



**CODE OF
BUSINESS CONDUCT
&
COMPLIANCE**

Message from the President & CEO

We are happy to have you as a valued employee of Granger Construction Company (“Granger”)! You are a member of an organization whose policies and procedures are built upon establishing a working environment based on mutual trust, integrity, honesty, and respect. Integrity and credibility are immeasurable corporate assets which when lost are almost impossible to regain. We are committed to making Granger a respected and honored company in our industry for our employees, customers, shareholders, and communities. We have built a reputation, not only as an exceptional place to work, but also as a company that can be trusted to do the right thing. At each level of operations, we have accomplished this together by conducting our business honestly and ethically.

Granger believes that a fundamental ingredient of business success is that all employees conduct themselves with basic honesty and integrity, whether it be in their dealings with other employees, customers, business partners or others. Ethical conduct is a core value and belief of Granger. Our customers respect and admire us for the high standards of conduct with which our employees perform in every business relationship. You are the “face” of Granger as you interact with our customers and in our community. We are counting on you to maintain and enhance that reputation.

Granger is dedicated to the quality of its construction projects, the satisfaction of its customers and the well-being of its employees. The Company’s commitment to caring extends to the way in which we conduct our business and treat one another. All employees and Management Team members are expected to develop an understanding of the laws and regulations that govern our business and to comply fully with them. All employees are further expected to conduct the affairs of Granger in accordance with the letter and the spirit of this Code of Business Conduct and Compliance (the “Code”). We have developed the Code as a guide for you in addressing common challenges and situations you may face. That said, it is impossible to anticipate every possible situation, so throughout the Code we have identified individuals from whom you can receive guidance and ask questions. In addition, you are encouraged to bring questions or concerns to Granger management, our Compliance Officer and our Compliance Counsel. We have also provided mechanisms to raise concerns anonymously and confidentially.

Our entire management team is fully committed to working with you to maintain Granger’s highly regarded reputation for future generations. Thank you in advance for your cooperation and commitment.



Glenn D. Granger
President & Co-Chief Executive Officer



Darryl R. Massa
Chief Operating Officer

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About the Code

Introduction

This Code of Business Conduct and Compliance (the “Code”) is our minimum standard of expected behavior. It is how we deal with each other and how we treat everyone with whom we interact in our daily business. Honoring and maintaining these standards of conduct will help ensure that all stakeholders will be well served and Granger’s highly regarded reputation for integrity and fair dealing is preserved.

The Code is applicable to all directors, officers, employees, and contract employees (each referred to as “employees”) of Granger Construction Company. The **responsibility for compliance** with the Code, including the duty to seek interpretation when in doubt, **rests with each employee**. All of us are depending on YOU!

The Code provides guidance to you on your ethical and legal responsibilities. We expect all employees to: (i) become familiar with, and conduct Granger business in compliance with, applicable laws, rules and regulations and Granger policies and procedures, including the Code; and (ii) treat all Granger employees, customers and business partners in an ethical, honest and fair manner.

Certain of Granger’s policies are complemented by specific responsibilities set forth in documents such as the Employee Handbook. Those polices should be separately consulted by Granger employees and are not incorporated by reference into the Code. Please consult with Compliance Officer Pat Monea or Benefits Coordinator Kim Davis for copies of any polices that you need.

As a condition of your employment, please read, understand and then sign the Certification found at the back of this document in **Attachment B** and submit it to Pat Monea by any of the methods below. You will be asked to annually submit it to Pat Monea.

Granger Construction Company

U.S. postal mail or other delivery: ATTN: Kim Davis, 6267 Aurelius Road, Lansing, MI 48911
E-mail: kdavis@grangerconstruction.com Phone: (517) 887-4106 Fax: (517) 318-4206

As you aspire to live the values and policies expressed in this Code, you may discuss any questions you have with your supervisor or the Compliance Officer, Pat Monea.

You are an important member of the Granger team, and you are expected to embrace this Code. You and your coworkers also have a duty to hold each other accountable to this high standard of behavior. As an aid, use the following *Ethics Guidelines* during your decision making:

- Is your proposed action legal? Does it comply with the law and Granger’s policies and values?
- Is your proposed action something you would like to see described in the newspaper or shown on TV?
- Is your proposed action something you can comfortably explain to your children?

In short, will your decision allow you to look in the mirror and feel proud about what you are doing? If the Ethics Check raises doubt, you have an obligation to seek guidance from your supervisor or contact the Compliance Officer, Pat Monea.

You also have a responsibility to seek assistance from your immediate supervisor, the Company’s Compliance Officer Pat Monea at (517) 887-4169, or Granger’s Compliance Counsel George Ash at 313-234-7147, when you have questions about the application of provisions of this Code. You must promptly raise any concern that you may have about possible violations of the Code, laws or the Company’s policies and fully cooperate with Granger employees or representatives investigating potential violations of Granger’s policies. Upon request, Granger will take reasonable steps to keep the identity of any person raising a concern confidential. If you want to anonymously raise questions or report concerns, you can anonymously contact the Compliance Officer by clicking on the “Contact Compliance Officer” button on Granger’s website at www.grangerconstruction.com. Furthermore, all supervisors have the additional responsibility to lead by example, to train their team, and to enforce these standards.

Core Values

The Company's Management Team has adopted governance principles which outline the core values of Granger. The principles include:

- Honesty and Integrity
- Accountability
- Trust
- Performance Excellence

Honesty and Integrity

Granger believes that a fundamental ingredient of business success is that all employees conduct themselves with basic honesty and integrity, whether it be in their dealings with the Company, employees, customers, business partners or others. Ethical conduct is a core value and belief of Granger. Our customers respect and admire us for the high standards of conduct that characterize the dealings of our employees in every business relationship. We are counting on you to maintain and enhance that reputation.

Accountability

Granger expects you to accept responsibility for your own actions or inactions and for those whom you supervise. You are also responsible for reporting the actions or inactions of your peers (that you are or become aware of) that are inconsistent with the provisions or spirit of this Code. You must take prompt, constructive steps to correct mistakes or defects. You should promote teamwork by holding each other accountable and by rejecting behaviors inconsistent with this Code.

Trust

It is critical that we trust all employees of Granger at every level of business. To foster trust, we must remain honest, ethical and upfront because trust is at the foundation of our relationships with our customers, our communities, our stakeholders and each other.

