

TURNER POLICY: HUMAN RIGHTS

Issued by: Legal & HR Departments

Approved by: Human Rights Committee

Approved Date: 07/01/2025

Last Revision: 06/24/2025

SUMMARY

1. Summary

Turner is dedicated to embedding respect for human rights into every aspect of our global operations and value chain. This Policy outlines our commitments to identify, prevent, mitigate, and account for potential human rights impacts arising from our activities, ensuring that all employees, partners, and suppliers uphold the dignity and rights of individuals affected by our work.

2. Purpose

The purpose of this Policy is to set forth the human rights principles and due diligence processes that guide Turner's decision-making and daily operations. It provides a clear framework for identifying risks, implementing corrective actions, and fostering a culture of accountability. This document is intended to inform employees and stakeholders of their roles and responsibilities; it is not exhaustive, and anyone with questions or uncertainties should consult their manager or the Compliance Department.

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").

POLICY

INTRODUCTION

Turner has been committed throughout its history to respecting human rights in accordance with the ethical principles and corporate culture that guide the performance of our activities and the achievement of our goals.

Turner recognizes international human rights and formalized the following due diligence process for identifying, preventing, mitigating, and reporting on adverse impacts on human rights in the scope of our activity and the global value chain.

At all times Turner will act in accordance with the following international reference standards established by the United Nations (UN) listed below:

- The United Nations International Bill of Human Rights, consisting of the Universal Declaration of Human Rights (UN, 1948), the International Covenant on Economic, Social and Cultural Rights (UN, 1966), and the International Covenant on Civil and Political Rights (UN, 1966) and the two protocols to it.
- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (ILO, 1998), the eight fundamental conventions that complement it, and the Convention concerning Indigenous and Tribal Peoples in Independent Countries.
- The Convention on the Rights of the Child (UN, 1999).
- The Convention on the Prevention and Punishment of the Crime of Genocide (UN, 1948).
- The Convention Against Torture and Other Cruel, Inhuman and Degrading Treatment or Punishment (UN, 1984).
- The Convention on the Rights of Persons with Disabilities (UN, 2006).

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- The Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities (UN, 1992).
- The Declaration on the Rights of Indigenous Peoples (UN, 2007).
- The UN Convention against Transnational Organised Crime and the Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the UN Convention against Transnational Organised Crime (UN, 2000).
- The Convention on the Elimination of All Forms of Discrimination against Women (UN, 1979).
- The International Convention on the Elimination of All Forms of Racial Discrimination (UN 1969).
- UN Human Rights Council Resolution 48/13 on the human right to a safe, clean, healthy and sustainable environment.
- The African Charter on Human and Peoples' Rights (OAU 1981).
- The American Convention on Human Rights (OAS, 1969).
- The European Convention on Human Rights (Council of Europe, 1953).
- The European Social Charter (Council of Europe, 1965).
- The Charter of Fundamental Rights of the European Union (Parliament, Council and European Commission, 2000).
- National constitutions and laws that recognize or implement human rights.

Turner is committed to actively contributing to any form of adverse impact on the human rights of people engaged in its direct operations and to the extent possible its global value chain, as well as to their remediation, by adhering to the following international guidelines:

- The UN Guiding Principles on Business and Human Rights (UN, 2011).
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises (OECD, 2011).
- The International Labour Organisation's Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy.

The following internal rules and policies accompany Turner's commitment to promoting the freedom and dignity of the people who make up Turner, the environment in which it operates, and its value chain:

- Code of Conduct
- Business Conduct Policy
- Code of Conduct for Business Partners

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- International Compliance Policy
- Anti-Harassment Policy
- Equal Employment Opportunity Policy
- Family and Medical Leave Policy
- Fire Prevention Planning Policy
- Prevailing Wage Policy
- Corporate Environmental, Health, and Safety Policy
- E.M.R. Policy & Procedure
- Information Security Policy

SCOPE AND APPLICATION

Turner's Human Rights Policy is directly applicable to all company activities and to all companies within Turner management control, and to all its directors, executives, and employees.

Turner will make every effort to ensure compliance with this Policy and that it is reflected in all relevant policies and operational procedures. All employees of Turner and our subsidiaries are required to comply with the commitments of this Policy, and act collectively under the same human rights model, integrating these principles across the entire value chain to the extent possible.

All suppliers, subcontractors, and business partners are required to comply with the same commitments under this policy and to respect internationally recognized human and labor rights through the application of the Code of Conduct for Business Partners, as well as the means deployed to supervise compliance. Turner will make every effort to promote the dissemination and adoption of the values set out in this document throughout the global value chain.

