (such as gift certificates/cards), stock, personal property, and assumption or forgiveness of a debt.
* Gifts - Any corporate travel, gifts, entertainment, and meals must be proportionate to the occasion and comply with the gift & entertainment policy/standards applicable to your location.
* Political contributions.
* Charitable contributions—if made to a charity at the direct request of a government official or private business partner, it could be considered an indirect bribe made in order to obtain or retain business or to secure other improper business advantage.
* Job offers or internship awards—offers to government officials (or their relatives) can present a risk of violating anti-bribery or anticorruption laws and regulations.
* Corruption is dishonest or fraudulent conduct by those in power, typically involving bribery.

Third parties

Companies cannot avoid liability by using a third party to give or receive a bribe. A third party includes, but is not limited to consultants, agents, representatives, subcontractors, and subadvisors. We must clearly convey to third parties representing the company that we expect them to comply with our company policies.

Due diligence should be performed to ensure that the third party is a bona fide and legitimate entity; is qualified to perform services for which it will be retained; and maintains standards consistent with the legal, regulatory, ethical, and reputational standards of the company.

Reporting violations

Employees and representatives should seek clarification on any questions or concerns regarding activities under consideration or the interpretation of any law. If you are offered a bribe from a person or entity doing business with or seeking to do business with the company, report it immediately to your business Human Resources contact. If you are offered something of value and are uncertain whether you’re allowed to accept it, refer to the gift & entertainment policy and standards applicable to your location, or check with your leader or your Human Resources contact. Those who report concerns in good faith are protected.

Anti-Sexual Harassment Policy

Purpose, scope, and responsibility

www.TURNSTILES.us, Inc. is committed to maintaining a workplace free from sexual harassment. Sexual harassment is a form of workplace discrimination. All employees are required to work in a manner that prevents sexual harassment in the workplace. This Policy is one component of the www.TURNSTILES.us, Inc. commitment to a discrimination-free work environment. Sexual harassment is against the law and all employees have a legal right to a workplace free from sexual harassment and employees are urged to report sexual harassment by filing a complaint internally with TURNSTILES.us Human Resources department. Employees can also file a complaint with a government agency or in court under federal, state or local antidiscrimination laws.

Policy

www.TURNSTILES.us, Inc. policy applies to all employees, applicants for employment, contractors, and persons conducting business whether paid or unpaid. In the remainder of this document, the term ‘employees’ refers to this collective group.

Sexual harassment will not be tolerated. Any employee or individual covered by this policy who engages in sexual harassment or retaliation will be subject to remedial and/or disciplinary action (e.g., counseling, suspension, termination).

Retaliation Prohibition: No person covered by this Policy shall be subject to adverse action because the employee reports an incident of sexual harassment, provides information, or otherwise assists in any investigation of a sexual harassment complaint. www.TURNSTILES.us, Inc. will not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected sexual harassment. Any employee of [Company] who retaliates against anyone involved in a sexual harassment investigation will be subjected to disciplinary action, up to and including termination. Employees, paid or unpaid interns, or non-employees working in the workplace who believe they have been subject to such retaliation should inform a supervisor, manager, or Human Resources. All employees, paid or unpaid interns or non-employees who believe they have been a target of such retaliation may also seek relief in other available forums.

Sexual harassment is offensive, is a violation of our policies, is unlawful, and may subject [Company] to liability for harm to targets of sexual harassment. Harassers may also be individually subject to liability. Employees of every level who engage in sexual harassment, including managers and supervisors who engage in sexual harassment or who allow such behavior to continue, will be penalized for such misconduct.

www.TURNSTILES.us, Inc. will investigate and ensure due process for all parties, whenever management receives a complaint about sexual harassment, or otherwise knows of possible sexual harassment occurring. www.TURNSTILES.us, Inc. will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever sexual harassment is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment.

Managers and supervisors are required to report any complaint that they receive, or any harassment that they observe or become aware of, to Human Resources.

