

Partner Code of Ethics and Conduct.

Gray, Inc. and its subsidiaries

PURPOSE AND VISION

At Gray, we are committed to making a positive difference in people's lives and building a better future for all. We envision transforming industries by reimagining what's possible and being the trusted partner for all our stakeholders. Our success is built upon the values of leadership, trust, respect, collaboration, safety, and customer focus, which define and protect Gray's culture. As a trade partner, supplier, consultant, or other partner, you are essential to helping us fulfill this vision.

Gray's commitment to building long-lasting relationships with trade partners, suppliers and consultants starts with prequalification and continues through the bid/ proposal, preconstruction, construction, and closeout processes. Collaboration is key to our projects' success, and we expect all of Gray's vendors, subcontractors, suppliers, consultants, and partners and their employees, agents, and contractors (collectively, "Partners") to follow responsible business practices and comply with this Partner Code of Ethics and Conduct ("Code") to ensure that together, we build a better, safer, and more ethical future. This Code complements any legal agreements with Gray or its affiliates, and we expect Gray's Partners to hold their supply chain to the same standards. Gray's Partners must comply with all applicable laws and, in the event of a conflict, follow the higher standard.



1. COMMITMENT TO SAFETY AND QUALITY OF LIFE

Safety Priority: Gray puts safety and quality of life first. We expect Gray's Partners to prioritize the health, safety, and welfare of everyone involved in their operations, including employees, subcontractors, and the broader community.

Health and Safety: Each Partner is responsible for integrating comprehensive health and safety management practices and job-specific risk assessment, risk management, and safety training into its operations. Gray's Partners will meet or exceed applicable laws, industry standards, and programs, and will work to ensure safe working conditions, actively work to prevent accidents, and achieve continuous improvement in workplace safety. Gray's Partners shall give their employees the right to refuse unsafe work and report unsafe or unhealthy working conditions.

Quality of Life: Beyond safety, we believe in promoting the well-being of workers. Gray's Partners are expected to offer fair wages, reasonable working hours, and work environments that foster dignity and respect for all employees.

2. ETHICAL LEADERSHIP AND ACCOUNTABILITY

Act with Integrity: Gray's Partners must conduct business honestly and ethically, upholding the highest standards of integrity in every transaction. Gray's Partners must be transparent in their dealings with Gray and should never engage in corruption, bribery, or other unethical practices.

Compliance with Laws and Regulations: Gray's Partners must comply with all applicable laws, including but not limited to labor laws, environmental regulations, anti-bribery, and anti-corruption laws, in the countries and jurisdictions in which they operate. Where applicable, Gray's Partners must comply with all trade and import regulations, including sanctions and embargoes.

Continuous Improvement: Gray's Partners are encouraged to pursue continuous improvement in their practices, leadership, and innovation to better align with our mutual goals.

3. RESPECT AND INCLUSION

Human Rights and Fair Treatment: Gray's Partners must respect human rights and ensure that all individuals within their operations are treated with fairness, dignity, and respect. No form of discrimination, harassment, or forced labor will be tolerated. Gray's Partners should provide an environment where people are treated the way they want to be treated—where everyone is welcome and respected.

Diversity and Opportunity: Gray's Partners should support environments that foster diversity and create opportunities for people of all backgrounds and characteristics.

Freedom Of Association And Collective Bargaining: Gray's Partners shall recognize and respect the right to collective bargaining and the rights of employees to associate or not to associate with any group, as permitted by law and in accordance with all applicable laws and regulations.

4. COLLABORATION AND TRUST

Partnering for Success: We value open communication, collaboration, and mutual respect in Gray's partnerships. Gray's Partners are expected to work with us as one cohesive team, assuming positive intent, and focusing on shared goals. Collaboration should prioritize long-term relationships and win-win outcomes for all.

Honesty in Communication: Clear, honest, and timely communication is crucial to maintaining trust. Gray's Partners are expected to communicate any challenges or changes that may impact our shared goals openly and promptly.



5. ENVIRONMENTAL STEWARDSHIP

Sustainability: Gray is committed to building a better future, and that includes protecting our environment. Gray's Partners are expected to operate in an environmentally responsible manner, minimizing their environmental impact, conserving resources, and adhering to all environmental regulations.

Innovating for a Greener Future: Gray's Partners should embrace an entrepreneurial spirit by continuously seeking innovative ways to improve sustainability and reduce environmental footprints in their operations and materials.

6. CUSTOMER AND RELATIONSHIP FOCUS

Commitment to Quality: Gray's Partners must deliver high-quality products and services that meet or exceed the expectations of Gray and its customers. Attention to detail, excellence in execution, and reliability are essential.

Customer-Centric Approach: Gray's Partners must understand that the end customer's needs and satisfaction are the foundation of our success. We expect Gray's Partners to be responsive, proactive, and dedicated to delivering outstanding service.

7. ETHICAL BUSINESS PRACTICES

Anti-Corruption and Anti-Bribery: Partners must comply with all anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and local laws prohibiting commercial and governmental bribery. No Partner may offer or accept bribes, kickbacks, or anything of value, engage in extortion or embezzlement, or improperly influence government officials or business dealings for unfair advantage. Additionally, Partners are prohibited from offering gifts to Gray's team members that could improperly influence business decisions or create an unfair advantage.

Fair Competition: Gray's Partners must compete fairly in the marketplace and avoid anti-competitive practices with third parties, such as collusion or price-fixing. Gray's Partners should conduct their operations with transparency, fairness, and openness.

Records: Partners shall maintain accurate and transparent financial books, business records, and accounts maintaining an accounting of all payments (including any gifts, meals, entertainment or anything else of value) made on behalf of Gray or out of funds provided by Gray and must furnish a copy of these records to Gray upon request.

Conflict of Interest: Gray's Partners should avoid any relationships or practices that could create real or perceived conflicts of interest with Gray or its customers. Gray's Partners must promptly disclose any potential conflicts to maintain transparency.

8. CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Protecting Information: Gray's Partners are expected to protect any confidential or proprietary information and intellectual property rights shared by Gray and refrain from unauthorized use or disclosure whether in paper, electronic, or other forms. Confidential information and intellectual property rights shared as part of the business relationship should not be disclosed unless authorized by Gray, even after the relationship ends. If a Partner mistakenly receives confidential information, they must notify their Gray contact and stop any further distribution.

Secure Data Handling: Gray's Partners should have strong data protection practices in place to safeguard any sensitive information or data they may handle on our behalf.