Performance Excellence

We hold ourselves to a very high standard of performance. We value innovative ideas and the teamwork it takes to turn innovation into reality. We recognize that when we stop improving and become complacent we will also become stagnant. We never stop asking ourselves how we can make the customer's experience better, and every day, we find an answer.

Training

Granger is committed to providing training to all of its employees so they can perform their job responsibilities in accordance with Granger's core values. Granger acknowledges that training is critical and necessary for employees to understand and comply with Company policies and procedures, this Code, and all applicable laws and regulations. All employees are required to attend an initial training program regarding compliance with this Code upon implementation or at the start of their employment. Employees are also required to participate in annual refresher programs. At the end of each training program, employees are required to execute a certification of attendance.

Furthermore, there are additional company policies or issues that are applicable to certain employees based on their job responsibilities. Granger has created training programs tailored specifically to address these policies and issues. Granger will provide you with guidance regarding the training programs available to you and whether the programs are mandatory or optional. If you have any questions regarding whether a training program is right for you or if you have identified the need for a training program on a specified topic, please contact the Compliance Officer, Pat Monea.

Granger's Compliance Officer

Any questions regarding the Code and any violations of the Code should be directed to Granger's Compliance Officer. We have designated a member of management to be our Compliance Officer. The Compliance Officer as of May 1, 2009 is Pat Monea.

The Compliance Officer has ultimate responsibility for overseeing compliance with the Code, all related Company policies and procedures and all applicable laws. Although the Compliance Officer may be a member of a specific group or department within Granger, his or her duties and reporting responsibilities as Compliance Officer are entirely separate and distinct from his duties and reporting responsibilities as a member of that specific group/department. The Compliance Officer has the authority to bring matters to the attention of other members of senior management, legal counsel, the Chairman of the Board of Directors (the "**Board**"), the President, the Chief Operating Officer, and the Chief Financial Officer. The Compliance Officer will bring matters to the attention of any or all of these individuals and/or groups based on the unique circumstances of the particular matter. You can reach the Compliance Officer by using any of the following four methods:

E-mail: pmonea@grangerconstruction.com

Phone: (517) 887-4169

U.S. postal mail or other delivery: ATTN: Pat Monea – Confidential, Granger Construction Company,
6267 Aurelius Road, Lansing, MI 48911

Reporting Concerns

Accounting and Financial Disclosures

If you wish to report a concern related to Granger's *accounting, internal control or auditing matters*, you may report such matters to the Company's Compliance Officer or you may report them anonymously as described below. If you are not comfortable reporting the conduct to the Compliance Officer or you do not receive what you believe is a satisfactory response in a timely manner, you may contact the COO of the Company, Darryl Massa, using any of the following three methods:

E-mail: dmassa@grangerconstruction.com , Phone: (517) 887-4141

U.S. postal mail or other delivery: 6267 Aurelius Road, Lansing, Michigan 48911

Examples of complaints regarding accounting, internal control or auditing matters include reports or suspicions about:

- Intentional error or fraud in the preparation, review or audit of any of our financial information statements.
- Violations of GAAP rules and regulations applicable to Granger and related to accounting, internal accounting controls and auditing matters.
- Significant deficiencies in or intentional noncompliance with our internal and reporting controls.
- Mail or wire fraud, bank fraud or fraudulent statements to management.
- Financial results that seem inconsistent with the performance of underlying business transactions.
- Inaccurate Company records, such as overstated expense reports, or erroneous time sheets or invoices.
- Requests to circumvent ordinary review and approval procedures.

General Reports

For *all matters other than accounting, internal control or auditing matters*, if you know of or suspect a violation of the Code, Granger provides many alternative means by which you may raise a concern, including anonymous reporting:

- Raise your concerns with your supervisor. Your supervisor will contact the Compliance Officer, who will work with you and your supervisor to investigate your concern.
- If you are not comfortable reporting the conduct to your supervisor or you do not receive what you believe is a satisfactory response in a timely manner, you should contact the Compliance Officer Pat Monea directly.

If you are not comfortable reporting the conduct to your supervisor or the Compliance Officer or you do not receive what you believe is a satisfactory response in a timely manner, you may also raise your concerns with Granger's legal counsel. To do so, please contact Granger's Compliance Counsel George Ash of Foley & Lardner LLP, using any of the following three methods:

E-mail: gash@foley.com, Phone: (313) 234-7147

U.S. postal mail or other delivery: Foley & Lardner LLP, Attn: George Ash
500 Woodward Avenue, Suite 2700, Detroit, Michigan 48226

Anonymous Reporting

When making a report, you may choose to remain anonymous. To the extent you so request, your identity will remain confidential. If you want to anonymously raise questions or report concerns, you can anonymously contact the Compliance Officer by clicking on the "Contact Compliance Officer" button on Granger's website at www.grangerconstruction.com. Please refer to **Attachment A** of this Code – "Complaint and Whistleblower Procedures for Accounting, Internal Control, Fraud or Auditing Matters" for additional information on these types of reports.

Information To Provide

All reports under the Code (other than anonymous reports) should include the following information:

- All relevant information concerning the allegations (sufficiently detailed description of the factual basis for the allegations in order to allow for an appropriate investigation).
- Your name, telephone number and/or e-mail address (unless you desire not to include this information).

If you desire, you may make any report anonymously. Please keep in mind, however, that in some circumstances, it may be more difficult or impossible for Granger to thoroughly investigate reports that are made anonymously or to report back to you with the results of our investigation. All questions and reports of known or suspected violations of the law or the Code will be treated with sensitivity and discretion. If requested, we will protect your confidentiality to the maximum extent possible as is consistent with the law and Granger's need to investigate your concern.

Confidential Reporting and No Retaliation

Reports and complaints will be kept confidential to the extent permitted by law and by the Company's need to properly investigate the complaint. You must cooperate completely in any investigation relating to Granger, and must be truthful at all times. Specifically, do not take the approach that you need to lie or "cover" for the Company. Once again, our most important core values are honesty and integrity. We need you to be totally truthful so the Company can take the appropriate action. You may never interfere with or obstruct an investigation conducted by the company or any government agency. In addition, you should never disclose or discuss an investigation with unauthorized persons.

