



BUSINESS PARTNER CODE OF CONDUCT



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FlatironDragados Business Partner Code of Conduct

1. Introduction and Scope

FlatironDragados (“the Company”), including all affiliate companies, is committed to conducting business with integrity, accountability, and respect for people, communities, and the environment. This Business Partner Code of Conduct (“Code”) establishes the minimum standards expected of all partners, subcontractors, vendors, consultants, and other business entities (“Business Partners”) working with or on behalf of FlatironDragados in the United States and Canada.

2. Compliance with Laws

Business Partners must comply with all applicable U.S. and Canadian federal, state/provincial, and local laws. These include but are not limited to bribery and corruption laws, antitrust and competition laws, labor and employment laws, health and safety laws, and environmental and sustainability laws. Where this Code and an applicable law differ, the more stringent requirement between the two applies.

3. Business Integrity and Ethics

FlatironDragados expects Business Partners to conduct business with the highest standards of integrity, transparency, and accountability. Business Partners must maintain effective controls, policies, and procedures to ensure compliance with all applicable laws and ethical standards. The Company reserves the right to review and audit Business Partners’ controls, policies and procedures prior to entering into an agreement and at any time during the agreement for compliance with this requirement.

3.1 Ethical Conduct and Accountability

Business Partners must:

- Conduct business honestly, fairly, and in good faith
- Avoid deceptive, fraudulent, or misleading practices
- Ensure that all representations to FlatironDragados are truthful and not misleading

Business Partners are responsible for ensuring that their employees, agents, suppliers, and subcontractors understand and adhere to these standards.

3.2 Conflicts of Interest

A conflict of interest arises when personal, financial, or other interests interfere—or appear to interfere—with business decisions.

Business Partners must:

- Avoid situations that create actual or perceived conflicts of interest



- Disclose promptly any real or perceived conflicts involving Company personnel through the Flatiron Dragados Helpline
- Refrain from offering employment, financial benefits, or other incentives to Company or Government personnel to influence decisions

Examples include:

- Personal relationships with Company employees who have direct involvement with or authority over the Business Partner
- Financial interests in competing or related businesses
- Outside activities with Company personnel that could impair objective decision-making

3.3 Anti-Corruption and Anti-Bribery

Business Partners are strictly prohibited from:

- Offering, promising, authorizing, or providing anything of value to Company personnel outside of items of insignificant or nominal value, or reasonable and infrequent business meals
- Making facilitation payments, kickbacks, or improper commissions to any government official
- Using third parties (agents, consultants, subcontractors) to circumvent these provisions or any anti-corruption laws

Business Partners must implement controls to:

- Prevent and detect bribery and corruption
- Conduct due diligence on third parties

3.4 Gifts, Hospitality, and Business Courtesies

Business Partners must ensure that gifts, meals, entertainment, or hospitality:

- Are of insignificant or nominal value, such as logo items or customary business courtesies, such as modest food items for communal sharing
- Are permitted by applicable law
- Are reasonable, infrequent, and not intended to influence, or appear to influence, Company business decisions

The following are always prohibited:

- Providing anything of value to any Government Official
- Cash or cash equivalents (such as gift cards)
- Lavish or excessive entertainment or travel, Company personnel are required to disclose these items to Compliance through the appropriate channel, and a Business



Partner may request confirmation of approval to receive these items in advance of offer

- Any benefit provided during active procurement or bid processes

3.5 Fair Competition and Antitrust Compliance

Business Partners must compete fairly and comply with all applicable antitrust and competition laws.

Business Partners must not:

- Engage in price fixing, bid rigging, or any form of collusion with competitors
- Share confidential pricing or competitively sensitive information obtained from the Company with competitors
- Provide Company personnel with non-public or competitively sensitive information regarding pricing or strategies of competitors
- Allocate or divide markets, territories, or customers with competitors

All bidding and procurement activities must be conducted independently and transparently.

3.6 Anti-Money Laundering and Financial Integrity

Business Partners must:

- Comply with all applicable anti-money laundering and financial reporting laws
- Conduct appropriate risk-based due diligence and conduct business only with legitimate, reputable entities
- Ensure funds used in transactions are derived from lawful sources
- Follow transparent payment practices
- Maintain adequate controls to detect and prevent suspicious transactions

3.7 Confidential Information and Data Protection

Business Partners must:

- Protect confidential and proprietary information belonging to FlatironDragados and third parties
- Use such information only for authorized business purposes
- Prevent unauthorized access, disclosure, or misuse of such information
- Immediately notify the Company of any actual or suspected data breach or security incident.

3.8 Protection of Assets

Business Partners must safeguard assets belonging to the Company and any third parties that are accessed, used, or entrusted to them, including but not limited to:

- Physical assets (equipment, materials, facilities)
- Intellectual property



- Digital systems and data
- Unauthorized use, theft, fraud, or misuse of assets is strictly prohibited.

3.9 Accurate Books, Records, and Reporting

Business Partners must:

- Maintain complete, accurate, and auditable books and records
- Properly document all transactions
- Comply with applicable accounting and reporting standards
- Provide copies of all transactions as required by the Company for payment verification or to comply with any internal or external audit

False, misleading, or incomplete records, including off-the-books accounts, are prohibited.

4. Labor and Employment Practices

Flatiron Dragados is committed to respecting the human rights of all employees in its operations and expects the same commitment from its Business Partners.

