

TURNER POLICY: Code of Conduct

Issued by: Compliance Department

Approved by: Compliance Committee

Approved Date: 07/01/2025

Last Revision: 06/24/2025

SUMMARY

1. Summary

Every employee of Turner serves as a representative of our company to colleagues, customers, potential customers, business partners and community members. As an employee of Turner, your words and your actions reflect directly upon how you and Turner are perceived. You are obligated to act with honesty, integrity, and transparency and follow the rules and guidance in this Policy. Turner will accept nothing less, nor should you.

2. Purpose

This Policy represents a summary of our most important ethical principles and is intended to provide a clear understanding of your expected conduct. Please note, however, this Policy is not all-inclusive and cannot predict every situation or list every potential requirement. This Policy is never a substitute for common sense and good judgment. If you are unsure or unable to determine the appropriate course of action, stop and talk with your manager. If the situation is still not resolved, please reach out to the Compliance Department for guidance.

3. Scope and Use

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

OUR VALUES

CORE VALUES

At Turner our actions are guided by the Core Values of Teamwork, Integrity, and Commitment. These principles shape how we conduct ourselves and our business, ensuring the creation of shared value for all stakeholders and supporting sustainable, long-term growth.

We are committed to consistently acting in accordance with these values, driven by the belief that doing so benefits our organization, our partners, and the communities we serve. Compliance is not just a policy—it is a reflection of our culture and a standard we uphold at every level.

We will, whenever possible, avoid business relationships with suppliers, contractors, or external partners who do not align with our values or with the behavioral expectations outlined in this Code of Conduct. A conflict of interest exists when a personal interest interferes in any way with the interests of Turner. All employees must avoid and disclose situations where their own personal or financial interests actually or potentially conflict with those of Turner.

OUR CULTURE

ZERO TOLERANCE

Please be aware that Turner has zero tolerance for violations of this Policy.

Any such violations will not be excused by a claim that there was a lack of awareness or misunderstanding of this Policy and will result in disciplinary action up to and including termination of employment.

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When engaging in behavior that might be viewed by others as improper, you should consider the consequences of this conduct becoming public knowledge within or outside the company. Even the appearance of a conflict of interest should be avoided.

REPORTING AND ANTI-RETALIATION

DUTY TO REPORT

Our corporate culture is anchored on these principles, which are essential to our organization. It is crucial that all employees uphold and abide by them, as it is a collective responsibility. Everyone must be well informed about the Turner Code of Conduct and take ownership of their adherence to it. Senior management holds a significant role in this aspect and must effectively communicate the importance and contents of the Code to their team members. As role models, they have the responsibility to ensure their employees comply with the principles. However, it is also essential to note that this does not limit employees' ability to act responsibly within the permissible limits.

The Turner Compliance Department is available to provide support to employees in implementing the Turner Code of Conduct. The Compliance Department conducts various trainings to educate employees on the Code's content and offers advice and counseling on relevant issues to prevent potential problems.

The Compliance Department maintains the following channels for submitting compliance-related inquiries or reporting suspected compliance violations. The hotlines provide the ability to submit information anonymously.

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>

Every employee is required to report to a supervisor and to the Compliance Department any known violation of the law or the following policy.

Turner evaluates and investigates these reports, as appropriate. If the hotline or website is used, please give as many details as possible and recognize that anonymous reports are far more difficult to investigate than those where the reporter is available for interview.

The failure to report a known violation of law or this Policy effectively condones the conduct in question and will be considered a violation of this Policy.

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DUTY TO REPORT CONTACTS BY GOVERNMENT

Any Turner employee who has been contacted by any government agency or official at the federal, state or local level in regard to any matter that relates to Turner's business or that could have an impact upon Turner, its reputation and its business, is required to notify his or her supervisor and the Compliance Department immediately. This includes when you have been subpoenaed, interviewed, questioned or otherwise contacted by a government agency or official in regard to any matter that relates to Turner, its joint venture partners, any of its subcontractors or vendors or any of its employees.

Additionally, employees are required to report to their supervisor and/or the Compliance Department any time they believe a subcontractor, vendor, or joint venture partner on a Turner job has been subpoenaed, interviewed, questioned or otherwise contacted by a government agency. Follow these procedures even if you believe or have been told that Turner's actions are not being investigated.

Report such contacts to the Compliance Department and include the name and phone number of the government agency or official.

