



CODE OF CONDUCT

2026

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A MESSAGE FROM THE CEO

Dear Team,

The commitment, support and actions our team have enabled FlatironDragados to become a trusted provider of innovative solutions to infrastructure challenges across the United States and Canada. Trust is the foundation of any positive relationship. And trust is what the Code of Conduct is all about.

We are more than a construction company. We're an organization of people with diverse backgrounds and varied expertise who share a single focus on enhancing the well-being of people and communities. We rely on each other to make good decisions, to behave appropriately, to do the right thing. This is how we build trust within the company and with the project owners, construction partners, suppliers and others with whom we work.

It is essential that we remain committed to the values that have shaped our success: Safety, Excellence, Integrity, Accountability, and Teamwork. Our Code of Conduct reflects these values and guides how we interact with each other, our clients, and the broader community.

The Code is not just a set of rules; it represents our collective commitment to doing what is right. It outlines our expectations for ethical behaviour, transparency, and professionalism, ensuring a positive and inclusive work environment. Every decision we make should align with these principles.

The Code of Conduct provides guidance for each of us regarding actions, decision-making and appropriate behaviors. It mandates that we follow the law and challenges us to exceed established regulations whenever possible. Most importantly, it reminds us to do the right thing—always.

Take time to read and understand the Code, the expectations we have for all employees, how it applies to your job, how the Code guides your dealings with vendors and contractors, as well as your interactions with colleagues.

If you have any questions or face a situation where the right course of action is unclear, please reach out. Our leaders are here to support you.

Thank you for your commitment to these values and your ongoing contributions to our success.

Sincerely,

Javier Sevilla
Chief Executive Officer

I. OUR CORE VALUES

At FlatironDragados, our core values are the foundation of our success. Every decision, project, and relationship are guided by these principles, steering us toward a shared purpose. As a member of our team, you are expected to embody and uphold these values in all aspects of your work. Our core values are:

Our Core Values

At **FlatironDragados**, we are driven by a steadfast commitment to our core values, which guide our actions, shape our culture, and drive us toward a future of sustainable growth and shared success with our employees, clients, partners and communities.



Safety

- Our commitment to safety is unwavering.
- Our priority is the well-being of our employees, clients and communities.
- Safety is the foundation for every decision and action for promote a secure and healthy environment.



Excellence

- We strive for excellence in all that we do.
- Our commitment to high standards motivates us to continuously improve our processes.
- Innovation allows us to deliver exceptional value to our employees, clients, partners and the communities where we operate.



Integrity

- Our commitment to integrity is reflected in the daily actions of our employees, who embrace the highest ethical standards.
- Our priority is honesty and transparency in all business activities, ensuring that doing the right thing is at the forefront of all our actions.
- These commitments enable us to build trusted relationships with our respective stakeholders.



Accountability

- We hold ourselves accountable for our actions, decisions and outcomes.
- By taking responsibility, we empower our team members to deliver results and learn from experiences — driving personal and organizational growth.



Teamwork

- Teamwork is essential to our ongoing success.
- We cultivate a collaborative, inclusive and respectful work environment with employees, clients and our partners.
- By working together, we harness our collective strengths to overcome challenges and achieve shared goals.

II. UNDERSTANDING OUR CODE

Why do we have a Code?

At FlatironDragados, we are dedicated to maintaining the highest ethical standards in all aspects of our business. We strive to foster a work environment that encourages productivity, collaboration, respect, and accountability. Our employees and business partners are expected to conduct themselves with professionalism, integrity, and uncompromising ethics in alignment with our core values: Safety, Excellence, Integrity, Accountability, and Teamwork.

The Code of Conduct serves as a guide for navigating situations where the right course of action may not be immediately clear. It is designed to help you uphold both your personal reputation and that of the Company, ensuring that every decision reflects our commitment to these core values.

This Code also provides an overview of key compliance policies, highlighting areas with significant legal and ethical implications. Offering guidelines for appropriate action helps mitigate risks and promote responsible decision-making. A collective understanding of, and adherence to, the Code and other policies are essential to our growth and success.

What does the Code expect from employees?

All employees are accountable for reading, understanding, and following our Code and applying good judgment that is consistent with it. The Company has developed an ethics and compliance training program to educate employees on our Code and its requirements.

All employees are required to abide by the Code and all other policies, procedures and practices at all times as a condition of and throughout their employment. The Code also seeks to hold subcontractors, suppliers and other business partners who do business with us to the same high standard. The main values of this Code are also reflected in the ACS Code of Conduct for Business Partners¹, which is applicable to FlatironDragados's relations with business partners through its inclusion in their contracts.

This Code is also applicable to those individuals who act within and before other entities in the name and on behalf of the Company. These persons must adhere to and promote the application of the principles contained herein.

Employees are expected to participate in and certify understanding of all required training. Employees are encouraged to seek guidance from appropriate resources if they have general or situational questions. If at any time you believe a violation of the Code has occurred, whether you experience it directly or learn about it, you are required to report it immediately through the channels specified in this Code. Employees who fail to comply with our Code, including those who fail to report Code violations, may face disciplinary action, up to and including termination.

¹ https://www.grupoacs.com/ficheros_editor/File/05_Compliance/Pol%C3%ADticas/1_a_C%C3%B3digo%20de%20Conducta%20para%20Socios%20de%20negocio_ENG.pdf

What does the Code expect of managers?

