

Code of Conduct

Ames Family of Companies



Ames Construction

Code of Conduct

For Ames to be successful both today and into the future, we must continue to encourage the promotion of people who possess complete integrity, honesty, and high moral values. Any individuals or departments within our organization that lacks accountability for these traits run contrary to the core values that shaped and sustained our great Company.

—Raymond G. Ames

It takes many good deeds to build a good reputation, and only one bad one to lose it.

—Benjamin Franklin



Introduction

Honesty and ethical conduct have always been an integral part of the culture at the Ames family of Companies. We have carefully developed and fostered this culture over the last 60 years. Implementing this culture developed organically, and earning the first-class reputation we currently enjoy is one of the Company's most precious assets. Having integrity is the right thing to do and is integral to our reputation and success.

Key factors to our sustained success are the preservation of our reputation for getting the job done with the utmost respect for integrity and fair dealing with all of our business partners. Coupled with the quality of our people, our name and reputation are our most valuable asset for years to come at Ames.

The requirement that all personnel at Ames act ethically and legally is reflected in our organization's Vision, Core Values, and Guiding Principles. This Code brings together those principles, while implementing systems and providing guidance on proper legal and ethical conduct.

No matter your role within our Company, it is your duty to act with the highest levels of integrity in compliance with the law. If you believe a violation of this Code, law, or any of our policies has occurred, you must report it immediately. You can report it to your immediate supervisor, Senior Vice President, Compliance Officer, Corporate Compliance Officer, the Human Resources Director as applicable, an attorney in the Ames legal department, or anonymously through the compliance helpline. Ames will not retaliate against persons reporting a suspected violation.

This Code will help ensure that our actions reflect well on ourselves, our colleagues, our business partners, and the Ames Family of Companies.

Raymond G. Ames

Chairman of the Board



AMES MISSION STATEMENT

Our mission at Ames is to provide construction solutions in harmony with nature so that our people, clients, partners, and communities flourish.

AMES CORE VALUES

We achieve this through our core values of people, team, our bond, persistence, and vision.

People

Developing our greatest asset.

Team

Working together as a team for a common goal.

Our Bond

Doing what we say we will do.

Persistence

Striving for excellence.

Vison

Taking your vision and making it a reality.

BRAND PROMISE

Our Brand Promise is performance, not promises. 'Trust Ames to deliver brilliant solutions to your most complex problems. Our roots are deep and our culture is flourishing.'

Ames Policy Statement

1. All employees are expected to know and must comply with this Code.
2. Any officer, partner, director, or employee violating this Code is subject to discipline, which may include demotion or dismissal.
3. All employees have a duty to report all suspected violations of the Code or other potentially unethical behavior by anyone, including officers, directors, partners, employees, agents, clients, subcontractors and suppliers, to your immediate supervisor or through any of the other reporting options provided herein.
4. Employees in management positions are accountable for their own conduct and the conduct of those reporting to them. Each management employee is expected to inform those reporting to them about this Code and take all necessary steps to ensure compliance with this Code.
5. No employee has the authority to direct, participate in, approve or tolerate any violation of the Code by anyone. Any employee who has questions about the application of this Code should consult his/her immediate supervisor, Senior Vice President, Compliance Officer, Corporate Compliance Officer, the Human Resources Director as applicable, or an attorney in the Ames Legal Department or anonymously through the compliance helpline.



Ames Code Of Conduct

1. Our commitment:

In support of core values, each employee, officer, and director of an Ames Company, and each agent, consultant, and worker engaged by Ames commits to abide by this Code. Each of those persons also commits to abide by all the policies referenced in the Code that are relevant to that person. Violations will be cause for corrective action, which may result in disciplinary action up to and including termination of employment or services.

This Code has been prepared as a working guide and not as a technical legal document. Thus, it will not provide an all-inclusive answer to specific questions. If any employee has doubts regarding a questionable or uncertain situation, that employee should immediately contact his or her supervisor, Senior Vice President, Compliance Officer, Corporate Compliance Officer, an attorney in the Ames legal department, the Human Resources Director as applicable, or anonymously through the Ethics Helpline at 1-800-495-5605.

2. Obey the law:

We will conduct our business in accordance with all applicable laws and regulations.

