



BUSINESS CONDUCT GUIDE

**“Our success relies on everyone doing
the right thing, every time.”**

— Leslie M. Duke, Chair and CEO

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MESSAGE FROM THE CHAIR AND CEO

At Burns & McDonnell, integrity and a commitment to ethics drive our success and have for over a century. As we grow, it is imperative this remains a priority.

Each of us represents Burns & McDonnell to our clients, competitors and within our communities. When we make ethical choices daily, we support our clients' success.

It is not always easy to navigate today's complex business landscape, but our Business Conduct Guide helps clarify expectations. It is your responsibility to read, understand and follow it. If issues arise, report them — Burns & McDonnell enforces a strict nonretaliation policy. It is your duty to help keep us honest with ourselves and faithful to our clients.

Our success relies on everyone doing the right thing, every time. When we each do our part, we strengthen the trust our clients and communities place in us and support the continued growth of our business and the positive impact we make together.

Sincerely,



Leslie M. Duke
Chair and CEO



INTRODUCTION

Sound business practices and ethical behavior have been the core of success at Burns & McDonnell since the firm's founding in 1898. Our culture of entrepreneurship shapes the actions we take and the decisions we make every day.



***We should strive
to act with the utmost
integrity, not just in
our most important
corporate decisions
but in the thousands
of actions we take
every day throughout
the world.***

The ethical performance of Burns & McDonnell is the sum of the daily behavior of all the women and men working on our team. Every Burns & McDonnell employee or authorized representative is expected to adhere to high standards of personal and professional integrity. At Burns & McDonnell, we believe that adherence to the policies stated in this Business Conduct Guide (Guide) will promote our continued success by earning and maintaining the confidence of our clients and the communities in which we work and live.

Burns & McDonnell is committed to conducting business lawfully and ethically. That means every employee and authorized representative is obligated to act at all times with honesty and integrity. We are expected to bring good judgment and a sense of integrity to every business decision. While it is not possible to list all policies and laws to be observed, nor all conflicts of interest or prohibited business practices to be avoided, this Guide details the Company's expectations regarding the conduct of Burns & McDonnell employees and any authorized representatives. This Guide serves as a road map to help everyone associated with Burns & McDonnell make good, ethical decisions.

YOUR RESPONSIBILITIES ACCORDING TO THE GUIDE

- This Guide serves as a corporate policy of Burns & McDonnell, Inc. and applies to our family of companies, including affiliates and subsidiaries. All are obligated to follow the policy. Changes have to be appealed through the shareholder representative to the Burns & McDonnell, Inc. Board of Directors.
- This Guide applies to each and every employee or authorized representative of Burns & McDonnell, including all in temporary and part-time roles.
- Any employee or authorized representative who has questions about the application of this Guide should consult with his or her supervisor, the Corporate Compliance Officer, or the Integrity Helpline.
- This Guide applies in every jurisdiction around the world where Burns & McDonnell does business, and any change, variation or waiver of the policies set forth in this Guide requires the review and approval of the Board of Directors.
- Failure to follow this Guide may result in disciplinary action, which could result in suspension, termination of employment, termination of any professional relationship with Burns & McDonnell, and/or referrals to law enforcement.

*We know that
acting ethically
makes us a better
company, a better
partner with our
clients and a better
corporate citizen.*

ADDITIONAL RESPONSIBILITIES FOR THOSE IN SUPERVISORY ROLES

- Every employee in a supervisory role is expected to periodically remind each member of his or her staff to review this Guide.
- Those with management responsibility should always lead by example, following both the letter and the spirit of policies, laws and regulations.
- Managers and supervisors should refer questions, inquiries and complaints to the Integrity Helpline or other appropriate resource, including the Corporate Compliance Officer, for assistance.
- Those in a supervisory role should take steps necessary to ensure compliance with this Guide.

CORPORATE POLICIES

This Guide discusses topics that may be covered in additional detail in other corporate policies. A cross-reference matrix can be found in Appendix A. In addition, MacCentral is a resource employees can use for additional information about the topics covered in the Guide.

