ENGINEERING®
ASSOCIATES

Supplier Code of Conduct



ENGINEERING ASSOCIATES, LLC
SUPPLIER CODE OF CONDUCT

Engineering Associates, LLC ("EA") are committed to conducting business with the highest standards of integrity and ethics, and with abiding respect for corporate citizenship and sustainability. Suppliers are a key part of EA's business, and therefore, we require them to adhere to the principles for promoting this commitment set forth in the following Supplier Code of Conduct (this "Code"). This Code mirrors the standards we set for our own employees and board of directors.

As used in this Code, "Supplier" refers to any person providing products or services to EA, its subcontractors, and its agents, including those indirectly providing services to us. Suppliers are expected to ensure that the principles of this Code are communicated to their employees, subcontractors, agents, and representatives doing business with or on behalf of EA. Suppliers are responsible for the acts and omissions of their personnel and for ensuring that their employees, subcontractors, agents, and representatives doing business with or on behalf of EA comply with the requirements of this Code.

At a minimum, all Suppliers must operate in full compliance with the laws, rules and regulations of the jurisdictions in which they operate or where they provide services to EA. Where this Code sets higher standards than what the law provides, EA expects Suppliers to adhere to such standards. This Code supplements, but does not supersede, any contracts between EA and a Supplier.

Suppliers are expected to ensure compliance with EA's other published policies, including its Quality, Health, Safety & Environmental Policy; Related Party Transaction Policy; Policies and Procedures Governing Insider Trading and Related Matters; Human Rights Policy; and Sustainable Procurement Policy. These policies and this Code may be updated from time to time, and Suppliers are expected to regularly check engineeringassociates.com for updates.

I. Ethics and Standards of Conduct

Suppliers must uphold the highest standards of ethics and behavior, including the following:

Business Integrity

Suppliers must carry out their business honestly and ethically and comply with all laws and regulations within the jurisdictions in which they operate. All forms of illegal or inappropriate activity, including, but not limited to, corruption, misrepresentation, extortion, embezzlement, or bribery, are strictly prohibited. EA expects its Suppliers to maintain policies and processes to ensure such behavior does not occur.

Competition, Advertising, and Marketing; Social Media

EA expects Suppliers to uphold fair business standards in advertising, sales, and competition. Suppliers may not use EA's name, logos, trademarks, or other intellectual property without EA's express written consent. If EA consents to such use, any reference or implication to EA in any manner must be truthful and accurate. Suppliers must not use social media in a way that harms the EA brand, our workers, systems, or assets.

Alcohol and Drugs

Suppliers must not engage in any work for or on behalf of EA, or in any fashion represent, or make any representations on behalf of EA, while under the influence of alcohol or other substances that may impair the ability to work safely. In addition, Suppliers may not possess, use or distribute illegal drugs or controlled substances while on EA premises or worksites, while in our vehicles, or while conducting business with or for EA. This prohibition does not include use or possession of legally obtained medications as directed by a licensed medical practitioner.

EA Property, Funds, and Information; Records

Suppliers must use all EA property, including, but not limited to, equipment, funds, documents, electronic and written information and communications systems, with care and adherence to acceptable standards and EA's rules and procedures. Records prepared for EA, including records of work time and expenses, must be accurate, truthful, and complete, and must meet applicable standards and requirements.

Suppliers are required to report any suspected or actual misuse, theft, vulnerability, improper exploitation, or sabotage of EA property.

International Business; Money Laundering

Suppliers must never engage in money laundering or actions related to terrorism, or do business with persons upon whom sanctions have been imposed by the U.S. Government. "Money laundering" is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the proceeds appear to have derived from legitimate origins or constitute legitimate assets. In addition, to the extent applicable, Supplier must act in full compliance with the U.S. Export Administration Act, the Export Administration Regulations, the Foreign Corrupt Practices Act, and any related applicable international laws. Suppliers must make only proper and permissible payments to persons outside the U.S. and exchange business courtesies only in accordance with this Code and with applicable laws.

Business Courtesies; Conflict of Interest

Suppliers are expected to compete based on the merit of their products and services, not through gifts, entertainment, or other excessive business courtesies. Suppliers must follow these guidelines:

- Suppliers may not provide gifts or entertainment exceeding a nominal value, or with a frequency that creates the appearance of a conflict of interest.
- Suppliers must not provide gifts or entertainment that could embarrass EA or harm its reputation.
- Payments of cash or cash equivalents by Suppliers to EA employees, or third parties designated by a EA employee, are never allowed.
- Any request by EA employees to provide gifts or entertainment is not permitted and should be immediately reported in accordance with this Code.
- Suppliers must disclose any known family or personal relationships with EA employees who have any influence over or involvement in EA business dealings or that may otherwise create the appearance of a conflict of interest.

Governmental Entities; Political Interactions

When Suppliers team with EA in providing goods and services to government entities within the U.S., or otherwise deal with governmental officials in connection with EA matters, gifts or entertainment of any value in connection with any EA matter, are not permitted without EA's express written authorization.

Suppliers are prohibited from contributing to any political party, official or candidate in connection with any EA matter without EA's express written consent. Suppliers must not make representations to public officials on behalf of EA without its express written approval.

