



NEW MEXICO
North Path

Code of Conduct

North Path strives to build and maintain long-lasting relationships with landowners by working in a respectful and collaborative manner for the life of the project. North Path requires that its employees and representatives follow a Code of Conduct, which provides that all representatives treat every landowner with consideration and respect, in addition to complying with all local laws, regulations and ordinances. Below is the text of the Code of Conduct.

North Path Code of Conduct for Right-of-Way Agents and Subcontractor Employees

This Code of Conduct applies to all communications and interactions with landowners and occupants of property by all right-of-way agents and subcontractor employees representing North Path in the negotiation of right-of-way and the performance of surveying, environmental assessments, and other activities for North Path on property not owned by North Path.

North Path requires its land agents, consultants, and contractors to comply with all applicable local laws, regulations and ordinances. Local laws, regulations and ordinances will control in the event of any conflict with this Code of Conduct.

I. All communications with landowners and occupants must be factually correct and made in good faith.

- a. Provide maps and documents necessary to keep the landowner properly informed.
- b. Do not make false or misleading statements.
- c. Do not purposely or intentionally misrepresent any fact.

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- d. If you do not know the answer to a question, do not speculate about the answer. Advise the landowner that you will investigate the question and provide an answer later.
 - e. Follow up in a timely manner on all commitments to provide additional information.
 - f. Do not send written communications suggesting an agreement has been reached when, in fact, an agreement has not been reached.
 - g. If information provided is subsequently determined to be incorrect, follow up with the landowner as soon as practical to provide the corrected information.
 - h. Provide the landowner with a secondary contact if requested by the landowner, to address issues that cannot be resolved by the land agent, or to report violations of the North Path Code of Conduct by a land agent.

II. All communications with landowners and occupants of property must be respectful and reflect fair dealing.

- a. When contacting a landowner in person or by telephone, promptly identify yourself as representing North Path.
- b. Do not engage in behavior that may be considered harassing, coercive, manipulative, intimidating or causing undue pressure.
- c. All communications by a landowner, whether in person, by telephone or in writing, in which the landowner indicates that he or she does not want to negotiate must be respected and politely accepted without argument. Unless specifically authorized by North Path, land agents will not contact the landowner again regarding negotiations.
- d. When asked to leave property, promptly leave and do not return unless specifically authorized by North Path.
- e. If discussions with the landowner become acrimonious, politely discontinue the discussion and withdraw from the situation.
- f. Notify the landowner before entering property for purposes of surveying or project-related studies. Clearly explain to the landowner the scope of the work to be conducted. Attempt to notify the occupant of the property each time you enter the property.
- g. Do not represent that a relative, neighbor and/or friend has signed a document or reached an agreement with North Path.
- h. Do not represent that a relative, neighbor and/or friend supports or opposes the North Path project, unless the person has publicly expressed their position on the project.
- i. Do not suggest that any person should be ashamed of or embarrassed by his or her opposition to the North Path project or that such opposition is inappropriate.
- j. Do not suggest that an offer is “take it or leave it”.
- k. Do not threaten to call law enforcement officers or obtain court orders.
- l. If a language barrier exists, land agent will work with North Path team to engage an interpreter and will provide written documents in landowner’s primary language.

III. All communications and interactions with landowners and occupants of property must respect the privacy of landowners and other persons.

- a. Discussions with landowners and occupants are to remain confidential except as allowed in II(h).
- b. Do not discuss your negotiations or interactions with other landowners or other persons except as allowed in II(h).
- c. Do not ask relatives, neighbors and/or friends to influence the landowner or any other person.