Being a manager comes with added responsibility. Managers are expected to lead with integrity and model behavior consistent with our Code. As a result, managers are expected to:

- Promote Code awareness and compliance in daily interactions with employees.
- Set a model example of integrity and ethical conduct.
- Ensure those who report to you know and understand what is expected of them.
- Support time needed to provide training and resources to aid employees in complying with the Code and other Company policies.
- Encourage employees to speak up if they have questions or concerns.
- Be aware of and address any misconduct on your teams in a timely manner, escalating to appropriate resources when necessary.
- Never tolerate retaliation in any form against individuals who report concerns, come forward, or participate in investigations in good faith.

How can I know what is right?

The Code represents a summary of some important ethical guidelines and is meant to provide a broad and clear understanding of the conduct that we expect. However, it is not all-inclusive and cannot predict every situation nor list every requirement. Sometimes, the difference between right and wrong is black and white. But other times, there are many shades of gray, and this can make it more complicated to know exactly what's right.

If you're unsure about the right course of action and don't find the answer you need in the Code, stop, think and ask:



If the answer to any of these questions is unclear or if you feel uncertain about your response, you must seek guidance from or the Human Resources, Legal or the Compliance Department.

Why Is It Important to Speak Up and Report Concerns?

Upholding our ethical standards is a collective responsibility. When we encounter potential issues related to integrity or misconduct, it is important to speak up. Reporting concerns helps prevent problems from escalating, ensuring a transparent and ethical work environment. By raising concerns, we protect the Company's integrity and foster a culture of trust and accountability. If you reasonably believe that something might put the company at risk, even if you do not have all the details, you should raise the concern. The reporting process is clearly outlined in this Code, with multiple reporting channels, including the reporting line, managed by an independent third-party provider, which allows for maintaining anonymity. Retaliation against individuals who report concerns in good faith is strictly prohibited, ensuring that everyone can speak up without fear of negative consequences.

III. OUR ETHICAL FOUNDATIONS

1. ADHERING TO LEGAL STANDARDS

We have a duty to comply with all laws, rules, and regulations that are applicable to our business and all the locations where we operate. If you are unsure about the legal impact of an action, please contact the Compliance Department.

a. Anti-bribery and Anti-Corruption

The Company maintains a strict zero-tolerance policy towards corruption and bribery. We are committed to complying with all anti-bribery and anti-corruption laws. The Company strictly prohibits the giving, offering, promising or accepting offers, promises or acceptance of financial or non-financial means in the form of bribes, kickbacks, or things of value, regardless of local practice or perceived customs, for the purpose of obtaining or retaining business or any other business advantage.

A "thing of value" refers to anything that may hold value to the recipient, including but not limited to cash, gifts, meals, entertainment, employment or business opportunities.

- **Bribery** can involve either public officials or private individuals.
- **Kickbacks** are illegal payments made in exchange for improper business advantages and are often a form of corruption involving government officials or third parties.
- **Payment** includes any money, fees, commission, credit, gift, gratuity, thing of value or other form of compensation, as well as the inclusion of kickback amounts in contract prices.
- **Recipients** of such illegal payments may include government officials or employees, prime contractors, prime contractor employees, subcontractors and subcontractor employees.
- Both attempted and successful payments are prohibited.

No employee may secure or attempt to secure undue benefits for business partners, their employees or other third parties from any form of business activity. Employees should not accept anything of value, including personal gifts, arising from a business relationship if it could reasonably be

perceived as influencing or impacting business decisions and/or transaction, or negatively impacting the Company's reputation.

Additionally, the prohibition of any form of bribery or corruption also applies to all third parties who act on our behalf. We must never engage with or allow a third party or business partner to offer, give, promise or accept a bribe of any type, as you and the Company may be held responsible for their actions.

Special caution must be exercised in interactions with government officials, as such dealings are often governed by stricter regulations. Employees are prohibited from offering anything of value to government employees or officials—whether directly or indirectly through intermediaries.

The Company upholds political neutrality. Contributions, donations, gifts, or sponsorships to political parties, political candidates, or political action committees are strictly prohibited under our policies.

Finally, you should recognize that offering or receiving a kickback presents an inherent conflict of interest between you and the Company. We take conflicts of interest disclosures and due diligence efforts in all procurement steps seriously.

b. Anti-Money Laundering

The Company does not participate in active or passive money laundering. All employees must stay vigilant to any evidence of a lack of integrity by natural and legal persons with whom we contract. For more information, please refer to related Company policies.

c. Contacts or Requests by Government

If you are contacted by any domestic or foreign government agency about the Company and/or any related business, you must report the contact to the Legal Department. This includes being subject to audit, being subpoenaed, interviewed or questioned by any government agency, even if their inquiry addresses our business partners, subcontractors, vendors or current and former employees. You also must report if you are aware of or believe a business or agency associated with the Company was contacted by a government agency.

2. PROMOTING STRATEGIC AND FAIR COMPETITION

The Company has zero tolerance for anticompetitive activities of any kind, whether these activities are engaged in by FlatironDragados employees or by third parties acting on behalf of FlatironDragados. Competition laws, known as antitrust laws, are designed to protect the free market and encourage competition. They control how we can compete in the market and aim to stop unfair business practices. In general, antitrust and competition laws prohibit competitors from working together to restrain competition and disallow efforts to monopolize markets or arrange prices. Antitrust and competition laws apply to both corporations and individuals; they can be violated by both corporations and individuals. Violating, or even the threat or appearance of violating, these laws can have very severe consequences, including civil and criminal penalties. Overall, antitrust laws prohibit unreasonable restrictions on competition. Therefore, your best course of action is to engage in conduct that provides for vigorous and fair competition against our competitors and reasonable treatment of our business partners. Employees shall not engage in any

form of agreements, whether formal or informal, with competitors that may adversely affect competition or customers. This includes activities such as bid rigging, price fixing, allocations of customers, territories or contracts, output restrictions, and agreements to fix the terms of employment or to not hire each other's employees.