Granger and, in many cases, federal law prohibits any employee from retaliating or taking adverse action against anyone for raising suspected violations of the Code or helping to resolve a related concern. Any individual who has been found to have engaged in retaliation against a Granger employee for raising, in good faith, a concern under the Code or for participating in the investigation of such a concern shall be subject to discipline, up to and including termination of employment or other business relationship. If any individual believes he or she has been subjected to such retaliation, that person is encouraged to report the situation as soon as possible to his or her supervisor, the Compliance Officer, or Granger's Compliance Counsel.

Cooperation with Government Investigations

Granger's policy is to cooperate with government investigators, regulatory examiners, law enforcement officials, and non-governmental regulators with oversight of our business. Within guidelines provided by the General Counsel, all employees must cooperate with such authorities. Always be courteous to government investigators. If you are authorized to provide information to a government investigator, you must consult with the General Counsel before doing so and must make sure that the information you provide is truthful and accurate. If a government investigator should approach you directly - on the job, in public or at your home - seeking information from you, Granger requests that you advise the investigator that you prefer to consult with company counsel first. Other rules of thumb are:

- Make sure that records and information relevant to the investigation are maintained.
- Never mislead or obstruct a government investigation.
- Never conceal, alter or destroy documents relevant to an investigation.
- Never hinder another employee from providing accurate information.
- Never retaliate against anyone who cooperates with a government investigation.

Our Employees

Equal Employment Opportunity (EEO) and Other Employment Laws

OUR POLICY IS . . .

To comply with all federal, state and local employment opportunity laws. Granger shall employ persons and make employment decisions without regard to an individual's race, color, religion, sex, age, national origin, citizenship, ancestry, marital status, sexual orientation, gender identity, disability, medical condition, pregnancy, veteran status, or any other protected class.

Granger is committed to compliance with the Americans with Disabilities Act and will make reasonable accommodations for qualified individuals with known disabilities. This policy governs all aspects of employment, including selection, job assignment, promotion, demotion, compensation, discipline, termination, and access to benefits and training.

Granger is also committed to full compliance with all applicable immigration, labor standards and wage and hours laws.

WHY IS THIS REQUIRED?

Preventing harassment, discrimination and threats is a matter of respecting each other's rights and dignity, which is a basic value at Granger. Granger's employees and business associates are entitled to conduct their business in a work environment free of these distractions. To help ensure such an environment, we must all take any discrimination, harassment or threat seriously and promptly advise appropriate management. Harassment for any reason violates Granger's policy and may also be prohibited by state and federal laws.

WHAT DOES GRANGER EXPECT OF YOU?

All employees, officers and directors are responsible for conducting themselves so that their actions are not considered sexually harassing, demeaning or intimidating in any way.

Under the law, sexual harassment is generally defined as either:

- (1) Unwelcome sex-based conduct that is so severe and pervasive that it creates an intimidating, hostile, or offensive work environment; OR
- (2) Sex-based conduct by someone's supervisor or manager that tangibly affects the employee's job – for example, imposition of discipline, rejection for promotion, or loss of pay or benefits.

Sexual harassment can occur in a variety of forms. The following conduct could constitute harassment:

- Unwelcome sexual advances
- Requests for sexual favors
- Verbal remarks or physical contact or conduct of an intimate or sexual nature, such as uninvited touching or sexually aggressive comments that interfere with another person's work performance or that create an intimidating, hostile, or offensive working environment.

If you believe that you have been subjected to objectionable conduct or become aware of such objectionable conduct, you must report it immediately to your supervisor or the Compliance Officer. Do not allow an inappropriate situation to continue by not reporting it, regardless of who is creating that situation. Granger will take prompt and necessary steps to investigate the matter and will protect your confidentiality as much as is possible, recognizing the need to thoroughly investigate all complaints. Granger will take all necessary corrective and preventative actions. Granger will not retaliate against any employee for bringing a good faith complaint to the attention of the appropriate persons pursuant to this policy or for participating in the investigation regarding a complaint. Any employee who violates this policy is subject to discipline, up to and including, discharge.

ASK YOURSELF

- Am I discriminating against an employee based upon age, race, color, religion, national origin, sex, sexual orientation, disability or veteran status or other protected classes?
- Am I creating a hostile work environment or harassing a co-worker?
- Have I witnessed conduct that appears to be unwelcome and sexual in nature?

Conflicts of Interest

OUR POLICY IS . . .

To be free of outside influence or interests which conflict with your duty to act in the best interests of the Company in business relationships and dealings. Employees must deal with owners, suppliers, customers, contractors and all others without favor or preference. Neither you or your immediate family members may be involved with any undisclosed business that competes with Granger, takes for yourself any business opportunity that properly belongs to Granger, or compromises your ability to make business decisions "on the merits" in Granger's best interests.

Directors are subject to fiduciary duties to the Company under state corporate law, and directors should promptly disclose any potential conflicts of interest to the remaining members of the Board of Directors prior to taking any action related to such matters. Directors should raise any questions in this regard to Granger's Compliance Counsel.

Officers and other employees should disclose their outside activities, financial interests or relationships that present an actual or potential conflict of interest or the appearance of a conflict of interest. These disclosures should be made promptly to the employee's supervisor as well as the Compliance Officer.

WHY IS THIS REQUIRED?

Granger has an obligation to its customers, vendors and shareholders to ensure that business decisions are not influenced by personal considerations or interests, but instead are based on quality, price, delivery, service, experience and reputation. Employees owe a duty to Granger to advance Granger's legitimate interests and not to use Company property, information or position for personal gain or interests.

WHAT DOES GRANGER EXPECT OF YOU?

If you or a family member are involved in an activity, or have a personal interest, which could affect your objectivity in performing your duties and responsibilities at Granger, contact the Compliance Officer. Keep in mind that both *actual and potential* conflicts of interest violate this policy. You must fully disclose any activities that create the appearance of a conflict of interest or may limit a corporate opportunity *before* actions are taken which could impact the opportunities or reputation of Granger or our employees.

Moonlighting

Employees are expected to devote their primary work efforts to Granger Construction Company's business. It is, therefore, mandatory that they refrain from engaging in other employment that: (1) could be inconsistent with Granger Construction Company's interests; (2) could have a detrimental impact on Granger Construction Company's image with customers or the public; or, (3) could require devoting a level of time and effort that the employee's work at Granger Construction Company would be adversely affected.

Employees are strictly prohibited from working for a direct competitor of the company. If an employee violates this policy, they may be subject to discipline, up to and including discharge.