4.1 Employment Eligibility

Business Partners must obtain and confirm employment eligibility for all personnel assigned to work on Company activities. Eligibility includes, but is not limited to, required government documents to confirm identity, eligibility to work in the location, and any government clearances required.

4.2 Forced Labor

Business Partners must prohibit all forms of forced labor, modern slavery, human trafficking, and coercion.

4.3 Child Labor

Business Partners must not employ individuals below:

- The legal minimum working age in the applicable jurisdiction, or
- Age 16, whichever is higher

4.4 Wages, Hours, and Working Conditions

Business Partners must:

- Pay wages and benefits in compliance with applicable laws
- Comply with prevailing wage requirements where applicable, including providing all required documentation to the Company in a timely manner
- Comply with working hours and overtime requirements
- Provide all payroll records requested to assist the Company in addressing inquiries from any regulator



4.5 Non-Discrimination and Anti-Harassment

Business Partners must provide a workplace free from discrimination and harassment in accordance with all applicable U.S. and Canadian laws and comply with all Company discrimination and harassment standards in Flatiron Dragados workspaces.

4.6 Freedom of Association

Business Partners must respect employees' rights to organize and engage in collective bargaining as permitted by law.

4.7 Respectful Workplace

Business Partners must ensure employees are treated with dignity and respect and are not subject to abuse, intimidation, or coercion.

5. Health and Safety

Business Partners must provide a safe and healthy workplace and comply with all applicable health and safety laws, including:

- U.S. Occupational Safety and Health Act (OSHA)
- All Canadian federal, provincial, and territorial occupational health and safety laws and regulations

5.1 Workplace Safety

Business Partners must:

- Identify and mitigate workplace hazards
- Provide appropriate training and personal protective equipment
- Ensure employees have the right to refuse or stop unsafe work without fear of reprisal, in accordance with applicable laws

5.2 Emergency Preparedness

Business Partners must implement emergency response procedures and ensure readiness for incidents.

5.3 Workplace Violence

Flatiron Dragados will not tolerate any intimidation, threats or acts of violence in the workplace. This prohibition extends to all Business Partners while working on Company projects or at Company locations.

Business Partners must:

- Implement and maintain policies and procedures to prevent and address workplace violence
- Provide appropriate training to personnel



- Establish reporting mechanisms and ensure that all incidents are reported, investigated, and addressed promptly
- Take appropriate corrective actions in response to identified risks or incidents
- Comply with all applicable workplace violence and occupational health and safety laws and regulations

5.4 Incident Reporting

All significant safety incidents related to FlatironDragados work must be reported promptly. All Business Partner personnel must cooperate with safety audits, inspections and investigations.

6. Environmental Responsibility

Business Partners must comply with all applicable environmental laws and operate responsibly, including:

- U.S. environmental laws (e.g., Clean Water Act, RCRA)
- Canadian Environmental Protection Act and all provincial and territorial environmental laws and regulations, where applicable

6.1 Environmental Management

Business Partners must:

- Maintain required permits and approvals
- Identify and mitigate environmental risks

6.2 Resource Efficiency

Business Partners must:

- Explore all potential solutions to reduce waste and emissions
- Promote recycling and efficient use of materials

6.3 Hazardous Materials

Business Partners must train their personnel to ensure proper handling, storage, transport, and disposal of hazardous materials.

6.4 Pollution Prevention

Business Partners must take appropriate measures to prevent pollution and minimize environmental impact.

7. Supply Chain Responsibility

7.1 Responsible Sourcing and Procurement Integrity

Business Partners must:



- Procure materials and services from lawful and ethical sources
- Comply with applicable supply chain transparency and conflict minerals laws
- Avoid sourcing from entities engaged in illegal activities, forced labor, child labor or corruption

Business Partners must exercise due diligence over their supply chains and maintain traceability where required.

7.2 Trade Compliance and Sanctions

Business Partners must not:

- Conduct business with restricted or sanctioned individuals or entities
- Misrepresent the origin of goods or services

Business Partners must:

- Communicate this Code to their suppliers, subcontractors and Business Partners
- Require compliance with these standards throughout their supply chain
- Conduct appropriate due diligence

8. Management Systems and Compliance

Business Partners are required to maintain effective compliance programs, including:

- Written policies and procedures
- Employee training which includes ethics and compliance topics
- Adequate internal controls to detect noncompliance
- Periodic risk assessments and reviews

FlatironDragados reserves the right to audit Business Partner compliance with this Code and applicable laws Business Partners must fully cooperate with all audits, investigations, and compliance reviews, including by providing complete, accurate, and timely information. Failure to comply with this code may lead to disciplinary actions up to and including termination of the business relationship.

9. Reporting and Non-Retaliation

FlatironDragados maintains reporting channels for reporting violations of law or policy, including anonymous reporting. Business Partners must promptly report suspected violations of laws or this Code directly to the FlatironDragados Compliance Department at compliance@FDCorp.com or through the Helpline found on the FlatironDragados website at: www.FlatironDragadosHelpline.com

9.1 Whistleblower Protections and Ethical Reporting

Business Partners must:



- Provide mechanisms for employees to report concerns confidentially
- Investigate allegations of misconduct promptly and fairly
- Protect individuals who report concerns in good faith from retaliation

9.2 Non-Retaliation

We maintain a zero-tolerance policy for retaliation. Retaliation against any individual who raises concerns, reports suspected misconduct or participates in an investigation in good faith is strictly prohibited. This includes any adverse action, intimidation, or discrimination related to such activities.