



**Kiewit**



**Kiewit Vendor  
CODE OF CONDUCT**

# Kiewit Vendor Code of Conduct

Kiewit Corporation, and each of its affiliates and subsidiaries (“Kiewit”) is firmly committed to conducting business with the highest integrity and in compliance with all applicable laws. Kiewit expects that all vendors, suppliers, sub-suppliers, contractors, consultants and each of their respective employees and any other third parties involved with the execution of Kiewit work (“Vendors”) will, at a minimum, comply with standards of business conduct consistent with those in this Vendor Code of Conduct (“Code”).

**This Vendor Code is not a modification of any vendor agreement. It is subject to updating and modification at Kiewit’s sole discretion.**

## Ethics

**Business Integrity** - Vendors will uphold the highest standards of ethics to promote honesty and integrity in business operation. Vendors are expected to prohibit all forms of bribery, corruption, extortion and embezzlement. Vendors shall not engage in any activity to obtain an unfair or improper advantage. Vendors shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate (for example the United States Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption laws.

- **Gifts & Entertainment** - Gifts should be infrequent and not substantial in value. Gifts to Kiewit employees that violate Kiewit policies will be returned to Vendors or handled in a manner that complies with our internal policies.
- **Anti-Corruption & Bribery** - Vendors shall not offer or accept bribes. Vendors are responsible for overseeing the conduct of their subcontractors and ensuring that applicable laws are not violated.
- **Payment to Government Officials, State-Owned Entities, or Candidates for Political Office** - In dealing with government employees and officials, Vendors should not give or offer, either directly or indirectly, any gratuity, gift, favor, entertainment, loan or anything of monetary value.
- **Antitrust** - Vendors are expected to conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

**Reporting & Disclosure of Information**- Vendors shall accurately record information regarding their business activities, labor, health and safety, and environmental practices and shall disclose such information without falsification or misrepresentation to all appropriate parties.

**Logistics & Trade Compliance** - Vendors shall comply with sanctions-related requirements as governed by applicable laws and regulations.

**Counterfeit, Fraudulent, & Suspect Items** - Vendors shall maintain processes and standards that are designed to assure the integrity of each shipment to Kiewit from its origin through to its destination and all points in between, including taking measures to ensure the corresponding know-how does not end up in the hands of counterfeiters or third parties.

**Conflicts of Interest** - Vendors and personnel performing services for Kiewit are expected to adhere to all professional standards and codes governing conflicts of interest related to the services performed.

**Confidentiality** - Vendors may not use, disclose or retain confidential or proprietary information about Kiewit or third parties (including Kiewit's clients or partners) obtained in the course of their business dealings with Kiewit except as allowed by contract provision.

**Data Privacy & Information Security** - Vendors must follow all applicable data protection, privacy, and information security laws in the countries in which they operate and be committed to respecting and protecting the privacy of individuals (including, without limitation, Kiewit clients, Kiewit employees or other Vendors).

## Safety

**Working Environment** - Vendors shall provide a safe and healthy working environment to prevent accidents, illness and injury to health from happening in the workplace. Vendors shall minimize employee exposure to potential safety hazards.

## Labor

**Anti-Discrimination & Harassment** - Kiewit is committed to offering equal employment opportunities, treating individuals fairly and maintaining a work environment free of discrimination, harassment and intimidation, and employees are expected to avoid conduct that could be interpreted as such. Kiewit expects its vendors to have this same commitment and treat individuals without regard to their race, color, religion, sex, age, national origin, veteran's status, physical or mental disability, marital status, ancestry, citizenship, pregnancy, sexual orientation, gender identity, genetic information, other protected activities or any other characteristic protected by federal, state or local laws ("protected characteristics").

Kiewit is also dedicated to providing a work environment free from offensive conduct directed at any individual's protected characteristics. Offensive conduct and/or harassment that affects tangible job benefits, interferes unreasonably with an individual's work

performance, violates federal, state or local laws, or creates an intimidating, hostile, or offensive working environment, will not be tolerated.

**Anti-Slavery, Human Trafficking & Child Labor** - Vendors shall ensure that all work performed is voluntary. Vendors shall not traffic persons or use any form of slave, forced, bonded, indentured or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt or employment of persons by means of threat, force, coercion, abduction, fraud or payments to any person having control over another person for the purpose of exploitation. Vendors shall ensure that the third-party recruitment agencies they use are compliant with the provisions of this Code and the law. Vendors recruiting foreign contract workers either directly or through third-party agencies shall be responsible for payment of all recruitment-related fees and expenses. Kiewit does not accept child labor. Vendors shall not make use of child labor and take the appropriate measures to ensure that no child labor occurs at their own place of operation or at their subcontractor's place of operation.

**Diversity & Inclusion** - Vendors are expected to share in Kiewit's commitment to acknowledging and valuing employee diversity.

## Environmental

**Environmental Permits** - Vendors shall obtain, keep current and comply with all required environmental permits and regulations.

**Sustainability** - Vendors shall minimize adverse effects on the community and environment to safeguard the health and safety of the public. Vendors will seek opportunities that promote the efficient use of resources and energy, as well as clean and low energy solutions.