TITLE VI NONDISCRIMINATION POLICY FOR ASPLUNDH TREE EXPERT, LLC AND SUBSIDIARIES

1. POLICY STATEMENT

Asplundh Tree Expert, LLC and its wholly owned subsidiaries (collectively, "Asplundh") are committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any of its programs, services, or activities receiving or benefiting from Federal Financial Assistance, on the ground of race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq.) and its implementing regulations.

This Policy applies to all programs, services, and activities conducted by Asplundh that receive or benefit from Federal Financial Assistance, as that term is defined in Section 2 of this Policy.

Asplundh also acknowledges its obligations under related federal nondiscrimination statutes, including Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794), the Age Discrimination Act of 1975 (42 U.S.C. § 6101 et seq.), and, where applicable, Title IX of the Education Amendments of 1972 (20 U.S.C. § 1681 et seq.).

2. DEFINITIONS

For purposes of this Policy, the following terms shall have the meanings set forth below:

(a) Complainant: Any person who files a complaint alleging discrimination prohibited by this Policy.

(b) Discrimination: Any act or practice that excludes, denies benefits to, or subjects a person to differential treatment on the basis of race, color, or national origin in any Program or Activity covered by this Policy.

(c) Federal Financial Assistance: Grants, loans, contracts, or other arrangements by which a federal agency provides assistance through the expenditure or distribution of funds, including the use of federal property or technical assistance.

(d) Limited English Proficiency (LEP): A condition in which an individual does not speak English as a primary language and has a limited ability to read, write, speak, or understand English.

(e) Program or Activity: As defined by 42 U.S.C. § 2000d-4a, the entirety of the operations of Asplundh to which Federal Financial Assistance is extended, including a geographically separate facility that receives such assistance.

(f) Subrecipient: Any entity that receives Federal Financial Assistance through Asplundh to carry out a program or activity on behalf of, or in partnership with, Asplundh.

(g) Title VI Coordinator: The individual designated by Asplundh to oversee compliance with this Policy, receive complaints, coordinate training, and maintain required records.

3. SCOPE AND APPLICABILITY

3.1 This Policy applies to all Programs or Activities of Asplundh that receive or benefit from Federal Financial Assistance, as those terms are defined in Section 2 of this Policy.

3.2 The following persons and entities are bound by this Policy when engaged in the administration, delivery, or support of federally assisted Programs or Activities:

(a) All employees of Asplundh;

(b) Contractors and agents acting on behalf of Asplundh;

(c) Subrecipients of Federal Financial Assistance passed through Asplundh; and

(d) Vendors providing goods or services in connection with federally assisted Programs or Activities.

3.3 This Policy governs the delivery of services, benefits, and access to Programs or Activities. Pursuant to 42 U.S.C. § 2000d-3, this Policy does not extend to general employment practices of Asplundh unless a primary objective of the applicable Federal Financial Assistance is to provide employment.

4. PROHIBITED CONDUCT

No person shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to Discrimination under any Program or Activity conducted by Asplundh that receives or benefits from Federal Financial Assistance. Prohibited conduct includes, but is not limited to, the following:

(a) Denying any individual the opportunity to participate in a Program or Activity, or denying any service, benefit, or advantage provided under such program.

(b) Providing any individual with services, benefits, financial aid, or other assistance in a manner different from that provided to others under the same Program or Activity.

(c) Subjecting any individual to segregation or separate treatment in any matter related to the receipt of services or benefits under a Program or Activity.

(d) Restricting any individual in the enjoyment of any advantage or privilege enjoyed by others receiving services or benefits under a Program or Activity.

(e) Treating any individual differently from others in determining eligibility for, or satisfaction of any requirement or condition for, participation in a Program or Activity.

(f) Utilizing criteria or methods of administration that have the effect of subjecting individuals to Discrimination or defeating the objectives of the Program or Activity.

5. LIMITED ENGLISH PROFICIENCY (LEP) COMMITMENT

Asplundh is committed to taking reasonable steps to provide meaningful language access to its federally assisted programs and activities, consistent with applicable law.

Asplundh shall provide language assistance services, free of charge, to LEP individuals who seek to access or participate in programs and activities receiving Federal Financial Assistance.

6. TITLE VI COORDINATOR

Asplundh hereby designates a Title VI Coordinator to oversee implementation of and compliance with this Policy. The Title VI Coordinator's contact information is as follows:

Field	**Details**
Name	James Gaynor
Title	HR Director
Mailing Address	680 Blair Mill Road, Horsham, PA 19044
Telephone	215-784-4439
Email	jgaynor@utilservllc.com

The Title VI Coordinator shall be responsible for the following:

(a) Ensuring Asplundh's compliance with Title VI and this Policy across all federally assisted programs and activities.

(b) Receiving, investigating, and processing complaints of Discrimination filed under this Policy.

(c) Coordinating and arranging periodic Title VI training for applicable personnel.

(d) Maintaining records of complaints, investigations, dispositions, and compliance activities as required by federal funding agencies.

(e) Serving as the primary liaison with federal agencies on Title VI compliance matters.

7. COMPLAINT PROCEDURE

Any person who believes that he or she has been subjected to Discrimination in violation of this policy may file a written complaint with the Title VI Coordinator. Complaints should be filed within 180 calendar days of the date of the alleged Discrimination.

The written complaint shall include the following information:

(a) The Complainant's name, mailing address, and telephone number.

(b) A description of the alleged discriminatory act or practice.

(c) The date(s) on which the alleged Discrimination occurred.

(d) The names of individuals involved, if known.

The Title VI Coordinator will forward Title VI complaints to the applicable state department of transportation for proper routing through the federal government.

Complaints also may be submitted (a) through Asplundh's Corporate Ethics & Compliance Hotline administered by NAVEX at 833-222-3066, through the NAVEX web portal at

Asplundh.ethicspoint.com, or via the NAVEX mobile platform at Asplundh.navexone.com, or (b) directly with the relevant federal funding agency or with the Civil Rights Division, U.S. Department of Justice, 950 Pennsylvania Avenue NW, Washington, DC 20530.

8. RETALIATION PROHIBITION

Asplundh prohibits intimidation, threats, coercion, or retaliation against any person who, in good faith:

(a) Files a complaint alleging Discrimination prohibited by Title VI of the Civil Rights Act of 1964;

(b) Participates or cooperates in any investigation, compliance review, hearing, or other proceeding related to the enforcement of Title VI; or

(c) Opposes any act or practice made unlawful under Title VI or this Policy.

This prohibition applies to all employees, contractors, Subrecipients, and vendors of Asplundh involved in any Program or Activity receiving Federal Financial Assistance. Any act of retaliation shall constitute a separate and independent violation of this Policy and may result in disciplinary action, up to and including termination of employment or contractual relationship, independent of the merits of the underlying complaint.

Any person who believes he or she has been subjected to retaliation in violation of this section should report the conduct to the Title VI Coordinator using the procedures set forth in Section 7 of this Policy.

9. DISSEMINATION AND ACCESSIBILITY

Asplundh shall disseminate this Policy and related nondiscrimination notices on its internet and intranet sites so that employees working on federally assisted programs or activities have access to its provisions and protections.

10. TRAINING

Asplundh shall provide periodic Title VI training to all employees, contractors, and agents who are involved in the administration, delivery, or oversight of programs and activities receiving Federal Financial Assistance.

11. RECORD KEEPING AND REPORTING

Asplundh shall maintain complete and organized records of all Title VI complaints received, investigations conducted, dispositions reached, and any corrective actions taken.