ETHICAL CONDUCT

As employees, our actions and decisions reflect the Burns & McDonnell culture. We are expected to be honest in our interactions with one another and in our dealings with clients, potential clients, suppliers, business partners and the public at large. We should strive to act with the utmost integrity, not just in our most important corporate decisions but in the thousands of actions we take every day throughout the world. Ethical conduct is a high ideal, but often it just means exercising common sense and sound judgment. We know that acting ethically makes us a better company, a better partner with our clients and a better corporate citizen.

If you are ever unsure about whether or not certain actions are ethical, ask yourself these questions:

- Is the action lawful?
- Does the action align with Burns & McDonnell values?
- What would others, including my family members and peers, say about the action?
- Is the action consistent with the reputation that Burns & McDonnell has built?

OBLIGATION TO REPORT VIOLATIONS, AND COOPERATION

Our commitment to ethics is more than just a statement. It defines the way we operate at Burns & McDonnell, so when we see wrongdoing, we take action. An ethical culture is built by each one of us doing the right thing. If you see something that is not right, by reporting it you help contribute to the ethical culture at Burns & McDonnell. If you see something, say something. No employee has the authority to direct, participate in, approve, or tolerate any violation of this Guide by anyone.

Employees are expected to report any and all suspected violations of this Guide or any other laws, rules or regulations by any employee and/or authorized representative in a timely manner. Employees must also report circumstances in which they believe that a violation may be about to occur, or has the potential to occur, absent intervention or proactive investigation by the Company.

Each Global Practice, Office and Department Manager is responsible for enforcing our commitment to conducting business ethically and legally. No supervisor may require or in any way imply that an employee should act contrary to any corporate policy, including this Guide.

All employees must fully cooperate in any investigation of a suspected violation of this Guide and cooperate with any request by the Corporate Compliance Officer or the Legal Department.

Q&A

There's an issue I want to report, but I'm afraid my supervisor will be mad at me for doing so. What should I do?

As an employee, you have an obligation to report wrongdoing. If you don't feel comfortable talking with your supervisor, there are other avenues available, including your Global Practice or Regional Officer Manager, or the Integrity Helpline. And know that retaliation is not tolerated at Burns & McDonnell, so there will be no repercussions for you making a report in good faith.

As a manager, what should I do if someone brings an issue to my attention?

If the issue is something you feel comfortable dealing with directly, take action. However, if there is a legal component to the issue at hand, you should reach out to Human Resources and/or the Legal Department. If you are in doubt regarding what action to take, other resources you may call upon include your Global Practice or Regional Officer Manager, or the Integrity Helpline.

STATEMENT OF NONRETALIATION

Retaliation, in any form, in response to reports made in good faith or to participation in an investigation is prohibited and will not be tolerated. If you ever feel retaliated against by anyone, including your supervisor, contact the Corporate Compliance Officer or Integrity Helpline immediately.

SEEKING ADVICE OR REPORTING VIOLATIONS OF LAW OR COMPANY POLICY

To help protect Burns & McDonnell and individual employees, it is essential that you seek advice from your supervisor or the Corporate Compliance Officer when in doubt about the proper course of conduct, and that you promptly and fully report any situation that may violate the law or Company policy — whether you are involved or not. You can use any of the following resources.

INTEGRITY HELPLINE

We have an Integrity Helpline available to all employees and authorized representatives, allowing reports of wrongdoing to be submitted via phone, email or the internet.

Persons making a report may do so anonymously by using the Integrity Helpline. However, we encourage disclosing your identity so we can conduct a more effective investigation into the situation. Even in such circumstances, the identity of the person making a report will be protected as much as possible based on the need to prevent potential harm to others, comply with the law and conduct a complete investigation.

Integrity Hotline Contacts

TELEPHONE: 855-446-0505
(Toll-free inside the U.S., Canada, Guam and Puerto Rico)

WEBSITE: burnsmcd.ethicspoint.com

EMAIL: integrity@burnsmcd.com

MAIL:

Burns & McDonnell Engineering Company Inc.
9400 Ward Parkway
Kansas City, MO 64114
Attention: Corporate Compliance Officer

In addition, the following contacts are available to you:

- Corporate Compliance Officer
- General Counsel
- Chief Financial Officer
- Chief Executive Officer

Contact information for each of the individuals listed above can be found in Appendix C of this Guide.