Competition - Do's & Don'ts

Do	Don't
<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Honest Competition. Accurately describe and sell on the basis of quality and value. <input checked="" type="checkbox"/> Honor Agreements. Pay attention to existing agreements and legal obligations. <input checked="" type="checkbox"/> Protect Secrets. Respect and protect all Company trade secrets. Be cautious when disclosing commercially sensitive information and check with appropriate FlatironDragados individuals prior to disclosure. Be careful when interacting with competitors in connection with joint ventures, trade organizations and Benchmarking. <input checked="" type="checkbox"/> Competitive Intelligence. Only collect, use and preserve competitive information in a legal and ethical manner. It is never acceptable to engage in illegal methods to obtain competitive intelligence. 	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Set Prices. Don't agree with competitors about prices. Avoid exchanging pricing or other competitively sensitive information with competitors. <input checked="" type="checkbox"/> Bid Rig. Never engage in any complementary, fraudulent or coordinated bidding with competitors, owners or business partners. <input checked="" type="checkbox"/> Allocate Markets or Customers. Never divide up territories with our competitors. <input checked="" type="checkbox"/> Boycott. Don't agree with competitors to exclude other competitors from the market. Never agree with competitors to boycott or refuse to deal with suppliers or customers. <input checked="" type="checkbox"/> Defame. Refrain from unfairly disparaging competitor products, personnel or services, either directly or indirectly. <input checked="" type="checkbox"/> Wage-fixing and no-poach agreements Don't engage in agreements or arrangements with other employers, whether or not they are competitors to FlatironDragados, to fix, maintain, decrease, or control salaries, wages, or terms and conditions of employment ("wage-fixing agreements"), or to non-solicit or hire each other's employees ("no-poach agreements"). Exceptions may apply in the case of joint ventures.

3. SAFEGUARDING HUMAN RIGHTS WITH DIGNITY AND RESPECT

FlatironDragados is fully committed to respecting and promoting human rights in all aspects of our operations. Every individual deserves to be treated with dignity, fairness, and respect, and we work to create an environment of equality and inclusivity. Any actions or behaviors that infringe upon human rights will not be tolerated.

Our dedication extends to protecting the rights of vulnerable groups and ensuring that all working conditions are safe, fair, and in full compliance with both international human rights standards and local laws.

We recognize that human rights violations can occur anywhere, and we provide clear channels for reporting any such incidents. Any suspected violation, whether observed within the Company or in its business relationships, must be promptly reported through the designated mechanisms outlined in this Code. For more information, please refer to the ACS Human Rights Policy.²

a. Modern Slavery and Human trafficking

FlatironDragados unequivocally rejects all forms of modern slavery, including forced labor, child labor, and human trafficking, and expects the same high standards from our clients, business partners, and suppliers. We are committed to preventing and addressing modern slavery throughout our operations and supply chain.

All employees are responsible for being vigilant in identifying and reporting any practices or conditions that may indicate the presence of modern slavery. This includes situations where individuals are coerced into work through violence, intimidation, or threats; controlled by an employer through mental or physical abuse; or forced to work to repay a debt. See related Company Modern Slavery Statements.

b. Respect for Minority Rights

The Company is dedicated to upholding the rights of Indigenous peoples; ethnic, religious, and linguistic minorities; individuals with disabilities; and migrant workers and their families. Our commitment to Human Rights goes beyond mere legal compliance; our corporate values align with international standards to protect the rights of minority groups in our company and the communities in which we work. We strive to create an inclusive and supportive environment that honors the diverse backgrounds and needs of all individuals, ensuring dignity, fairness, and respect for everyone.

c. Immigration Laws

FlatironDragados is fully committed to complying with all applicable immigration laws and regulations. We uphold the highest standards of integrity and diligence in ensuring that our workforce is authorized to work in the countries where we operate. The Company will never knowingly employ individuals who are not legally authorized to work, nor will it knowingly engage subcontractors who employ unauthorized workers. We require all prospective employees to provide accurate, complete, and truthful information, as necessary, to ensure compliance with immigration laws.

² https://www.grupoacs.com/ficheros_editor/File/05_Compliance/Pol%C3%ADticas/4_Politica%20Derechos%20Humanos_EN.pdf

d. Equal Employment Opportunity

USA: We provide equal opportunities in all aspects of employment. We prohibit discrimination based on race, color, sex, national origin, ancestry, age, religion, disability, sexual orientation, gender identity, gender expression, genetic information, military and veteran status, marital status, pregnancy or any other characteristic protected by law. In addition, FlatironDragados complies with all applicable local, state and federal anti-discrimination laws.

Canada: Conduct that is contrary to applicable federal or provincial human rights legislation is prohibited. Canadian legislation covers varying areas of prohibited grounds of discrimination in each provincial jurisdiction and includes race, color, ancestry, place of origin, ethnic or linguistic background, political belief/convictions, religion or creed, marital status, family status, social condition, source of income, physical or mental disability, sex including pregnancy, sexual orientation, gender, age, criminal record or summary conviction offense unrelated to the employment or intended employment of that person, and actual or presumed association with any of these grounds.

e. Harassment-Free Workplace

FlatironDragados supports a workplace that is free from unlawful harassment of any kind and strictly prohibits anyone from encouraging, condoning or otherwise permitting harassment. Unwelcome conduct that could create an intimidating, hostile or offensive work environment has no place at FlatironDragados.

