



Kiewit Vendor

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 and anti-money laundering laws and regulations of the countries in which they operate (for example the United States Foreign Corrupt Practices Act (FCPA) and applicable international counterparts.

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

Counterfeit, Fraudulent and 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 kF4 [012 02 02 reW*(a)0