Definitions

Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex when:

* Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment.
* Such conduct is made either explicitly or implicitly a term or condition of employment; or
* Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment.

Any employee who feels harassed should report so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

Examples of Sexual Harassment

The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

* Physical acts of a sexual nature
* Unwanted sexual advances or propositions
* Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.
* Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.
* Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity.

Complaint and Investigation

All complaints or information about sexual harassment will be investigated, whether that information was reported in verbal or written form. Investigations will be conducted in a timely manner, and will be confidential to the extent possible.

An investigation of any complaint, information or knowledge of suspected sexual harassment will be prompt and thorough, commenced immediately and completed as soon as possible. The investigation will be kept confidential to the extent possible. All persons involved, including complainants, witnesses and alleged harassers will be accorded due process, as outlined below, to protect their rights to a fair and impartial investigation.

Any employee may be required to cooperate as needed in an investigation of suspected sexual harassment. www.TURNSTILES.us, Inc. will not tolerate retaliation against employees who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

While the process may vary from case to case, investigations should be done in accordance with the following steps:

* Upon receipt of complaint, Human Resources will conduct an immediate review of the allegations, and take any interim actions (e.g., instructing the respondent to refrain from communications with the complainant), as appropriate. If complaint is verbal, encourage the individual to complete the 'Complaint Form' in writing. If he or she refuses, prepare a Complaint Form based on the verbal reporting.
* If documents, emails or phone records are relevant to the investigation, take steps to obtain and preserve them.
* Request and review all relevant documents, including all electronic communications.
* Interview all parties involved, including any relevant witnesses
* Create a written documentation of the investigation (such as a letter, memo or email), which may contain the following:
	+ A list of all documents reviewed, along with a detailed summary of relevant documents
	+ A list of names of those interviewed, along with a detailed summary of their statements
	+ A timeline of events
	+ A summary of prior relevant incidents, reported or unreported; and
	+ The basis for the decision and final resolution of the complaint, together with any corrective action(s).
* Keep the written documentation and associated documents in a secure and confidential location.
* Promptly notify the individual who reported and the individual(s) about whom the complaint was made of the final determination and implement any corrective actions identified in the written document.
* Inform the individual who reported of the right to file a complaint or charge externally as outlined in the next section.

Protections And Remedies

Sexual harassment is not only prohibited by www.TURNSTILES.us, Inc. but is also prohibited by state, federal, and, where applicable, local law. Aside from the internal process at www.TURNSTILES.us, Inc., employees have additional protections.

Anti-Violence and Harassment Policy

Purpose, scope, and responsibility

www.TURNSTILES.us, Inc. is committed to providing a workplace that is safe and free from harassment and violence by establishing preventive measures and providing assistance and support to those who believe they may have been subjected to harassment or acts of violence in the workplace. This policy applies to all employees, users, vendors, and all others interacting with www.TURNSTILES.us, Inc. Any form of harassment and violence defined in this policy may be cause for disciplinary action, up to and including dismissal.

Policy

Violent behavior of any kind or threats of violence, include, but are not limited to the following:

* Taunting, bullying and other forms of harassment
* Implied (Covert) threats
* Verbal / Psychological / Mental Abuse
* Harassment/Badgering
* Threatening gestures
* Specific (Overt) Written or Verbal Threats
* Stalking
* “Scuffles” (Physical Contact)
* Destruction of property
* Assault - Physical, Sexual, Armed
* An event creating significant fear of imminent harm
* Unauthorized possession of firearms or other weapons on government premises

Any of the above that is either implied or direct, is prohibited at TURNSTILES.us physical or virtual properties, or at sponsored events. All reported violations of this policy by employees, users, vendors or others will be investigated promptly by management, Human Resources and security as appropriate.