Prior to engaging in any other employment you must obtain the written approval of your supervisor. In addition, you must advise your supervisor of any change in the terms of any such approved employment. Any violation of this policy may result in discipline, up to and including termination.

ASK YOURSELF

- Outside of your Granger responsibilities, are you involved with a third party entity that could present a conflict of interest?
- Do you or an immediate family member own or work at an outside business which may have a competing or shared interest with Granger?
- Do you serve on a board or committee that could present a conflict of interest?
- Do you have an arrangement with a customer from which you are deriving a personal benefit from?

Giving or Accepting Gratuities and Business Courtesies

OUR POLICY IS . . .

To conduct business with customers and vendors on the basis of service, quality, performance and price without giving or accepting anything of value that could improperly influence or appear to improperly influence the outcome of a transaction.

WHY IS THIS REQUIRED?

To ensure the integrity of our business transactions and to comply with applicable laws, business decisions must not be (or appear to be) improperly influenced by gifts, gratuities or favors. If it appears that a business decision was made because of a gift, gratuity or business courtesy, and not purely on the basis of merit and sound business judgment, Granger's reputation may be harmed and in some cases such an award may break the law.

Gratuities are items of value (cash, goods, services, use of property, etc.) that are given voluntarily and not in return for, or in anticipation of, a reciprocal service or courtesy.

Business Courtesies are reasonable accommodations (meals, refreshments, entertainment, transportation or lodging, etc.) that may be offered or received only in connection with marketing, product information, procurement, public relations or other business activities of the Company.

There is a distinction between what is acceptable in a purely commercial setting and what is proper when dealing with government and public officials or with government prime contractors, and consequently two different rules exist for each of these groups.

WHAT DOES GRANGER EXPECT OF YOU?

As a general rule, you may not give or receive gratuities or business courtesies to or from customers or suppliers if the gratuity or business courtesy would be viewed as an inducement or reward for any particular business decision. You may give and accept business courtesies that are of nominal value (i.e., \$25 or less).

Acceptable Gratuities and Business Courtesies - Non-Government Setting

In a purely commercial setting (i.e., not dealing with a government official or a higher-tier government contractor), Granger recognizes that it is customary commercial practice to entertain business partners and clients (both potential and existing) and that providing/receiving business courtesies, is part of accepted business practice. However, business courtesies and gratuities exchanged in the commercial setting must be reasonable in nature, frequency and cost, and not excessive. This applies when Granger is both giving or receiving such business courtesies, gratuities and gifts. We must not compromise or appear to compromise our ability to make objective, "arms length" business decisions.

By way of example, common business courtesies that are usually acceptable in a commercial setting (i.e., non-government customers and partners) are occasional meals, occasional attendance at sporting events, or accepting promotional items such as golf balls, hats, t-shirts, and mugs).

Additionally, all gratuities and business courtesies should be properly accounted for on expense reports. You should refuse or return a gift that is beyond these permissible guidelines. Granger acknowledges that refusing or returning a gift is often uncomfortable for associates, but it is required. Please contact the Compliance Officer for suggestions regarding how to appropriately and professionally refuse or return a gift.

Strict Prohibition Against Gratuities and Business Courtesies - Government Setting

The prohibition on giving or receiving gifts, gratuities, and business courtesies applies very strictly to federal, state, and local employees and officials, unless of nominal value of \$25 or less, consistent with the Office of Government Ethics. Note that some state and local government agencies have their own rules regarding gifts and gratuities and the policy may be more stringent than Granger's policy (e.g., a lower definition of nominal value). Government prime contractors should be treated as government employees and officials with respect to the strict limitations on offering or receiving gifts, gratuities, or business courtesies.

When authorized by Granger, you may refer customers to third-party vendors. However, you may not accept any fee, commission, or any other compensation for this activity from anyone except Granger.

ASK YOURSELF

- Is this a proper gratuity or business courtesy?
- Could my offer or acceptance of this gratuity or business courtesy be construed as an improper attempt to influence a business decision?
- Did I disclose the gratuity or business courtesy I provided to a customer or supplier on my expense report?
- Has my entertaining with a particular client been too frequent or excessive?

Company Assets and Financial Integrity

Use of Company Assets and Resources

OUR POLICY IS . . .

To not use Granger funds or assets, for any unlawful or improper purpose or improper personal gain. Granger resources, time or facilities (including office equipment, e-mail and computer resources) should not be used by employees other than in the furtherance of the Company's legitimate business objectives. You are prohibited from downloading, storing or transmitting information which contains obscene or explicit language or images that are offensive.

WHY IS THIS REQUIRED?

Appropriate and effective use of Company assets benefit the organization as a whole. Improper use of Company assets could reduce productivity and profit, increase prices to our customers and, ultimately, result in decreased business and fewer jobs.

WHAT DOES GRANGER EXPECT OF YOU?

To ensure the protection and proper use of Granger's assets, each employee should:

- Exercise reasonable care to prevent theft, damage or misuse of Granger property.
- Promptly report the actual or suspected theft, damage or misuse of Granger property to a supervisor.
- Use Granger's telephone system, other electronic communication services, written materials and other property for business-related purposes and in a manner that does not reflect negatively on Granger or its customers.
- Safeguard all electronic programs, proprietary data, communications and written materials from inadvertent access by others. Without obtaining permission from a supervisor, employees should never download or save Granger software, documents or information onto their personal computers or storage systems or to the computer or storage system of any third party.
- Use all software in accordance with applicable license agreements. Use of unauthorized computer software violates Company policy and may be in violation of federal copyright statutes.
- Personal use of company telephones, computers, etc. should be kept to a minimum.

All information, data, messages, attachments and other information created, communicated or stored using Granger's information and technology resources are the property of Granger. Granger reserves the right, for any purpose, without notice and in its sole discretion, to access, inspect, review, store, delete, copy and/or monitor any information, data, messages, attachments or other information communicated or stored through the use of its information and technology resources, including business or personal e-mails or other electronic messages. In addition, Granger reserves the right, for any purpose, without notice and in its sole discretion, to disclose any such information to law enforcement or other third parties, or to otherwise give access to such information.

