

## **BIG CONSTRUCTION CODE OF ETHICS & BUSINESS CONDUCT POLICY**

A Note from Our CEO & Founder

BIG Construction is founded on the idea that strong relationships drive greater accomplishments than can be achieved alone. Ours is a culture united by a sense of community—one that values collaboration in service of successful projects and happy clients. And important to collaboration is a deep commitment to safety, ethics and integrity.

BIG's Code of Ethics & Business Conduct Policy is rooted in our values of trust, drive, ideas, and build, and provides a framework for how we should interact with our peers, clients, partners, suppliers and communities.

As we work together to tackle complex challenges for our clients, there may be times when we are faced with an ethical dilemma. When we understand our Code of Ethics & Business Conduct Policy and commit to these standards, we are better equipped to successfully navigate issues and prevent harm to our business.

If you have a question on the best course of action, ask before you act. Remember your manager and the Leadership team are always available to you. Pursue discussion until the matter is resolved.

If you become aware of a possible violation of our policy or a law that governs our business – please reach out to your manager, the HR Manager or any member of the Leadership Team.

This Code of Ethics & Business Conduct Policy is a living document that will continue to grow and evolve alongside our company and ever-changing industry.

I am proud to lead a company that is dedicated to bettering the construction experience. Thank you for your dedication to our success and for your commitment to doing the right thing each day.

Tony Iannessa  
CEO & Founder

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## **Introduction**

### **Policy Procedures**

In conducting the business of BIG Construction, employees must follow the Code of Ethics & Business Conduct Policy. BIG observes and complies with all laws that apply to us. In the course of our business transactions and relationships, our values and ethics require us to do more than the law requires, and in all cases, we act with integrity.

Remember, Trust is one of our values, if not our most important, and in order to fulfill our commitment to live our values, each of us must effectively implement BIG's Code of Ethics & Business Conduct Policy:

### **Responsibility of All Employees**

Every BIG employee must be familiar with this Code of Ethics & Business Conduct Policy and take appropriate action to ensure that the operations in his or her area of responsibility are conducted in accordance with the Code.

### **Responsibility of BIG Leadership Team**

BIG's Leadership Team is required to annually affirm that they have read the Code of Ethics & Business Conduct Policy, are in compliance, and agree not to knowingly engage in activities in violation of this Code.

### **Reporting Violations of the Code of Ethics & Business Conduct Policy**

If any BIG employee suspects or is aware of violations of any laws or conduct inconsistent with the Code of Ethics & Business Conduct Policy, the employee is urged to report the activity to Human Resources or a member of BIG's Leadership Team.

BIG's policy prohibits retaliation against any employee who makes a good faith complaint to the company. Employees should not fear retaliation for reporting a suspected violation or asking a question related to this Code of Ethics & Business Conduct Policy.

### **Questions**

Direct any questions concerning the Code of Ethics & Business Conduct Policy to Human Resources. Each employee is responsible for bringing any questions to the attention of HR or the Leadership Team if he or she is in doubt whether a particular act or course of action is legal or appropriate.

In the event that an employee is not comfortable discussing potential questions or violations associated with the Code of Ethics & Business Conduct Policy, they may report this via the HR Department Hotline (<https://www.buildbig.com/compliance-reporting>). The hotline allows Compliance Reporting to be submitted by employees and vendors. Users are able to withhold their name in order to provide an anonymous report.

## Compliance

### Equal Employment Opportunity

BIG Construction is an equal opportunity employer. We are committed to providing equal employment opportunities to employees and applicants for employment without regard to race, color, national origin, marital status, sexual orientation, gender, age, citizenship status, disability, religion, or any other characteristic protected by law. The policy also applies to qualified disabled persons and qualified disabled veterans and veterans of the Vietnam era.

This policy applies to all terms and conditions of employment, including, but not limited to, recruitment, recruitment advertising, employment, placement, promotion, transfer, demotion, termination, layoff, recall, leaves of absence, eligibility for benefits, rate of pay or other forms of compensation, and selection for training.

It is the policy of BIG to comply with all the relevant and applicable provisions of the Americans with Disabilities Act ("ADA"), as amended and any applicable state and local law. BIG will not discriminate against any qualified employee or applicant with a disability with respect to any terms, privileges, or conditions of employment and will also provide reasonable accommodation for such employee or applicant as required by applicable law. Should you require a reasonable accommodation, please contact your manager.

Any employee in violation of this policy may be subject to appropriate disciplinary action, up to and including termination.

### Safety and Health

Your health and safety are of paramount concern. At BIG, our people and our relationships are the heart of our business, and we work diligently to promote your overall well-being.