Harassment based on protected characteristics such as race, color, sex, national origin, ancestry, age, religion, disability, sexual orientation, gender identity, gender expression, genetic information, military and veteran status, marital status, pregnancy or as otherwise prohibited under applicable law or human rights legislation, will not be tolerated and is strictly prohibited.

f. Sexual Harassment

The Company does not tolerate sexual harassment or inappropriate sexual conduct of any kind. Employees are strictly prohibited from sexually harassing others. This prohibition applies not only to employee actions but also to conduct between employees and others with whom employees have regular business contact.

g. Workplace Bullying

FlatironDragados prohibits bullying of any kind. Bullying is inappropriate behavior or assertion of power intended to intimidate that could mentally or physically hurt or isolate a person, whether verbal, physical or otherwise.

h. Retaliation

Under no circumstances will FlatironDragados tolerate any direct or indirect retaliation against an individual who reports in good faith a suspected Code violation, raises concerns, seeks guidance about an issue, or cooperates in an investigation of potential misconduct. Allegations of retaliation will be thoroughly investigated and may result in disciplinary action, up to and including termination.

4. PROTECTING OUR EMPLOYEES AND THE WORKPLACE

Safety and security are top priorities. A successful work environment goes hand-in-hand with a safe and secure one.

a. Anti-Violence Policy

FlatironDragados will not tolerate any intimidation, threats or acts of violence in the workplace. Our prohibition of violence also extends to owners, subcontractors, vendors, business partners and others who interact with our employees. You should immediately report any behavior that may constitute a potentially violent situation.

What constitutes violence?

- Physical and/or verbal intimidation
- Threatening or violent conduct or remarks
- Vandalism, sabotage or arson
- Use of weapons and/or carrying weapons onto Company property

b. Physical Safety

The Company considers employee safety and health to be one of our highest priorities. We provide a safe work environment that preserves the health and safety of our employees. When we are working, we all need to exercise an appropriate level of care, understand and comply with established safe work practices, and observe appropriate safety precautions. The Company complies with all health and safety laws, and all employees are responsible for adhering to each. For more information, please refer to related Company policies. If an employee has any safety-related concerns, they should report them immediately to the appropriate resources or through one of the channels specified in this Code.

Q&A

I noticed a co-worker not wearing proper PPE while working. When I mentioned it, they dismissed it, saying they'd finish the task before putting on the PPE. What should I do?

Safety is our top priority. Not following safety procedures can lead to serious injuries or even death. It also violates the Code and could lead to disciplinary actions, including termination, and legal penalties for the Company. You should report this immediately so it can be addressed properly.

c. Drug- and Alcohol-Free Workplace

FlatironDragados believes that maintaining a drug- and alcohol-free workplace and minimizing work related accidents are crucial steps to ensuring that employees, contractors, subcontractors and the families and communities that depend on them remain safe.

FlatironDragados prohibits the use, manufacture, sale or possession of alcohol, narcotics, illegal drugs or controlled substances while working on Company property, or jobsite. These behaviors are prohibited and are subject to disciplinary action, up to an including termination. Employees are prohibited from reporting to work or being at work while under the influence or effects of alcohol, narcotics, illegal drugs or controlled substances.

5. AVOIDING CONFLICTS OF INTEREST

A conflict of interest occurs when an employee's personal interests interfere with their ability to make impartial decisions in the best interest of the Company. Even the appearance of a conflict can undermine trust and damage the Company's reputation. To ensure the Company's continued success, we must always act with integrity, prioritizing its interests over personal considerations. Both actual and perceived conflicts must be avoided, as they can be equally harmful. All conflicts, whether real or perceived, must be reported promptly through the channels specified in this Code, including the link provided on our intranet. Employees owe a duty of loyalty to the Company, meaning all business decisions and actions should be made in the Company's best interests and free from personal interest. Company assets must be safeguarded from misuse, abuse, or theft, ensuring that our business decisions are driven solely by sound judgment and the Company's goals, free from any outside or personal influences.

a. Personal relationships at the workplace

When doing business for FlatironDragados with outside vendors or subcontractors, where a relative is employed or has a financial interest, the FlatironDragados employee must disclose the relationship. Employees must disclose at time of hire, annually, or whenever there is a change in relationship or working status. The FlatironDragados employee should not participate in any activity or decision which involves a relative or a relative's employer or could be perceived as favoritism. However, it is not unusual for employees to have relatives, significant others, friends or non-related members of your household who also work in other parts of the Company or the industry. By and large, this does not result in conflict. But sometimes, situations in this area can be troublesome. To ensure the absence of an actual or perceived conflict of interest, we have established guidelines covering relationships in the workplace.

Relatives include but are not limited to the husband, wife, spouse, domestic partner, father, mother, father-in-law, mother-in-law, grandfather, grandmother, son, son-in-law, daughter, daughter-in-law, uncle, aunt, nephew, niece, brother, sister, brother-in-law, sister-in-law, step-relatives, half-relatives. No preference will be given to any relative or family member, and all business decisions will be made in the best interests of FlatironDragados.

If an employee intends to conduct business on behalf of the Company with an organization where a relative is employed, they must immediately disclose this relationship and seek approval through the Compliance Department. It is important to note that the employee cannot have any decision-making authority concerning the Company.