ASK YOURSELF

- Am I meeting my obligation to protect Company resources, deter theft and avoid damaging or compromising Company property?
- Does my use of the Granger computer, telephone, or other Company property serve the business interests of Granger?
- Could the e-mail I am sending to my co-worker be considered obscene or offensive?
- Am I providing the Company with the fair benefit of my time at work?

Protecting Information

OUR POLICY IS . . .

To proactively safeguard all information reasonably considered confidential (including Granger's customer and supplier information) to protect our competitiveness, profitability and security in dealing with all outside parties. Access to employee data should be limited to those who are authorized to use such data for Company purposes.

WHY IS THIS REQUIRED?

Granger has and will continue to develop, compile and own certain confidential or proprietary information of significant value. In Granger's competitive market, it is important to protect the Company's business information. Further, it is important to Granger's integrity to respect other individuals' and organizations' confidential information and not use such information without prior authorization.

WHAT DOES GRANGER EXPECT OF YOU?

Granger employees may use and disclose proprietary and/or confidential information only as authorized and only in furtherance of Granger's business. In addition, each employee is responsible for ensuring adequate safeguards are used to prevent the disclosure or loss of proprietary and/or confidential information. It is Company policy that all Granger confidential or proprietary information be marked with a legend identifying its sensitivity and use restrictions.

Confidential information includes, but is not limited to, all nonpublic information that might be of use to competitors, or harmful to the Company or its customers, if disclosed. An employee's obligations to protect the confidential information described above continues after he or she leaves Granger.

All employees must also maintain the confidentiality of third-party information that Granger has agreed to maintain confidential, to the extent of and consistent with any such confidentiality or nondisclosure agreement. An employee's obligation to protect Granger proprietary and confidential information exists whether or not the information is explicitly labeled or otherwise designated as being proprietary or confidential, and the obligation continues even after leaving the Company. Further guidance may be set forth in your non-solicitation, non-competition, confidential, labor, or non-disclosure agreement with Granger. If you believe that confidential information may have been inadvertently disclosed, please contact the Compliance Officer immediately.

Granger maintains and uses private and sensitive personnel information about employees for legitimate business purposes. Employees may access and share confidential employee data for legitimate business purposes, with proper approvals, and on a need-to-know basis.

ASK YOURSELF

- Is the information I am about to disclose useful to competitors?
- Have I sought the proper authorization prior to sharing Company confidential and/or proprietary information with non-company employees?
- Is the information I want to share subject to a non-disclosure, non-solicitation, or non-competition agreement?
- Does the proprietary or confidential information I intend to release include a proper legend identifying its sensitivity and use restrictions?

Company Books, Records and Reports

OUR POLICY IS . . .

To maintain all books and records in accordance with generally accepted accounting practices (GAAP) and all applicable laws and regulations. All labor time and costs must be accurately and completely recorded in an auditable manner. No false, misleading or artificial entries may be made in the books and records of the Company.

WHY IS THIS REQUIRED?

Maintaining accurate and complete books, records and reports is essential. Incorrect time charging or other business entries violate the trust of our customers, vendors and may also violate the law.

WHAT DOES GRANGER EXPECT OF YOU?

Every book, record and report (i.e., time cards, expense reports, general accounting records, or purchasing or job/project records) must be complete, accurate and truthful. It is your responsibility to ensure that these documents are properly maintained.

Employees who are found to have submitted or approved any documentation, report or other information containing knowingly materially inaccurate, materially incomplete or other improper data or unauthorized signatures are subject to disciplinary measures, up to and including termination. Ask your supervisor or the Compliance Officer if you have any questions.

ASK YOURSELF

- Are my time records accurate?
- Does the Company record I created accurately reflect the transaction?
- Have I reported accurate information that may be used in the Company's public reports?
- Has information changed that requires the books to be updated?

Antitrust and Competition

OUR POLICY IS . . .

To obey antitrust and competition laws.

WHY IS THIS REQUIRED?

The consequences of failing to follow antitrust and competition laws can be severe. Often this results in the violator as well as the Company being subject to criminal penalties, including imprisonment and/or significant fines as well as exposure to damages.

Two types of conduct are clearly prohibited. First, the antitrust laws prohibit agreements with competitors fixing prices, dividing markets, rigging bids, or otherwise limiting competition. Second, the antitrust laws prohibit certain types of unilateral conduct, that is, conduct undertaken by Granger alone, such as sabotage and false statements.

The antitrust laws also limit the terms/relationships of certain business decisions. Before engaging in exclusive dealing, teaming agreements, refusals to deal, tying, reciprocal dealing, bundling, setting prices below cost, or other similar decisions, contact the Compliance Officer and/or Granger's Compliance Counsel.

WHAT DOES GRANGER EXPECT OF YOU?

Employees should have a general awareness of the types of business arrangements that have antitrust implications and contact the Compliance Officer and/or Granger's Compliance Counsel before entering into such arrangements. Employees should promptly report potential antitrust/competition violations to the Compliance Officer and/or Granger's Compliance Counsel.

Be aware of potential allegations of if a competitor approaches you about a possible business deal that would limit or appear to limit competition.

ASK YOURSELF

- Does the proposed transaction involve prohibited conduct?
- Does the proposed conduct unfairly eliminate competition or reduce the customer's choices?
- Will I be expected or have I been asked to share pricing or other competitive terms and conditions with competitors?
- Am I using the materials and quality of materials required by the contract?

Quality Control

OUR POLICY IS . . .

To provide goods and services that meet our customers' needs and satisfy contractual requirements.

WHY IS THIS REQUIRED?

Granger is committed to becoming the contractor of choice by providing the best quality, delivery and service. Granger's reputation depends on diligent adherence to customer and contractual specifications. Any unauthorized deviation could violate the contract and adversely affect our customers' faith in the integrity of our products.

WHAT DOES GRANGER EXPECT OF YOU?

All employees must design, construct and commission our projects in strict accordance with all contract requirements and document any authorized changes. Even if the project construction arguably exceeds contract requirements, such deviation from the requirements must be approved and documented. The most effective method to ensure we deliver high quality projects is to consistently follow Company processes intended to assure quality, safety and reliability.

ASK YOURSELF

- Am I delivering a project or service that satisfies the contractual requirements?
- To the extent I deviated from contractual requirements, have I sought approval and accurately documented such deviations?

Government Business

Doing Business with the Government

OUR POLICY IS . . .

To conduct business in accordance with the procedures, rules and ethical standards of the federal government, states, municipalities and agencies. It is also Granger's policy to work with Government representatives in an honest and ethical manner.

