

## Code of Conduct

### A MESSAGE FROM OUR PRESIDENT & CHIEF EXECUTIVE OFFICER

#### Integrity in Action

We think of our workplace as “our house.” In our house, we “do the right thing.” As a company and as individuals we seek to maintain the highest standards of business conduct.

The words and actions of our employees reflect directly upon how they and Turner are perceived. Every employee of Turner serves as a representative of our company to colleagues, customers, potential customers, business partners, and community members.

Thank you for ensuring that we continue to deliver our services by the principles on which this company was founded – Teamwork, Integrity, and Commitment. Your continued support helps ensure the future of our personal and professional reputations as well as the reputation and future of our Company.

Sincerely,

**Peter J. Davoren**  
**President and Chief Executive Officer**  
**Turner Construction Company**

#### General Principles

This Code of Conduct applies to employees of Turner Construction Company and Turner International (collectively, “Turner”). All Turner employees shall act in accordance with ethical principles and comply with the laws and other legal requirements in effect in the countries and localities where Turner conducts business.

#### 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.

## Bribery and Corruption

All employees must comply with anti-corruption laws and any other applicable legal requirements, including, without limitation, the Foreign Corrupt Practices Act (“FCPA”), 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 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 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.

## Donations and Sponsoring

Turner business units and companies do not make any direct or indirect donations to political organizations, parties or individual politicians.

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

## Fair Competition

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.

## Money Laundering

Turner undertakes to comply with all laws that prohibit money laundering or financing for illegal or illegitimate purposes. Employees must stay vigilant to ensure that we work with reputable counterparties involved in legitimate business activities with funds derived from legitimate sources.

## Confidential Information and Protection of Assets

Confidential information relating to Turner and Turner stakeholders must be respected. No information may be disclosed to any person who does not have a right to that information.

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.

## Data Protection

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.

## Documentation of Business Transactions

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

## Respecting Human Dignity

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.

## 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 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

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.

### Environmental Protection

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.

### Implementation and Responsibilities

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.

Employees and third parties can direct any compliance-related inquiries to [compliance@tcco.com](mailto:compliance@tcco.com), as well as our whistleblower hotline for reporting possible violations.

If an employee suspects that a violation has been committed, they are required to report the matter to their supervisor, the whistleblower hotline, or the Compliance Department. 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.

Email: [compliance@tcco.com](mailto:compliance@tcco.com)

Hotline: 1-888-738-1924

Web Reporting: <https://Turnerconstruction.navexone.com>