Any person who exhibits violent or harassing behavior may be subject to prosecution and disciplinary action up to and including dismissal. Employees should bring forward any concerns they might have to their supervisor or other levels of management. If there are reservations about discussing a situation with a supervisor, employees should report concerns to Human Resources. Retaliation against a person who reports a complaint regarding violent behavior or threats of violence made to him/her is also prohibited. Such conduct will not be tolerated.

Definitions

* Harassment: The act of systematic and/or continued, unwanted and undesirable actions that annoys, threatens, intimidates, alarms, or puts a person or group in fear of their safety. If this type of misconduct interferes with work or creates an intimidating, hostile, or offensive work environment, it may also be considered harassment.
* Workplace Violence: Any act of physical or virtual violence against persons or property, physical or verbal threats, or other hostile behavior that poses imminent threats of danger and causes fear for personal safety.
* Threat: The implication or expression of intent to inflict physical harm or actions that a reasonable person would interpret as a threat to physical safety or property.
* Intimidation: Making others fearful or feeling inhibited through threatening behavior.
* Weapon: A gun, knife, explosive, pyrotechnic, or other dangerous instrument or material likely to produce substantial injury or damage to persons or property, unless recognized as standard work tool.

Examples of Prohibited Behavior

Violence in the workplace may include, but is not limited to, the following list of prohibited behaviors directed at or by a co-worker, supervisor or member of the public:

* Direct threats or physical intimidation (see the ‘Workplace Harassment and Violence Threat Level Table’)
* Implications or suggestions of violence
* Blatant or intentional disregard for the safety or well-being of others
* Stalking
* Physical contact/restraint
* Loud, disruptive or angry behavior or language that is clearly not appropriate to a professional work environment.
* Assault of any form
* Commission of a violent felony or misdemeanor on Jefferson Lab property
* Any other act that a reasonable person would perceive as constituting a threat of violence, harassment or causing fear of harm or endangerment.

Reporting Acts or Threats of Violence

A person who is the victim of violence, believes he/she has been threatened (or is being threatened) with violence, or witnesses an act or threat of violence towards anyone else shall take the following steps:

If an emergency exists and the situation is one of immediate danger, the employee is to contact the local police officials by dialing 9-1-1, and take whatever emergency steps are available and appropriate to protect himself/herself from immediate harm.

If the situation is not one of immediate danger, the employee should report the incident to the appropriate supervisor, manager, Human Resources or security as soon as possible.

Management and/or Human Resources will complete an Incident Form upon receipt of the reported concern. The reporting employee will review the completed form detailing the allegations for accuracy.

RESPONDING TO WORKPLACE VIOLENCE CONCERNS:

Incident Investigation

It is the responsibility of management, Human Resources and Security to promptly investigate acts of violence or threats in order to protect employees from danger and unnecessary anxiety concerning their welfare. Simultaneously, Security will refer certain matters to local police for their review and determination of potential violation of civil and/or criminal law when appropriate.

If an employee believes he/she has been subjected to or witnessed an act of harassment or violence in the workplace, he/she should inform the supervisor, manager, Human Resources immediately and include a written statement that provides specifics details about the incident/allegation. Management is to work in concert with the Associate Director, Human Resources and Security as appropriate to ensure that allegations of workplace harassment or violence are investigated. After a review of the investigation, management will coordinate with Human Resources to determine the appropriate response, to include corrective action, employee termination and/or civil/criminal prosecution. No retaliatory action will be taken against anyone for reporting or inquiring in good faith about potential breaches of policies or for seeking guidance on how to handle suspected breaches.

Vulnerable Persons Policy and Practice

Purpose, scope, and responsibility

The safety, welfare and wellbeing of children, young people and vulnerable adults is www.TURNSTILES.us’ highest priority. The right to enjoy a safe environment free from threats, harm, abuse, mistreatment or exploitation is a core commitment to our clients and the communities we serve.

We encourage our workforce to be personally and professionally accountable for upholding this commitment. This means we expect every member of our team to hold themselves and others accountable, to be transparent and to learn from their experiences working with vulnerable people.