COOPERATION IN INVESTIGATIONS

There will be occasions when it is necessary for the company to investigate issues of concern or allegations regarding possible violations of this Policy or the law. These investigations are necessary to enable Turner to determine whether there is legal risk.

Employees are required to cooperate with the individuals conducting the investigation, including Turner employees or outside counsel retained by the company. Employees are also expected to provide requested documents and answer questions honestly and in a forthright manner.

Knowledge of any such investigations must be kept confidential and may not be shared with others inside or outside of the company unless the Compliance Department has given you specific permission to do so.

ANTI-RETALIATION

Turner takes pride in maintaining an environment where employees are encouraged to speak up. No employee at Turner will face any form of retaliation for acting in compliance with legal requirements or the principles set forth in the Turner Code of Conduct. Our strict anti-retaliation policy protects those who:

- Make a good faith report about potential misconduct. "Good faith" means the person brought forward what they know in a sincere and honest report, regardless of whether the conduct turns out to be unethical.
- Raise a concern or seek guidance about an issue; and
- Cooperate in an investigation of potential misconduct.

Allegations of retaliation will be investigated and, where substantiated, met with disciplinary action, up to and including termination. If you know or suspect that retaliation has occurred, report the matter immediately to a supervisor, Human Resources, or the Compliance Department.

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CONFLICTS OF INTEREST

AVOIDING CONFLICTS OF INTEREST

A conflict of interest exists when a personal interest interferes in any way with the interests of Turner. All employees must avoid and disclose situations where their own personal or financial interests actually or potentially conflict with those of Turner.

Turner expects all employees to demonstrate loyalty to the company. All employees must avoid situations where their own personal or financial interests' conflict with those of Turner. A conflict of interest exists whenever the nature or scale of a participating interest could in any way influence how employees perform their duties for Turner.

Employees must also avoid the appearance of such conflicts of interest. Conflicts that are merely perceived can be as damaging as actual conflicts.

PARTICIPATION IN ORGANIZATION BOARDS OUTSIDE OF TURNER

Turner recognizes the value of employees serving on the boards of worthwhile institutions. However, Turner employees should avoid situations where they are members of boards or other entities that might be in a position of deciding on a Turner proposal or recommending Turner for construction work. This would create a conflict of interest. Employees should anticipate such issues and seek guidance from their supervisor(s) and the Compliance Department before their actions could become a conflict for Turner.

OUTSIDE EMPLOYMENT

Turner employees may not be employed by any company that conducts or may potentially conduct business with Turner or performs work on any Turner project. Turner managers are responsible for ensuring that Turner trade workers and laborers are not employed on Turner projects through subcontractors or vendors. This measure is intended to maintain clear employment relationships and uphold compliance with company policies and labor regulations.

All actual or potential conflicts of interest must be disclosed to the Compliance Department. For further guidance, please refer to the **Conflict of Interest Policy**.

BRIBERY AND CORRUPTION

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All employees must comply with anti-corruption laws and any other applicable legal requirements, including, without limitation, the Foreign Corrupt Practices Act ("FCPA") and the Foreign Extortion Prevention Act ("FEPA"), that govern operations in the countries and localities where we conduct business. The FCPA prohibits any U.S. person or company, acting anywhere in the world, from offering, promising, or providing any item of value to foreign officials directly or indirectly for the purpose of obtaining or retaining business or securing an improper business advantage. The FEPA complements this by making it a criminal offense for foreign officials to solicit, demand, or accept bribes from U.S. persons or companies. Together, these laws reinforce our commitment to conducting business ethically and lawfully across all markets.

Corruption is the act of unfairly or illegally influencing a decision-making process through the giving or receiving of a benefit. Bribery refers to the offering, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual holding a public or legal duty.

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A public official who requires or accepts a benefit for him/herself or a third person is also liable to prosecution for bribery. Even if no public official is involved, a case of bribery may occur in the course of private business relationships if someone offers to an employee the prospect of an advantage as a return for unduly favoring him or her or another person.

The giving or receiving of a bribe is unlawful, unacceptable and a violation of this Policy. Any employee who gives or receives a bribe will be separated from the Company and subject to having the conduct reported to law enforcement.

For further guidance, please refer to the **Criminal and Anti-Bribery Compliance Policy**.

GIFTS

Turner's general policy is that employees should take nothing of value from any individual or entity doing business for the company or seeking to do business for the company.

