

Subcontractor and Supplier Code of Conduct

Introduction

It is Pepper Construction Group's expectation that our culture of respect and dignity extends to all our partners. We are committed to maintaining ethical standards and practices that provide for the welfare and safety of our team members, business partners and the communities in which we live and work.

The Pepper Construction Group Subcontractor and Supplier Code of Conduct ("Code") describes the company's expectations of how our Subcontractors and Suppliers conduct business. Pepper Construction Group expects Subcontractors and Suppliers to act in accordance with the Code, and that all Subcontractors and Suppliers comply with applicable laws and regulations within the geographies where they operate and be open and cooperative with the regulators enforcing such laws. In instances where expectations outlined in the Code differ from local laws, Subcontractors and Suppliers must follow these expectations within the bounds of applicable local laws.

Overview

The Code reflects Pepper Construction Group's values and provides additional detail about what is expected of its Subcontractors and Suppliers with respect to the following topics:

1. Ethics and integrity
2. Data privacy and security
3. Employment and working conditions
4. Safety and wellbeing
5. Diversity, Equity & Inclusion
6. Sustainability and the environment

Subcontractor and Supplier Code of Conduct

1. Ethics and integrity

Over the years, Pepper Construction Group has built a strong reputation for integrity, ethics, quality and customer service. That reputation is the bedrock of our success, and we guard it as such. We expect anyone doing business as a partner to uphold the appropriate ethical standards and we require compliance with all applicable laws, rules and regulations. In particular, Pepper Construction Group requires Subcontractors and Suppliers to focus on adherence to the following standards:

Bribery and anti-corruption: Subcontractors and Suppliers must fully comply with requirements of all applicable bribery and anti-corruption laws (e.g., U.S. Foreign Corrupt Practices Act of 1977).

Gifts and entertainment: Subcontractors and Suppliers must not offer or accept any gift to obtain improper advantages or influence for the Supplier, Pepper Construction Group (such as Pepper Construction Group's employees and their family members and associates), or any third party. Gifts include a benefit, fees, commissions, dividends, cash, gratuity, services or any inducements.

Non-retaliation for reports of concern: Pepper Construction Group expects Subcontractors and Suppliers to have a policy and process for reporting workplace concerns. The policy and process should be transparent, easily understandable, and should protect reporting and participating individuals from retaliation.

2. Data privacy and security

Pepper Construction Group requires our Subcontractors and Suppliers to protect the privacy of individuals and the security of all confidential assets and information.

Confidential assets and information: Subcontractors and Suppliers must protect Pepper Construction Group's and its clients' confidential assets and information. Subcontractors and Suppliers must design and maintain processes to provide appropriate protections for this information.

Personal information and privacy: Pepper Construction Group requires Subcontractors and Suppliers to protect personal information in compliance with all applicable local laws. Personal information provided by or on behalf of Pepper Construction Group should only be used, accessed, and disclosed as permitted by the Subcontractor or Supplier agreement.

3. Employment and Working Conditions

Pepper Construction Group supports, among other things, the United Nation's Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Pepper Construction Group strives to adhere to the principles set forth in these standards and expects our Suppliers to do the same.

Modern slavery and human trafficking

Pepper Construction Group does not tolerate slavery, forced labor, or human trafficking in any form. Pepper Construction Group requires Subcontractors and Suppliers to fully comply with the applicable legal requirements of slavery, forced labor and human trafficking laws, and expects Subcontractors and Suppliers to enact practices to ensure compliance with such laws.

Child labor

Pepper Construction Group does not tolerate child labor in any form. Subcontractors and Suppliers must act in compliance with all laws regulating minimum working age for each position, including any laws pertaining to the employment, apprenticeships, and internships of youths and students.

Human rights

Pepper Construction Group does not tolerate human rights violations in any form. Pepper Construction Group expects Subcontractors and Suppliers to enact practices to maintain a respectful and safe workplace. Pepper Construction Group expects Subcontractors and Suppliers to not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, bullying or harassment of any kind.

