

Code of Conduct

Ethics

Ethics is an integral part of BLD Homes. One of the key factors to our success has been our reputation for integrity and fair dealings. Our reputation continues to be one of our most valuable assets as we move forward. The requirement that all personnel of BLD Homes must act in accordance with both legal requirements and ethical principles is reflected in our organization's vision, values, and guiding principles. This Code of Conduct brings together those policies, provides additional guidance on legal and ethical conduct, and implements systems to better ensure compliance. This code and its associated policies are intended to help ensure that the actions of all of us reflect well on ourselves, our colleagues and BLD Homes. Brent Brownlee - President and CEO.

Core Values

Honesty

- Open communication.
- Being transparent and truthful.

Integrity

- Our word is our bond.
- We live up to the highest standards of fairness.

Respect

- We work hard to earn our client's and business partners' trust and respect on every project we undertake.
- We are all responsible for building and protecting our reputation as the home builder of choice.

Dynamic Culture

- We constantly seek new opportunities to learn, improve and to teach.

Passion

- We love what we do.
- We take the lead, and we lead by example.

Commitment

In support of our core values, each employee of BLD Homes, and each vendor, consultant and subcontractor worker engaged by BLD Homes commits to abide by this Code of Conduct. Each of those persons also commits to abide by all the policies referenced in this code that are relevant to that person. Violations will be the cause for

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corrective action, which may result in disciplinary action up to and including termination of employment or services contract.

Obey the Law

We will conduct our business in accordance with all applicable laws and regulations.

Act Ethically

We will conduct our business in accordance with the highest standards of ethics. Most ethical problems can be avoided by exercising common sense. When confronted with a situation which raises a concern, ask yourself:

- Are my actions legal?
- Am I being fair and honest?
- Will my actions stand the test of time?
- How will I feel about myself afterwards?
- Would I think that others were acting unethically if they acted this way?
- How would it look in the newspaper?
- Will I sleep soundly tonight?
- What would I tell my child to do?
- How would I feel if my family, friends, and neighbors knew what I was doing?

Positive Work Environment

We provide a positive and ethical work environment that supports doing what is right, respecting others, and performing with high standards. We must be careful in our words and our conduct to avoid placing, or seeming to place, pressure on others that could cause them to deviate from acceptable ethical behavior. While all of us must contribute to the creation and maintenance of such an environment, our management personnel assume special responsibility for fostering a positive work environment. We provide a workplace where everyone feels respected, satisfied, and appreciated. We respect diversity, equality and inclusion. We comply with all applicable anti-discrimination laws, wherever we do business, and with the requirements of our harassment and discrimination policies. For additional information, consult our Workplace Anti-Violence and Harassment Policy. We provide a safe and healthy work environment and observe environmentally sound business practices. We comply with the requirements of all applicable laws and all of our policies respecting safety and the environment.

Avoid Conflicts of Interest

Management, employees, consultants, and subcontract workers of a company have a duty to advance the legitimate interests of that company. A conflict of interest occurs whenever that person's private interests are not aligned with – or appear not to be

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aligned with – the interests of that company. In addition, you must avoid any relationship, influence, or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job. You must not use company property or information for personal gain or take for yourself personally any opportunity that is discovered through your position with BLD Homes.

Recordkeeping

Transactions between BLD Homes and its clients, subcontractors and suppliers must be promptly and accurately recorded in accordance with generally accepted accounting practices and principles. You must not misrepresent facts in company records or falsify company records. Costs incurred on one project must not be charged to another project, unless expressly permitted by contract and applicable laws.

Public Disclosures

We are committed to full, fair, accurate, timely and understandable disclosure in all public communications, including all periodic reports and documents filed with government entities. Those disclosure obligations apply to all persons who have any responsibility for preparing, drafting, reviewing, signing, or certifying the information contained in such reports. This requires operating in an environment of open communication, while not compromising proprietary and confidentiality concerns.

Adhere to All Competition and Antitrust Laws

Canadian competition and antitrust laws are designed to protect the free enterprise system and to promote open and fair competition. Competition and antitrust laws are vigorously enforced. Violations may result in severe penalties and significant fines against the company. There may also be sanctions against individuals, including substantial fines and prison sentences. In your dealings with competitors, including competitive bidding, teaming agreements or joint ventures, you must be familiar with the applicable competition and antitrust laws that apply to those activities, and you must comply with BLD Homes' competition and antitrust policies.

Political Contributions and Activities

We encourage you to become involved in civic affairs and to participate in the political process. However, any involvement and participation must be on an individual basis, on your own time, and at your own expense. In Canada, corporations are prohibited from making political contributions to federal parties and candidates for federal office. Provincial legislation also governs political contributions and activities as they apply to their respective jurisdictions. Laws that establish rules relating to lobbying activities are

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designed to ensure that the transparency and integrity of legislative and other government processes are preserved. BLD Homes will comply with all such laws.

Bidding, Negotiating and Performing Contracts

We will compete fairly and ethically for all business opportunities. In circumstances where there is reason to believe that the release or the receipt of non-public information is unauthorized (such as when doing business with the Canadian government) we will not attempt to obtain and will not accept such information from any source. If you are involved in proposals, bid preparations, or contract negotiations, you must be certain that all statements, communications, and representations to prospective clients are accurate and truthful. We deliver what we contract to do. We pride ourselves in always delivering a quality work product, consistent with all of our contractual obligations. Our commitment to deliver is never compromised by cutting corners.