This policy applies to all people engaged to work with www.TURNSTILES.us, Inc., including paid and unpaid employees, contractors, suppliers, and volunteers.

Definitions

A vulnerable person means a child (an individual under the age of 18), or an adult (18 years and above) who may be unable to safeguard themselves against harm or exploitation by reason of illness, trauma, disability, or for any other reason. A vulnerable adult is unable, rather than unwilling, to learn or properly maintain some aspects of basic living skills and self-protective behaviors.

Physical, economic, social and political factors determine a person’s level of vulnerability and the extent of their capacity to resist, cope with, and recover from hazards. Factors that contribute to vulnerability include:

* being a child or young person
* lived experience of trauma
* living with a disability
* poor physical or mental health
* being culturally and/or linguistically diverse
* socio-economic disadvantage
* being an immigrant or refugee
* dependence on others
* being aged or frail

Policy

All children, young people and vulnerable adults have a right to feel and to be safe. Safeguarding vulnerable people is everybody’s responsibility every day. To uphold this commitment, www.TURNSTILES.us, Inc. will:

* Create and maintain an environment that ensures all people involved in activities, programs or services act in the best interests of children, young people and vulnerable adults. This includes creating and maintaining a safe culture that is understood, endorsed and put into action by all individuals who work for, volunteer or access our business.
* Take all reasonable steps to ensure the safety, welfare and wellbeing of clients, including encouragement of its workforce to act to protect children, young people and vulnerable adults from all forms of abuse, bullying, neglect and exploitation.
* Ensure the dignified and respectful participation of children, young people and vulnerable adults in decision-making processes. This includes consulting with and seeking the views of children, young people and vulnerable adults on issues affecting their lives; respecting clients as individuals; and recognizing clients’ differing circumstances and priorities.
* Comply with all laws and regulations and conform to the ethical expectations of the communities we serve in providing safe spaces.

Actions and Implementation

It is the responsibility of everyone at www.TURNSTILES.us, Inc. to support the organization’s commitment to the safeguarding of children, young people and vulnerable adults. It is the responsibility of managers, supervisors and all members of the frontline workforce (paid or unpaid) to ensure they understand the importance of this policy.

If you have a concern about any issue that you believe (or suspect) may violate any law or company policy, you are encouraged to speak up. You can always raise any concern or ask for advice or support by contacting your line management, supervisor, other trusted advisors or members of the Human Resources department. The Chief Executive Officer of www.TURNSTILES.us, Inc. is the authority to make necessary operational decisions on a case-by-case basis.

Anti-Child Labor Policy

Purpose, scope, and responsibility

Our child labor policy is our position on employing minors and aims to ensure that our company, its subsidiaries and everyone we’re connected with follows the law and cares for children’s interests.

International, local and federal child labor laws are stricter today than they were years ago. But millions of children are still forced to work in bad conditions all around the world, even in developed countries.

As an organization, www.TURNSTILES.us, Inc. wants to do business in a legal, ethical manner adding value to society and the environment. Helping stop child labor is fundamental to us. We want to make sure that our organization doesn’t take part in children’s exploitation and also helps end it to the best of our ability.

This policy applies to our entire organization and those we do business or partner with including suppliers, vendors and contractors. The International Labor Organization (ILO) and the U.N Convention on the Rights of the Child guide our policy on child labor. When it comes to legal aspects, we always:

Follow the stricter law if more than one law applies (e.g. state and federal, local and international).

Require suppliers, partners and vendors to follow the stricter applicable laws and recognize children’s rights. They must also require their own suppliers, subcontractors and stakeholders to do the same.

In this policy, we refer to “children” as people who are younger than [18] years of age. “Young children” are people younger than [14]. “Child labor” refers to work that deprives children of their childhood and affects their schooling, their potential and their dignity. It’s work that’s harmful to them mentally, physically and socially.

