

TURNER POLICY: CODE OF CONDUCT FOR BUSINESS PARTNERS (US AND INTERNATIONAL)

Issued by: Compliance Department

Approved by: Compliance Committee

Approved Date: 07/01/2025

Last Revision: 06/24/2025

SUMMARY

1. Summary

Turner is committed to conducting all aspects of our business with the highest levels of integrity, responsibility, and professionalism. As trusted extensions of our operations, Business Partners—including subcontractors, suppliers, vendors, and others working on Turner's behalf—are expected to uphold these same values. This Code of Conduct outlines the behavioral, legal, and ethical standards we require of all Business Partners who provide goods or services to Turner. By adhering to this Code, Business Partners help protect Turner's reputation, foster safe and respectful workplaces, and ensure that our business is conducted in a lawful, ethical, and sustainable manner. Compliance with this Code is a condition of entering into and maintaining a contractual relationship with Turner.

2. Purpose

The purpose of this Code of Conduct is to ensure that Turner's expectations for ethical conduct, legal compliance, and corporate responsibility are clearly communicated and consistently applied across our supply chain. This document serves as a foundational guide for Business Partners to understand the principles Turner considers essential in areas such as anti-corruption, fair competition, labor and human rights, environmental protection, workplace safety, and responsible sourcing. It reflects Turner's commitment to responsible business practices and requires that Business Partners implement and maintain internal systems that promote ethical decision-making, transparency, and accountability throughout their operations and those of their subcontractors and affiliates.

3. Scope and Use

This policy applies to all Business Partners of The Turner Corporation, its subsidiaries, and joint ventures of which they are a member (collectively, "Turner" or the "Company").

POLICY

INTRODUCTION

Turner has a long-standing reputation for conducting its business activities in accordance with ethical principles. This reputation is one of the pillars of Turner's success, and preserving it is one of our highest priorities.

This Code of Conduct, in conjunction with the applicable contractual agreement, reflects our standards and expectations of our subcontractors, suppliers and other vendors (collectively, "Business Partners"). These standards apply to all third parties that provide goods or services to Turner and their owners, officers, directors, employees, contractors, agents, and others working on their behalf.

Turner reserves the right to modify this Code of Conduct from time to time. Business Partners agree to observe the principles reflected in the Code of Conduct and ensure they are upheld as part of their management practices.

Acceptance of this Code of Conduct is a prerequisite for all contractual agreements between Turner and its Business Partners.

BUSINESS INTEGRITY

General Principles

Business Partners shall comply with the laws and other legal requirements in effect in the countries and localities

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where they transact business. Furthermore, Business Partners are expected to demonstrate honesty and fairness in all aspects of their business activities and commit to being socially responsible with respect to all of their business activities.

Conflicts of Interest

A conflict of interest exists when personal interest(s) interferes in any way with the interests of Turner. Business Partners must avoid and disclose any actual or potential conflicts of interest in their dealings with Turner.

Anti-Corruption Laws

Business Partners must comply with anti-corruption laws and any other applicable legal requirements, including, without limitation, the Foreign Corrupt Practices Act ("FCPA"), that governs operations in the countries and localities where they transact business. The FCPA prohibits any U.S. person or company, acting anywhere in the world, from providing any item of value to foreign officials directly or indirectly for the purpose of obtaining or keeping business or securing an improper business advantage.

Illegal Payments and Gifts

Offering, promising, or authorizing any gift, meal, ticket, entertainment or other item of value by Business Partners and their employees to public officials as a means of influencing the actions of an individual holding a public or legal duty is not permitted. Business Partners and their employees shall not accept any gift, meal, ticket, entertainment or other item of value in exchange for the purpose of securing an improper business advantage.

In addition, offering, promising, or authorizing any gift, meal, ticket, entertainment or other item of value by Business Partners and their employees to Turner Employees for the purpose of securing an improper business advantage is not permitted.

Fair Competition

Business Partners are expected to uphold standards of fair business and competition. Business Partners shall not act in a way that is or could be interpreted as unfair, anti-competitive, or abusive. All activities must be in line with current laws that uphold and promote competition, in particular prevailing anti-trust laws as well as laws that regulate competition. In dealing with competitors, Business Partners shall not collude or engage in other activities aimed at influencing prices or conditions, dividing sales territories or customers, or inhibiting free and open competition.

