We are determined Alberici will live on generation after generation as a successful and independent organization, providing opportunities for exceptionally fulfilling work. This is our time to uphold and enhance this legacy through uncompromising integrity, excellence and commitment to what we do. These essential values are evident in our work with each other, and with our clients, associates and communities.

April 1, 2025

Our success and reputation depend upon many interconnected factors, some of which are tangible and others of which are harder to quantify. One of those important intangible factors is the dedication of the company and its employees to operate within the lawful bounds of acceptable behavior. Adherence to the law where we live and work is the minimum standard for everything we do.

As part of our continued growth as a company, this Code of Conduct was developed to reflect the ethical principles under which Alberici has operated for the past 100 years.

The Code of Conduct is but one part of an overall compliance program that reflects Alberici’s commitment to ethical behavior. However, it is not a recipe book for every situation. Each of us is expected to exercise intelligence, common sense and good judgment in accordance with not only the content, but also the overall spirit of the Code of Conduct.

If you find yourself in a situation which the Code of Conduct does not explicitly address and

you’re not sure what to do, ask yourself the following questions:

1. Is it legal?
2. Does it reflect our core values?
3. Is it fair?
4. Would I want to read about my actions in the newspaper or have to explain it to my family or friends, or worse yet, to a judge or jury?

If the answer to any of the questions is no, then you’ve identified a situation that presents a risk to you and the company. The next step is to either discontinue that course of action or else seek direction from your supervisor, the Chief Compliance Officer, Human Resources or the Legal Department as to the right course.

What is written in the Code of Conduct is nothing new for us. We are as strongly committed to ethics now as we ever have been. As our world becomes more complex and we find ourselves operating in many different locations, recognizing and reinforcing the value of our ethical standards will be crucial to our continuing success.





Greg Hesser

Executive Chairman

Richard Jaggers

President & CEO

# CODE OF CONDUCT

## Health, Safety and Environment

* + Alberici is committed to complying with all applicable health and safety laws in each jurisdiction where we do business and employees are expected to follow the rules and practices in our safety program. If you are not sure whether to report a safety matter to your supervisor or safety personnel, report it.
	+ Alberici is committed to comply with all applicable environmental laws in each jurisdiction where we do business and employees are expected to promptly report any encounter with, or spill or release of, a hazardous substance to your supervisor or safety personnel.
	+ The distribution, possession or use of a controlled substance on Alberici premises or while conducting Alberici business is strictly prohibited.

## Employee Relations

* Alberici is an equal opportunity employer and does not tolerate discrimination based on race, color, religion, sex, age, marital status, sexual orientation, military status, national origin, citizenship status, disability, gender identity, pregnancy, or genetic information.
* Alberici prohibits harassment and will not tolerate verbal abuse, discriminatory remarks, unwelcome sexual advances, or any other offensive, obscene, vulgar or threatening words or conduct, including the creation, distribution or sharing of such content through the use of email, voicemail or other electronic communications.
* The confidentiality of private, sensitive personnel information about employees (such as addresses, resumes, social security numbers, health, benefits and compensation) is protected by privacy laws and employees are to refrain from accessing or sharing such information unless for legitimate business purposes with approval from company officials.

## Company Assets and Activities

* + Confidential information relating to Alberici and its customers, subcontractors, suppliers and partners should not be disclosed to anyone outside the company except on a need-to- know basis for proper business purposes with the appropriate safeguard procedures in place. Your commitment to protect in perpetuity confidential information acquired during your tenure is considered a fundamental condition of your employment and you may not take, copy or retain any documents containing confidential information should you depart from the company.
	+ Fraudulent conduct of any kind, including embezzlement, forgery, theft of company assets, fraudulent reporting and misrepresentation of company information, and unauthorized access, alteration and deletion of company records is strictly prohibited.
	+ Employees are expected to be free from conflicts of interests that interfere with your ability to perform your job, compromise your judgment when acting on behalf of the company or otherwise conflict with the best interests of Alberici; even the appearance of a potential conflict of interest should be avoided.

Examples of a conflict of interest include:

(i) using your position for personal gain, (ii) taking a business opportunity presented to or discovered by the company for yourself, (iii) making a purchasing commitment to a business involving a family member or in which you have a financial interest, or (iv) “moonlighting” or outside employment that gives the appearance you represent the company.

* + Employees are to protect and use company property, such as computer and communications gear, tools, construction equipment, buildings, databases, brand names and service marks, for business purposes only. All information transmitted, stored or received using electronic equipment is considered a business record of the company and is subject to inspection, monitoring and disclosure at any time.

## Outside Relations

* + We deal fairly and honestly with our customers, subcontractors, suppliers, competitors and partners, and improperly obtaining or disclosing trade secrets of such parties is unacceptable. For further guidance on dealing with subcontractors and suppliers, see our Subcontractor Fairness Doctrine.
	+ Alberici adheres to antitrust laws that prohibit agreements between competitors to (i) engage in bid rigging or otherwise fix prices and other contract terms, (ii) allocate customers, territories, markets or contracts, (iii) limit production or fix quotas, (iv) boycott a customer or supplier, or (v) collude to restrain or restrict competition in the market. Employees are not to discuss prices, contract terms, marketing plans and similar matters of a competitive nature with others outside the company except in limited situations for a lawful purpose.
	+ Entertaining clients and partners is an acceptable business practice, provided any gifts, meals and entertainment are reasonable, have a business purpose and do not compromise (or appear to compromise) the ability to make objective business decisions based on sound judgment. A gift of cash or cash-equivalent is never acceptable. The same principles apply when an employee is presented with such courtesies from a subcontractor, supplier or partner.
	+ Alberici will, as permitted by law, selectively participate in political activities that directly impact the company’s welfare and operations, but will not apply any pressure on any employee to make a financial contribution or otherwise support a political party, candidate or cause. Employees are encouraged to participate in the political process on their own time with their own resources but may not give or offer Alberici funds or assets for political purposes. In no event should a political contribution be made in exchange, directly or indirectly, for any favorable action by a Government official – such contributions could be construed as a bribe.

