



## Supplier Code of Conduct

**Introduction:** Granite Construction Incorporated, together with our subsidiaries and affiliated companies (“Granite”), has a strong commitment to upholding the highest ethical business standards, following the spirit and letter of the law, caring for the safety and well-being of our employees and acting responsibly within the communities in which we live and work in a manner that benefits society. Granite’s core values of integrity, safety, excellence, sustainability, and inclusion are the foundation upon which our company’s success is built. We choose suppliers who share our unwavering commitment to good ethical practices and in return we strive to be fair and honest, firmly believing that relationships built on our core values will be sustainable and beneficial for all. We view our suppliers as partners and expect them to follow our core values and maintain the standards set forth in this Supplier Code of Conduct (the “Supplier Code”).

**Compliance with Laws:** Suppliers must be aware of and adhere to applicable laws.

**Human Rights:** We are committed to upholding ethical and sustainable business operations—at the center of this commitment is respect for people and their human rights. We value diversity and strive to create an inclusive culture that fosters innovation and growth.

We are committed to respecting human rights by upholding the principles of the United Nations Universal Declaration of Human Rights. Human rights refer to the basic standards of treatment to which all people are entitled—as a broad concept, it includes economic, social, cultural, political, and civil dimensions. For us, this means ensuring that our products and services are provided under conditions that demonstrate respect for the people providing them. It also means respecting the rights of people living in the communities around our operations, as well as those of our suppliers.

We recognize our responsibility to protect against human rights abuse throughout our operations and develop a culture which supports these principles: freedom, individuality, equality, citizenship, right to assemble, and health. We recognize and respect collective bargaining agreements and our employees’ right to freedom of association and collective bargaining, where permissible by law. Our commitment to this belief is supported by periodically assessing the adequacy of our adherence to the laws and addressing any shortfalls; proactively creating policies that enable respect for human rights; and communicating how we address human rights with our business partners. We also recognize our responsibility to continuously improve our approach to protecting human rights—updating our practices to take in to account new issues raised and growing awareness within our business of the human rights impacts of our decisions. We maintain a zero-tolerance policy for human trafficking, child labor, and forced labor, and we prohibit discrimination based on age, ancestry, color, religious creed, denial of family and medical care leave, disability, marital status, medical condition, genetic information, military and veteran status, national origin, race, sex, gender, gender identity, gender expression, sexual orientation, or any other characteristic protected by federal, state and/or local law.

**Safety:** We believe we have a responsibility to maintain a safe, healthful and productive work environment for our employees and suppliers on our work sites. The protection of our employees, property, the public and the environment are essential to the efficient and successful completion of every project we undertake. We believe that the prevention of injuries and incidents is more than just good business, it is our moral obligation.

We are committed to the prevention of injury and illness and to the continual improvement of safety and health performance by adoption of our Safety and Health Management System (SHMS). Our SHMS provides incident prevention performance requirements for all operations, assigns responsibilities and establishes safety standards for meeting or exceeding the requirements of applicable safety and health laws, regulations and client contracts. These commitments reflect Granite’s Safety Core Value, support our safety and health objectives, and apply to all employees, suppliers and other stakeholders. For additional information on Granite’s safety program, please reference [Safety by Choice: Safety Program](#).





**Environmental Stewardship:** Our commitment to sustainability includes a focus on environmental stewardship—we recognize our duty to protect the environment and our responsibility to manage the environmental impacts of our operations. Our goals are to conserve natural resources and protect water, air, land, and wildlife.

Suppliers must comply with all environmental requirements specific to the products or services provided as described in design and product specifications, contract documents, and within the parameters of our environmental stewardship standards. For additional information on Granite’s environmental program, please reference [Keep Granite Green: Environmental Program](#).

**Responsible Sourcing of Minerals:** Suppliers must take reasonable steps to ensure that the products they provide do not contain Conflict Minerals as described in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

**Corruption and Bribery:** Suppliers must comply with all aspects of the U.S. Foreign Corrupt Practices Act (FCPA) and other applicable anti-corruption and anti-bribery laws enforceable in the jurisdictions in which they conduct business. We strictly prohibit illegal payments, or promises to provide anything of value, to a Foreign Government Official (FGO) which are designed to gain an illegal business advantage (Bribe), including without limitation, inappropriate payments made directly or indirectly to an FGO. We require that our books, records and accounts be kept in reasonable detail and that all transactions be accurately and fairly reflected in accounting records. These standards apply to our employees, suppliers, and any stakeholder acting on behalf of Granite.

Understanding that hiring suppliers in foreign jurisdictions exposes us to a high level of risk, we employ a risk-rating system in the international supplier engagement process to reduce risk exposure. High-risk international suppliers may be required to submit additional due diligence information; consent to an audit of their books and records related to performance of services for our company; or otherwise objectively verify that they are in compliance with this requirement. Continuous red-flag monitoring is conducted on the highest-risk suppliers, as well as internal monitoring and auditing of financial transactions through our corruption detection system.

Employees who regularly conduct business outside the United States and who interact with international suppliers are required to complete annual training on our Anti-Bribery and FCPA Policy. Suppliers may also be required to complete anti-corruption training and certification. We maintain a zero-tolerance policy for bribery or violation of our Anti-Bribery and FCPA policy.

**Conflicts of Interest:** Suppliers must conduct business in a way that is open, transparent and supportive of fair business opportunity. We expect suppliers to exercise reasonable care and diligence to prevent any actions or conditions that could result in a conflict of interest, the appearance of a conflict of interest, or that may compromise the exercise of independent judgment during the execution of work for or on behalf of Granite.

**Gifts:** We discourage suppliers from giving gifts to our employees, as accepting or giving gifts in a business setting can create a sense of obligation or the appearance of an obligation.

**Violations:** A supplier who violates the Supplier Code or refuses to take part in a remediation plan may be terminated. We will exclude from consideration suppliers who do not demonstrate high ethical standards, compliance with applicable laws, and the Supplier Code. We strongly encourage any ethical or legal misconduct or violations of the Supplier Code be reported using our Ethics & Compliance Helpline, which may be accessed at [Granite Ethics & Compliance Helpline](#) or by calling 1-800-211-4226 in the U.S. or Canada, or 001-844-528-3663 in Mexico.