Money Laundering

Business Partners agree to comply with all laws that prohibit money laundering or financing for illegal or illegitimate purposes. Business Partners should endeavor to work exclusively with reputable counterparties involved in legitimate business activities with funds derived from legitimate sources.

Responsible Tax

Business Partners shall comply with all applicable tax laws and regulations in the jurisdictions where they operate. They must not engage in tax evasion, illegal tax avoidance, the concealment of relevant information, or the pursuit of undue tax benefits. Obstructing tax authority inspections or misrepresenting financial information is strictly prohibited. Turner expects its Business Partners to act with transparency in all financial dealings and to collaborate fully with tax authorities by providing timely, accurate, and complete information in accordance

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with current legislation.

Compliance Guarantees with Sanctions and Environmental Treaties

Business Partners affirm that neither they nor their affiliates are subject to international sanctions, nor do they engage in activities that contravene applicable environmental treaties or conventions. Business Partners must ensure these commitments extend to their own supply chains.

Intellectual Property and Protection of Assets

Business Partners must respect confidential information relating to Turner and Turner stakeholders. No information may be disclosed by a Business Partner to any person who does not have a right to that information. Business Partners commit their employees to safeguarding the confidential information of Turner and Turner stakeholders.

Partners are to ensure that suitable security and cybersecurity measures to protect confidential information have been implemented and that all their employees fulfill this duty in their relations with Turner. Additionally, Business Partners are expected to cooperate fully with any investigation into actual or suspected data breaches or cyber-attacks.

Business Partners must also respect the assets of Turner and Turner stakeholders. Business Partners' employees may only use assets belonging to Turner and others when appropriately authorized. Business Partners must not tolerate theft of assets.

Business Partners shall establish and maintain an information security program with administrative, physical, and technical safeguards designed to ensure the confidentiality, integrity, and availability of all non-public project data, protect against anticipated threats or unauthorized access to or use of such data and associated systems, and ensure the secure disposal of such data when required. Business Partners shall comply with all applicable data privacy and cybersecurity laws governing the collection, storage, processing, and transmission of Personally Identifiable Information (PII), as defined by the relevant regulatory authorities, and shall ensure that any lower-tier subcontractors adhere to the same obligations. In the event of any actual, suspected, or alleged information security incident—defined as an event compromising the confidentiality, integrity, or availability of an information system or data due to malicious or unauthorized activity— Business Partners shall use their best efforts to notify Turner within twenty-four (24) hours of discovery, regardless of whether Turner data is confirmed to be impacted, via email to infosecurity@tcco.com, and shall fully cooperate in investigation, mitigation, and remediation efforts at its own expense. Furthermore, upon Turner's written request, no more than once annually, Business Partners shall permit Turner to audit their systems, processes, and procedures relevant to the protection of Turner data, with such audit conducted at Turner's expense and subject to mutually agreed scope and timing.

Responsible Sourcing

Business Partners must implement measures to ensure the responsible procurement of goods and materials and compliance with related laws and regulations. The purchase and trade of regulated conflict minerals (in particular, tantalum, tin, tungsten, gold or their derivatives considered as conflictive) is not permitted. Specifically, Business Partners must ensure that no items are delivered to Turner that contain metals based on minerals that originate from a conflict region where the purchase directly or indirectly supports or finances armed groups.

MANAGEMENT SYSTEM

Business Partners are required to ensure observance of this Code of Conduct by establishing an appropriate

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management system or by traceably documenting that all issues are an integral part of the Business Partner's business culture.

Business Partners are at liberty to adopt their own codes of conduct so long as they do not restrict the standards defined in this Code of Conduct. Business Partners commit to inform and provide training as necessary to their employees of the provisions of this Code of Conduct and the associated obligations. Documentation of such training should be available for audit upon request.

Business Partners must establish governance systems to ensure adherence to this Code. This includes defining clear responsibilities for compliance oversight, periodic internal reviews, and designated points of contact for ethical concerns.

Turner reserves the right to audit adherence to this Code of Conduct at any time and without prior notification or to have adherence audited by independent third parties.