WHY IS THIS REQUIRED?

Violations of applicable laws and regulations when performing Government contracts can lead to substantial fines and penalties for both the individual and the Company, and in severe cases, suspension or debarment from receiving Government contracts once again for both the individual and the Company.

For U.S. Government procurements, there is a ban on either obtaining or disclosing competing contractor bid or proposal information or Government source selection information. This includes competitive information submitted to a Government agency as part of, or in connection with, a bid or proposal to enter into a Government procurement contract. This may also include nonpublic information which has been prepared for use by the procuring agency in the evaluation of a contractor's bid or proposal. These procurement integrity restrictions apply to everyone involved in a U.S. Government procurement and it applies until the contract is awarded.

For all Certifications sent to the Government, the individual compiling, signing, and submitting the Certification and or Acknowledgement must be truthful and honest in the preparation and submittal of information. Individuals signing certifications should have personal knowledge that the statements are accurate, current, and complete. In the alternative, the signor needs to know that the Company has a system in place to ensure the underlying compliance of the certification, and the signor needs to do sufficient "due diligence" to conclude the "system" was faithfully followed in this case, giving the signor a reasonable belief that the certification is accurate. No false statements should ever be made.

WHAT DOES GRANGER EXPECT OF YOU?

All employees must use sound business judgment and comply with applicable laws and regulations in dealing with Government customers. Each employee is responsible for learning, understanding, and following the rules of agencies they are working with, the provisions of the contracts they are working on and the government regulations.

Always exercise caution should a third party offer to provide you with bid, proposal or source selection information and pay special attention to receiving or disclosing marketing intelligence, which may include a competitor's price, cost data or program evaluation criteria.

Always be truthful and honest when submitting information and certifications to Government Customers.

ASK YOURSELF

- Do I and the members of my team know and understand the procurement integrity and ethics laws and regulations that affect the Government customer or agency that we are dealing with?
- Am I complying with the procurement integrity and ethics laws and regulations that affect the Government customer or agency that we are dealing with?
- Am I about to receive a competitor's proposal information or Government source selection information that I am not legally permitted to receive?
- Am I preparing the information to be submitted to the Government in a truthful, complete, accurate and honest manner?

Bribery and Kickbacks

OUR POLICY IS . . .

To prohibit giving or receiving (or offering, soliciting or attempting) bribes, kickbacks or any other illegal or improper payments, transfers or receipts. No employee shall offer, give, solicit or receive any money or anything else of value to government personnel, foreign government officials, prime contractors or subcontractors (either directly or through third parties) for the purpose of: (1) obtaining, retaining or directing business; or (2) bestowing or receiving any kind of favored treatment.

WHY IS THIS REQUIRED?

It is unethical, illegal and strictly forbidden to offer, render, or accept bribes, kickbacks, payoffs, or other unusual or improper payments to obtain or keep business. It is also a crime even to “attempt” such behavior. Violations subject both the Company and the individual to harsh penalties.

Strict rules apply to gifts and entertainment extended to government officials (see page 12 regarding Giving or Accepting Gratuities and Business Courtesies) .

WHAT DOES GRANGER EXPECT OF YOU?

All employees are prohibited from offering or accepting (or attempting to offer or accept) bribes, kickbacks, payoffs or other unusual or improper payments to obtain or keep business.

No outside consultant, agent or third party of any kind shall be used or employed in any manner or for any purpose that would be contrary to this prohibition against bribes, kickbacks and other illegal or improper payments. Fees, commissions and expenses that are paid to such outside agents should be based upon proper billings and reasonable standards for mutual services rendered.

If you are in doubt about the legality and propriety of making or authorizing any payment, contact the Compliance Officer and/or Granger’s Compliance Counsel.

ASK YOURSELF

- Is this payment I am making, authorizing, or receiving for the purpose of improperly obtaining, retaining or directing business?
- Is this payment I am making, authorizing, or receiving for the purpose of improperly bestowing or receiving any kind of favored treatment?
- Is the payment arrangement open and transparent?
- Is the payment typical of industry practice?

Recruiting Government Employees

OUR POLICY IS . . .

To conduct its recruiting and hiring of Government employees in accordance with laws and regulations.

WHY IS THIS REQUIRED?

Current and former U.S. Government employees are subject to federal laws and regulations that may limit the ability of the Company to hire and recruit certain individuals, and may limit the activities they may be able to perform for the Company. Depending on the circumstances, it may be against the law for you and that person to discuss potential employment with Granger without taking pre-hire steps.

WHAT DOES GRANGER EXPECT OF YOU?

Granger employees are prohibited from engaging in employment discussions with certain current or former U.S. Government employees. Guidance should be obtained through the Compliance Officer and/or Granger's Compliance Counsel, to determine whether a U.S. Government employee's prior or current employment could create a conflict of interest and/or a possible violation of law. Such action protects you and the Company as well as the prospective employee.

ASK YOURSELF

- Is the person who I intend to speak with about an employment opportunity a current or former U.S. Government employee?
- Do I understand the rules related to discussing employment opportunities at our Company with current or former Government officials?
- Do I understand the restrictions that apply to former Government employees who work for me?
- Have we inquired as to the prior government service of any candidate/applicant, assessed whether any employment restrictions apply, and document the file accordingly?

Political Contributions and Lobbying

OUR POLICY IS . . .

To comply with all laws relating to political contributions and lobbying.

WHY IS THIS REQUIRED?

Federal law prohibits Granger from donating any corporate funds, services, or goods to or on behalf of any candidate for elective office, political party or political committee. Similar local and state laws exist for their particular jurisdictions.

The Company may employ the services of a lobbyist to alert our electoral representatives of concerns that affect Granger's business. The costs of employing such a lobbyist have to be excluded from any invoice to the Government. In addition, the Company shall require any lobbyist it hires to comply with registration and notification filings required by law or regulation.

WHAT DOES GRANGER EXPECT OF YOU?

Granger recognizes the benefits to employees and our communities associated with political contributions. Voluntary personal contributions to candidates, parties of employee choice, and civic organizations are consistent with Granger's commitment to community involvement. Such involvement and participation must be on an individual basis, on your own time, and at your own expense.

Employees shall not engage in lobbying activities on behalf of Granger without the prior approval of the Compliance Officer. All employees engaging in such activities must comply with all applicable laws and regulations.