INVESTIGATIONS AND DISCLOSURES

Burns & McDonnell will investigate all credible allegations concerning violations of company policies and applicable law. The Corporate Compliance Officer is responsible for conducting or overseeing all investigations and will involve others as necessary to investigate the concerns.

Identified persons making reports will receive confirmation that the report was received.

In the event that the internal investigation results in discovery of credible evidence of a violation of this policy or any applicable law or regulation, the Company will make a timely disclosure to the appropriate internal and/or external parties, including governmental entities and regulatory bodies.

CONSEQUENCES FOR VIOLATIONS

Violations of this Guide may be cause for disciplinary action and may result in any of the following consequences:


- Reprimand
- Loss of compensation, seniority or promotional opportunities
- Reduction in pay
- Demotion
- Suspension with or without pay
- Termination of employment
- Termination of any professional relationship with Burns & McDonnell
- Referral to law enforcement

UPDATES TO THE BUSINESS CONDUCT GUIDE

To ensure that the Company maintains integrity in its business, the Company, led by the Corporate Compliance Officer, will review and make appropriate changes to the Business Conduct Guide. The most current version will always be available on MacCentral and www.burnsmcd.com. See Appendix D for revision history.



WORKING TOGETHER



To fulfill our mission of making our clients successful, we have to work together. Working together involves collaboration, cooperation, honesty and support. This section of the Guide covers expectations we have of one another when working together.

EQUAL EMPLOYMENT

Burns & McDonnell seeks an energetic, enthusiastic and entrepreneurial spirit in each of our employees. We offer equal opportunity in all areas of employment to all qualified individuals regardless of race, creed, color, religion, sex (including pregnancy, childbirth or related medical conditions), age, national origin, ancestry, military status, disability, family care status, veteran status, sexual orientation, gender identity, marital status, citizenship status, genetic information or any other characteristic protected by state or federal laws.

ANTI-HARASSMENT AND NONDISCRIMINATION

We strive to maintain a workplace where all employees are treated with dignity, honesty, fairness and respect. Harassment or discrimination based upon race, color, religion, gender, marital status, sex, age, national origin, veteran status, sexual orientation, disability, or other characteristics or classes protected by law is strictly prohibited. If you experience or witness harassment or discrimination, report it right away and know that retaliation is not allowed.

The [Employee-Owner Handbook](#) (Chapter 1 of the Policy Manual) outlines our employment and office policies. See Appendix A for additional details.

Q&A

A co-worker has shared jokes about men that I find offensive. I know she's just trying to be funny, but I don't like that type of humor. What should I do?

First, try talking to your co-worker and tell her how you feel. If you don't notice a change, talk with your supervisor. No one at Burns & McDonnell should ever feel disrespected or offended in the workplace.

Examples of prohibited harassment:

- Verbal conduct such as derogatory jokes, slurs or comments
- Nonverbal conduct such as noises, whistling or obscene gestures
- Physical conduct such as unwanted kissing, blocking normal movement, or assault
- Threats and demands

GIFTS AND ENTERTAINMENT

Building and maintaining strong, ethical relationships with our clients, suppliers and contractors is vital to our business success. Engagement in both formal and informal interactions with clients and business partners is a key aspect of fostering productive business relationships.

Employees are required to exercise prudent judgment and sound discretion when offering or accepting business meals, entertainment or gifts. It is essential that no gift, entertainment or gratuity — whether offered or received — compromises or could be perceived to compromise objectivity, integrity, impartiality or the individuals involved. Employees must

ensure all business courtesies are consistent with both our internal policies and those of our clients and must avoid any activity that could be construed as creating a sense of obligation on the recipient's part. Prior to offering any gifts, Burns & McDonnell employees must review and understand the applicable gift and entertainment policies of their clients, particularly when the clients are employed by state or federal government entities.

Under no circumstances should employees offer or accept cash or cash equivalents as gifts. Cash gifts, in any form, are strictly prohibited as they may lead to concerns about improper influence. This does not include political contributions addressed in the Political Activities section of this guide.

No gifts, entertainment or business courtesies may be given or accepted during any bid list development, active solicitation, bidding process or contractual negotiation. Engaging in such activities at these times may lead to a perception of impropriety or improper influence and is strictly prohibited.

