



## CODE OF ETHICS AND PROFESSIONAL CONDUCT

Commitment and dedication to ethical professional conduct is expected of all employees in every aspect of our business practices. Our company is judged by how its employees act. Therefore, upholding the Turner reputation is paramount. This reputation will be upheld only if we act with honesty and integrity in all business practices. Maintaining the trust and confidence of owners, employees, customers and other people with whom we conduct business, as well as the communities in which we work, is crucial to our continued growth and success.

This Code shall serve as a basis for ethical decision-making in the performance of work for this Company. Additionally this code may serve as a basis for judging the merit of a formal complaint pertaining to violations of professional ethical standards contained herein. It is understood that some words and descriptions in a code of ethics and professional conduct are subject to varying personal interpretations, and that any ethical principle may conflict with other ethical principles in specific situations. Questions related to ethical conflicts can best be answered by thoughtful consideration of fundamental principles such as honesty, integrity, trust, openness, teamwork, pride, professionalism and respect for others, rather than a complete reliance on detailed regulations.

### General Business Principles

#### Objectives:

The objectives of our company are to engage efficiently, responsibly and profitably in the construction, maintenance, fabrication and specialty services industries and to participate in the search for and development of other sources of revenue. Our company seeks to maintain a high standard of performance and aims to maintain a long-term competitive business position.

#### Economic Principles:

Profitability is essential to fulfilling our objectives. Without profits and a strong financial foundation it is not possible for us to fulfill our objectives. In addition, when making investment and business decisions we will not exclusively consider economic results but will also take into account social and environmental considerations.

#### Business Integrity:

We as a company insist on honesty, integrity, and fairness in all aspects of our business and expect the same in our relationships with those with whom we conduct business. The direct or indirect offer, payment, solicitation, and acceptance of bribes in any form is unacceptable. Conflicts of interest between employees' private financial activities and their part in the conduct of company business must be avoided. All business transactions on behalf of our company must be reflected accurately and fairly in the accounts of our company in accordance with and subject to established procedures and audit. Employees have a duty to avoid situations that might be adverse to our Company's interest or that might result in conflicting loyalties or interests. Our Company's *Conflict of Interest* policy details prohibited involvement with suppliers, contractors, competitors or customers, prohibited gifts and entertainment as well as prohibited use of company information.

#### Competition:

Our company supports free enterprise. We seek to compete fairly and ethically within the framework of applicable competition laws and we will not prevent others from competing freely with us. Our Company's *Antitrust Compliance Policy and Antitrust Compliance Guide* set forth our intentions to conduct operations in strict compliance with all applicable antitrust laws. The antitrust laws generally prohibit business activities that constitute unreasonable restraints on trade.

### Political Activities:

Our company strives to act in a socially responsible manner within the laws of the countries in which we operate. Our company has the right and from time to time may make our position, as a company, known on any matter that affects our company, our employees or our clients. Our company also has the right to make our position known on matters that affect the communities in which we operate. Where individual employees wish to engage in activities in the community, including standing for election to public office, that individual will be given the opportunity to do so whenever there is no conflict of interest or work interference.

### Health, Safety and the Environment:

All employees are expected to commit to the pursuit of harming neither people nor the environment by using material, equipment and energy efficiently and by following all established safety policies and procedures. Our Company's systematic approach to health, safety and environmental management is designed in order to achieve continuous performance improvement while ensuring compliance with laws. Subcontractors are required and joint ventures under our Company's operational control are expected, to comply with all required safety policies and procedures.

### The Community:

The most important contribution our Company makes to the social and material progress of the communities in which we operate is in performing our business activities as effectively and efficiently as possible. Additionally, our company takes a constructive interest in social matters that may or may not be directly related to our business. Community involvement in educational and/or charity programs may vary and each opportunity will be evaluated individually.

### **General Moral Imperatives of Our Company and Our Employees:**

1. Avoid harm to self and others
2. Contribute positively to society and human wellbeing
3. Be honest and trustworthy
4. Be fair and take action not to discriminate against others in any way
5. Honor property rights including such things as copyrights and patents
6. Respect the privacy of others
7. Give proper credit for intellectual property - One must not take credit for other's ideas or work
8. Honor Confidentiality
9. Adhere to all federal and state laws and regulations

### **General Professional Responsibilities:**

1. Acquire and maintain professional competence
2. Know, respect and adhere to existing laws related to our operations
3. Learn and grow from work performance evaluations
4. Strive to achieve exceptional quality, effectiveness and dignity in business practices
5. Honor contracts, agreements, and responsibilities

### **Compliance with this Code:**

The future of our Company depends on our operational, administrative and ethical excellence. All employees should adhere to the principles of this code as well as encourage and support adherence to these principles by their co-workers. Our compliance policies and this Code are all aimed at avoiding unethical conduct as well as possible violations of laws. Each employee has an obligation to seek clarification and advice whenever a question concerning compliance with this Code arises. Such advice may be sought from management, from the Ethics & Compliance Committee or from our internal Risk Management, Legal, Audit or Human Resources departments. Our long-term success in this area will depend on each

employee's realizing our Company's commitment to this Code, seeking advice before engaging in conduct that presents legal or ethical questions, and proceeding with business in a professional and ethical manner.

**Reporting Possible Violations of this Code:**

If an employee feels that they have a good faith report of behavior that they believe to be a violation of this Code they are required to make such report to the Turner Ethics & Compliance Committee at **1-800-288-6503**. Any attempt at retaliation or intimidation against anyone reporting in good faith, a suspected violation of this Code or against anyone who participates in an investigation of a suspected violation will not be tolerated. Once a report of a possible violation of this Code is made, a prompt investigation will be conducted by the Turner Ethics Committee. Our Company strives to consistently and appropriately enforce this Code. Violators of this Code are subject to disciplinary action up to and including termination. In certain cases, where appropriate, law enforcement officials will be informed of facts discovered by any internal investigation concerning non-compliance with laws.

In addition to this Code, Company and site specific policies and procedures are detailed in your employee handbook. It is the responsibility of every employee to perform his or her job in a manner that is in strict compliance with all Company policies, procedures and Codes.