

Our Values

Zachry has a proud reputation as an organization of honorable, ethical employees. We believe that this reputation is a critical element of why companies choose to do business with us. Our business is built on the values of safety, commitment, trust, integrity, service, economy, and skill. Commitment to our values is part of our company's legacy.

Zachry has a business code of conduct that includes specific corporate policies and establishes a common set of ethical standards and legal principles that are binding for all Zachry employees. The purpose of this Supplier Code of Conduct ("Code") is to define Zachry's expectations of suppliers when working with Zachry.

Why does Zachry have a Supplier Code of Conduct

Zachry seeks to conduct business with reputable suppliers, vendors and other providers of goods and services, or legal entities who are committed to the same high ethical standards that Zachry is committed to. All suppliers and their employees with whom Zachry does business are expected to follow this Code and implement controls and systems to ensure compliance with applicable laws and regulations and the principles set out in this Code.

Fundamental Expectations

The highest standards of integrity are expected at all times from suppliers in their interactions with or on behalf of Zachry. Our suppliers must make a commitment to openness and honesty. High standards of ethical behavior are a priority, an obligation, and should be reflected in all aspects of our relationship. Zachry reserves the right to monitor, review, and verify compliance with this Code and will take action up to and including terminating its business relationship with any supplier who fails to comply with this Code.

- **Health & Safety.** Safety is always our first consideration. It is not optional. Suppliers must abide by all contract specific safety requirements and federal and state regulations. Suppliers must ensure their employees are aware of and comply with all rules and regulations concerning workplace safety, including training, monitoring, and enforcement. In addition, suppliers must maintain a drug and alcohol-free workplace.
- **Environmental.** Suppliers must comply with all applicable federal, state, and local environmental laws, regulations, policies, procedures, and industry requirements and conduct their operations in an environmentally responsible manner.
- **Resources.** Suppliers are responsible to safeguard Zachry resources utilized in the course of performing work in accordance with all contract-specific requirements.
- **Intellectual Property.** The intellectual property rights of Zachry and those of third parties must be honored in accordance with all contract-specific requirements. Suppliers are required to take all reasonable efforts and necessary precautions to protect Zachry's intellectual property rights.
- **Confidentiality.** Confidential information can only be shared within your company on a need-to-know basis in accordance with all contract-specific requirements. Sharing confidential information with third parties is not allowed without express written permission. Zachry suppliers and subcontractors must comply with all applicable data protection and privacy laws and regulations.
- **Brand.** We expect suppliers that interact with our customers to conduct themselves at all times in ways that reinforce and strengthen the Zachry brand. Use of Zachry's brand is not permitted without prior written approval.
- **Honesty.** Suppliers must strictly prohibit any of their directors, officers, employees, representatives, and agents from seeking any advantage through unfair, misleading, or otherwise unethical conduct.
- **Diversity.** We encourage our suppliers when practicable to utilize and develop diverse suppliers and disadvantaged business enterprises while performing work on our behalf.

- **Social Responsibility.** Suppliers must conduct all their operations in a socially responsible, non-discriminatory manner consistent with applicable laws including, but not limited to, those associated with equal opportunity, child labor, forced or compulsory labor, working hours, wages and benefits, freedom of association, and harassment-free work environment.
- **Anti-Corruption Compliance.** Suppliers are required to comply with all applicable legal requirements including those dealing with bribery, kickbacks, corruption, and other prohibited business practices. Zachry will not condone or tolerate suppliers or subcontractors engaging in or not reporting behavior that violates the standards set forth in the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, or any other relevant anti-corruption laws.

Suppliers must never offer an incentive to any Zachry officer, employee, or such person's family or friends to obtain, retain, influence, or gain any preferred treatment or improper advantage. During the solicitation process, suppliers shall not give any gifts, hospitality, entertainment, or travel to Zachry employees or anyone closely-related to Zachry employees that could give the appearance of impropriety or create a potential conflict of interest.

- **Site Visits.** Suppliers should not overburden Zachry project sites with excessive visits. Suppliers must pre-coordinate and secure approval for project site visits with the respective procurement professional.
- **Compliance with Laws and Regulations.** Suppliers are required to fully comply with all laws, rules, and regulations applicable to their country of operation and locations where Zachry is performing work.
- **Cyber Security.** Suppliers are required to implement and maintain sufficient cyber security measures to protect against unauthorized access, use, disclosure, modification, or destruction of Zachry's computer network, as well as confidential or sensitive information provided by Zachry, or accessed during the course of the supplier's work for Zachry.
- **Import/Export.** Suppliers must ensure that their business practices are in accordance and comply with all applicable laws and regulations governing the export and import of domestic and foreign origin goods and services. Suppliers must retain and maintain all registrations, records, and documents related to any shipments or exports related to contracted services or goods associated with work performed on behalf of Zachry.
- **Books and Records.** Suppliers shall maintain accurate books and records and record all payments, in cash or in kind, on behalf of Zachry or related to the contract or work.
- **Political Contributions.** Suppliers must follow applicable laws and regulations regarding political contributions. Suppliers are prohibited from making any political contributions of any form, or lobbying government entities or officials, on behalf of Zachry without express written consent from Zachry.
- **Audit and Inspections.** Zachry reserves the right at any time to review a supplier's adherence to this Code and to investigate any complaints or violation of policy. Failure of a supplier to cooperate with Zachry regarding audits and inspections will have consequences up to and including termination of its relationship with such supplier.
- **Business Continuity.** Suppliers are expected to manage business continuity risks and assure the availability of their products or services during an unexpected event. Suppliers should have disaster recovery plans in place to ensure they can continue to meet their obligations to Zachry with minimal disruption in the event of an emergency.
- **Conflict Minerals.** All Zachry suppliers must, without limitation, conduct due diligence to track and monitor human rights and associated environmental risks linked to the extraction, transport, and use of all raw materials. The process shall be informed by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and shall

include appropriate risk identification, mitigation, monitoring, remediation, and reporting mechanisms.

- **Restricted Parties.** Suppliers may not use any supplier of services or equipment which (a) is in any country subject to United Nations, U.S., or EU economic sanctions (or acting on behalf of persons or entities located in such countries) or (b) appears on lists of restricted or prohibited persons maintained by the United Nations, U.S., EU or the country of manufacture, origin, or destination of the cargo. Suppliers shall ensure that all vessels, containers, and other equipment and their owners are screened to ensure compliance with this requirement.
- **Sub-Supplier.** Zachry's expectation is that our suppliers will secure the same level of commitment from their supplier base as well.

Questions or Concerns

Zachry expects that its third-party business partners will report known or suspected violations of this Code or Zachry's policies, even when they are personally involved. We do not tolerate retaliation against those who make such reports in good faith.

If you encounter any situation in which you believe this Code is being violated or are uncertain how to proceed consistent with the principles of this Code, you should immediately seek guidance by contacting: (1) your Zachry Representative, (2) Zachry Director of Corporate Compliance at 210-588-6003, corporatecompliance@zachrygroup.com, or (3) the Zachry toll-free Helpline number at 877-350-0129.