



## SOLV ENERGY'S CODE OF CONDUCT

10/17/23

The SOLV Energy's ("SOLV") Code of Conduct ("Code") defines basic standards for fair, safe, and healthy workplaces throughout our company and our construction and supply-chain and is applicable to all parties who work for or do business with SOLV. SOLV 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 SOLV, this Code holds SOLV's subcontractors, suppliers, and vendors, including their respective supply chains to the minimum standards set forth in this document. From time to time, SOLV is required to follow a Project or Owner-specific code of conduct or compliance program in addition to this Code of Conduct. In each such case, the applicable Owner and/or Project-specific requirements will apply to SOLV's business partners as well. SOLV employees are further subject to the SOLV Energy National Employee Handbook and the Impact & ESG Policy.

The expectations under this Code are as follows:

### A. 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.



## **B. 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 either exported from or imported into the United States.

SOLV expects cooperation in the implementation and execution of reasonable due diligence procedures for themselves and their service providers, subcontractors, suppliers, vendors, and other participants to ensure transparency in their supply-chains. Parties must strive to uphold ethical and environmental, social and governance (“ESG”) standards, where each understands the risks and impacts associated within their supply-chain and works to mitigate those risks. Notify SOLV promptly as soon as any breach, or potential breach, of obligations under this provision become 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.
- To the extent permitted by law, respecting employees’ right to freedom of association and collective bargaining.



### **C. SAFETY**

SOLV'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.

### **D. ENVIRONMENTAL AND CULTURAL RESPONSIBILITIES**

SOLV is committed to consider sustainability in everything we do and take our environmental and cultural responsibilities seriously and expects 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, minimize waste, and choose recycled and reclaimed materials whenever possible.

### **E. DIVERSITY, ANTI-HARRASSMENT, AND ANTI-DISCRIMINATION**

SOLV 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.

SOLV is committed to providing a work environment that is free of harassment (which includes unwelcome sexual advances, as well as derogatory, ethnic, racial, or sexist remarks) and discrimination. SOLV's anti-harassment policy applies to all persons involved in its operations, regardless of their position or location.

As part of SOLV's AAP and its Impact & ESG policy, SOLV requires all parties to make every effort to maximize opportunities for minority, women-owned, and disabled veteran business enterprise (MBE/WBE/DVBE) participation in all purchasing and contract business.



## **F. REPORTING**

The reporting of violations is particularly important to SOLV and SOLV will timely investigate any reported misconduct that comes to our attention. It is SOLV's intention to voluntarily disclose misconduct involving or affecting our company or its operations. SOLV will not tolerate retaliation or discrimination against anyone who has raised an issue in good faith.

SOLV is providing free, unlimited access to a third-party anonymous and confidential incident reporting system, MySafeWorkplace. This beneficial service is available 24 hours a day, 7 days a week via toll-free number, 800-461-9330, or the internet at [www.MySafeWorkplace.com](http://www.MySafeWorkplace.com).

## **G. CONTROLS, MONITORING, AND ADDRESSING NON-COMPLIANCE**

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

SOLV will periodically review and evaluate this Code of Conduct and revise or adjust as deemed necessary. All parties are subject to the latest version of the Code of Conduct as posted on the SOLV Energy website, at any given point in time.