Policy

Young children

When it comes to young children (younger than [14]), we don’t want to stand in the way of their health, schooling or free time. That’s why we don’t and won’t employ anyone younger than [15 years] of age and require our subsidiaries to do the same, regardless of the country they’re in.

We’re also committed not to do business with any organization that employs children younger than [15]. We’ll include this condition in every contract we sign and reserve the right to break the contract without penalty if our stakeholder violates this condition and refuses to agree on or follow through with an elimination plan.

Legal exceptions

[Agriculture. Many laws make the distinction between agricultural and non-agricultural jobs. Agricultural job requirements for minors may be less strict, especially if a child works at a family-owned farm. In these cases, we’ll follow the law when doing business with agricultural businesses and we’ll make sure that children involved aren’t placed in danger via regular audits and official documentation.]

Parental employment. We might occasionally do business with family-owned businesses. Those businesses are usually allowed to employ the owner’s young children as long as the work isn’t too hazardous (e.g. mining, manufacturing). We accept this regulation, but we’ll still dissolve our contract if it comes to our attention that these children are exposed in danger or are working consistently during school hours.

Occasional work. Sometimes, parents bring their children to work to teach them skills and introduce them to a work environment. They may also hand them some tasks to complete (e.g. a painter may ask his child to help with a painting job he’s taken). This is an acceptable practice, as long as it doesn’t deprive children of school on a consistent basis or puts them in any danger. (For example, the painter shouldn’t allow his son to inhale toxic paint or ask him to climb on scaffolding.)

Older children

When it comes to employing children who are older than [15], we’ll always follow the local and international laws. As a general rule, these children can have a job, but they should never do work that jeopardizes their health and safety or affects their schooling and development.

With this rule in mind, we may employ children older than [15] for light work such as [stocking shelves, being cashiers, delivering packages in short distances on bicycles, light cleaning duties etc.] They will not use any heavy or dangerous equipment, chemicals or vehicles when working.

We’ll determine their work hours and wage based on applicable laws. We won’t employ children for more than the maximum weekly or daily hours allowed. [For example, according to the U.S. federal child labor laws, work hours for children between 14 and 16 years old have a limit of 18 hours a week.]

These are mandatory conditions when forming partnerships or other business relationships. We’ll refuse to do business with anyone who employs children of any age in hazardous or exhausting jobs or doesn’t follow applicable laws on working hours or pay. We also expect them to communicate and enforce the no child labor policy to their own contractors.

Actions and Implementation

To make sure we enforce this policy and help eliminate child labor, we’re committed to:

* Working with governments and other organizations to end child labor. We may sponsor or organize actions to educate communities, build schools or find ways to ensure children won’t be forced to work to support their families.
* Educating our staff on youth work laws and show them how to report child labor if they see or suspect it.
* Requiring hiring managers and HR to avoid hiring minors under the legal age for working. We also expect them to know and follow this policy and laws on wages and hours for older children.
* Keeping and validating documentation verifying our employees’ age after they’re hired. If we discover that we’ve hired a minor under the age of 18, we’ll review applicable laws and adjust working hours accordingly. If we need to let the child go, we’ll assess their situation and make sure to provide for them to the best of our ability (e.g. pay him or her their would-be salary for a couple of months) when necessary.
* Communicating our no child labor policy to organizations we’re connected with and ensure our contracts have the right stipulations.
* Auditing suppliers and partners randomly to ensure they aren’t involved in child labor. If we discover hidden business sites that employ children, we’ll dissolve our contract immediately.
* Demanding and monitoring an elimination plan in cases where suppliers discover child labor in their business. We’ll also work together with the stakeholder to create plans to support children, keeping their best interests in mind, and make efforts to involve them and their families in the process.
* Employing or consulting with experts on topics like child labor, health and safety standards or corporate social responsibility.

Children’s welfare is everyone’s business. We ask all of our employees and partners to follow this policy, not just because we demand it as an organization, but because securing a bright future for children is everyone’s duty.