ASK YOURSELF

- If I expense a political fund raising event I attended, will it violate political contribution laws?
- Am I using corporate assets for partisan political activity?

Compliance with all Laws, Rules and Regulations

OUR POLICY IS . . .

To comply with all laws, rules and regulations. This includes, without limitation, the [not a public company], laws covering bribery and kickbacks, copyrights, trademarks and trade secrets, information privacy, political contributions, antitrust prohibitions, offering or receiving gratuities, environmental hazards, unlawful employment discrimination or harassment, occupational health and safety, false or misleading financial information and misuse of corporate assets.

WHY IS THIS REQUIRED?

Granger is committed to complying with the applicable laws, rules and regulations that govern its business. Compliance with such laws, rules and regulations enhances Granger's reputation and preserves its business for future generations.

WHAT DOES GRANGER EXPECT OF YOU?

You are expected to understand and comply with all laws, rules and regulations that apply to your job position. If any doubt exists about whether a course of action is lawful, you should seek advice immediately from your supervisor or the Compliance Officer.

ASK YOURSELF

- Do I understand the laws, rules and regulations governing my work responsibilities?
- Would I be ashamed to disclose my activities to my supervisor or family?

Health, Safety and Security

Employee Health and Safety

OUR POLICY IS . . .

To comply with all applicable health and safety laws and regulations. Granger is committed to the prevention of accidents and injury to our employees and the general public. Granger will comply with all applicable environmental laws, ordinances, and regulations and will cooperatively participate with regulatory agencies conducting inspections or investigations.

WHY IS THIS REQUIRED?

The safety and security of Granger employees is vitally important. Failure to conduct our operations properly can have serious and damaging consequences for our employees, customers, and Company. Granger will not tolerate violent behavior, threats or intimidation towards any Granger employee or anyone having a business relationship with Granger.

WHAT DOES GRANGER EXPECT OF YOU?

All employees are responsible for following environmental health and safety instructions in the performance of their duties and identifying best practices for maintaining a safe work-site and environment including reducing waste and improving the efficient use of all resources.

All employees are prohibited from fighting, attempting to injure others or threatening the safety of others while on Company property or while performing work for the Company. Employees are also prohibited from bringing weapons of any kind onto Company property or possessing weapons of any kind on Company property or while on duty. This is true even if you have obtained a legal permit to carry a weapon. The prohibition of weapons also applies to having weapons in personal or Company vehicles while on Company property or while on duty.

If you experience, witness or otherwise become aware of a violent, potentially violent situation or safety concern that occurs on Granger property or on a Granger project site, you must immediately report the situation to your supervisor or the Compliance Officer.

ASK YOURSELF

- Am I complying with the Company's safety policies?
- Do I have a weapon in my possession or in my vehicle while I am on Granger property or conducting Company business?
- Am I aware of a situation or condition that adversely affects the health and safety of Granger's employees?

Alcohol and Drugs

OUR POLICY IS . . .

To maintain a drug-free work place. All Granger employees must strictly comply with Company policies regarding the abuse of alcohol and the possession, sale and use of illegal substances, or face disciplinary action, up to and including termination of employment.

WHY IS THIS REQUIRED?

Reporting to work or working under the influence of alcohol or a controlled substance puts other employees at risk and increases the incidence of accidents. In addition, possessing or bringing onto Granger property or project site illegal substances is strictly prohibited.

WHAT DOES GRANGER EXPECT OF YOU?

You must not report to work or work under the influence of alcohol. If you report to work under a controlled substance you must have a medical prescription. Possessing, using, selling or offering illegal drugs and other controlled substances is prohibited under all circumstances and must never be brought onto Granger property or project site. You are prohibited from reporting for work, or driving a Company vehicle or any vehicle on Granger business, while under the influence of alcohol or any illegal drug or controlled substance. "Under the influence" for this purpose is defined to include having alcohol in your system above the limit permitted to drive a passenger vehicle in the applicable jurisdiction or having illegal drugs or other unauthorized controlled substances detectable in your system through a drug test.

Employees who are suspected of being under the influence may be requested to take a drug or alcohol test at Granger's expense. Failure to submit to or cooperate with testing requested by Granger shall be grounds for disciplinary action up to and including termination of employment.

If you become aware of a violation of the immediately preceding paragraph, you must immediately report the situation to the Compliance Officer.

ASK YOURSELF

- Am I under the influence of alcohol, an unauthorized controlled substance, or illegal drug while I am at work or while I am driving a Company vehicle?
- Have I witnessed a co-worker returning from lunch with slurred speech and smelling of alcohol?

Violations of the Code

OUR POLICY IS . . .

To abide by the terms of the Code and all applicable laws, rules and regulations. Granger is committed to taking prompt and consistent action in response to violations of the Code or applicable laws, rules and regulations.

WHY IS THIS REQUIRED?

Employees who violate the law or the Code may expose themselves or the Company to substantial civil damages, criminal fines and prison terms. Granger may also face substantial fines and penalties and may incur damage to its reputation and standing in the community. Your conduct as a representative of Granger, if it does not comply with the law and with the Code, can result in serious consequences for both you and the Company.

Only the Company's Board of Directors or the appropriate committee of the Board may grant a waiver of any provision of the Code to an executive officer or director. Any changes in or waivers of the Code granted to executive officers and directors by the committee will be disclosed to the employees to the extent required by applicable laws, rules and regulations. Granger's Chief Executive Officer and Chief Financial Officer, acting together, may grant waivers of the Code for other employees.

WHAT DOES GRANGER EXPECT OF YOU?

Granger expects all employees to strictly comply with the letter and spirit of this Code. Furthermore, employees are urged to seek answers or clarification if there are any doubtful or "gray" areas. We urge all employees to seek answers to questions concerning ethical behavior before it becomes a problem. Whether you speak to your supervisor, the Compliance Officer, Granger's Compliance Counsel, or anonymously contact the Compliance Officer by clicking on the "Contact Compliance Officer" button on Granger's website at www.grangerconstruction.com, there are multiple avenues available to you to raise your concerns or questions.