This policy also extends to practices that involve employee hiring, promotion and transfer. Relatives and those in a dating relationship or members of the same household are not permitted to be in positions that have a reporting responsibility to each other.

If employees begin dating or become relatives, partners or members of the same household, the employees are required to disclose the relationship via one of the disclosure methods available: either through the disclosure link located on the intranet or through one of the channels specified in this Code.

FlatironDragados reserves the right to apply this policy to situations where there is a conflict or the potential for conflict because of the relationship between employees, even if there is no direct-reporting relationship or authority involved.

b. Outside employment or activities

All employees are judged by the same performance standards and will be subject to FlatironDragados's scheduling needs, regardless of any requirements of outside work or activity. If outside work or activities interfere with your performance or ability to meet the requirements of your job, you may be asked to terminate either the outside work or activities or your job with the Company. Further, you may not receive any compensation from outside sources for work performed in connection with your job with FlatironDragados.

In addition, except with prior approval, outside work interests or activities such as those noted above (whether political, charitable, personal or otherwise) should not:

- Be done during work hours, when an employee should be devoting his/her efforts to job responsibilities for FlatironDragados;
- Adversely affect the quality of the employee's work or have a potential impact on the employee's business decisions;
- Involve any use of FlatironDragados equipment, facilities, or supplies; and
- Imply FlatironDragados's sponsorship or support (for example, through the use of FlatironDragados's stationery for personal purposes).

An actual or potential conflict of interest may occur when you are in a position to influence a decision that may result in a personal gain for you or for a relative or when you act against the interest of FlatironDragados, including violations of confidentiality.

It is impossible to describe every situation that may result in a conflict of interest. If you have questions concerning a possible conflict of interest, you should request advice from the Compliance Department or Human Resources.

c. Investments in other companies

FlatironDragados employees may buy stock or hold investments in other companies. If an employee, however, holds a substantial interest in a competitor, business partner, customer or vendor, there may be a conflict between FlatironDragados's interests and the employee's financial interest, and it should be disclosed for review. Prohibited investments that would rise to the level of an actual conflict of interest include investing in a competitor, business partner, customer or vendor if, through your position with FlatironDragados, you have access to any material, non-public information or may be able to influence FlatironDragados's decision to do business with the competitor, business partner, customer or vendor.

d. Gifts and Entertainment

When you consider giving or accepting gifts, gratuities, favors or entertainment, keep in mind that perceptions matter. Even if you think that a particular gift is not improperly influencing your business judgment or the judgment of a competitor, business partner, customer or vendor, others might have a different perception and affect the Company's and your reputation. Gifts or entertainment must not be accepted where doing so might result in an obligation or the appearance of an obligation to conduct business in a manner other than an independent relationship.

Bribes, payoffs, kickbacks or trades out of service are prohibited. You must never give or accept gifts, favors, gratuities or entertainment to or from any competitor, business partner, customer or vendor other than gifts or entertainment of insignificant or nominal value, such as Company logo items, which is consistent with ordinary business courtesy or practice and that are provided in connection with the promotion or demonstration of FlatironDragados's products and services.

Regardless of the amount, employees must disclose any gift or entertainment through the link on the FlatironDragados intranet. The total cumulative value of all gifts, presents, favors, or attentions given or received from the same third party must not exceed the Company threshold within a calendar year.

Further, you may never accept or give cash or cash equivalents, including gift cards, debit cards or gift certificates, unless it is pursuant to a program that has been approved by FlatironDragados Compliance Department.

Business meals among business partners are permitted, provided that the costs are reasonable (per FD Travel and Expense Policy) and there is no intent to unduly influence or gain unfair advantage.

Business meals with current or potential subcontractors, suppliers, or vendors are permitted, provided that the costs are reasonable (per FD Travel and Expense Policy), the meals do not create the impression that they are required to maintain a contractual relationship, they are infrequent, and the intent of the meal is of a business nature not a social nature.

However, lavish entertainment or substantial favors must not be offered or accepted. If you are unsure about accepting or offering a gift or favor, please consult with FlatironDragados Compliance Department.



What should I consider before accepting entertainment?

- Is the entertainment being offered in the normal course of our business?
- Will a representative of the business partner, customer or vendor be attending?
- Is the entertainment taking place at a location and in a manner that does not violate any other provisions of the Code or risk damaging your or FlatironDragados's reputation? For example, adult entertainment is never acceptable.
- FlatironDragados has pending business with the business partner, customer, or vendor?

If you cannot answer "yes" to all of these questions, you should request guidance.

e. Political Activities

All FlatironDragados employees are free to make political contributions, support candidates, parties, or organizations, and advocate for causes so long as they do so in their own name and not on behalf of FlatironDragados or using FlatironDragados funds. Political contributions made on behalf of the Company or with the Company assets are prohibited. Contributions made by certain level employees and officers in their personal capacity may be required to be disclosed on government disclosures and bid documents.

f. Donations, Sponsorships and Charitable Activities

Any contributions of Company funds or in-kind donations to charitable or community service organizations, as well as support for local activities, must be approved in accordance with our internal policies. Sponsorships and donations should not be used to bypass the provisions of this Code of Conduct.



Q&A

- **Can I take a part-time job?**

Avoid jobs that may conflict with your work at FlatironDragados. Don't use FlatironDragados resources or time for other work, and don't work for a competitor. Any secondary employment must be disclosed via the conflict-of-interest disclosure form.

