

ENGLOBAL CORPORATION EMPLOYEE COMPLAINT PROCEDURES AND NON-RETALIATION POLICY

ENGlobal Corporation (the “Company”) is committed to ensuring a safe workplace for its employees, and business practices that are ethical and comply with federal and state law. **Any employee who has a complaint that involves imminent danger or physical injury should report the matter immediately to Human Resources and the Health Safety and Environmental Departments, as well as to proper authorities.** Any employee who has a concern relating to any other matter may submit the concerns regarding the Company’s business practices to the Management of the Company. This may be done anonymously if the employee prefers. Employees who submit their concerns may do so without fear of dismissal or retaliation of any kind. Employees should report any unethical or dishonest conduct, or potential violation of federal or state law, including, but not limited to, the following:

- violations of federal or state criminal law relating to securities fraud, mail fraud, bank fraud, wire, radio and television fraud, or fraud against shareholders;
- violations of any rule or regulation of the Securities and Exchange Commission;
- fraud or deliberate error in the preparation, evaluation, review or audit of the Company’s financial statements;
- fraud or deliberate error in the recording and maintaining of the Company’s financial records;
- deficiencies in or noncompliance with the Company’s internal controls over financial reporting;
- misrepresentations or false statements to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company;
- deviations from full and fair reporting of the Company’s financial condition;
- conflicts of interest that have not otherwise been disclosed; and
- violations of the Company’s Codes of Ethics.

The Company’s Audit Committee will oversee responses to employee complaints. To facilitate the reporting of complaints, the Company’s Audit Committee has established the following procedures for (1) the receipt, retention and treatment of complaints and (2) the **confidential, anonymous** submission by employees of concerns regarding the Company’s business practices.

SUBMISSION OF EMPLOYEE COMPLAINTS

Employees may report their concerns on a confidential, anonymous basis using the Company’s telephone complaint hotline (the “Telephone Hotline”) or its email complaint submission system (the “Email System”). The Telephone Hotline and Email System are not suited for complaints that involve imminent danger or physical injury. These types of complaints should be immediately reported to the Vice President of Human Resources and the Director of Health, Safety and Environmental.

To use the Telephone Hotline, simply call 888-882-3534 and listen to the instructions. The automated recording will ask you to describe your complaint. It is not necessary to leave your name unless you want the Company to respond to you with the action(s) taken. The Telephone Hotline is monitored daily by the Company’s General Counsel (GC). Access to the message retrieval system on this telephone extension is password protected and the recorded message itself is limited to the GC and the Chair of its Audit Committee. Before the investigation, if any, all recorded complaints will be transcribed to ensure anonymity.

The Telephone Hotline will be monitored daily by the Company’s GC, who will determine whether the complaint is a financial-related complaint or another type of complaint.

To use the Email System, logon to the Company Intranet and:

1. Click on “Employee Feedback System;” and
2. Complete the form and click on “Submit.”

Please note that the logon process merely provides access to the Employee Feedback System – once the form submitted, your complaint will be anonymous unless you choose to identify yourself in Question 7. The Company will take necessary measures to ensure that your name and your complaint submitted using the Email System are kept confidential.

Employees are strongly encouraged to provide as much detail as possible in the complaint. Once received, the GC will assess the complaint based on the information provided and whether informal inquiries are required to further investigate the complaint. The GC will then send all:

- financial-related complaints to the Chief Financial Officer and to the Audit Committee Chair,
- complaints regarding ENGlobal’s business practices to the Audit Committee Chair,
- human resources related complaints to the Vice President of Human Resources; and
- safety-related complaints to the Director Health Safety and Environmental.

TREATMENT OF EMPLOYEE COMPLAINTS

The Audit Committee Chair shall be responsible for reviewing the complaints and determining, with the assistance of the Audit Committee, whether further investigation is appropriate. An investigation and further corrective action will be initiated when warranted in the judgment of the Audit Committee. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

In addition, the GC will maintain a record of all complaints, tracking their receipt, investigation and resolution and shall submit a report to the Audit Committee summarizing the complaint, investigation findings and proposed remediation plan, if any. Copies of complaints, reports and the investigation support documents will be maintained in accordance with the Company’s document retention policy.

NON-RETALIATION POLICY

The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints or as otherwise specified in Section 806 of the Sarbanes-Oxley Act of 2002.

If an employee believes he or she has been subjected to any action that violates this policy, he or she should file a complaint with his or her supervisor, the General Counsel or the Company’s Vice President of Human Resources. If it is determined that an employee has experienced any improper employment action in violation of this policy, the employee will be entitled to appropriate corrective action as determined by the Company’s Board of Directors. We reserve the right to unilaterally modify or amend any portion of these Complaint Procedures at any time without prior notice.

*Ratified by Resolution of the Board of Directors
June 15, 2017*