Anti-Forced Labor Policy

Purpose, scope, and responsibility

www.TURNSTILES.us, Inc. has zero tolerance for forced labor. The purpose of this policy is to describe commitments of www.TURNSTILES.us, Inc. to comply with, and respect individuals’ rights under law, and the responsibilities of all to help comply with these laws.

Policy

www.TURNSTILES.us, Inc. and its affiliates shall not tolerate, engage in or support Forced Labor or Human Trafficking of any kind through activities, including in its supply chain, or assist any other party in doing so.

www.TURNSTILES.us, Inc. shall respect its employees’ rights to agree to terms and conditions of employment voluntarily without coercion, and freely terminate their employment on appropriate notice.

Definitions

* “Forced Labor” means all work or service exacted from a person under threat or penalty (including slavery, servitude and forced recruitment), which includes penal sanctions and the loss of rights and privileges where the person has not offered himself or herself voluntarily.
* “Human Trafficking” means the act of recruiting, harboring, transporting, providing or obtaining a person for forced labor or commercial sex acts using fraud, coercion (e.g., threats of serious harm or physical restraint or abuse or threatened abuse of the legal system) or deception.

Reporting Violations and Concerns

www.TURNSTILES.us, Inc. takes this policy very seriously and violations may lead to disciplinary action up to, and including, termination of employment. While we retain discretion as to how to respond to any violation of this policy, any disciplinary process will be undertaken in accordance with all applicable local laws and other legal requirements.

If you have a concern about any issue that you believe (or suspect) may violate any law or company policy, you are encouraged to speak up. You can always raise any concern, or ask for advice or support, through your line management, supervisor, other trusted advisor or member of the Human Resources department.

Complaint Policy and Procedure

CONTACT INFORMATION
303-670-1099
patrick.mcallistar@TURNSTILES.us
contact@TURNSTILES.us
8641 S. Warhawk Dr. Conifer, CO 80433

We Want to Know!

If you believe anyone is violating (1) any law; or (2) any Company policy, we need to please know about it immediately. There are multiple options for you to let us know about your concerns:

* By phone: You are welcome to contact our Company President and CEO directly at any time to share your concerns.
* Online: Our contact form on TURNSTILES.us website alerts the team or sending an email to a specific team member allows you to submit your concerns 24/7.
* In writing: Any concern may be submitted in writing via a written statement and provide to the company. We encourage you to notify your supervisor or anyone in Human Resources.

Timing
Please notify www.TURNSTILES.us, Inc. promptly if you are aware of any violations of law or company policy. Prompt reporting will serve to enhance our ability to investigate effectively and to preserve important evidence for future proceedings, including, for example, legal and disciplinary proceedings.

Confidentiality
Confidentiality is critical to help ensure all concerns and complaints are reviewed and (as appropriate) investigated objectively and fairly to everyone involved. Please know that all concerns and complaints are important to us; however, depending on the nature and complexity of the issue, it will take time to evaluate the concern. Subject to all laws and policies, we will keep you apprised of developments. Please know that in some circumstances we may not be able to share with you the resolution or specific actions taken by www.TURNSTILES.us, Inc.

Anonymity
Please know that all complaints are reviewed and handled with care and concern for our employees. If a concern is reported anonymously, it will be reviewed to the extent possible. However, anonymous complaints may affect our ability to investigate and respond effectively.

No Retaliation
No one may be discouraged from notifying www.TURNSTILES.us, Inc. of any complaint or concern. If you believe that you or anyone that has filed a claim is receiving any type of negative treatment as a result of notifying the Company of a concern, please notify any member of the Executive team or HR immediately.

