

CODE OF CONDUCT

This Code of Conduct Policy applies to all SOLV Energy employees and its affiliated companies, herein referred to as "the Company", and its subcontractors, suppliers, and vendors. This Code of Conduct ("Code") defines basic standards for fair, safe, and healthy workplaces throughout the Company and our construction and supply-chain and is applicable to all parties who work for or do business with the Company. The Company is committed to meeting fundamental responsibilities in the areas of ethics, human rights, labor, safety, environment, and community, and it holds its employees and business partners to the same set of principles.

In addition to the Company, this Code holds the Company's subcontractors, suppliers, and vendors, including their respective supply chains to the minimum standards set forth in this document. From time to time, the Company is required to follow a project or owner-specific code of conduct or compliance program in addition to this Code. In each such case, the applicable owner and/or project-specific requirements will apply to the Company's business partners as well. The Company's employees are further subject to the SOLV Energy Employee Handbook and the Impact & Environmental Social and Governance ("ESG") Policy.

The expectations under this Code are as follows:

ETHICS

All parties are expected to act in accordance with the highest standards of business ethics and to avoid any appearance of impropriety. This includes, but is not limited to, the following:

- **Fraud, Deception, and Dishonesty.** No attempt to defraud, deceive, or engage in dishonest business practices will be tolerated.
- **Bribery and Corruption.** Business is conducted with integrity and no form of bribery or corruption will be tolerated.
- **False Claims.** It is a felony to knowingly make a false claim or false statement to the Government, and such conduct will not be tolerated.
- **Open and Fair Competition.** Open and fair competition is valued, and no violation of antitrust laws, competition laws, or related regulations will be tolerated.
- **Gifts, Gratuities, and Kickbacks.** Involvement with or giving of or receiving of gifts, gratuities, kickbacks, or payments that are in violation of the law is prohibited.
- **Conflicts of Interest.** Any relationship or activity that impairs the ability to make objective and fair decisions is avoided. It is the responsibility of any individual who knows of any activity that is in violation of laws, regulations, or contracts to report such activity promptly.



HUMAN RIGHTS AND LABOR

No party shall procure, manufacture, or subcontract for any service, product, or material for which forced or indentured labor, child labor, or other exploitation is used in its production. For purposes of this Code, “forced labor” shall mean all work (including services, products, or materials) which is exacted from any person by force or indentured labor or other exploitation, including child labor, under the threat of a penalty and in which such person has not offered themselves voluntarily (also known as modern slavery, indentured servitude, or human trafficking).

All parties must ensure that they and their sub-tier service providers, subcontractors, suppliers, and vendors, throughout the supply-chain, do not directly or indirectly use forced labor for any service or in the procurement or manufacture of any product or material, which is imported into the United States.

The Company expects cooperation in the implementation and execution of reasonable due diligence procedures for itself and its service providers, subcontractors, suppliers, vendors, and other participants with respect to their supply-chains. Parties must strive to uphold ethical and ESG standards, where each understands the risks and impacts associated within their supply-chain and works to mitigate those risks. Notify the Company promptly as soon as any breach, or potential breach, of obligations under this provision becomes known.

All parties are required to provide the following:

- A workplace that is free of abuse, bullying, harassment, and discrimination.
- Employment that is voluntary and only offered to persons over the age of 16.
- Working hours that are not deemed excessive by definition of the law.
- Compensation of employees in a timely manner, following applicable state and federal laws.
- To the extent permitted by law, respecting employees’ right to freedom of association and collective bargaining.

ENVIRONMENTAL AND CULTURAL RESPONSIBILITIES

The Company is committed to consider sustainability in everything we do and take our environmental and cultural responsibilities seriously. We expect the same from those engaged in our work. All parties agree to protect human health, the environment, and cultural artifacts by meeting applicable regulatory requirements, favor the use of non-hazardous products and materials, promote the adoption of renewable energy, reduce energy and fuel consumption, minimize waste, and choose recycled and reclaimed materials whenever possible.



SAFETY

The Company's goal for every project we build or operate is zero injuries. We expect prompt reporting of safety issues and believe that by doing so, we significantly reduce the risk of accidents, injury, and illness. In addition to the project-specific safety programs for each project, all parties are required to ensure an injury-free workplace by adhering to the following general principles:

- Develop and maintain safety programs and procedures that meet or exceed federal, state, and local laws, regulations, and standards.
- Ensure employees are properly trained and provided with the proper equipment to perform safe work.
- Encourage employees to stop unsafe work.

SECURITY

The Company's is committed to providing a workplace that minimizes security threats and acts of violence wherever possible. All parties are expected to follow the Company's Workplace Violence Prevention Plan ("WVPP") and contribute to updating the WVPP when opportunities to improve security measures are identified.

The purpose of the WVPP is to:

- Provide mechanisms for employees to report violent incidents, threats, or concerns, and outline the Company's response to such reports.
- Reinforce the prohibition against unlawful retaliation for good-faith reporting of incidents and participation in investigations.
- Outline procedures for responding to workplace violence emergencies.
- Detail training requirements and frequency regarding the WVPP.
- Describe procedures to identify and evaluate workplace violence hazards.
- Communicate post-incident response and investigative processes.

DIVERSITY, ANTI-HARASSMENT, AND ANTI-DISCRIMINATION

The Company is an equal employment opportunity (EEO) employer, committed to the implementation of fair employment practices. In accordance with our Affirmative Action Program (AAP) and applicable law, we prohibit discrimination against any applicant or employee based on any legally recognized basis and we promote diversity as a valued strategic initiative.

The Company is committed to maintaining a work environment free from harassment, discrimination, and retaliation. This includes verbal and physical harassment, unwelcome sexual advances, and derogatory remarks or actions based on ethnicity, race, sex, or other protected characteristics. The Company's anti-harassment policy applies to all persons involved in its operations, regardless of their position or location.

