

Barton Malow

Business Associate Code of Conduct

BUILDING WITH THE AMERICAN SPIRIT

For nearly a century, the Barton Malow Family of Companies, consisting of Barton Malow Company, Barton Malow Builders LLC, Barton Malow Holdings LLC, LIFTbuild, LLC, Flypaper Technologies, LLC and their respective subsidiaries and affiliates (collectively, "Barton Malow") has been committed to Building with the American Spirit: People, Projects, and Communities. With nearly 3,000 team members and 15 offices throughout North America, our employee-owned enterprise is on a mission to transform the construction industry through innovation and increased efficiencies in the building process.

Our organization is guided by our core values of integrity, partnership, and empowerment.

INTEGRITY

Through integrity, we strive to make fair and right decisions in every situation; to always demonstrate consistency between words and actions; and to honor all our commitments.

PARTNERSHIP

Through partnership, we build relationships based on trust and respect; we work together with each other, our clients, our subcontractors, and our vendors to advance mutual interests; we appreciate each other's input and communicate with candor; and we work to ensure a highly collaborative and enthusiastic work environment.

EMPOWERMENT

Through empowerment, we equip and enable our team members to deliver results; we share understandable, achievable, and detailed expectations; we lead with and encourage decisiveness; and we demonstrate and foster self-motivation and entrepreneurialism.

Barton Malow's goal of developing long-lasting relationships with our subcontracting partners begins with prequalification and is consistent through the bid management process and streamlined, comprehensive, and innovative preconstruction and construction processes. Because collaboration is so critical to the success of our projects, Barton Malow expects all of its vendors, subcontractors, suppliers and business partners with whom we do business (collectively, our "Business Associates") to engage in responsible business practices and to comply with this Business Associate Code of Conduct (this "Code"). The provisions of this Code are in addition to, and not in lieu of, the provisions of any legal agreement or contract between a Business Associate and Barton Malow or any of its subsidiaries or affiliates. We expect Business Associates to hold their supply chain, including subcontractors, third-party labor agencies, and any contract and seasonal workers, to the same standards contained in this Code. This Code does not create any third-party beneficiary rights or benefits for Business Associates, their respective employees or any other party. Barton Malow respects the law in its business operations and expects all Business Associates to do the same by complying with all laws that apply to their respective businesses and their work with us and our clients. In case of any conflict between what the law requires and the standards of this Code, each Business Associate must meet the higher standard.

Keep in mind that this Code is a two-way street. We hold our team members to the same standards that we hold our partners to. And while no two situations are alike, we want to ensure that the partners we work with adhere by our values. All of our reputations depend on it.

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When working with Barton Malow, remember Ben Maibach III's often repeated words, "It's not what you do, it's how you do it."

INTEGRITY

Everyone who works for and does business with Barton Malow is expected to act with integrity, make the right decisions, and take the right actions in compliance with applicable laws and regulations in the countries and jurisdictions in which they operate. Each Business Associate must be able to demonstrate compliance with this Code upon Barton Malow's, or its applicable client's, request and take action to correct any noncompliance. Barton Malow reserves the right to audit any Supplier's compliance with this Code and to terminate any agreement or arrangement with any Business Associate who cannot or will not demonstrate compliance with this Code.

ANTI-CORRUPTION AND ANTI-BRIBERY

Business Associates shall comply with all anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act, as well as all local anti-corruption laws prohibiting commercial and governmental bribery. Specifically, no Business Associate can offer or accept any bribe, kickback, favor, or anything of value; engage in any extortion or embezzlement; or use any improper influence when dealing with government officials or in any business arrangements in order to obtain an improper advantage. In addition, Business Associates are prohibited from providing or offering gifts to Barton Malow team members that could inappropriately influence Barton Malow's business decisions or gain an unfair advantage.

FAIR COMPETITION AND ANTI-TRUST

Business Associates will operate honestly and ethically throughout the supply chain and in accordance with applicable law, including those laws pertaining to anti-competitive business practices.

BOOKS AND RECORDS

Business Associates shall maintain accurate and transparent financial books, business records and accounts. Business Associates must keep an accounting of all payments (including any gifts, meals, entertainment or anything else of value) made on behalf of Barton Malow or out of funds provided by Barton Malow. Business Associates must furnish a copy of this accounting to Barton Malow upon request.

CONFLICTS OF INTEREST

Barton Malow team members should not have any financial interest or employment arrangement with a Business Associate that might conflict, or appear to conflict, with the team member's obligation to act in the best interests of Barton Malow. If a Business Associate has an employee with a family relationship (for example, spouse, child, parent, sibling, grandparent, mother- or father-in-law, sister- or brother-in-law, grandchild, domestic partner, etc.) to a Barton Malow team member, or if the Business Associate has any other relationship with a Barton Malow team member that might represent a conflict of interest, the Business Associate should disclose this to Barton Malow.

NON-RETALIATION

Business Associates shall prohibit retaliation against their employees who report a compliance or ethical issue learned during the course of work performed for Barton Malow or who cooperate in good faith with the investigation of a complaint.

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CONFLICT MINERALS

To facilitate an assessment of upstream supply chain compliance, Business Associates must be able to disclose supply chain mapping back to the primary origin associated with the products or services provided to Barton Malow or its clients for products which contain tin, tungsten, tantalum, gold, or any other material or derivative designated by the U.S. State Department as a “conflict mineral.” More specifically, Business Associates are required to undertake reasonable due diligence with their supply chains to assure that conflict minerals are being sourced from mines and smelters outside The Democratic Republic of the Congo (“DRC”) or an adjoining country (collectively, the “Conflict Region”) or, if sourced within the Conflict Region, then from mines and smelters that have been certified by an independent third party as DRC conflict free. To the extent any Business Associate does not currently have this capability, such a Business Associate is required to disclose its future plans to do so. Business Associates shall make all disclosures to Barton Malow or its clients upon request within a timely manner.