Employees must be particularly vigilant when interacting with public officials or governmental personnel, as strict rules and regulations apply, including prohibitions under the U.S. Federal Acquisition Regulation (FAR) and the Foreign Corrupt Practices Act (FCPA) when dealing with foreign officials. In such cases, employees must seek guidance from the Corporate Compliance Officer to ensure full compliance with applicable laws and regulations.

Furthermore, all expenses related to the purchase of gifts or entertainment must be properly documented and recorded in accordance with the company's financial reporting standards. Accurate records are essential to maintain transparency, ensure compliance with legal obligations and uphold our commitment to ethical conduct.

In situations where the appropriateness of providing or accepting a gift or entertainment is unclear, employees are expected to consult with their supervisor, Legal or Compliance for guidance. Burns & McDonnell is committed to fostering a culture of integrity, and we expect each employee-owner to uphold these principles in their day-to-day interactions.



Q&A

A client's project manager was instrumental in the success of a recent project. I would like to take her to lunch as a way to show my gratitude. Is that OK?

Possibly. This expression of gratitude might be considered acceptable since the lunch expense would be nominal and appropriate under the circumstances. However, it is always a good idea to discuss such situations with your supervisor to make sure there aren't unique circumstances or client restrictions that would prohibit these types of activities.

These guidelines about gifts and entertainment only apply to situations involving U.S. firms, right? I'm doing business overseas, where gifts and bribes are considered normal business practices.

No. These guidelines, and all of the guidelines outlined in this document, pertain to everyone, regardless of your home country or where you are doing business. There is more information regarding bribes and kickbacks later in this Guide, but you should know that bribes are never allowed by Burns & McDonnell.

HIRING FROM THE PUBLIC SECTOR

Strict rules may govern hiring, attempting to hire, or discussing items involving the hiring of certain employees of governmental agencies. Burns & McDonnell employees may not take part in any discussions involving the hiring of any public-sector employees without appropriate Global Practice management approval.

OUTSIDE EMPLOYMENT

Any outside employment that interferes with your job responsibilities or conscientious performance of your duties is deemed to be a conflict of interest and is not permitted. Outside employment is considered both self-employment or work performed for a third party. Examples of prohibited outside employment include:

- Work performed for anyone or any company who is or is attempting to become a competitor of the Company
- Using Burns & McDonnell resources, such as premises, equipment, materials, vehicles, or "inside information," in your outside employment
- Earning personal compensation for work performed for Burns & McDonnell
- Any activity that is hostile or adverse to the Company

Q&A

I would like to get a part-time job at a local retailer during the holidays to earn extra money. Is this OK?

This is probably acceptable, though checking with your supervisor would be the best course of action. Generally, jobs that don't interfere with your time and work commitments to Burns & McDonnell and don't create a conflict of interest are acceptable.



SAFETY AND HEALTH

At Burns & McDonnell, safety is not just behavior — it is a way of thinking. Every activity, whether mundane or extraordinary, poses some risk, and taking unnecessary risks can result in having to accept unnecessary losses. We should approach each situation with safety in mind. Only through safe business practices can we accomplish our mission to make our clients successful.

Burns & McDonnell considers employee safety and health its highest value. Many of the job activities, products and materials handled by our employees require strict adherence to safety procedures, rules and regulations. We should be aware of the Corporate Safety Program and follow all applicable procedures.

Supervisors are responsible for seeing that reasonable safeguards and precautions are taken in the workplace and reinforcing compliance with Burns & McDonnell procedures and guidelines, especially promoting safe work practices and using proper personal protective equipment.



***Burns & McDonnell
considers
employee safety
and health its
highest value.***

SUBCONTRACTING

As a federal government contractor, Burns & McDonnell may be responsible for confirming that certain subcontractors and suppliers hired by the firm conduct themselves in compliance with federal contracting laws and regulations.

Affected subcontractors may need to have:

- A published contractor code of business ethics and conduct,
- A business ethics awareness and compliance program, and
- An internal control system to facilitate the timely discovery of improper conduct and to ensure corrective measures are promptly instituted and carried out.