Turner acknowledges human rights obligations alongside our compliance with the regulations and laws of the various territories where we operate. However, in jurisdictions where this Policy conflicts with applicable law, the highest human rights principles and standards will be applied in each case.

COMMITMENTS TO HUMAN RIGHTS

This Policy is fundamentally aimed at promoting and respecting all human rights as recognized in international treaties and applicable law. However, Turner has fixed priority areas aligned with the United Nations Guiding Principles. Detailed below, these basic principles of action represent Turner's greatest impact based on the potential effects of global activity on the groups involved: workers throughout the value chain, consumers and end users, and local communities.

Commitments to Workers in the Value Chain

Value chain workers include Turner employees (both Staff and Trade), applicants, interns, volunteers, clients, independent contractors, vendors of Turner, business partners, and their respective value chains. Turner

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expects all business partners to strictly comply with core ILO conventions, and the following commitments to workers' rights:

- **Eradication of child labor:** Promoting safe adolescence and childhood and ensuring compliance with the provisions of Convention 138 of the International Labour Organisation (ILO) on child labor, always and in all cases rejecting all forms of child labor and slavery.
- **Eradication of all forms of forced labor, slavery, and human trafficking:** Rejecting forced or coerced labor, slavery (including practices associated with modern slavery), servitude, and human trafficking, and minimizing identified risks in all operations and the global value chain.
- **Decent work and living wage:** Supporting, encouraging, and promoting decent work and a living wage that meets workers' and their families' basic needs, with remuneration in line with the duties performed and the number of hours worked, while respecting applicable minimum wage legislation, and ensuring that payments are made regularly, on time, and directly. ILO standards on working hours and social security, as well as applicable governance regarding working hours and overtime, must be respected. Workers should be provided with accessible and clear rules on working hours, breaks, and remuneration.
- **Diversity, inclusion, and non-discrimination:** Turner prohibits 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, and any other protected characteristic or status. This commitment extends to all organizations with which Turner does business.
- **Anti-Retaliation:** Turner also 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 employment opportunity laws or this Policy.
- **Recruitment and labor migration practices:** Based on the commitment to respect and monitor the human rights of the particularly vulnerable group of migrant workers, the necessary measures are taken for their protection.
- **Occupational health and safety:** Workers must be equipped with the necessary personal protective devices and a safe working environment to carry out their tasks in optimal health and safety conditions.
- **Accommodation and living conditions:** Where employees or workers are provided with accommodations, they must be guaranteed safe and clean facilities.
- **Freedom of association, assembly, the right to organize, and collective bargaining:** Employees are entitled to maintain open and constructive communication with management regarding working conditions, and may freely associate, nominate employee representatives, join trade unions, and engage in collective bargaining within the bounds of prevailing laws and statutes.
- **Promoting work-life balance:** The right to holidays, rest, and work-life balance is an important value for all employees and must be respected, as well as implementing actions focused on the physical and emotional well-being of all employees.

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- **Equal employment opportunities:** Turner recognizes and supports equal employment opportunity for all employees and supports this policy with procedures and objectives to ensure fair employment practices with regard to recruitment, hiring, training, promotions, benefits, compensation, and all other employment-related factors.
- **Education and training:** Employees receive training to provide skills and experience to perform their jobs safely, grow and adapt to different needs in the course of their duties, and be aware of their rights and obligations in the workplace.

Commitments to Consumers and End-Users

Consumers and end-users are defined as any individual who receives Turner's services to meet their needs. Turner endeavors to conduct business in a professional and efficient manner, addressing the needs of consumers, clients, and end users, focusing on excellence and quality of service, and applies the following principles and commitments:

- **Protection of data privacy and confidentiality of information:** Turner maintains requirements and guidelines for the administrative, technical, and physical safeguards required to ensure the confidentiality, integrity, and availability of information stored on and processed by Turner's information, assets, and systems, including those entrusted to Turner by its clients, partners, and employees.
- **Quality, accessibility, and safety of services:** Services must be safe and accessible to everyone, including individuals with disabilities. Turner studies existing physical barriers and safety hazards to make reasonable accommodations for physical and mental limitations of employees and applicants, consistent with required job qualifications and the effective operation of the business. Accident and emergency response plans also provide for the safety of visitors and the community; such plans are available to employees and visitors who have access to Turner facilities with adequate information and signage arrangements.
- **Responsible development of products and services:** The design of products and services must be based on sustainable criteria, prioritizing social or environmental contributions, integrating the needs of consumers, users, and society in general, taking into account diversity and inclusion criteria, and considering the product or service's life cycle as a whole, applying control and due diligence processes from conception to supply and delivery.