CONFIDENTIALITY AND DATA SECURITY

Business Associates should protect our confidential information by keeping it secure, whether in paper, electronic, or other media. Business Associates who have been given access to confidential information as part of the business relationship should not share this information with anyone unless authorized to do so by Barton Malow, even after our business relationship ends. Business Associates should not trade in securities, or encourage others to do so, based on confidential information received in the course of providing services to or acting on behalf of Barton Malow or any of its clients. If a Business Associate believes it has been given access to Barton Malow’s or any other third party’s confidential information in error, the Business Associate should immediately notify its contact at Barton Malow and refrain from further distribution of the information. Similarly, a Business Associate should not share with anyone at Barton Malow information related to any other company if the Business Associate is under a contractual or legal obligation not to share the information.

REPORTING

Barton Malow encourages all Business Associates to create their own internal programs, processes, and procedures for handling reports of workplace grievances, including anonymous reports. Business Associates shall promptly report actual or suspected violations of law or this Code to Barton Malow. This includes actual or suspected violations by any employee or agent acting on behalf of either the Business Associate or Barton Malow. A Business Associate’s relationship with Barton Malow will not be affected by an honest report of potential misconduct. To report a concern anonymously, contact Barton Malow at www.bartonmalow.ethicspoint.com.

HUMAN RIGHTS

Barton Malow requires each of its Business Associates to conduct its activities in accordance with the International Labour Organization’s 1998 Declaration on Fundamental Principles and Rights at Work and the United Nations Universal Declaration of Human Rights.

FORCED LABOR

Business Associates will not use any form of slave, forced, bonded, indentured, or involuntary labor. Business Associates will not engage in human trafficking or exploitation or import goods tainted by slavery or human trafficking. Business Associates will not require payment of fees or the surrendering of government-issued identification, passports, or work permits as conditions of employment.

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CHILD LABOR

Business Associates shall ensure that no underage labor has been used in the procurement, production, or distribution of their goods or services. Business Associates will not employ children less than 15 years of age or 14 years of age where local law allows. Business Associates shall ensure that legally young workers, under 18 years of age, are not permitted to perform hazardous work, overtime, or night shift work.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Business Associates shall recognize and respect the right to collective bargaining and the rights of employees to associate or not to associate with any group, as permitted by law and in accordance with all applicable laws and regulations.

EMPLOYMENT STATUS

Business Associates shall employ only workers who are legally authorized to work in their location and facility and are responsible for validating employees' eligibility to work through appropriate documentation.

ANTI-DISCRIMINATION AND FAIR TREATMENT

Business Associates shall encourage a diverse workforce and treat employees with fairness, dignity, and respect. There will be no unlawful discrimination, harassment, or abuse of any kind.

WAGES AND BENEFITS

Business Associates shall provide employees with compensation that includes wages, overtime pay, premium pay, and benefits that meet or exceed the legal minimum standards. Business Associates shall pay employees equal pay for equal work without discrimination. Business Associates shall pay employees in a timely fashion and make no deductions from pay for disciplinary reasons.

WORKING HOURS

Business Associates shall comply with all applicable laws regulating hours of work, including the maximum number of working hours and overtime. Business Associates shall ensure workers have the holidays and rest hours required by local law.

TOTAL SAFETY CULTURE AND CORPORATE RESPONSIBILITY

At Barton Malow, we do not tolerate acts or threats of violence, internally or externally. We expect all Business Associates to be observant of their surroundings, practice good security measures, and speak up about any threats of potential violence. We do not allow weapons on our or our clients' properties for which we are responsible. We also promote a workplace free of bullying and abusive conduct, whether physical, verbal, visual, or emotional.

HEALTH AND SAFETY

Business Associates shall provide employees with a safe, respectful, clean, and healthy work environment. Each Business Associate is responsible for integrating comprehensive health and safety management practices and job-specific risk assessment, risk management, and safety training into its business. Business Associates shall give their employees the right to refuse unsafe work and report unsafe or unhealthy working conditions. Each Business Associate will meet or exceed applicable laws and industry standards in this area. Business Associates will maintain a program to achieve continuous improvement in workplace safety. Business Associates will provide only products and services that are safe and in compliance with all applicable local and national laws.

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ENVIRONMENT

Business Associates shall operate its facilities and work locations in compliance with all environmental laws, including laws and international treaties relating to waste disposal, emissions, discharges, and hazardous and toxic material handling. Business Associates shall manage, measure, and minimize the environmental impact of their facilities and work sites and demonstrate continuous improvement in areas such as air emissions; waste reduction, recovery, and management; water use and disposal; energy usage; and greenhouse gas emissions. Business Associates will look to conserve resources and protect the communities and environment that surround them.

CHEMICAL COMPLIANCE

Business Associates shall maintain programs to actively participate in and comply with the requirements of all applicable chemical-related laws.

SUSTAINABILITY REQUIREMENTS FOR OWN BUSINESSES ASSOCIATES

Business Associates will communicate these or substantially similar codes to their suppliers and subcontractors. Business Associates will continuously improve their sustainability and stakeholder engagement process. Barton Malow also encourages Business Associates to work closely with local communities to implement projects and strategies that improve the communities where their own employees live, work, and play.