Turner prohibits employees from giving a gift, meal or any item of value to any individual or entity for dishonest or unlawful purposes, or in violation of this Policy. This includes the giving and receiving of gifts through others for an employee's own purposes.

In the context of business, gifts are often offered with the expectation of receiving something of value in return. These exchanges can create conflicts of interest, the appearance of impropriety, and the perception that Turner is not acting in the best interests of our clients.

Employees are prohibited from accepting any gift, meal, ticket, entertainment or other item of value from a Turner subcontractor or vendor, or any subcontractor or vendor seeking to work with Turner.

It is acceptable for a vendor or subcontractor to provide a modest meal to a project team or department in connection with an on-site educational meeting, open house or shop tour provided the meal is authorized in advance by the project executive or department head.

Turner employees may not knowingly use any Turner vendor, subcontractor or anyone seeking to become a Turner vendor or subcontractor or any employee of such a subcontractor or vendor to do any work on any property of a Turner employee or the property of any relative of any Turner employee – even if the work is paid for. For any questions, contact the Compliance Department for guidance.

When a contract with a private owner prohibits or limits Turner and its employees from giving anything of value to the employees of the owner, the prohibition or limitation must be observed.

Turner employees should also become familiar with and respect any such prohibitions in the owner's compliance policy.

EMPLOYEES OF FEDERAL, STATE, LOCAL OR FOREIGN GOVERNMENTS

Turner prohibits employees from giving a gift, meal, or any item of value to any public employee, public official, government official, foreign government official or employee (including an employee of a company owned or controlled by a foreign government or an employee of an international organization such as the United Nations or the International Monetary Fund) or an employee of an institution that receives operating funds or funds for

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construction from any state, local or federal government or authority – even though there is no intention to obtain anything in return.

If you are uncertain if a person falls into one of the categories described above, please seek guidance from the Compliance Department.

It is acceptable to offer a public employee light refreshments that are available to everyone at a project meeting and that are not part of a meal

Offering, promising, or authorizing any gift, meal, ticket, entertainment, or other item of value to public officials as a means of influencing the actions of an individual holding a public or legal duty is prohibited. No employee may accept any gift, meal, ticket, entertainment, or other item of value in exchange for the purpose of securing an improper business advantage.

SPORTING EVENTS

When entertaining clients at sporting events, it is important to choose ticket options that align with our company's responsible spending guidelines. This ensures we maximize the value of client interactions while being mindful of budget constraints. Please consult with Senior Leadership and refer to the ticket policy in the **Accounting Policy and Procedures Manual**.

SUBCONTRACTORS AND VENDORS ON PUBLIC PROJECTS

The entertainment of subcontractors and vendors working on Turner's public projects should be avoided unless expressly authorized in this Policy. The appearance of entertainment can call into doubt the integrity and honesty of Turner's support of a payment requisition, change order request, or claims.

It is acceptable to provide a modest meal on the project premises for subcontractor appreciation events, safety luncheons and similar events. It is also acceptable to provide a modest meal in the business unit or on the project premises as part of a working session.

Turner may include subcontractors and vendors who are working on public projects as Turner's guests in events open to other subcontractors, such as holiday parties, where the expense is modest. Otherwise, you may not take these subcontractors off the project premises or out of the office to restaurants, bars, sporting events and other venues.

SUBCONTRACTORS AND VENDORS ON COST-REIMBURSABLE PROJECTS

The cost associated with entertainment of Turner's subcontractors and vendors who are working on a cost-reimbursable project should not be submitted to the project owner for reimbursement without the express written approval of the project owner.

OWNERS' EMPLOYEES AND REPRESENTATIVES

Employees may not entertain or provide anything of value to an employee or representative of the owner (Owner's Representative, Program Manager, architect, engineer, or similar person) while working on a

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public project.

If a design firm is working with Turner on both private and public sector projects, the employees of the design firm working on that public project may not be entertained. The principals and executives of design firms working with Turner on that, or another public project may be entertained by Turner employees, but the entertainment should be modest, should not include travel, and must not be excessive under the circumstances to avoid the appearance of impropriety. There should be no substantive discussions of Turner's public sector project while entertaining the principals or executives of the design firm.