As part of the Companies AAP and its Impact & ESG policy, the Company requires all parties to make



efforts to maximize opportunities for minority, women-owned, and disabled veteran business enterprise participation in all purchasing and contract business.

REPORTING

The Company provides free, unlimited access to a third-party confidential and optionally anonymous incident reporting system, *AllVoices*. This beneficial service is available 24 hours a day, 7 days a week online <https://solvenergy.AllVoices.co/> and is accessible via the company's internet "the Grid" on the People Operations (HR) page, or via toll-free number, 866.357.5095.

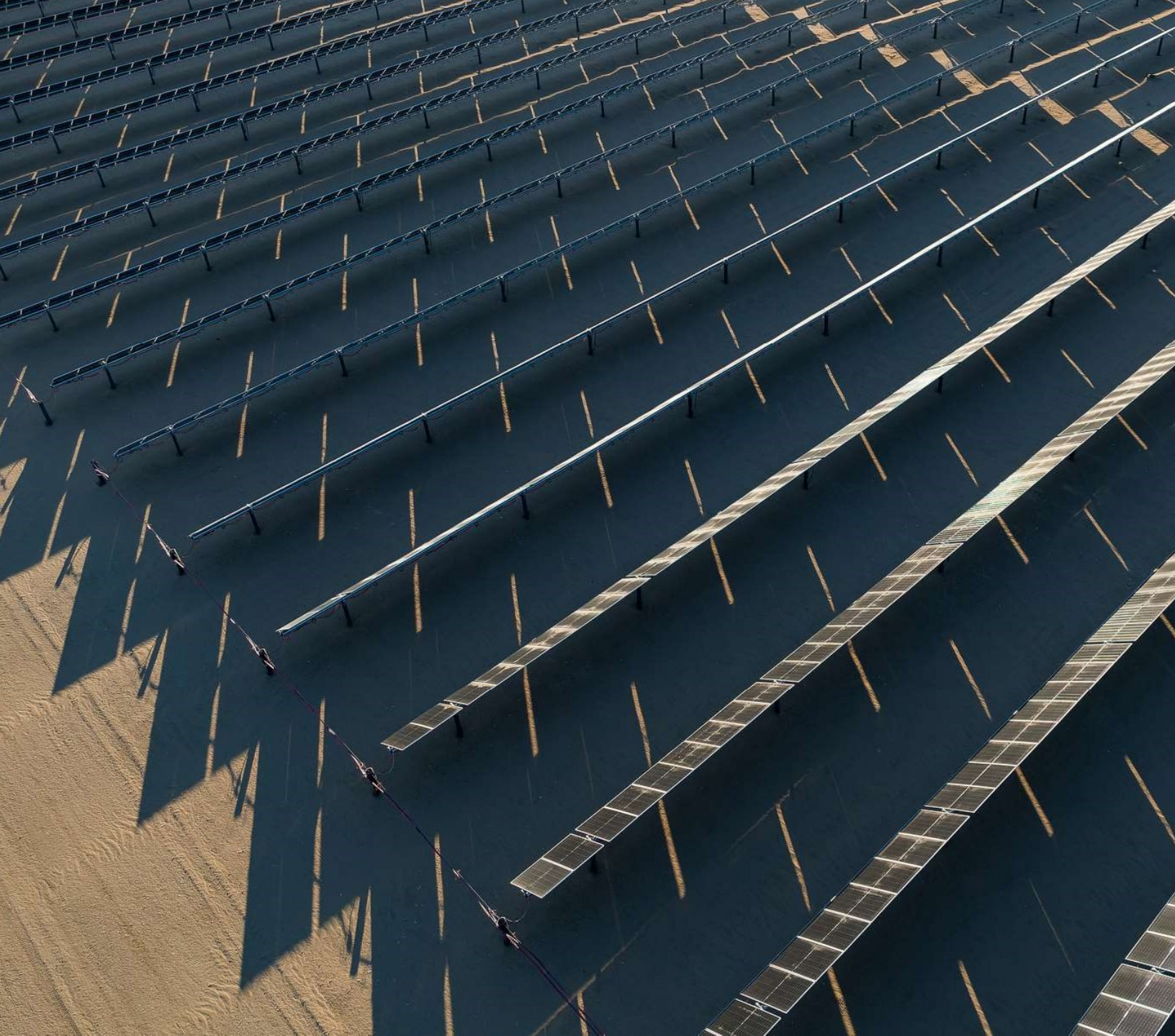
The reporting of violations is particularly important and the Company will investigate timely any reported misconduct that comes to our attention. It is the Company's intention to voluntarily disclose misconduct involving or affecting our company or its operations. By disclosing such issues, the company aims to demonstrate its commitment to transparency, ethical practices, and accountability from reports. The Company will not tolerate retaliation or discrimination against anyone who has raised an issue in good faith.

Employees who feel they need to make a report can refer to the company's Whistleblower Policy found in the Company's Employee Handbook and on the People Operations (HR)'s Whistleblower Grid page.

CONTROLS, MONITORING, AND ADDRESSING NON-COMPLIANCE

Violating this Code may result in disciplinary action or termination of ongoing relationships, including the termination of employment status, specific contracts, and/or legal action. All parties (subcontractors, suppliers, and vendors) are responsible for ensuring that their employees understand and comply with this Code. The Company reserves the right to monitor and audit those who are subject to this Code at any time to ensure that these responsibilities are being honored.

The Company will periodically review and evaluate this Code and the Company Employee Handbook to revise or adjust these documents as deemed necessary. All parties are subject to the latest version of the Code as posted on the Company website, at any given point in time.



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