Conflicts of Interest
Please know that your concerns will only be shared with internal individuals that need to know about the issue in order to appropriately and adequately review and investigate the concern. In the event your concern involves an individual that would typically be involved or made aware of such a concern, please know that the Company will take all reasonable steps to avoid any conflicts of interest. We have processes in place to allow alternate individuals evaluate the concern when potential conflicts of interest arise. Typically, HR and only individuals relevant to the concern will be involved in the investigation. The [Legal] department may be involved as well depending on the nature and complexity of the concern. Please let us know of any potential conflicts of interest that exists or might exist.

Timing
Each concern and complaint are unique and important to us. Therefore, it is impossible to provide a specific timeline for resolution of all complaints and concerns. However, HR will begin its review and investigation process usually within three (3) business days of receiving the complaint or concern. Depending on the number of individuals involved and complexity, the investigation can take up to three to six weeks.

Your concerns are important to us! We are here to help.

Supplier Code of Conduct

Purpose, Scope, and Responsibility of Suppliers

www.TURNSTILES.us, Inc. is committed to environmentally and socially responsible business management. We expect the same conduct from all of our suppliers. We also require all of our affiliates to respect the principles of environmentally and socially responsible and ethical conduct and to integrate these principles into our company culture. Furthermore, we strive continually to optimize the sustainability of our corporate activities, and we ask our suppliers to contribute to these efforts in the spirit of an integrated approach.

For future cooperation, the contracting partners agree on the validity of the following rules for a common CoC (Code of Conduct). This agreement forms the basis for all future deliveries of supplies. The contracting partners commit to fulfil all of the principles and requirements of the CoC. The suppliers are requested to contractually commit their subcontractors to adhere to the standards specified in this document. Violation of this CoC can constitute a cause and reason for the company to terminate the business relationship.

Social Responsibility

• Elimination of forced labor
No forced labor or similar form of labor may be used. All work must be done by choice, and employees must be able to end the work or the employment relationship at any time. Furthermore, no worker may be subjected to unacceptable treatment such as psychological cruelty or sexual or other personal harassment.

• Prohibition of child labor
Child labor is forbidden at every phase of production. The suppliers are called upon to adhere to the ILO conventions’ recommended minimum age for the employment of children. According to these recommendations, the age should not be lower than the age at which compulsory school attendance ends, and should in no case be lower than 15. If children are discovered to be working, the supplier is to document the measures that are to be taken to remedy the situation and enable the children to attend school. The rights of young workers are to be protected and special protective provisions for them are to be complied with.

• Fair wages
The wage for regular working hours and overtime must comply with at least the statutory national minimum wage or the customary minimum wage for the industry, whichever is higher. In every case, the wage for overtime hours must be higher than the wage for regular hours. If the wage is not sufficient to cover the usual cost of living while allowing the worker to accumulate a minimum amount of savings, the supplier is obligated to increase the worker’s pay to reach a sufficient level for this. All legally mandated benefits are to be provided to employees. Wage deductions as a punitive measure are not permitted.

• Fair working hours
The working hours must comply with the applicable laws and industry standards. Overtime is only permitted if it is performed on a voluntary basis and does not exceed a total of 12 overtime hours per week. After six consecutive working days, an employee is to be provided with at least one day off. The total weekly working hours cannot regularly exceed 48 hours.

• Freedom of association
In cases in which freedom of association and the right to hold collective meetings are legally restricted, alternative possibilities for an independent association of employees for the purpose of collective bargaining are to be permitted. Employee representatives are to be protected from discrimination. They are to be granted free access to their colleagues’ workplaces to ensure that they are able to exercise their rights in a lawful and peaceful manner. The supplier shall respect workers’ right to freedom of association, to joining trade unions, to appealing to worker representatives and to membership in works councils in accordance with the applicable local laws. It must be possible for workers to communicate openly and without fear of reprisals or harassment.

• Prohibition of discrimination
Discrimination against employees in any form is prohibited. This applies, for example, to discrimination on the basis of gender, race, caste, skin color, disability, political convictions, family background, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of every individual shall be respected.

