



Code of Ethics

The Davey Tree Expert Company and All Subsidiary Companies (“Davey Tree”)

The Davey Companies, and their directors, officers and other personnel, will conduct the Company’s business affairs according to strong corporate ethics. As representatives of the Company, we will comply with applicable federal, state, and local laws, our Corporate Governance Guidelines, and internal policies and procedures. Our trademark will be corporate integrity, and we strive to be forthright in our relationships with each other, with customers, suppliers, competitors, governmental agencies, and all other business associates.

Every director, officer, and employee of the Company has a specific responsibility to act in accordance with our Code of Ethics and our Company policies, and to communicate these standards to all peers and employees through action, as well as word. The Company’s standards of ethical conduct are:

- The directors, officers and employees of the Company will comply with the laws, regulations and internal practices that govern our business and our actions. These policies include governance guidelines for directors and all other policies and procedures issued by the Company. Such standards include certain financial process expectations such as proper expense reporting, including Pcard and fuel card usage/reporting, unauthorized use of Company assets, equipment, and information, the accurate reporting of time (including time sheets) and services performed, and other applicable policies and procedures.
- The Company intends to conduct itself as a responsible institution and a constructive member of each of the communities in which it operates. This sense of public responsibility and accountability is shared with all personnel and, accordingly, employees will conduct themselves in a manner that will preserve the Company’s standards.
- The Company considers itself to be a steward of the environment and intends to conduct its operations in a manner that responsibly identifies and addresses environmental issues as they relate to our business. Employees are charged with acting in a manner which will respect our environment. Work practices and materials used are intended to conform to acceptable industry and/or Company standards, and will comply with applicable federal, state, and local laws.
- Many of the Company’s services involve safety risk activities. Individuals are instructed to perform their work responsibilities in a manner to provide the proper degree of safety for themselves, their fellow workers, our customers, and the general public.
- All matters related to recruiting, hiring, training, compensation, benefits, promotions, discipline, transfers, layoffs, terminations, and all terms and conditions of employment, will be respectful of each other and free from discrimination harassment, and retaliation.
- We will solicit business from our customers and potential customers in a professional and ethical manner. The Company’s advertising will accurately represent our services and products. We will respond to the complaints of our customers or business associates in a professional manner. Customers are to be treated respectfully in situations where disagreements arise, and we will seek fair and equitable resolutions.
- Lawful conduct will be observed in relationships concerning our competitors. We will not participate in untruthful actions intended to damage our competitors. Employees will refrain from dealings with competitors for the purpose of unlawfully restricting competition or conducting any other activities prohibited by law.
- Company stockholders rely on employees to responsibly manage their ownership interests. Information concerning our business affairs will be distributed to stockholders in accordance with the Securities and Exchange Commission (SEC) guidelines for financial reporting.
- All business transactions are to be accurately recorded and reported; there will be no compromise of the integrity of our financial records or financial statements.
- Directors, officers, and employees of the Company will avoid a personal interest or association which is not consistent with, or appears to be inconsistent with, the best interests of the Company. Directors, officers, employees, and members

of their families will not engage in outside business interests or business associations which could be deemed a conflict of interest. In the event that a director, officer or employee has any question about whether an interest or association presents a potential or actual conflict, that person is required to report the matter to Joseph R. Paul, Chief Financial Officer, or a member of the Legal department, to ensure compliance with this policy. The following are some of the activities which may be considered to be in this category:

- A. Having a financial ownership interest or other personal or professional affiliation in a supplier, competitor, or customer that could influence, either positively or negatively, the Company's ability to conduct its business.
 - B. Having any financial interest in any transaction between the Company and any third party.
 - C. Receiving from, or giving to, any supplier, competitor, or customer any gift or entertainment designed to create a conflict of interest.
- The confidentiality of business information will be required at all times. Directors, officers and employees of the Company are specifically prohibited from using or communicating any non-public, confidential information involving the Company, clients, competitors or others, which they may receive in the course of their involvement with Company matters.
 - Company personnel are the custodians of our business information assets. All Company-owned information assets will only be used for legitimate business purposes regardless of the method or device accessing the information.
 - Directors, officers, and employees of the Company will not compete with the Company or profit personally at the Company's expense.
 - Direct political campaign contributions to candidates with Company assets in connection with the election of an individual to political office is not permitted, except in furtherance of the Company's interests.

DIRECTIONS FOR CONTACTING INTERNAL RESOURCES:

- Website: daveyvoice.ethicspoint.com
- Contact us by Phone: (844) 916-2751
- Mobile: daveyvoicemobile.ethicspoint.com