If Business Partners discover any violations of applicable law or this Code of Conduct, they must inform Turner of such discovery immediately. In the event of any violation of applicable law or this Code of Conduct, Turner reserves the right to terminate the contractual relationship with the respective Business Partner.

LABOR AND HUMAN RIGHTS

Turner requires Business Partners to uphold the human rights of all employees and to treat them with respect and dignity as understood by the International Labor Organization ("ILO") and the Turner Human Rights policy. Business Partners shall support the United Nations Human Rights Conventions and fair working conditions for all people working on their workplaces and in their supply chain. Business Partners' employees are under an obligation to ensure that these universally recognized fundamental rights are observed. Turner Human Rights Policy can be found at this link: <https://www.turnerconstruction.com/commitments/ethics-and-compliance>

Forced Labor

Business Partners are required to reject every form of forced labor. No employee may be obliged to work by the direct or indirect use of force and/or intimidation. Only people who voluntarily make themselves available for work may be employed. Turner does not tolerate any kind of slavery, human trafficking, debt bondage or involuntary prison labor in the supply chain.

Child Labor

Business Partners respect the standard of the United Nations on human rights, and in particular on children's rights. Turner requires all Business Partners to have zero tolerance for any kind of child labor in the company and in the supply chain. This refers to all stages of manufacturing. The minimum age for employment must not be below the age at which compulsory schooling ends, and in no case may it be below the age of 15 or below any higher minimum age specified by local law. In particular, Business Partners commit to complying with the ILO convention concerning the prohibition and immediate action for the elimination of the worst forms of child labor. If a national regulation concerning child labor provides for stricter measures, these shall have precedence.

Fair Working Conditions and Remuneration

Business Partners must ensure that wages and benefits of their employees and subcontractors are fair and comply with all national and local laws, applicable prevailing wage laws, statutes, or requirements. Business Partners shall maintain such records as necessary to establish the amount of wages and other compensation paid to workers in connection with all projects. Business Partners will ensure adherence to all applicable laws

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and regulations related to maximum working hours.

Anti-Harassment and Discrimination

Business Partners must comply with all federal, state, and local laws prohibiting discrimination in employment, including discrimination based on race, sex, gender, gender identity, gender expression, transgender status, sexual orientation, pregnancy, childbirth and other pregnancy-related conditions, color, national origin, ancestry, age, creed, religion, citizenship, marital status (including registered domestic Business Partners), parental status, disabilities (mental or physical), medical condition, genetic information, military or veteran status (including protected veteran status), and any other protected characteristic or status. Turner expects the organizations with which it does business to share this commitment.

Turner has zero tolerance for sexual and other unlawful harassment by or against employees, applicants, interns, volunteers, clients, independent contractors, vendors or non-employees of Turner at a Turner work site. Sexual and other unlawful harassment of employees or other individuals occurring in the workplace or in other settings in connection with their employment or engagement is unlawful and prohibited. This policy applies to all incidents of alleged harassment, including those which occur off premises, or off-hours, whether the alleged offender is a co-worker or a third-party non-employee with whom you may be involved in any business or potential business relationship. This policy applies regardless of an individual's immigration status.

Turner forbids retaliation of any kind (including harassment, intimidation, threats, coercion or discrimination) against any individual who files a charge of discrimination, reports or otherwise objects to harassment or discrimination, assists, testifies, or participates in an equal employment proceeding, or otherwise exercises any other right protected under applicable equal opportunity employment laws.

Freedom of Association

Business Partners must respect their employees' right of association within the bounds of prevailing laws and statutes. Business Partners are required to maintain an open and constructive communication with their employees and employee representatives. In accordance with the National Labor Relations Act, Freedom of Association and local laws, Business Partners shall respect their employees' right to freely associate, nominate employee representatives, join trade unions, and engage in collective bargaining and form works councils. It must be ensured that all employees are able to openly communicate with the management regarding working conditions.

Occupational Health and Safety

Turner requires that all Business Partners provide their employees with a safe and healthy environment. On an ongoing basis, Business Partners must identify safety risks and update prevention measures. They are responsible for strict compliance with the Turner Environmental Health and Safety (EH&S) policy and safety standards. Prior to start of work, all employees must receive adequate training and be provided with the proper equipment to safely carry out their work. Furthermore, all employees have the right and the obligation to immediately stop unsafe work.