• Health protection; occupational safety
The supplier is responsible for a safe and healthy working environment. Through the construction and use of suitable workplace safety systems, the necessary preventive measures are taken against accidents and injuries to health that could occur in connection with workplace activities. The employees are also informed regularly about the applicable health protection and safety norms and measures and receive training about them. The employees are provided access to adequate quantities of drinking water and to clean sanitary facilities.

• Complaint mechanisms
At the operational level, the supplier is responsible for establishing an effective complaint mechanism for
individuals and communities who could be affected by negative impacts. Even in places where legal systems are effective and well-equipped, complaints mechanisms can offer special advantages such as rapid access and swift relief, reduced costs and transnational reach. Employees who lodge a complaint about violations of this Code of Conduct or the applicable laws are not to be subjected to disciplinary measures in any form.

Environmental Responsibility

• Treatment and discharge of industrial wastewater
Wastewater from operating procedures, production processes and sanitation facilities is to be monitored, tested and treated as needed before it is introduced or disposed of. Beyond this, measures should be introduced to reduce the generation of wastewater.

• Dealing with air emissions
General emissions from operating procedures (air and noise emissions) and greenhouse gas emissions are, before they are released, routinely monitored, and treated as needed. It is also the supplier’s responsibility to monitor their emissions treatment systems and the supplier is obliged to find solutions for minimizing emissions.

• Dealing with wastes and hazardous substances
The supplier shall pursue a systematic approach in order to identify solid waste, manage it, reduce it, and responsibly dispose of or recycle it. Chemicals and other materials that pose a danger when they are released into the environment are to be identified and managed in such a way that safety is ensured when people interact with these materials, as well as when they are transported, stored, used, recycled or reused, and when they are disposed of.

• Reducing consumption of raw materials and natural resources
The use and consumption of resources during the production process and the generation of waste of any sort, including water and energy, are to be reduced and avoided. This takes place either directly at the place where the waste is generated or through processes and measures – for example, through changing production or maintenance procedures or processes in the company, through the use of alternative materials, through economizing, through recycling or through the reuse of materials.

• Dealing with energy consumption and efficiency
Energy consumption is to be monitored and documented. Cost-saving solutions are to be found to improve energy efficiency and minimize energy consumption.

Business Ethics

• Fair competition
Norms of fair business practices, fair advertising and fair competition are to be observed. Beyond this, the relevant antitrust laws, which particularly prohibit agreements and other activities to influence prices or conditions, are to be applied. These rules further prohibit agreements between customers and suppliers that are intended to limit customers’ freedom to autonomously determine the prices and conditions for their resale of goods.

• Privacy/data security
The supplier commits to fulfil the reasonable expectations of the client, subcontractors, customers, consumers and employees concerning the protection of private information. In the collection, storage, processing, transmission and transfer of personal information, the supplier is to observe the laws on data protection and information security as well as the regulatory requirements.

• Intellectual property
Intellectual property rights are to be respected; transfers of technology and expertise are to be carried out in such a way that intellectual property rights and customer information are protected.

• Integrity/corruption, personal gains
The highest standards of integrity are to be applied to all business activities. The supplier must pursue a zero-tolerance policy regarding the prohibition of bribery, corruption, extortion and embezzlement. Processes for monitoring and implementing norms are to be applied in order to ensure compliance with anticorruption laws.

Actions and Implementation

We expect our suppliers to identify risks within supply chains and take appropriate measures. In the case of a suspected violation, as well as to safeguard supply chains with heightened risks, the supplier will inform the company promptly and, if necessary, regularly about the identified violations and risks and about the measures taken. If a violation of the rules of this Code of Conduct is identified, the client shall notify the supplier of this in writing within one month and will provide a suitable period of time within which the supplier’s conduct shall be brought into compliance with these rules. If the violation was caused culpably and this renders the continuation of the contract until its due termination unacceptable for the client, the client can end the contract upon the expiration of the stated time period.