

## KIEWIT ETHICS AND CODE OF CONDUCT

**Introduction:** At Kiewit, there is only one way to conduct business – with the highest ethical standards and in full compliance with the law. Through the dedication of our employees, Kiewit has the reputation of an ethical company and responsible corporate citizen. That reputation is the product of 125 years of concerted effort by our founders and subsequent generations of managers and employees. We must continue to work together to ensure that ethical business practices are applied at all levels of our company, and that those with whom we do business know that Kiewit is a company dedicated to the highest ethical standards.

Our reputation as an ethical company is essential to our business and we are committed to conducting our business in a manner that earns us the respect and goodwill of those around us. Performing quality work, completing it on time, and dealing fairly and honestly with everyone involved are essential in maintaining our excellent reputation in the industry. Kiewit's reputation for being a company of real integrity is as important as any asset the company owns.

**A fundamental principle at Kiewit is that there is no gain or benefit that justifies unethical conduct.**

**Core Values:** Kiewit has a rich and honorable culture with very strong core values, such as:

- *Integrity* – conduct business with integrity and honesty. Treat others with respect and dignity, and take responsibility for your actions.
- *Employee Ownership* – Kiewit's employee ownership culture promotes open communication, financial transparency, and efficient and effective decision-making to facilitate the company's long-term success.
- *Caring for Employees* – caring for the well-being of our employees as characterized by our Safety and Wellness Program.
- *Development and Mentoring Employees* – our people are our greatest asset to success; providing a lasting career development for our people.
- *Quality* – build work, right the first time. Kiewit employees are committed to quality and excellence at all levels of our business and projects.
- *Continual Improvement* – continued dedication to improve performance. Comes with a high sense of individual and collective accountability.

**Our Ethics Policy:** The cornerstone of all Kiewit policies and business practices is the Kiewit Ethics Policy, which consists of two basic principles:

- Conduct business with the highest ethical standards; and
- Compliance with the law.

These two basic principles apply to all Kiewit policies. Put simply, if a person fails to follow either, they are violating our policies, which is unacceptable. Kiewit Ethics Policy is really the window through which employees should view and apply all other Kiewit policies and business



practices. Employees are expected to know and follow all Kiewit policies and business practices, and should contact their supervisors should they have any questions or concerns.

In the event you learn of a violation of any of Kiewit's policies, you must report it immediately. You may choose to do so to your District or Department Manager or Kiewit's General Counsel. You also have the option of reporting a violation anonymously through Kiewit's Compliance Reporting Hotline at 1-800-901-1087.

**Our Workplace Conduct:** Whether it's a matter of safety, quality or compliance issues, how we conduct ourselves as Kiewit employees is essential to the company's success. The company has policies and business practices in place that guide employees in proper workplace conduct.

**Business Practices with Others:** Kiewit employees work in a complex and dynamic business. Accordingly, Kiewit has established policies and procedures to guide and instruct everyone on proper practices when conducting business with anyone outside the company.

**Education and Training:** At Kiewit, education and training is one of our highest priorities and essential to maintaining our reputation as an ethical company. Through Kiewit University, the company conducts training in essentially all core areas of our business.

**Our Ethics and Compliance Program:** Kiewit has implemented a robust compliance program to assist in monitoring employee compliance with Kiewit policies and procedures. This program provides another mechanism for Kiewit to communicate with employees on the importance of business ethics and compliance with all Kiewit policies and business practices.

**One thing that cannot be overstated is that Kiewit has a "zero tolerance" policy for noncompliance with Kiewit policies and business practices.**

This document includes an overview of core components of Kiewit Ethics and Code of Conduct, but it is not intended to be the only tool employees use to understand and comply with those policies and business practices. There are many more tools in the box to help in that effort. The company expects everyone to work hard at compliance in all areas, and we encourage all employees to ask questions of each other, as well as their managers. A team approach to compliance is one of the best assurances of success.