## Government Contracting

* + Doing business with a Federal, State or Municipal Government Agency involves a unique framework of regulations, contract requirements and administrative practices. What may be considered acceptable in the private, commercial world may be prohibited or regulated in the public, government world and potentially lead to criminal and/or civil sanctions against the company and individual employees. Government contracts may have special accounting, administrative, billing, quality control and assurance, record-keeping and reporting/disclosure requirements that must be understood and fully complied with. In addition, outlined below are some of those special requirements that generally apply when dealing with a Government Agency; however, these descriptions are not a substitute for keeping informed of changes to laws and seeking advice from the Legal Department if there is a question

as to what is appropriate.

* + What is considered normal custom in the private sector with respect to gifts, meals, entertainment and favors could be illegal when Government employees are involved. Government employees are generally prohibited from accepting, and you are prohibited from offering, anything other than a promotional company article of a nominal value (i.e. less than $20) or light refreshments during a business meeting. If a Government employee offers to pay for his refreshments, do not refuse. Even a simple gesture such as a shared ride to the airport may be a violation of these requirements. Regardless of the size of the gift, it is illegal to offer a gift with the intent to improperly influence Government action.
	+ It is illegal to either (i) offer or provide, or (ii) solicit or accept, either directly or indirectly, any bribe, kickback, commission or other illegal payment in order to improperly influence a Government contract or subcontract.
	+ Government solicitations and awarded contracts often contain more stringent requirements for protection of classified information that are to be clearly understood and adhered to.
	+ During a competitive procurement process until such time as the applicable contract is awarded, confidential information (including selection criteria and competitor information) obtained or received by Alberici, even if obtained inadvertently, should never be used unless the information was publicly available or officially provided by the Government.
	+ All time records (and for that matter, all information, records and reports prepared for the purposes of a Government contract) must be timely and accurately recorded in the proper accounts.
	+ On cost-reimbursable contracts with a Government Agency, certain costs identified in both the contract and applicable regulations are considered unallowable (i.e. alcohol, first-class travel, political contributions) and will not be reimbursed; otherwise, proper and reasonable costs incurred in connection with the performance of the work can be charged to the Government as an allowable cost. In addition, certain “overhead” type expenses may be allowable under a cost-reimbursement contract while others may not. Before allocating any time or cost to a particular category on a cost-reimbursement contract with a Government Agency, be sure it satisfies the applicable definition of “allowable” under the contract and regulations; any unallowable cost should not be billed to the Government.
	+ There are complex rules under which Alberici can recruit or hire a Government employee, including restrictions on the work these employees may perform and future interaction they may have with Government officials if hired by Alberici.

# APPLICATION OF THE CODE

Employees, officers and directors of Alberici are expected to read and understand the Code of Conduct and more importantly, recognize when to ask for help.

Reporting Violations

If you have questions concerning the Code of Conduct or believe there has been a violation of the Code of Conduct or any laws or regulations, you should refer such questions and violations to any one of the following:

1. your immediate supervisor;
2. a senior employee in the Human Resources Department
3. the Chief Compliance Officer; or
4. the Alberici Code of Conduct Hotline, which can be reached toll- free, 24/7 at 1(877) 739-4555 or by email hotline@alberici.com.

If you are not content with an answer or explanation you receive from your supervisor, you can escalate your question or concern at any time to the Chief Compliance Officer or the Hotline. With respect to the Hotline, although investigations are generally more successful if callers identify themselves, you are not required to identify yourself. Alberici is committed to maintaining confidentiality to the maximum extent possible under the circumstances and within the objectives of the Code of Conduct. Furthermore, retaliation against an employee, officer or director for raising a question or reporting a concern in good faith will not be permitted, even if such concern proves to be unfounded. However, any abuse of the reporting procedures or the Hotline may be subject to disciplinary proceedings.

Investigation and Disciplinary Actions

Any reported violations of the Code of Conduct will be promptly investigated by the Chief Compliance Officer and subject to the confidentiality of your identity, your cooperation in the investigation will be expected. If the investigation reveals a violation of the Code of Conduct has probably occurred, appropriate disclosure, discipline and corrective actions will be instituted.

Employees, officers and directors who violate the Code of Conduct or any laws and regulations applicable to Alberici will be subject to disciplinary action, up to and including termination of employment. Committing a violation is unacceptable; failing to report a known or suspected violation is just as wrong and could equally result in discipline. Violations of a criminal nature may be forwarded to the appropriate authorities for prosecution.

Alberici takes compliance with policies, procedures, laws and regulations seriously. Adherence to the Code of Conduct is a condition of your continued employment. However, the Code of Conduct is provided as a standard of acceptable behavior, and is not a contract and doesn’t otherwise alter your at-will employment status with Alberici.