Employment laws

Subcontractors and Suppliers must comply with all applicable local wage and labor laws. Pepper Construction Group expects Subcontractors and Suppliers to provide employees with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work. All use of temporary, dispatch and outsourced labor shall be in accordance with local law.

4. Safety and wellbeing

Pepper Construction Group expects Subcontractors and Suppliers to implement sound safety practices across business operations in accordance with the Pepper Construction Safety Handbook.

Health and safety

Subcontractors and Suppliers must comply with all applicable health and safety laws and regulations. Pepper Construction Group expects Subcontractors and Suppliers to adopt practices to minimize health and safety risks, support accident prevention, and ensure a safe workspace for all workers.

5. Diversity, Equity & Inclusion

Pepper Construction Group is committed to a workplace that is diverse, equitable and inclusive. Our culture is founded on the principles of respect and dignity, and this is core to how we treat each other. We expect our partners to uphold these principles and comply with the following specifics.

Non-discrimination and workplace diversity: Subcontractors and Suppliers must comply with all applicable laws relating to discrimination in hiring, employment practices, and harassment and retaliation. Pepper Construction Group expects Subcontractors and Suppliers to operate workplaces free of discrimination, harassment, victimization and any other abuse on any grounds including but not limited to age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation or veteran status.

Subcontractor and Supplier diversity

As one component of Pepper Construction Group's long-standing commitment to advancing diversity, equity and inclusion, Pepper Construction Group encourages relationships with diverse and underrepresented businesses in our strategic sourcing and procurement process. Pepper Construction Group values Subcontractors and Suppliers that similarly value diversity in their own supply chain and that support Pepper Construction Group's goals with respect to supplier diversity.

6. Sustainability and the environment

Pepper Construction Group prioritizes sustainability through our work – and we expect our Subcontractors and Suppliers to do the same, when possible. Pepper Construction Group prioritizes carbon drawdown by introducing five scalable strategies on every project including carbon infused concrete, sustainable energy options, water reduction strategies, insulation best practices and modern refrigeration strategies. The company supports the highest standards in recycling methods and the integration of healthy materials into every project we build.

Environmental footprint

Subcontractors and Suppliers must comply with all applicable environmental laws and regulations. Pepper Construction Group expects Subcontractors and Suppliers to address Subcontractors and Suppliers' environmental risk and impact. Within reasonable means, Pepper Construction Group expects its direct Suppliers and the Suppliers of their Subcontractors to measure, manage and reduce energy use, water use, waste and greenhouse gas (GHG) emissions within their own operations.

Compliance with the Code of Conduct

Violations

Subcontractors and Suppliers are required to promptly report to Pepper Construction Group legal violations or violations of the Code or other Pepper Construction Group policy. Subcontractors and Suppliers must promptly forward to Pepper Construction Group, if permitted by law, any subpoenas, regulatory requests, media inquiries or other third-party requests concerning Pepper Construction Group.

To report a violation or other information, please contact Dena Anderson, Senior Vice President, Human Resources (denaanderson@Pepperconstruction.com). Pepper Construction Group will keep the reported information confidential, provided it does not hinder any investigation and is permitted to do so by law.

Pepper Construction Group's Rights

Pepper Construction Group reserves the following rights to ensure and enforce Subcontractors and Suppliers' compliance with the Code.

Supplier selection

Pepper Construction Group will evaluate Subcontractors and Suppliers' compliance with the Code upon request.

Violations and termination

Subcontractors and Supplier shall contractually obligate its Subcontractors and Suppliers, if any, to comply with the Code. Non-compliance with, or violation of, the Code, shall be considered by Pepper Construction Group to be a violation of any Subcontractor's or Supplier's contractual obligations, and shall be handled as such.

Order of Precedence; Changes to the Code

The Code is not meant to, and does not, supersede any applicable law or any term in an agreement between Pepper Construction Group and a Subcontractor or Supplier. To the extent there is any conflict between this Code and any applicable law or provision of any agreement, the applicable law or agreement controls. Pepper Construction Group reserves the right to update or change the Code requirements.

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