Prevention and Emergency Preparedness

Turner requires Business Partners to ensure safe working processes, appropriate controls, and preventive maintenance in order to minimize health and safety risks at the workplace. In doing so, Business Partners are expected to evaluate production processes and machinery for health and safety hazards. The impact of identified hazards must be minimized by implementing emergency procedures. All health and safety incidents related to Turner projects, workplaces or construction sites must be reported to Turner immediately.

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ENVIRONMENTAL PROTECTION

Turner believes in utilizing our technical expertise to create a healthy, prosperous and sustainable future for our people, clients and the environment. Laws and international standards, as well as customer requirements to protect the environment must be observed.

All required official permits, licenses and registrations need to be present and maintained. Business Partners support efforts to minimize adverse impact on the environment and climate, and improve environmental protection. Business Partners will identify environmental risks and set up appropriate prevention measures.

Pollution and Resource Saving

Turner expects Business Partners to save natural resources. Negative impacts on the climate, the environment and animals can be minimized or avoided by reusing and recycling materials, adjusting production processes, and using material substitutes. Business Partners are furthermore expected to engage in the use of climate-friendly products and working methods to support reduction of greenhouse gas emissions.

Hazardous Materials

Biological or chemical materials or any other materials that have the potential to cause harm to humans, animals, or the environment, either by themselves or by interacting with other materials are to be identified and managed to ensure their safe handling. This applies to storing, moving, using, recycling and disposing of the materials. All information relevant to safety needs to be disclosed to Turner.

Waste Water and Solid Waste

Business Partners shall have systems in place to ensure the safe handling, transport, storage, reuse or recycling of wastewater and solid waste. They are expected to reduce or avoid waste of all types, including energy, for instance by modifications of production processes, maintenance, the use of material substitutes, recycling or reusing. All activities that may have a negative impact on the health of humans, animals or on the environment shall be handled in an appropriate way. Business Partners shall monitor and evaluate all kinds of wastewater and solid waste generated from works prior to discharge or disposal and treat the substances as required by local laws and regulations.

CONTRACTUAL COUNTERPARTIES OF THE BUSINESS PARTNER

Business Partners are expected to communicate the basic principles of this Code of Conduct to their immediate contractual counterparties and to require and promote their compliance with this Code of Conduct.

DUTY TO REPORT

Business Partners are obliged to report to Turner any suspected or known misconduct. Information as to possible offenses, non-compliance with legal or company requirements, environmental, social or safety issues, or other problems within the company can be communicated through Turner's whistleblower hotline, by email, or Turner's web portal, all of which are set forth below. Reports can be made on an anonymous/confidential basis, if desired. Turner evaluates and investigates all reports.

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Email: compliance@tcco.com

Internal Hotline: 1-212-229-6485

External Hotline: 1-888-738-1924

<https://turnerconstruction.navexone.com>



International Hotline:

1-888-738-1924

<https://iwf.tnwgrc.com/turnerinternational>

Turner does not retaliate against anyone for submitting in good faith a report of suspected or known misconduct, nor do we tolerate others retaliating. Similarly, Business Partners must not retaliate or tolerate retaliation against anyone who, in good faith, reports suspected or known misconduct. "Good faith" means that to the best of a person's knowledge and belief, everything reported is true and that everything known is reported.

ACKNOWLEDGMENT OF TURNER'S CODE OF CONDUCT FOR BUSINESS PARTNERS

All registered Suppliers are required to have acknowledged Turner's Code of Conduct for Business Partners prior to issuance of any purchase order or contract.

I, on behalf of _____ (Business Partner name), acknowledge and agree to comply with Turner's Code of Conduct for Business Partners and ensure that the owners, officers, directors, employees, contractors, agents, and others working on behalf of _____ (Business Partner name) are aware of and agree to abide by the Code of Conduct in preparing and submitting bids and proposals for Turner work, providing goods and services to Turner, and performing all agreements entered into with Turner for such purposes.

Authorized Signatory _____

Name (printed) _____

Title _____

Date _____

**** DOCUMENT MUST BE EXECUTED BY AN OFFICER OF THE COMPANY**