

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. Granite's core values: safety, honesty, integrity, fairness, accountability, consideration of others, pursuit of excellence, reliability, and citizenship 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: Granite maintains a zero-tolerance policy for human trafficking, child labor, and forced labor. For additional information, please refer to Granite's <u>Human Rights Statement</u>.

Environmental Stewardship: Suppliers must comply with all environmental requirements specific to the products or services provided to Granite as described in design and product specifications and contract documents.

Responsible Sourcing of Minerals: Suppliers must take reasonable steps to ensure that the products they provide to Granite 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 adhere to the U.S. Foreign Corrupt Practices Act and any other anti-corruption and anti-bribery laws enforceable in the jurisdictions in which they conduct services for Granite. Suppliers who we deem to have a higher risk profile may be required to submit additional due diligence information, complete anti-corruption training and/or consent to an audit of their books and records, as related to performance of services for Granite, or otherwise to objectively verify that Suppliers are in compliance with this Code.