THE SPECIAL CIRCUMSTANCES OF PROJECT TEAM BUILDING EVENTS

Whenever a public owner seeks to have Turner pay for or conduct a topping out party, project team-building event or similar activity for public employees to participate in, the Project Executive or Business Unit General Manager shall first obtain a written request from the public owner's authorized representative that Turner pay for the event, including written assurances that no laws or regulations would be violated by such an event being paid for by Turner. If the public owner's authorized representative is unable to provide the written request or the requested assurances, Turner may not pay for the event. In addition, where possible, Turner should seek to include a provision in the contract that provides clear authorization for these activities.

Please note that such events may only take place at the project site and nowhere else unless clearance is obtained from the Compliance Department.

Furthermore, such events are not intended as a mechanism to avoid Turner's policy that prohibits providing any item of value to a public employee and should not be used as authorization for entertaining individual public employees in restaurants, bars or similar venues or giving gifts.

UNION OFFICIALS

At Turner, it is important that we maintain ethical relationships with union officials. This means that:

- No gifts, meals or other valuables can be offered to influence decision-making.
- Excessive gifts or entertainment are also inappropriate.
- Similarly, accepting anything of value from a union official is not allowed.

For further guidance, please refer to the **Gifts and Entertainment Policy**.

MONEY LAUNDERING

Turner does not participate in active or passive money laundering. Money laundering is the use of otherwise legal enterprises or transactions to obscure or disguise the proceeds of criminal activity. Turner complies with all laws prohibiting money laundering or financing for illegal or illegitimate purposes. Clients and suppliers may only be involved in legitimate business activities with funds that come from legitimate sources. Always ensure there

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are no indications of potential money laundering, such as requests for cash payments or other unusual payment terms.

All employees must stay vigilant to any evidence of lack of integrity by any individual or entity Turner enters into a contract with. If you suspect that a company transaction may involve money laundering, you must immediately notify your manager, your Financial Manager and the Compliance Department

CHARITABLE CONTRIBUTIONS

Turner encourages employees to be active members in the communities where they live and work. Employees may engage in charitable organizations of their personal choosing so long as you do so in your own name and not on behalf of the company.

When Turner is pursuing or working on a public project, donations to the public owner, whether requested by the public owner or not, should not be made directly to the public owner when they can be made to an affiliated charitable foundation. When that option is not available, contact the Compliance Department before agreeing to make any donation.

Making charitable contributions to an entity to which Turner is making a proposal during the procurement process can result in Turner's disqualification from the procurement and, in some instances, may violate the law. Turner does not make charitable contributions to improperly influence business decisions or seek favor from decision makers. We must also ensure that the company's contributions are made to legitimate charities and accurately accounted for in our books and records.

Soliciting our business partners for charitable contributions also presents heightened risks of corruption. Inviting business partners to support worthwhile causes may be appropriate under certain circumstances, but we can never allow charitable contributions to influence business decisions. Out of an abundance of caution, employees with involvement in the procurement process, including those in the Preconstruction and Procurement departments should consult with the Compliance Department before soliciting charitable contributions from our business partners.

Turner should never handle or place the funds of any subcontractor or vendor into Turner's accounts in connection with a charitable event or donation.

POLITICAL CONTRIBUTIONS

Political contributions made by any Turner employee are not reimbursable by the company either directly or indirectly. All political contributions in the name of Turner, including contributions to political action committees (PACs), must be approved in advance by the Chief Compliance Officer and the CEO.

Do not sign any document that could have the effect of binding Turner to a specific political action committee without proper approval in advance from the Chief Compliance Officer.

Turner is a federal contractor and is prohibited by law from making political contributions in federal elections.

Employees and members of their immediate family are free to make personal political contributions, support candidates and parties, and advocate causes as long as they do so in their own names.

No political position in the name of Turner on any issue shall be stated publicly without the prior approval of the Chief Compliance Officer and the CEO.

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No officer or supervisor may direct anyone at Turner to make a political contribution.

In certain states there are regulations that impose reporting requirements upon Turner for political contributions made by the officers, employees and their families in the context of “pay to play” rules which, if not adhered to, may result in the disqualification of the company from performing work in those states.

Some states and localities limit the contributions of certain officers of the company or prohibit them from making any political contribution. In response to these requirements, Turner may be obliged to ask its employees to provide information about political contributions made by them or their family to candidates and parties. Every Turner employee is obligated to cooperate with such requests in a timely and complete fashion.