Commitments to Local Communities

Turner embraces the commitment to protect local communities and the environment, contributing to preserving resources and habitats in all its operations and respecting communities' rights to live in a clean and healthy environment with decent quality of life. Local communities are defined as individuals and groups likely to be affected by Turner's activities.

- **Right to a clean and healthy environment:** Pollution prevention measures must be in place, especially for the protection and sustainable use of air, soil, and water in the areas where the business operates, avoiding impact on the health of the community or reducing living standards. This will ensure the conservation of natural resources and habitats while respecting the communities' right to live in a clean and healthy environment with a decent standard of living.

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- Tax accountability and rejection of corrupt practices and bribery: There should be processes in place to identify and resolve cases of corruption, fraud, bribery, and conflicts of interest, repudiating any such practices in the course of operations. Business must also be conducted with fiscal and financial integrity, in an open and transparent manner, protecting the public budget and the interests of users, consumers, and society, and rejecting all forms of money laundering. Likewise, any practices aimed at unduly interfering with anyone's free access to a fair legal process in the course of business are also unacceptable.

Turner acknowledges the unique rights of indigenous peoples to free, prior, and informed consent in all matters affecting their lands, resources, or ways of life. In all instances where our operations could impact indigenous territories or communities, the following measures shall be supported:

- Early and ongoing consultation with the affected populations;
- Clear and accessible information regarding project impacts; and
- The right to free, prior, and informed consent of these communities before proceeding. This proactive engagement is essential to safeguard the rights and interests of indigenous peoples and ensure equitable decision-making processes.

To the extent that it is practicable, Turner shall proactively protect cultural, historical, and religious heritage sites within our operational areas.

Commitments to Ethical and Responsible Activity

Turner is committed to the responsible use of artificial intelligence (AI) to support business processes while upholding human rights. AI applications shall be developed and employed in a manner that:

- Supports transparency, accountability, and non-discriminatory practices;
- Avoids perpetuating biases or infringing on individual rights; and
- Undergoes regular review to assess and mitigate any adverse human rights impacts.

In all instances, the deployment of AI will support our broader commitment to ethical conduct and respect for all human rights.

IMPLEMENTATION AND MONITORING OF THE POLICY

To ensure that the commitments adopted in this Policy are applied throughout the global value chain, Turner is committed to the following procedures:

- Turner continuously implements measures and processes based on criteria of proportionality and probability to identify, prevent, and mitigate actual and potential adverse human rights impacts throughout the business and global value chain, delivering, where appropriate, effective redress in cooperation with affected stakeholders. These procedures and their results are regularly monitored and audited to ensure their correct functioning and results, engaging interest groups by encouraging their participation in the continuous review and adaptation of the procedures.
- To ensure compliance with these commitments across the value chain, business partners will be given contractual requirements to ensure that these procedures are established and deployed.

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- Turner is committed to assigning human rights responsibilities for cross-cutting integration in all its direct operations and value chain, as well as promoting due diligence by providing human rights training plans for employees throughout the global value chain.

This Policy will be clearly communicated and disseminated internally and externally to all stakeholders, in particular employees and business partners, and made publicly available on Turner's website.

REPORTING OF VIOLATIONS

All employees of Turner and its global value chain who have knowledge or well-founded suspicion of any breach of the commitments in this Policy may report anonymously via the Turner hotline provided for this purpose, accessible via email, phone, website, and QR code.

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 takes pride in maintaining an environment where employees are encouraged to speak up. There will be no retaliation against any employee who, in good faith, reports a violation of law or this Policy. Our strict Anti-Retaliation Policy protects those who:

- Make a good faith report, meaning the person brought forward what they know in a sincere and honest report, regardless of whether the conduct turns out to be unethical or violates this Policy;
- Raise a concern or seek guidance about an issue; and
- Cooperate in an investigation of the reported issue.

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.

ENFORCEMENT AND UPDATING OF THE POLICY

Turner's Human Rights Committee will lead the global approach to human rights due diligence and management. The Human Rights Committee members include leaders of Human Resources, Procurement, Compliance, Legal, and Operations. The Chief Human Rights Officer will lead and coordinate this committee,

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with the Executive Vice President, Chief Human Resources Officer, and Senior Vice President, Chief Legal Officer providing executive support and oversight.

Turner will review and update this Policy, incorporating the results of ongoing due diligence and stakeholder feedback processes, and will ensure the improvement and reinforcement of its human rights strategy throughout our company's sphere of influence.