This means:

- You are expected to perform your work free from the influence of alcohol, drugs, or controlled substances.
- You are expected to behave in a safe, respectful, and professional manner while at work. We have a zero-tolerance policy towards workplace violence.
- You are expected to use your time and energy to perform your job responsibilities while in the workplace. Use of company resources, such as information systems (i.e. computer equipment, company networks, accessing the internet) must be appropriate to the workplace
- You are responsible for treating co-workers with respect.

All BIG employees are responsible for maintaining a safe and healthy work environment. Adhere to BIG's safety practices and guidelines and immediately report any concerns to your manager. In some instances, certain incidents must be reported promptly to the appropriate government agency. If you are uncertain if reporting is required, check with your manager. BIG's policy strictly forbids retaliation or reprisals against an employee for reporting a safety concern.

## Conflicts of Interest

It is sometimes a customary business practice and common courtesy to present prospective clients or suppliers with gifts, favors, and entertainment; however, these occasions are carefully defined. There is never an occasion for secret commissions, kickbacks, or hidden payments to third parties who might have influence on clients, suppliers, or officials.

These strict rules and conditions must be followed to ensure compliance:

### Giving Gifts, Favors and Entertainment

An employee may extend gifts, favors or entertainment to any client, potential client, supplier or potential supplier, only if all the following conditions are met:

- They are not in violation of any applicable law.
- They are consistent with customary business practices.
- They are not offered in exchange for gain or in exchange for any action.
- They are of such limited value and are in such a form that they cannot be construed as a bribe or payoff.
- Public disclosure of the facts surrounding them would not reflect negatively against BIG or the recipient.

### Receiving Gifts, Favors and Entertainment

BIG employees and members of the employee's immediate family should not solicit, accept or retain any personal benefit from any individual doing or seeking to do business with BIG. A personal benefit includes any type of gift, entertainment, special consideration, gratuity, favor, service, discount, loan, fee or payment of anything of value.

Limited exceptions are as follows\*:

- If there is no reasonable likelihood of improper influence in the performance of duties on behalf of BIG.
- If the personal benefit is less than \$100 and falls into one of the following categories:
  - Normal business courtesies, such as a meal or a golf game involving no more than ordinary amenities.
  - Non-cash gifts which are not of significant value.
  - Gifts received because of kinship, marriage or social relationships entirely beyond and apart from any business relationship.

\*These exceptions are only permissible provided the following conditions are met:

- The receipt of the personal benefit is not in violation of any applicable law.
- The personal benefit is not offered in exchange for gain or in exchange for action on the part of BIG.
- The personal benefit is of such limited value and is in such form that it cannot be construed as a bribe or payoff.
- Public disclosure of the facts surrounding the personal benefit would not reflect negatively against BIG or the giver.

## Bribery

BIG strictly prohibits offering bribes in any manner to secure business from any client, to obtain favorable terms from suppliers or to influence the decisions of a client or union official.

BIG engages in vigorous but fair and ethical competition. Anti-competitive and unethical business practices are prohibited.

## **Business Activities**

Consult your manager if you have a question about how a task should be done. Don't forget that the door to BIG's Leadership Team, your manager, and HR are always open. We believe that concerns are best addressed through informal and open communication and encourage you to pursue discussion of work-related concerns until resolved. General rules that apply to all employees include the following:

- All employees of BIG Construction must comply with applicable federal, state, and local laws, rules, and regulations.
- Use of company funds or property for any purpose that is in violation of applicable laws or company policy is prohibited.
- Employees are prohibited from competing with BIG and from personally taking for themselves opportunities that occur in the course of company business, such as using company property, equipment, information, or position for personal gain.
- The use of company equipment, materials, and other resources for other than company business (for example, charitable or personal work) must be approved in advance by your manager.
- Employees must maintain the confidentiality of information entrusted to them by BIG and its clients, except when disclosure is authorized or legally mandated. Confidential information includes all nonpublic information that might be of use to competitors or harmful to the company or its clients, if disclosed.
- Each employee should deal fairly with BIG's clients, suppliers, and competitors.

## **Accounting and Financial**

- All BIG Construction employees must act in good faith, responsibly, with due care, competence, and diligence, without misrepresenting material facts or allowing their independent judgment to be subordinated.
- All funds must be properly recorded on company books and records.
- All information disclosed in our public reports, including those filed with regulatory agencies, will be full, fair, accurate, timely, and understandable.
- BIG will comply with the rules and regulations of federal, state, and local governments and other appropriate private and public regulatory agencies.

## **Managing Company Records**

Maintaining records is essential to our work, and care must be taken to ensure that records are managed properly. These principles should guide us to:

- Maintain all records required by law.
- Make a good faith effort to ensure the accuracy of records – especially important when documents are produced for an official purpose, such as litigation or a government inquiry.
- Retain records related to litigation or an investigation.