- **Can I help a friend/family member get a job at FlatironDragados?**

Many FlatironDragados employees know great candidates for employment and FlatironDragados welcomes referrals. However, If the position is in your division and/or function and you sit in a managerial or supervisory role, directly or indirectly, you may not participate in the hiring process or participate in interviews. In this instance, your close friend or relative should not apply for the role and should not be selected for the position.

- **Can I date a co-worker?**

Yes, but relationships must not present an actual or perceived conflict of interest. All relationships must be disclosed via the conflicts of interest form. To avoid business interruption or distraction, coworkers in an intimate relationship cannot report to the same direct manager. Managers can't have relationships with subordinates.

- **Can I run for a local political office?**

Possibly. If the position relates to FlatironDragados's interests, it may create a conflict. You must disclose your intentions to run in advance. If your run is successful, there are additional rules and restrictions that will apply.

- **Can I accept invitations to business meetings, golf, and dining, including travel expenses from a business partner?**

Avoid accepting paid travel or accommodations. If the trip is for business, FlatironDragados should pay for it. You may accept reasonable entertainment if there is no ongoing contract negotiation and FlatironDragados is not engaged in any bid process. All gifts and entertainment must be disclosed and be approved prior to receipt. Employees can use the gifts and entertainment link or reach out for guidance from the Compliance Department.

6. PROTECTING OUR ASSETS AND USING TECHNOLOGY APPROPRIATELY

We are all responsible for protecting FlatironDragados's physical and intangible resources to ensure our continued success. To this end, we have a duty to protect our physical and financial assets from damage, misuse, theft, fraud, waste or abuse. We also have a duty to protect all confidential and proprietary information. This information gives FlatironDragados a competitive advantage that we must safeguard.



Is it OK to share my user ID and password with a co-worker?

No, this is not OK and would be a violation of the Code. We must not share or allow the use of our user ID outside of FlatironDragados and must not share our password with anyone internal or external to FlatironDragados or use someone else's password to gain system or file access. Also, we are accountable for all work saved or retrieved, messages sent or received, or transactions carried out under our user ID and password.

I received an inappropriate email from a friend outside FlatironDragados to my work email. Is it ok to forward to others?

No. It's never OK to use FlatironDragados computers or network systems, even on your phone or tablet, to view or forward inappropriate emails, even if you're alone in the office, at home or on a business trip. Also, an employee should not expect any privacy when using the internet or sending emails using FlatironDragados equipment and systems.

a. Using and Protecting Physical Company Assets

Each of us is responsible for safeguarding FlatironDragados's property and resources made available to us in the course of our jobs. In our industry, our property includes physical assets, such as our facilities, materials and equipment, as well as our communication systems, such as our computers, portable electronic devices, internet service, telephones and email. You must prevent the loss, damage, misuse or theft of FlatironDragados's property. In addition, FlatironDragados's property must never be sold or given away without proper authorization.

b. Confidential Information

The Company's business is highly dependent on adequate protection of its confidential or proprietary information. This information is a valuable asset that must not be taken and shared with others outside of FlatironDragados. The Company's proprietary and confidential information is not publicly disclosed.

CONFIDENTIALITY

As a general rule, any information you hear or see at FlatironDragados should remain confidential and not be shared outside the Company, including with family members. Employees are prohibited from disclosing confidential or proprietary information or trade secrets during or after employment without prior approval or unless required by law. This information is the property of

FlatironDragados and cannot be copied or taken by employees, even if they created it. Confidential data and trade secrets must not be used for personal gain, and this obligation extends beyond employment. The confidentiality duty also applies to non-public information shared with third parties as a result of business dealings with the Company.

Confidential information should only be used for its intended purpose and shared only with those who need it for their work. It must not be disclosed to anyone outside the Company, including family members, former employees, or friends.

Employees must immediately report any release or potential release of confidential information using the channels outlined in this Code.

How do I know it's confidential?

To help you determine if information is confidential, ask yourself the following questions:

- Is this information known outside of FlatironDragados?
- Is it proprietary to us or to one of our business partners, suppliers or customers?
- Would FlatironDragados or an employee be disadvantaged or harmed if others knew this information?

If you're still unsure, then ask your manager, Human Resources, or the Compliance Department for guidance and take the appropriate steps to protect the information.

Further, remember that FlatironDragados's financial information is confidential. Employees must not disclose any information relating to FlatironDragados's financial records to anyone outside the Company nor to anyone who does not have a legitimate business right to such information.

c. Data Privacy

FlatironDragados is committed to protecting the privacy and confidentiality of personal information. All employees must handle personal data responsibly and in compliance with relevant data protection regulations, ensuring it is collected, stored, and processed only for legitimate business purposes. Appropriate security measures must be in place to prevent unauthorized access, disclosure, or misuse.

Employees must respect the privacy of colleagues, clients, and third parties by safeguarding any personal information encountered during their duties. Any breach or unauthorized access must be reported immediately to the Data Protection Officer or through the channels outlined in this Code.

Additionally, FlatironDragados is committed to protecting the confidentiality and ownership of intellectual property entrusted to us, including third-party information. Employees must treat all confidential or proprietary data from business partners, suppliers, and customers with the same care as our own.

d. Information Security

Employees must ensure the protection of all information and data under their responsibility, adhering to the highest standards of confidentiality, integrity, and availability. This includes safeguarding Company, client, and third-party information from unauthorized access, use, disclosure, or destruction. Employees are required to comply with all relevant laws, regulations, and Company policies related to information security and must take proactive steps to identify and report potential security risks or breaches. Any misuse or mishandling of sensitive information is strictly prohibited. Employees must also adhere to Company protocols for handling, storing, and disposing of confidential data, ensuring it remains secure at all times.