Granger is committed to taking prompt and consistent action against violations of Granger's policies. Any person who is subject to the provisions of the Code and violates the Code is subject to a variety of disciplinary actions, including immediate termination. Employees who are aware of suspected misconduct, illegal activities, fraud, abuse of Granger's assets or violations of the standards outlined in the Code or other Granger policies are responsible for reporting such matters. Granger will promptly investigate reports of suspected violations of the Code on a case-by-case basis and apply an appropriate sanction based upon the facts and circumstances of each particular situation, including, in its sole discretion, reporting the violations to the authorities. We expect all employees to cooperate in internal investigations of misconduct and unethical behavior. If you want to anonymously raise questions or report concerns, you can anonymously contact the Compliance Officer by clicking on the "Contact Compliance Officer" button on Granger's website at www.grangerconstruction.com.

ASK YOURSELF

- As a leader, am I creating an environment where employees feel comfortable raising their ethical concerns?
- If I have witnessed a violation of this Code, who should I report it to?
- If I am experiencing retaliation for raising my ethical concerns to my supervisor, who should I report it to?

Note: The Code and the matters contained herein do not provide a guarantee of continuing Company policy or alter Granger's general policy whereby employment is at will and under which either Granger or the employee may terminate the employee's employment at any time, with or without notice. Nothing in the Code shall be construed as or deemed to constitute a contract of employment or confer upon any employee a right to employment for any specified period or definite duration or interfere with the right of Granger or an employee to terminate their employment relationship. We reserve the right to amend or supplement the Code and the matters addressed herein, without prior notice, at any time.

Date of Document Origin / Review	Individual Responsible	Date of Revision
6/9/09	Pat Monea	

Attachment A

Granger Construction Company has adopted the following procedures to govern the receipt, retention and treatment of complaints regarding accounting, internal control or auditing matters.

To report complaints about Granger's accounting, internal accounting controls or auditing matters or other concerns, please choose one of the below listed options. When making such a report, you may choose to remain anonymous. Please keep in mind, however, that in some circumstances, it may be more difficult or impossible for Granger to thoroughly investigate reports that are made anonymously, and also makes it impossible to report our findings back to you.

1. Call Granger's Compliance Officer, Pat Monea, to make a report. His telephone number is (517) 887-4169.
2. Write to Granger's Compliance Officer at: ATTN: Pat Monea – Confidential, Granger Construction Company, 6267 Aurelius Road, Lansing, Michigan 48911. He will review any communications and if appropriate forward them as directed.
3. E-mail Granger's Compliance Officer. The e-mail address is pmonea@grangerconstruction.com.
4. Contact Granger's COO Darryl Massa at dmassa@grangerconstruction.com or 517-887-4141 or mail to 6267 Aurelius Road, Lansing, Michigan 48911.
5. You can anonymously contact the Compliance Officer by clicking on the "Contact Compliance Officer" button on Granger's website at www.grangerconstruction.com.

If you are not comfortable reporting the conduct to the Compliance Officer or you do not receive what you believe is a satisfactory response in a timely manner, you may contact Granger's Compliance Counsel, using any of the following three methods:

1. Call Granger's Compliance Counsel George Ash, to make a report. His telephone number is (313) 234-7147.
2. Write to Granger's Compliance Counsel at: Foley & Lardner LLP, 500 Woodward Avenue, Suite 2700, Detroit, Michigan 48226, Attn: George Ash
3. E-mail Granger's Compliance Counsel. The e-mail address is gash@foley.com.

The Compliance Officer and/or Granger's Compliance Counsel will assess the report and forward it to the Board of Directors or other persons as is appropriate to address the issues raised by the report.

With respect to reports made under these procedures:

- Reported matters relating to Granger's accounting, internal accounting controls or auditing matters will be referred to members of the Board of Directors as appropriate.
- You can report your concerns anonymously (by not including your name and/or contact information) or confidentially (by marking the postal envelope or e-mail subject line of your communication as "Confidential" or verbally telling the Compliance Officer and/or Granger's Compliance Counsel).
- Reports of misconduct, including those made anonymously, will be investigated and feedback will be provided when appropriate.
- The law provides protection against retaliatory termination or adverse employment action by Granger and its officers, other employees and agents, against any associate who (i) provides information to a supervisor, the federal government or Congress that the associate reasonably believes relates to federal securities or anti-fraud violations, or (ii) files, testifies, participates in or otherwise assists in any actions involving conduct that the associate reasonably believes relates to federal securities or anti-fraud violations. Granger will not condone reprisals against people who report suspected violations in good faith, and their identities will be protected to the maximum extent possible consistent with law and Granger policy.

Other Communications with the Board of Directors

You may communicate with members of Granger Construction Company's Board of Directors by sending correspondence addressed to the board as a whole, a specific committee or a specific Board member c/o Pat Monea, Secretary, Granger Construction Company, 6267 Aurelius Road, Lansing, Michigan 48911.

Retention of Reports

All reports will be retained by Granger for a minimum of 2 years.

Attachment B

As a Granger employee, and as applicable to my work responsibilities . . .

1. I will deal fairly and ethically with Granger and on Granger's behalf in all matters and at all times proactively promote ethical behavior, demonstrating Granger's commitment to integrity.
2. I will avoid actual or apparent conflicts with Granger's interests.
3. I will not (a) take for myself personally opportunities that are discovered through the use of Granger property, information or position; (b) use Granger property, information or position for personal gain; or (c) compete with Granger.
4. I will protect Granger's assets, and promote their efficient and legitimate business use.
5. Without exception, I will comply with all applicable laws, rules and regulations.
6. I will promptly report any illegal or unethical conduct to the Compliance Officer or other appropriate authorities.
7. I will seek guidance or clarification from the Compliance Officer regarding any questionable situation.

I have read the Granger Code of Business Conduct and Compliance and do certify that:

1. I understand the Granger Code of Business Conduct and Compliance (the "Code").
2. I understand that I have the responsibility to ask questions, seek guidance and report suspected violations of the Code.
3. To the best of my knowledge, I am in compliance with the Code.
4. I will continue to comply with the Code.
5. I understand that this Code states Granger's policies and practices in effect on the date of publication and that these policies, practices and procedures are continually evaluated and may be amended, modified or terminated at any time.
6. I understand and acknowledge that it is my responsibility to review the on-line Code at <http://www.grangerconstruction.com/governance.html> on a consistent basis to stay abreast of any updates, and I undertake to do so.

Please sign and date this Certification and return it to Kim Davis.

(Signature)

(Date)

(Print name)