

June 1, 2018

Attn: Dennis Corporation Employees
1800 Huger Street
Columbia, SC 29201

Dear Employees,

Dennis Corporation has established a long reputation for honesty and integrity in business dealings and lawful and ethical behavior. This reputation is a source of pride for us as well as one of our greatest assets because it instills the necessary trust and confidence in us by our customers, subcontractors, suppliers, and the overall community in which we live. Here at Dennis Corporation, we are committed to the highest standards of business ethics. Violations of this standard will not be tolerated and will be met with swift response, including disciplinary action. To that end, we have established a telephone hotline for whistle blowing and ethical compliance issues. Employees are encouraged to utilize this method to alert operations of any wrong doing.

In order to maintain our commitment to integrity, we have established a Code of Ethics: A Corporate Compliance Program. The Code of Ethics is intended to identify the manner our employees are expected to follow whenever conducting business for Dennis Corporation. The Corporate Compliance Program is intended to ensure that all employees are abiding by the Code. As an employee, you are expected to read both the Code and the Program and certify annually your commitment to fully comply with them.

To administer this Program, I have appointed Pam Johnston as the Corporate Compliance Officer. Among other things, she will be responsible for implementing appropriate procedures and policies for the Program, ensuring that each of you receive a copy of the Program, providing regular training on compliance with the Program, and ensuring effective and appropriate enforcement of the Program. Mrs. Johnston reports directly to me and to the Dennis Corporation Board of Directors. I expect our officers and managers will ensure that this Program and Mrs. Johnston receive their full support in the Program's implementation. Also, even though I have appointed Mrs. Johnston Corporate Compliance Officer, please know that I maintain an open door policy for any employee who has concerns about the Company or any employee practices. In addition, Dennis Corporation is implementing a secure and anonymous reporting system through Red Flag Reporting. You have an obligation to report suspected misconduct, including actual or potential violations of federal or state laws or administrative regulations, or potential compliance matters to me or to the Corporate Compliance Officer, your supervisor, or employees may also use anonymous reporting through the anonymous external call system Red Flag Reporting (877-647-3335), Client Code: Dennis.

I cannot stress strongly enough that Dennis Corporation does not, and will not, tolerate any form of unlawful or unethical behavior by any person or entity associated with it. At the very least, each of our employees must conduct themselves in accordance with the laws and regulations that apply to our business and not condone criminal or unethical behavior by others. Each of you is expected to alert Mrs. Johnston of any information you may have of any unlawful or unethical behavior by any of our employees, prime contractors, subcontractors, suppliers, or clients. Violation of this program, including failure to report a violation or other unlawful or unethical behavior, can be grounds for discipline, including termination.

Our continued success depends on all of us doing the right thing at all times and maintaining the highest ethical standards. Only in this way, can we continue to earn the trust and confidence of our customers and the community in which we live.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dan Dennis', with a stylized flourish at the end.

Dan Dennis