Company resources such as computers, cell phones, internet access, and corporate email accounts are provided for professional use only. Personal use of these resources is not permitted.

In accordance with principles of necessity and proportionality, the Company reserves the right to access employees' work on Company-provided devices in accordance with applicable legislation and following the procedures established by FlatironDragados. As such, employees should have no expectation of privacy when using these resources.

e. Electronic Communications and Internet Use

Safeguarding our assets also includes the appropriate use of technology provided by FlatironDragados, such as computers, portable electronic devices, and other equipment.

Please remember that all data stored on FlatironDragados technology is the property of the Company. With that in mind, technology assets and services should be used to conduct business in a positive, legal and professional manner, in accordance with relevant laws, the guidelines set forth in this Code, and other Company policies.

Usage of Artificial Intelligence (AI):

All employees are expected to use Artificial Intelligence (AI) (such as ChatGPT®) in a responsible, ethical, and secure manner that is consistent with the Company's core values. Employees are prohibited from (i) entering any confidential information and/or (ii) mentioning FlatironDragados, its clients, employees, or projects by name when utilizing any third party's Artificial Intelligence solution. The outputs generated by Artificial Intelligence solutions must be diligently assessed for accuracy, suitability, utility, and impartiality. Employees are personally accountable for the use of any outputs produced.

f. Social Media

The Company encourages all employees to conduct themselves professionally and ethically when engaging on social media, making posts, or responding to comments. Employees should ensure their actions do not negatively impact the Company's reputation. FlatironDragados monitors social media and online platforms for references to the Company, its subsidiaries, and our projects.

When using social media, you must exercise good judgment and adhere to FlatironDragados's guidelines, including those related to confidential or proprietary information, harassment, bullying, conflicts of interest, data privacy, and third-party intellectual property rights. If discussing FlatironDragados online, you may identify yourself as an employee, but you may not make

statements on behalf of the Company or give the impression that you speak for the Company. If a post could create the appearance that it is an official Company position you may be required to remove the post. Additionally, employees should not ask family or friends to post content online that they themselves are not authorized to post. Please don't post photos of other FlatironDragados employees without their consent.

7. EMBRACING ETHICS, HONESTY AND TRANSPARENCY.

On a daily basis, we must each strive to ensure our records completely and honestly reflect our business and provide reliable information. We all play a role in accurately maintaining FlatironDragados books because every business transaction becomes a part of our Company's records. We require full, fair, accurate, timely and understandable disclosure in all FlatironDragados records.

a. Accounting Controls and Accurate Records

FlatironDragados employees must properly account for the use of Company time and resources, particularly financial resources. This proper accounting includes creating truthful supplier invoices and keeping accurate expense reports, time sheets, and records related to construction projects. Inaccurate records could result in civil or criminal liability for both the Company and the individuals responsible for the records.

When we make entries in our records, we must support those entries with appropriate documentation to provide an accurate and auditable record. We will only enter into transactions pursuant to appropriate authorization or established policies and procedures.

b. Records Retention

In our work, many of us create communications, documents or records that need to be retained to achieve our business objectives and ensure we are in compliance with applicable law. All employees who create and use any records and information as part of our business activities are responsible for maintaining these records in accordance with the requirements of our records retention standards.

If management, auditors or government agencies request information or documentation from us, we must cooperate. This means we may not conceal, alter or destroy such information. Falsifying business records, destroying documents or lying to management, auditors, or government officials is a serious offense.



Lee's business unit is falling short of its financial targets. Lee's manager approaches him while he's closing the books for the quarter and asks him not to record certain supplier invoices that were just received, even though the supplier's work was completed weeks ago. Lee knows that this is improper and would overstate his business unit's operating income. What should he do?

Lee should not act on his manager's request. His manager is violating FlatironDragados's accounting policies, as all known expenses must be recorded in the Company's financial records at the end of a reporting period. Lee must report this matter to any of the resources listed in this

Code. Employees can be held responsible for violations of this Code, any laws and/or policies, even when their manager directs such action.

c. Expense Reports

FlatironDragados expects all employees to act responsibly and professionally when incurring and submitting costs. We must keep accurate and complete expense reports. FlatironDragados employees must only be reimbursed for actual, reasonable and appropriate expenses.

d. Fraud and False Statement

We specifically prohibit fraud in any transaction or communication by any of us. The improper alteration, destruction, concealment or falsification of records or documents is strictly forbidden. In addition, false statements are not tolerated in any context. Entering false information - or leaving out any critical details - is strictly prohibited. No false, artificial or misleading statements or entries should be made in FlatironDragados books, records, account documents or financial statements for any reason.

When FlatironDragados enters into a contract, we must make sure that the terms of that contract accurately reflect the nature of the transaction. Side-deals or side-agreements are strictly prohibited.

Employees are prohibited from knowingly submitting or endorsing the submission of any payments, claims or estimates that are false or fraudulent for FlatironDragados or on behalf of a subcontractor or supplier. In addition, FlatironDragados will never engage in unlawful or unethical antitrust practices, including bid rigging, complementary bidding or price fixing to exclude, restrict or distort competition.

e. Transparent Action (Support Audits)

Before any FlatironDragados employee engages with an external audit or investigation, or any outside agency, the employee must immediately notify legal and compliance of the audit, investigation or other related requests. Employees should not provide any information to outside sources without obtaining such approval. All FlatironDragados employees are required to provide accurate, necessary, comprehensive, and timely information regarding their job-related activities and competencies. Additionally, they are expected to fully cooperate with audits, investigations, and any other legitimate internal or external processes that require access to information within their knowledge.