3. Act Ethically:

We will conduct our business in accordance with the highest standards of ethics. Most ethical problems can be avoided by exercising common sense. The following statements are potential examples of unethical conduct:

- Well, maybe just once...
- No one will ever know.
- It doesn't matter how it gets done as long as it gets done.
- It sounds too good to be true.
- Everyone does it...
- Shred that document.
- We can hide it.
- This will destroy the competition.
- We didn't have this conversation.
 - o When you encounter these situations, ask yourself: Is what I'm doing legal? What would you tell your child to do? How would you feel if your friends, family and neighbors knew what you were doing? How would this look in the newspaper?

4. Promote a Positive, Open, Safe, Non-Discriminatory, and Ethical Work Environment:

We will provide and promote a positive and ethical work environment while respecting others, and performing to the highest standards.

At Ames we care about our coworkers and take seriously our responsibility to keep each other safe on the job. We expect you to do the same and speak up when you see someone working in an unsafe manner. If you see something, say something.

We will provide a workplace where everyone is respected and appreciated. We will respect diversity. We will comply with all applicable anti-discrimination laws wherever we do business, and the requirements of our harassment and discrimination policies.

5. We strive for Quality in all that we do:

Our people will provide quality service and products to our customers as required by Contract, our policy and/or, good industry standard. Our reputation for quality work will never be compromised by unethical decision-making.

6. Protecting the Environment:

Being a responsible corporate entity includes having respect for the environment. The Ames Environmental Policy aims to ensure that everyone works in compliance with all federal, state, and local laws. Adherence to the environmental policy also includes avoiding any concealment of any improper discharge, release, or disposal of regulated materials.

7. Avoid Conflicts of Interest:

Directors, officers, employees, agents, consultants and contract workers have a duty to advance the interests of the Company. A conflict of interest occurs whenever a person's private interests are not aligned with, or appear to be inconsistent with, the interests of the Company. This includes anything with the appearance of a "kickback".

In addition, you must avoid any relationship, influence, or activity that might impair, or even appear to impair your ability, or the ability of any government representative or agent to make objective and fair decisions when performing your job. You must not use Company property or information for personal gain.

8. Recordkeeping:

Transactions between an Ames Company and its clients, subcontractors and suppliers must be promptly and accurately recorded in accordance with generally accepted accounting practices and principles.



You must not misrepresent facts in Company records or falsify Company records. Costs incurred on one project must not be charged to another project, unless expressly permitted by contract and applicable law.

9. Public Disclosures:

We are committed to full, fair, accurate, timely, and understandable disclosure in all public communications. Those disclosure obligations apply to all persons who have any responsibility for preparing, drafting, reviewing, signing or certifying the information contained in such reports. This requires operating in an environment of open communication, while not compromising confidentiality concerns.

10. Competition and Antitrust Laws:

In all of your dealings with competitors, teaming agreements, joint ventures, exclusive subcontracting, (including, but not limited to, pricing, bid/no bid, marketing strategies. you must be familiar with applicable competition and anti-trust laws that apply to those activities.

If you are involved with proposals, bid preparations, or contract negotiations, you must be certain that all statements, communications, and representations to prospective clients are accurate and truthful.

11. Political Contributions and Activities:

In the United States, federal law prohibits corporations from donating corporate funds, goods, or services, directly or indirectly, to candidates for federal office or federal officials. This includes employee's work time. Local and state laws also govern political contributions and activities as they apply to their respective jurisdictions.

Favorable treatment must not be sought, received, or given in exchange for furnishing or receiving gratuities. We must avoid acts that might give the appearance that such favorable treatment was sought, received or given. We will not tolerate any violation of applicable law related to gifts, gratuities, and business courtesies (foreign or domestic..

12. Confidential Information:

Confidential information includes all information, whether technical, business, financial, or otherwise, concerning the Company that the Company treats as confidential or secret, and that is not readily available or made available publicly.

You must keep that information protected and secured. You must not disclose that information to anyone without proper authorization or use that information for anything other than its intended purpose.