## **Safeguarding Client Information**

Information is a valuable asset and releasing confidential information can harm our interests and/or our clients. Similarly, misusing information from our clients and partners violates their trust in us. In any contract or interaction, you should have a clear understanding of what information you are receiving, how you are to deal with it, and what you are to use it for.

- Our relationships are founded on trust and transparency. Being honest is the right thing to do, and also contributes to our productivity and success. When being honest necessitates voicing a concern or complaint, be sensitive in how you craft your message, and remember the difference between fact and opinion.

- If a client requests that we sign a Non-Disclosure Agreement (NDA), BIG employees should notify all team members who may be affected, including the Leadership Team and Marketing.
- Only accept sensitive or proprietary information from clients or suppliers when you really need it. Manage the receipt, use, distribution and destruction of this information so that you are able to maintain the appropriate level of confidentiality.
- Do not seek out confidential information unless it is vital to the completion of your duties.
- If you are inadvertently exposed to confidential information, get advice from your manager immediately as to how to handle the information moving forward.
- Do not seek information through illegal means or by misrepresenting yourself, misusing consultants, or exploiting proprietary information or trade secrets.

### **Use of Company Assets**

It is each employee's responsibility to control and judiciously use BIG Construction's assets. This includes tangible assets such as furnishings, office equipment, tools, vehicles, cash, and other property used in the execution of our jobs. It also includes intangible assets such as data, processes, information resources, company time, and intellectual property. Employees should safeguard company assets against unauthorized use or removal as well as any loss by criminal act or breach of trust.

- BIG acknowledges and respects everyone's right to privacy, but please keep in mind that the systems you use are Company property and BIG employees have no expectation of confidentiality when communicating using Company property.
- Company assets may never be used for offensive or illegal purposes, conducting a business, or helping a competitor.
- Employees are expected to use good judgment for their incidental and occasional personal use of BIG's communication systems and should be aware that users automatically waive any claims to privacy. If a communication is intended to be "personal and confidential," alternative means of transmission should be used.
- Follow all company security protocols, including the protection of passwords or access numbers to prevent unauthorized use of these systems or networks. You are responsible for the security of information accessed or modified under your password.
- Equipment and its contents remain company property and must be protected and returned. Any loss or theft must be immediately reported.
- Only approved and licensed software may be placed on company equipment. Check with IT before downloading software. You may not make unauthorized copies of software programs or use personal software on company equipment.

## Outside Business Activities

### Political Activities and Charitable Contributions

BIG encourages all employees to be active and responsible citizens in your communities, to participate in civic and support organizations, and to donate to workplace giving campaigns. Remember that volunteering your personal time can be as important as donating money.

BIG supports many charitable organizations every year. Employees may offer recommendations of worthy organizations and causes. Contact your manager if you have a suggestion. All charitable contributions must be approved by management and the following rules apply:

- There will be no pressure on employees to personally contribute to any political activity, and BIG will not reimburse any employee, officer, or director for individual or group political activity.
- BIG will never make contributions to candidates for federal office.
- Contacts with government officials are highly regulated. You may not contact officials, on behalf of BIG Construction regarding a policy, regulation or legislation unless the action has been approved by the CEO.

### Interacting with the Media

You are responsible for seeking approval from the Marketing Manager prior to any interaction with the media on behalf of BIG Construction. BIG is proud of our accomplishments and the contributions of our employees. We want to share significant news about our company's activities with the public while ensuring that the information is appropriate, factual, consistent, and in the best interests of our clients and our company.

Likewise, photography and image use often has stringent copyright, trademark, licensing, intellectual property, right-to-privacy, and permission requirements. Please check with Marketing before distributing imagery.

### Interacting Online

You are responsible for behaving with discretion online. Social media has enormous potential but also carries risks. Standards of honesty, discretion, and confidentiality are as essential online as they are in any other setting. It is never permissible to disclose confidential, proprietary, or non-public information related to your work, whether it belongs to the Company, a client, partner, or supplier.

Remember online communication is public and permanent. Whether expressing an opinion or simply chatting, take precautions to use good judgment.

As a general guideline, if it is appropriate to do something offline as a part of your job, it is appropriate to do it online. The opposite is also true: If it is not appropriate offline, you should not do it online.

When you communicate online, you are representing yourself; you are not a company spokesperson. You should make it clear that your communications represent your personal views and do not represent BIG's views.

### Project Site Representation

Each project site is a representation of BIG Construction, LLC. Every BIG employee is responsible for following the guidelines set in this Code of Ethics & Business Conduct at the project sites and ensuring that on-site activities are carried out in a safe, respectful, and professional manner to all stakeholders.

Stakeholders include, but are not limited to clients, building tenants, property managers, pedestrians, subcontractors, and consultants. By following the Code, we preserve BIG's reputation, and the trust we have built with our clients, business partners and each other.