Sponsoring and donations to other, non-political recipients must not be used to circumvent this rule

LOBBYISTS AND CONSULTANTS FOR BUSINESS DEVELOPMENT

No lobbyist, person or company who will engage in approaching government officials seeking work on Turner’s behalf shall be retained without the express approval of the President and Chief Executive Officer and compliance with **Turner Policy for Retention and Use of Consultants**, which may be found on TKN.

Turner will never pay any success fee to any lobbyist or consultant who will approach government officials on Turner’s behalf.

Consultant(s) with duties that include business development shall not be retained unless the requirements of the **Turner Policy for Retention and Use of Consultants** have been met.

INSIDER TRADING

Under federal and state securities laws, employees are not permitted, directly or indirectly, to trade in securities of any company while in possession of material, non-public information regarding such a company, nor are they permitted to entice or encourage any person to directly or indirectly trade in securities of such company

Turner’s parent is HOCHTIEF A.G., a German corporation whose shares are publicly traded in Europe. A majority of the shares of HOCHTIEF is owned or controlled by ACS, also a publicly traded company in Europe. Turner employees may not buy or sell those shares on the basis of material, non-public information or information acquired as a result of their employment at Turner.

You may not offer stock tips or directly or indirectly trade in, purchase or sell, for your own account or for the account of others, securities of a company that you know is doing business with Turner or any of its affiliates in a material respect and when this business, or any part of it, is non-public information. A company shall be deemed to be doing business with Turner in a material respect if information pertaining to the company’s business with Turner would be relevant to an investor’s decision to buy, sell, or hold securities of that company. Information is non-public if it is not available to the general public. You may not offer stock tips, or directly or indirectly trade in, purchase or sell, for your own account or for the account of others, securities of a company based upon information you obtain as an employee of Turner.

Except in the course of your duties as an employee of Turner, you may not communicate information regarding a transaction between Turner and/or its affiliates and any publicly traded company, or the fact that Turner and/or its affiliates and such a company are in discussions regarding a potential transaction, to any other person, including family and friends.

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FAIR COMPETITION

UNFAIR COMPETITION AND ANTICOMPETITIVE CONDUCT

Employees are expected to uphold standards of fair business and competition. No one should 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 antitrust laws as well as laws that regulate competition. In dealing with competitors, employees must not collude or engage in other activities aimed at influencing prices or conditions, dividing sales territories or customers, or inhibiting free and open competition.

For further guidance, please refer to the **Antitrust and Competition Policy**.

ACCOUNTING CONTROLS

ACCURATE RECORDS

All business transactions must be fully and properly documented in accordance with the law and regulations as well as internal Turner policies.

On a daily basis, we must ensure our records completely and honestly reflect our business and provide reliable information. We all play a role in accurately maintaining Turner's books, because every business transaction becomes a part of our company's records. We require full, fair, accurate, timely and understandable disclosure in all Turner records. Each of us must be committed to the integrity and completeness of our corporate recordkeeping.

Turner employees must properly account for the use of company time and resources. This proper accounting includes maintaining accurate supplier invoices, expense reports, time sheets, and records related to construction projects. In addition, Turner is legally obligated to comply with U.S. Generally Accepted Accounting Principles (GAAP) and International Financial Reporting Standards (IFRS). We only enter into transactions pursuant to appropriate authorization or established policies and procedures. All transactional entries must include appropriate documentation and authorization to provide an exact and auditable record.

Projects can only be charged for actual time worked by employees, or as part of an approved cost allocation method developed and managed by the Finance department. Projects can only be charged for cost directly related to the project, or as part of an approved cost allocation in accordance with all Turner Policies and Procedures. Absolutely no costs can be charged to a project unless those costs correlate to the project, even if the costs are charges to a non-reimbursable account. All accounting entries should be coded into an account that accurately and fairly reflects the true nature of the transaction. Undisclosed activities invite misconduct, while full disclosure reinforces responsibility and acts as a powerful deterrent to wrongdoing. Therefore, Turner strictly prohibits any concealed or unrecorded transactions.

All transactions must be recorded in Turner's systems even if the owner wishes such transactions to also be recorded in their own systems

EXPENSE REPORTING

All expense reports must be honest, accurate and complete with due regard to the certifications appearing at the bottom of the expense reports.