II. Labor

EA expects Suppliers to treat all employees with respect and dignity, and as such, Suppliers are expected to adhere to the following labor standards:

No Child Labor; No Forced Labor

Suppliers must not use child labor. The term "child" refers to any person under the age of 14, or under the applicable minimum age for completion of compulsory education, or under the minimum legal age for employment in the relevant jurisdiction, whichever is the highest. In addition, Suppliers must not use forced labor of any type, including bonded, indentured, or involuntary prison labor.

Freedom of Association and Collective Bargaining

Suppliers must comply with applicable laws and regulations governing the legal rights of their employees to join or not join worker organizations, including trade unions, and the right to collectively bargain, if they choose to be represented. Suppliers should use good employee communication to promote positive employee relations.

Non-Discrimination

EA embraces equal opportunity as a fundamental principle and key component of its corporate strategy. Suppliers must not engage in discrimination on any basis prohibited by applicable laws. Suppliers must provide equal employment opportunities to all potential workers, applicants, and employees and must maintain a workplace free from abuse, illegal discrimination, harassment, and retaliation. Suppliers must not discriminate in their hiring and employment practices based on race, color, age, sex, gender, gender identity, sexual orientation, citizenship, national origin, religion, disability, pregnancy, or other legally protected status.

Working Hours and Wages

Suppliers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. Employees should have the ability to earn fair wages, as determined by applicable laws.

III. Health and Safety

EA expects Suppliers to apply robust health and safety policies and practices in their operations. Suppliers must provide a safe and healthy work environment in accordance with applicable standards, laws, rules, and regulations and must maintain a work environment that is free from violence and threatening, hostile, or abusive behavior. Suppliers should provide appropriate health and safety information and training to their employees. EA expects Suppliers to minimize the impact of emergency events by proactively implementing business continuity plans and response procedures.

Suppliers working on EA's behalf must have procedures and systems to promptly prevent, manage, track, and report all occupational injuries and illnesses and any hazardous or unsafe working conditions. EA expects its Suppliers to, where practicable, use reasonable best efforts to:

- Minimize the use of energy, water and raw materials;
- Maximize the use of recyclable and renewable materials including energy whenever possible;
- Minimize waste and dispose of it in a safe, efficient, and environmentally responsible manner; and
- Avoid contamination of the local environment and ensure that emissions, air, noise and odor pollution is, as a minimum, within nationally defined limits.

IV. Environment; Sustainable Business Practices

EA is committed to reducing negative environmental impacts across our supply chain. Suppliers should use reasonable efforts to minimize their impact on the environment and source responsibly, which may include attending training on health, safety and environmental issues, participating in on-site audits of Supplier's compliance with this Policy and integrating sustainable procurement objectives as part of Supplier's performance obligations Supplier also must comply with all applicable environmental laws and regulations.

V. Confidentiality and Privacy; Information Security

EA values and protects confidential information, including information about its customers, employees, operations, finances, and business plans. Suppliers may be granted access to confidential information of or relating to EA or one or more EA customers. EA may execute a nondisclosure agreement or enter into an agreement with confidentiality provisions with Suppliers before providing access to confidential information. EA may also include a confidential/proprietary legend on confidential information. Suppliers must protect EA's or its customer's confidential information in compliance with those agreements and confidential/proprietary legends. Any unauthorized disclosure of EA's or its customer's confidential information is prohibited. This includes inadvertent disclosures, which means that Suppliers must not discuss EA's or its customer's confidential information in public areas where discussions could be easily intercepted or overheard.

Suppliers that store, process, or access EA's or its customer's information must implement and maintain appropriate physical, technical, and organizational measures to ensure the security, confidentiality, and integrity of their systems and processes and must securely maintain any such information. Suppliers are expected to notify EA within 24 hours after the discovery of any known or suspected unauthorized access, use, misuse, disclosure, theft, loss, transfer, or destruction of EA's or its customer's information. EA will follow similar measures to protect Suppliers' confidential information.

VI. Property Rights

EA respects the property rights of others, and its policy is to honor and respect others' intellectual property rights, including patents, trademarks, and copyrights. Suppliers should not engage in any improper use of the intellectual property rights of others, including the unlawful or unauthorized copying, revealing, or use of anyone's intellectual property. Improper use by a Supplier of others' intellectual property may expose EA and such Supplier to criminal and civil fines and penalties.

VII. Insider Trading

Suppliers may not buy or sell securities of EA when in possession of material, non-public information and must not share such information with others for any improper purpose.

VIII. Grievance Procedures

Suppliers are expected to enable employees to communicate openly with management regarding working conditions without fear of reprisals, intimidation, or harassment. Suppliers should also have grievance mechanisms in place to allow complaints from other stakeholders to be heard, assessed, and, if necessary, remedied as expeditiously as possible.

IX. Reporting of Suspected Violations

Suppliers and their personnel are encouraged to report potential or actual violations of this Code or other legal or ethical concerns. Such a violation or concern may be reported by:

A. Calling the Company's Supplier Hotline at (888) 818-1480; or
B. Emailing at generalcounsel@dycominc.com.

X. Compliance Management Process

Suppliers must manifest their commitment to implementation of the principles of this Code with an appropriate compliance management process. As part of this process, Suppliers should create and maintain appropriate documentation and records to track and ensure compliance with this Code. The compliance management process should also include appropriate training programs for Supplier personnel.

XI. Acknowledgement

I acknowledge that I have reviewed and understand the principles set forth in this Code and that, as a Supplier, I am responsible for complying with such principles.

Signature: _____

Name: _____

Date: _____