13. Use of Assets:

You are responsible for the proper use of property, information resources, materials, facilities, credit cards, expenses, time-reporting, cash and bank accounts, and equipment belonging to the Company, our subcontractors, suppliers, and clients. You must use and maintain these assets with care and respect, guarding against waste and abuse.

14. Use of Electronic Communications:

Electronic communications of any type, in addition to oral or written communications, must be conducted in accordance with this Code.

15. Contract Payment and Claims:

Ames has built a reputation for honesty in every interaction and transaction, including changes and pay requests. As an Ames employee, you agree that payments received by the client accurately reflect the value of the goods or services as required by the contract, and do not knowingly contain false information.

16. Disadvantaged Business Enterprises and Small Business:

We will not discriminate based on race, color, national origin, or sex in the hiring of suppliers and subcontractors. We are committed to full compliance with government sponsored opportunity programs such as the US DOT DBE program and various state and local DBE initiatives.

We also fully embrace the US government's long-standing commitment to provide small business subcontractors the maximum practical opportunities to participate in federal construction projects.

17. Compliance Assessments

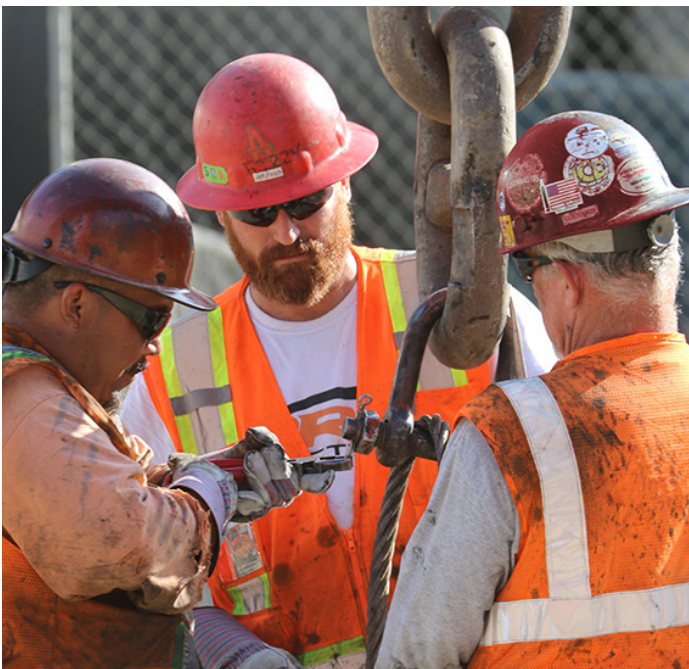
- Ames performs assessments at the area office and project level by the compliance group.
- Compliance results are reported on a quarterly basis to the Ames Corporate Compliance Committee. This committee includes Ames executives.

18. Anti-Human Trafficking, Modern Day Slavery:

We reject any form of modern day slavery including forced labor, debt bondage, forced marriage and trafficking; child labor; or other labor exploitation in our activities.

19. Business Courtesies:

Our employees, contractors, and third parties will not engage in activities like bribery, corruption, or offering or accepting gifts that could be perceived as influencing business decisions, with a strong emphasis on transparency and reporting any potential issues.





Reporting Unethical Conduct or Violations

All complaints will be investigated with care and discretion.

As an Ames employee, it is your obligation to report all suspected or actual violations of the law or this Code immediately to your supervisor. This applies to suspected conduct, regardless of the identity or position of the suspected offender. You may also report your concerns to your immediate supervisor, Senior Vice President, Compliance Officer, Corporate Compliance Officer, an attorney in the Ames legal department, the Human Resources Director as applicable, or anonymously through the Ethics Helpline.

Corporate Compliance Officer

Name: Tara Leeper

Phone: 952-994-7846

Email: taraleeper@amesco.com

West Compliance Officer

Name: Tayler Jordan

Phone: 951-751-2032

Email: taylerjordan@amesco.com

East Compliance Officer

Name: Kari Strack

Phone: 612-468-9909

Email: karistrack@amesco.com

Compliance Reporting Helpline:

You may report a violation anonymously by calling the Compliance Reporting Helpline:

1-800-495-5605

You may also report a violation by email, QR Code or online at:

- reportaconcern@amesco.com
- amesconstruction.navexone.com

EMAIL



ONLINE