Turner expects all employees to act responsibly and professionally when incurring and submitting costs, including accurate and complete expense reports. Turner employees are only reimbursed for actual, reasonable, and appropriate expenses, and generally, should be made financially "whole" — no gain or loss after reimbursement for reasonable expenses. Ethical and careful judgment must be exercised when deciding on

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what expenses to incur and submit for reimbursement. When incurring expenses, accurate documentation must be retained, including receipts and invoices. Entertainment for clients and customers should be reasonable and proper. A reasonable business expense would be to establish, strengthen, or preserve business relationships. However, you must not spend money to gain an unethical advantage, nor ever to “pay to play.”

CONFIDENTIAL INFORMATION AND PROTECTION OF ASSETS

CONFIDENTIALITY

Turner’s business activities must be treated confidentially. Company information must not be disclosed to unauthorized persons without permission. This obligation persists beyond the termination of a person’s employment. As a general rule, any company information that is not included on Turner’s public website should be treated as confidential.

PROJECT PROPERTY

Items slated for or recovered from demolition, project materials, tools and supplies are the property of the Owner and/or Turner unless expressly stated otherwise in the subcontract or vendor agreement. No salvage or excess material can be removed from project sites for non-project purposes without written permission from the Owner or approval from the BU General Manager.

ARTIFICIAL INTELLIGENCE AND TECHNOLOGY USE

AI COMPLIANCE

Turner is committed to ethical and responsible use of AI. In this regard, Turner will maintain the highest ethical standard for the contracting, use and development of AI, ensuring that all AI tools used comply with our ethical principles.

For further guidance, please refer to the **Artificial Intelligence Policy**.

TECHNOLOGY USE

Everyone must also respect the assets of Turner and Turner stakeholders and may only use assets belonging to Turner and others when appropriately authorized. Theft of assets will not be tolerated.

For further guidance, please refer to the **Technology Use Policy**.

SOCIAL MEDIA

Social media refers to a variety of online communities and platforms including Facebook, Instagram, Twitter, LinkedIn, TikTok, and also blogs, social networks, chat rooms or forums, anywhere that information is shared in a public, accessible manner. All employees must take care with sharing information on social media. Your employment with Turner includes a number of formal and informal expectations for your behavior as a representative, or ambassador of the company.

For further guidance, please refer to the **Social Media Policy**.

DATA PROTECTION

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Turner employees must observe all applicable data protection regulations as well as the Turner rules regarding the protection of data of employees, clients and other third parties. Protection of personal data is of particular importance. Employees should provide immediate notice of any known deficiencies to the Chief Information Security & Privacy Officer.

For further guidance, please refer to the **Data Protection Policy**.

HUMAN RIGHTS

OVERVIEW

Turner respects human dignity and champions the observance and protection of human rights. All employees are under an obligation to ensure that universally recognized fundamental rights are observed.

For further guidance, please refer to the **Human Rights Policy**.

FORCED LABOR

We 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

We respect the standard of the United Nations on human rights, and in particular, children's rights. Turner has zero tolerance for any kind of child labor in the company and in the supply chain. 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.

FAIR WORKING CONDITIONS AND REMUNERATION

Turner undertakes to ensure that the wages and benefits of its employees and people working on its behalf are fair and comply with all national and local laws, including those regarding applicable prevailing wage.

ANTI-HARASSMENT AND DISCRIMINATION

Turner is committed to compliance 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 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 has zero tolerance for unlawful harassment by or against employees, applicants, interns, volunteers, clients, independent contractors, vendors or non-employees of Turner at a Turner work site. Unlawful harassment of employees or other individuals occurring in the workplace or in other settings in connection with their employment or engagement is prohibited.

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

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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

Turner respects its employees' right of association within the bounds of prevailing laws and statutes.

HEALTH AND SAFETY

SAFETY

Turner strives to develop a work environment that promotes health and safety and comply with any legal requirements related to workplace and health protection. All employees are required to observe Turner's policies as well as applicable laws and regulations regarding health and safety.

For further guidance, please refer to the **Environmental Health and Safety Policy**.

ENVIROMENTAL PROTECTION

SUSTAINABILITY

Turner believes in utilizing our technical expertise to create a healthy, prosperous, and sustainable future for our people, clients, and the environment. Employees are required to comply with all applicable rules, laws, company policies, and customer requirements to protect the environment.

For further guidance, please refer to the **Environmental Policy**.

POLICIES

Employees are expected to comply with all Turner Construction Company policies and procedures, including those that may not be explicitly included or referenced in this document. It is the responsibility of each employee to remain informed of and adhere to all applicable company policies in effect.