8. BUILDING A SUSTAINABLE FUTURE

At FlatironDragados, we are dedicated to advancing sustainability across every facet of our operations. We take bold, purposeful actions to protect and care for people, while actively transforming the industry and safeguarding our planet for future generations. Our commitment integrates practices that minimize environmental impact, promote long-term growth, and create lasting value for our employees, clients, and communities.

We strive to be the highest-value provider of global construction services and technical expertise, making a positive difference in the lives of those we serve. Guided by principles of environmental protection, social responsibility, and ethical business practices, we act with purpose, transparency, and measurable outcomes.

a. Environmental Laws and Regulations

FlatironDragados is fully committed to compliance with all applicable environmental laws, standards, and regulations. Environmental compliance is not only a legal requirement but also a critical part of our responsibility to the communities where we operate and an essential element of our strong reputation.

It is imperative that all employees involved with regulated air emissions, water discharges, hazardous materials, or other pollutants understand and adhere to relevant environmental laws and guidelines. No employee of FlatironDragados may engage in concealing improper discharge, disposal, or storage of hazardous materials or other pollutants.

Employees who believe there may be a violation of environmental laws or internal policies must report their concerns immediately through the channels specified in this Code.

IV. REPORTING SUSPECTED MISCONDUCT AND CONCERNS

FlatironDragados takes all reports of misconduct and policy violations seriously and seeks to investigate and address any violations or potential violations as early as possible to prevent their reoccurrence. Regardless of the reporting channel (described below), we will review all claims indicating potential violations of FlatironDragados' Code of Conduct, policies, procedures, or applicable law.

a. Duty to report

FlatironDragados has an open-door policy. Any employee or third party who is aware of, or has a reasonable suspicion of, a violation of this Code, any related policies, laws, rules, or regulations has the responsibility to report the situation in good faith through one of the channels listed below:

- FlatironDragados third party reporting line.

- Link for online reporting:



- Phone: 1-888-229-2294
- Online: www.FlatironDragadosHelpline.com
- Multiple language options are available.

- The reporting line is operated by an independent third party that notifies the Compliance Department of questions and reports. If utilizing this resource, please keep in mind that providing contact information along with the report assists any investigation that may follow.

- Direct Supervisor or any other member of management
- Human Resources
- Legal Department
- Member of the Compliance Committee
- Local EEO Officer
- Any member of the Compliance Department

Reports can be made anonymously. Your identity will be kept confidential to the greatest extent possible and consistent with applicable laws. Any reports made anonymously should include sufficient detail to allow us to investigate the matter appropriately. For example, it is important to provide information about:

- The names of the people involved in or witness to the incident(s);
- The dates and times of the incident(s) (approximate or exact);
- Where the incident(s) occurred; and
- Why you believe the incident(s) should be reported.

If the report contains insufficient detail, we may not be able to investigate and address the matter fully. Even if you were personally involved in misconduct or a policy violation, you are still expected to report these incidents. Self-reporting will be considered when deciding whether or what corrective action is appropriate.

All of the above serve as reporting mechanisms for breaches of the principles contained in this Code, as well as a means to clarify any doubts that may arise regarding its application. FlatironDragados is committed to fostering an environment where employees feel empowered to speak up.

b. No Retaliation Policy

Under no circumstances will FlatironDragados tolerate any direct or indirect retaliation against an individual who reports in good faith a suspected Code violation, raises concerns, seeks guidance about an issue, or cooperates in an investigation of potential misconduct. Allegations of retaliation will be thoroughly investigated and may result in disciplinary action, up to and including termination.

c. Cooperation in Investigations

There may be instances where the Company needs to investigate concerns or allegations related to potential violations of this Code or the law. When a complaint has been received, we will evaluate it to determine the appropriate next steps. These investigations are essential for determining whether there is any legal risk to the Company.

Employees are required to fully cooperate with those conducting the investigation, including FlatironDragados personnel or external counsel retained by the Company. This includes providing requested documents and answering questions honestly and transparently. Any employee who

withholds information, fails to cooperate with our investigation, or intentionally lies or misleads the investigator will be subject to disciplinary action, up to and including termination of employment.

V. DISCIPLINARY OR CORRECTIVE ACTION

Failure to comply with the provisions of this Code and any applicable policies, procedures, or laws may result in serious consequences for the Company and its employees.

Any violations may result in disciplinary action up to and including termination. The disciplinary or corrective action's extent and severity will be judged by the seriousness and frequency of the violation.

Disciplinary or corrective action may be taken against individuals who authorize or participate directly in a violation and against employees who fail to report a violation or who withhold relevant information. Violations will never be justified or excused because an employee was directed to perform them by management or other employees. If you report your own violation, discipline or corrective action will be applied in a just and equitable manner as warranted by the circumstances.

VI. REVIEW AND CERTIFICATION OF UNDERSTANDING

The Compliance Committee will regularly review the Code of Conduct to ensure it reflects current best practices. Based on these reviews, the Committee may propose updates and amendments to the Board of Directors to support the Code's continuous development and improvement.

As a condition of employment, all employees are required to familiarize themselves with, understand, and comply with this Code and the policies referenced within it. The FlatironDragados Compliance Department will periodically require employees to certify that they have read, understood, and agreed to adhere to the Code of Conduct.