



## Vendor Code of Conduct

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### COMPLIANCE WITH THE VENDOR CODE OF CONDUCT

As established by its Code of Business Conduct and Ethics, ("Code") the Centuri Construction Group ("Centuri" and, with regard to Centuri and each of its subsidiaries, individually and collectively, the "Company") is committed to honesty, integrity, respect, and responsibility in connection with all business-related practices, and expects likewise of its vendors.

While vendors are independent entities from Centuri, the business practices and actions of a vendor can significantly impact and reflect upon our Company. Centuri thus expects all Company vendors and their employees, agents, and subcontractors ("representatives") to follow our high ethical standards set forth in this Vendor Code of Conduct ("Code"), while conducting business with us or on our behalf.

Each vendor and representative is responsible for understanding and fully adhering to Centuri's expectations, notifying a member of Centuri management if and when any situation develops in which the vendor or representative is operating in conflict with this Code. Compliance with the Code is required in addition to any other obligations in any agreement a vendor may have with the Company.

### LEGAL AND REGULATORY COMPLIANCE PRACTICES

All Company vendors shall conduct their business activities in full compliance with applicable laws and regulations while conducting business with and/or on behalf of Centuri, and shall, without limitation:

- Anti-Corruption: Observe all standards of conduct set forth in the U.S. Foreign Corrupt Practices Act ("FCPA") and all anti-corruption and anti-money laundering laws as may apply, fully complying with all such laws as well as laws governing lobbying, gifts and payments to public officials, political campaign contributions, and other related regulations. Vendors shall not improperly influence any act or decision of a public official, employee, or political candidate for the purpose of promoting the business interests of the Company in any respect, or) otherwise improperly promote the business interests of Centuri Construction Group in any respect.
- No officer, employee or agent of the Company has authority to offer, promise, make or



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facilitate the making of payments to a foreign official.

### **BUSINESS PRACTICES AND ETHICS**

Centuri's vendors shall conduct their business interactions and activities with integrity and shall, without limitation:

- **Business Records:** Vendors and their officers, employees and agents are obligated by this Code to keep records and accounts that truly, accurately and fairly reflect all transactions by or on behalf of the Company. Each vendor is responsible for creating, retaining, and disposing of business records in full compliance with all applicable legal and regulatory requirements.
- **Media:** Vendors may not speak on behalf of the Company unless authorized to do so in writing by the Company CEO.
- **Gifts:** Avoid gifts to Company employees, as even a well-intentioned gift (which is anything of value) might appear as though a bribe under certain circumstances, or appear to influence, compromise judgment, or otherwise obligate the Company employee, or create notions of a conflict of interest. This is not to ban such business courtesies as small tokens, meals, or entertainment for Company employees, however, all such courtesies should be consistent with local customer and practice, and shall be ethically-mindful, discrete and in moderation and, in all cases, compliant with applicable law and not in violations with the giver's and/or recipient's policies on the matter.
- **Conflicts of Interest:** Avoid even the appearance of improprieties or conflicts of interests. Vendors shall not deal with any Company employee, in the course of negotiations or performance of obligations; whose spouse, domestic partner, or other family member or relative holds a significant financial interest in the vendor.

### **LABOR PRACTICES**

- All Company vendors shall conduct employment practices in full compliance with all applicable laws and regulations, and shall, without limitation, cooperate with Centuri's commitment to lawful, harassment-free employment. We thus require our vendors not to engage in discriminatory hiring, compensation, access to training, promotion, termination, and/or



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retirement based on race, color, sex, national origin, religion, age, disability, gender identity or expression, marital status, pregnancy, sexual orientation, political affiliation, union membership, or veteran status.

### **HEALTH AND SAFETY**

Company vendors are expected to integrate sound health and safety management practices into all aspects of business, and shall, without limitation:

- Provide a safe and healthy work environment and fully comply with all safety and health laws, regulations, and practices including those applicable to the areas of occupational safety, emergency preparedness, and occupational injury and illness.
- Prohibit workplace use (or such use as may negatively affect workplace safety, efficiency and productivity) of alcohol and substances considered unlawful.

### **ENVIRONMENTAL REGULATIONS AND PROTECTION**

All Company vendors shall, without limitation:

- Comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste and wastewater discharges, including the manufacture, transportation, storage, disposal, and release to the environment of such materials.
- Adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances.



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### PROTECTION OF ASSETS AND INTELLECTUAL PROPERTY

All Company vendors shall, without limitation:

- Comply with all Company requirements and procedures for maintaining passwords, confidentiality, security and privacy as a condition of providing Company with goods or services or receiving access to the Company's internal corporate network, systems and buildings. All data stored or transmitted on Company-owned or -leased equipment is to be considered private and is the property of the Company, with all use of its network and systems (including email) and all data stored or transmitted thereon being subject to Company access and monitored.

### REPORTING QUESTIONABLE BEHAVIOR

If you wish to report questionable behavior or a possible violation of the Vendor Code of Conduct, you are encouraged to work with your primary Centuri contact in resolving your concern. If that is not possible or appropriate, please contact Centuri through any of the following methods:

- **Phone:** Company Compliance Officer at 1-623-582-1235
- **Email:** You may send an email to the Compliance Officer at [complianceofficer@nextcenturi.com](mailto:complianceofficer@nextcenturi.com)
- **Mail:** Send a letter to the Compliance Officer at Centuri Construction Group, Office of Chief Counsel, 2355 West Utopia Road, Phoenix, AZ 85027.

Centuri will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of this Vendor Code of Conduct.