



The Boldt Group, Inc. Business Partner Code of Conduct

Effective February 2026, Subject to Periodic Review

This Code of Conduct outlines The Boldt Group Inc.'s ("Boldt") expectations for the conduct of subcontractors, suppliers, vendors, and other business partners ("Business Partners") who work with Boldt and its subsidiaries. Business Partners are expected to understand and act in a manner that is consistent with Boldt's approach to integrity, responsible sourcing, and supply chain management. Boldt expects that its Business Partners will cascade similar expectations through their own supply chains.

Business Partners must meet Boldt's standards and reflect its values throughout the supply chain. Boldt chooses its Business Partners carefully, and expects that they will satisfy contractual requirements, comply with laws, regulations, and act in a way consistent with the principles and values of this Code of Conduct.

HUMAN RIGHTS

Forced Labor

Business Partners will not use slave, prisoner or any other form of forced or involuntary labor. Business Partners must take reasonable measures to ensure that all of their employees understand the terms of their employment.

Child Labor

Business Partners will not use child labor. Boldt has a zero-tolerance policy regarding the employment of children where the age of employment is not in accordance with applicable laws.

Human Trafficking

Business Partners will not engage, directly or indirectly, in human trafficking. Boldt prohibits human trafficking.

Conditions of Employment

Business Partners will comply with applicable laws regulating work hours, wages and benefits. Employees must be paid in a timely fashion that meets or exceeds legal minimum standards.

Labor Brokers

If necessary for a Business Partner to use a labor broker, the Business Partner shall notify Boldt that it is using a labor broker and will ensure that the broker employs ethical recruitment practices, complies with applicable laws, and does not withhold identity documents. Upon Boldt's request, Business Partner will certify that it has validated that its labor broker has complied with this policy.

Harassment & Discrimination

Business Partners will not discriminate on the basis of gender, color, race, national origin, religion, sexual orientation, age, veteran status, disability or gender identity or other legally protected status. Harassment or discrimination of any kind will not be tolerated.

Freedom of Association and Collective Bargaining

Business Partners will comply with applicable laws that recognize and respect the rights of employees to freedom of association and collective bargaining.

HEALTH & SAFETY

Workplace

Business Partners will provide clean, healthy and safe environments for their employees that meet or exceed legal standards. Business Partners will have safety procedures for their employees and tracking tools that drive to a goal of zero workplace safety incidents. Business Partner employees will have the right to refuse work and report any conditions that do not meet these criteria. Business Partners must adhere to Boldt's safety policies and rules applicable to any project for which they supply goods and/or services.

Reporting

The Boldt safety policy supports and encourages all Business Partners and their employees working on any Boldt project or site to report any safety concerns or violations and to freely make suggestions to improve safety. Safety concerns or suggestions can be made at any time by reporting them in accordance with Boldt's safety policy.

ENVIRONMENT

Continuous Improvement

Business Partners will increase efficiency throughout their companies and take measures to reduce their carbon footprint, energy use, water use, waste, and other emissions. Over time, Boldt expects Business Partners will establish targets and be transparent in their progress toward their targets.

Responsible Stewardship

Business Partners will look to conserve resources and protect the communities and environment that surround them. Boldt encourages its Business Partners to develop and diffuse environmentally friendly technologies and to increase the use of renewable energies.

BUSINESS INTEGRITY

Anti-Corruption/Anti-Bribery

Business Partners will not tolerate corruption, bribery, embezzlement or fraud in any form. This includes giving or receiving anything of value, including money, gifts or unlawful incentives to improperly influence negotiations or any other dealings with governments and government officials, customers, or any other third parties.

Ethical Behavior

Business Partners will avoid conflicts of interest and operate honestly and ethically throughout the supply chain and in accordance with applicable law, including those laws pertaining to anti-competitive business practices, respect for and protection of intellectual property, company and personal data, export controls and economic sanctions.

Reporting and Non-Retaliation

Business Partners will provide an adequate mechanism for their employees to report integrity concerns, safety issues and misconduct without fear of retaliation. Business Partners will also appropriately investigate reports and take corrective action, if needed. Business Partners will prohibit retaliation.

Stakeholder Engagement

Business Partners will communicate these or substantially similar codes to their Business Partners and subcontractors. Business Partners will continuously improve their sustainability and stakeholder engagement progress. Boldt also encourages Business Partners to work closely with local communities to implement projects and strategies that benefit their community and its residents.

Business Partners will develop and implement appropriate internal business processes and policies to ensure compliance with applicable law and this Code of Conduct. Business Partners will be able to demonstrate compliance with this Code of Conduct upon our request and will take any action to correct any non-compliance.

REPORTING

Reporting Integrity Concerns to Boldt

Business Partners must promptly inform Boldt of any concerns related to this Code of Conduct, subject to legal restrictions. Boldt policy prohibits retaliation against any person reporting such a concern. To report a concern, Business Partners can always speak directly to the person that signed their contract or purchase order. In addition, the Boldt Ethics Hotline allows employees, Business Partners and others to report concerns of misconduct affecting Boldt. Individuals can call this Hotline at 888-882-6538 (888-88-BOLDT) 24 hours a day, 7 days a week. Boldt will take all reasonable steps to maintain the confidentiality of any report it receives, subject to Boldt's need to investigate reported matters, the requirements of applicable laws and other company policies. Business Partners will be required to acknowledge compliance with this Code of Conduct on an annual basis.