Gifts, Gratuities and Business Courtesies

Favourable treatment must not be sought, received, or given in exchange for furnishing or receiving gratuities. We must also avoid any acts that might give the appearance that such favorable treatment was sought, received, or given. We will not tolerate any violation of applicable law or of our policies related to gifts, gratuities, and business courtesies.

Business Courtesy Policy

Specific guidance on offering, giving, or receiving gifts, gratuities and business courtesies is set out in the Employee Code of Conduct. You must be familiar with and comply with that policy. Canadian federal, provincial, and municipal government departments and agencies and their employees, and elected officials are governed by several complex laws and regulations concerning acceptance of food, entertainment, gifts, gratuities, and other things of value from firms and persons with whom those government departments, agencies, employees and officials do business, or over whom they have regulatory authority.

Consultant, Agents and Representatives

Business integrity is a key standard for the selection and retention of those who represent us. Agents, representatives, or consultants who will be representing BLD Homes must certify their commitment to act in a manner that is consistent with our policies and procedures, including this Code of Conduct. You must not retain any consultant, agent or representative to circumvent our values and principles or to undertake acts that you would be prohibited from undertaking.

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Protect Proprietary and Confidential Information

You may have access from time to time to various types of proprietary or confidential information belonging to BLD Homes. You must keep that information protected and secured. You must not disclose that information to anyone without proper authorization or use that information for anything other than its intended purpose. In the course of normal business activities, clients, subcontractors and suppliers may sometimes divulge to you information that is proprietary or confidential to their business. You must not disclose or use that information other than as agreed by those clients, subcontractors, or suppliers, or if required by law.

Use of Assets

You are responsible for proper use of property, information resources, materials, facilities, and equipment belonging to us and to our subcontractors, suppliers, and clients. You must use and maintain these assets with care and respect, guarding against waste and abuse. Your personal use of assets belonging to BLD Homes must always be approved by a manager as applicable.

Use of Electronic Communications

If used improperly, electronic communications, applications and services including those conducted on computer based and/or mobile applications may expose us to significant risks and liability. Accordingly, electronic communications of any type or kind, in addition to other oral or written communications, must be conducted in accordance with this Code of Conduct, and our Social Media Policy.

Report Unethical Conduct

Our statement of guiding principles says that we are accountable to one another, and everyone has the responsibility, the freedom, and the power to act. To protect our organization from unethical or illegal activity, it is always your duty and obligation to be watchful of the practices that you see occurring around you, to take reasonable steps to prevent or detect improper conduct, and to report any suspicion of fraudulent, abusive, unethical, or illegal activity. The objective of this principle is to provide an avenue for you to raise concerns and to assure you that you will be protected from reprisals or victimization for reporting, in good faith, suspected fraudulent or other unethical or illegal acts.

Reports

You must report any breach of this Code of Conduct, including any activities by an employee, consultant or subcontractor, or any department or combination of those persons that may constitute:

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- accounting irregularities;
- conflict of interest or other unethical business conduct;
- theft or fraud;
- violation of laws, rules or regulations;
- violation of professional standards or internal policies;
- a risk to health and safety;
- a risk to the environment;
- harassment or discrimination;
- workplace violence; or,
- any other matter of concern that you believe is a breach of this Code of Conduct or any policies referred to in this code.

Contact

You should take your concerns to your immediate supervisor or HR manager, or any other management personnel you feel comfortable talking to. You may be requested to submit your allegations in writing. Any such reports will be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation and, with the legal obligations of BLD Homes to voluntarily disclose information to authorized Canadian agencies as applicable.

Complaint Handling

All complaints will be investigated with care and discretion. The person to whom a complaint is made must forward information received in respect of the complaint to the applicable authority. If the complaint relates to activity of a chief operating officer, then the information received in respect of the complaint must be forwarded to the chief executive officer. The persons to whom the information received in respect of the complaint is forwarded must determine the process for investigation, resolution and/or disciplinary action in consultation with the chief operating officer.

Protection From Retaliation

No one may retaliate or discriminate against any person who has submitted a good faith complaint. Specifically, no one may discharge, demote, suspend, threaten, harass, or in any manner discriminate or retaliate against a complainant or other person who provides information in good faith during an investigation. If you feel that you have experienced retaliation because of making a complaint or providing information, you should report such incidents to your supervisor, HR or other management personnel. Violations of this policy will be investigated and individuals who have been found to retaliate or discriminate will be disciplined up to and including termination of

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employment. Similarly, individuals who are found to have intentionally made false and malicious claims may be subject to disciplinary action.

Cooperation in Ethics Investigations

You must cooperate in ethics investigations. Failing to cooperate or providing false information will result in disciplinary action up to and including termination of employment.

Acknowledgment and Agreement

I, _____, acknowledge that I have read and understand the Code of Conduct of BLD Homes. I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules set forth by this policy, I may face disciplinary action up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Witness: _____