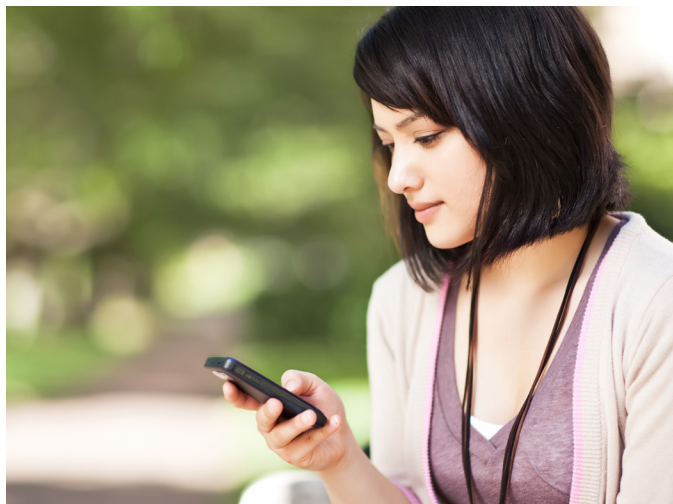
These requirements apply on all federal government contracts where the value of the subcontract exceeds the mandated thresholds of dollar value and period of performance unless:

- The subcontract is only for the acquisition of a commercial item as defined by [FAR 2.101](#)
or
- The subcontractor qualifies as a small business concern under Small Business Administration regulations, in which case the subcontractor is required only to have a published contractor code of business ethics and conduct.

Training and knowledge regarding this subject will be required of project managers and procurement staff on federal government contracts.

NO CHILD OR FORCED LABOR OR HUMAN TRAFFICKING

At Burns & McDonnell, we believe that all individuals deserve respect. As such, we look to create an environment that focuses on compassionate treatment of all. We do not condone child or forced labor or human trafficking, regardless of the local laws and customs in which we operate.



SOCIAL MEDIA

Social media can be a beneficial way to communicate with others.

However, these communication vehicles can blur the line between personal and professional lives. As such, it is necessary to always protect the privacy and reputation of Burns & McDonnell and yourself.

Examples of social media:


- Social networking sites such as Facebook, Twitter and LinkedIn
- Blogs and chat rooms
- Video sharing sites such as YouTube

Highlights of Burns & McDonnell Social Networking Guidelines:

- Know and follow the Burns & McDonnell Business Conduct Guide, Electronic Information Policy and other employment policies.
- Respect copyright, fair use and financial disclosure laws.
- Be aware of your association with Burns & McDonnell in online social networks.
- Make it clear that you are speaking for yourself and not on behalf of Burns & McDonnell, unless you have been given authorization.



COMPETING IN THE MARKETPLACE



Similar to any sports competition, competing in the business marketplace requires proper preparation, hard work and skill. But it also includes following the rules of the game and treating your competitors fairly. This section of the Guide outlines what is expected of each of us while competing in business.

Q&A

A friend who works at another engineering company recently told me details of his company's proposal for a project that Burns & McDonnell is also pursuing. What should I have done? What should I do now?

Assuming that the proposals are still pending and the information is not yet public, you should have interrupted your friend and told him that you cannot participate in such a conversation. Telling your supervisor about what happened and documenting the conversation with your friend in a confidential email to the Burns & McDonnell General Counsel would be appropriate steps to take.

ANTITRUST

Burns & McDonnell competes vigorously and fairly, and is fully committed to compliance with antitrust and related laws, which are designed to promote free and open competition in the marketplace. Not only do our clients benefit by getting the best product at the lowest price, but the Company also benefits by being able to compete on a fair and level playing field with our competitors. Antitrust laws are complex. Routine business decisions involving prices, terms and conditions of sale, dealings with competitors, and many other matters may present problems of great sensitivity. It is therefore essential that every employee be generally aware of antitrust laws and that all employees who are actively involved in bidding work, awarding contracts, subcontracts or purchase orders, or negotiating deals comply with such laws.

PRICE-FIXING, BID-RIGGING AND MARKET DIVISION

Price-fixing, bid-rigging and market divisions describe coordination amongst conspiring competitors to restrict competition. Price-fixing is an agreement among competitors to raise, fix, or otherwise maintain the price at which their goods or services are sold. Bid-rigging is when conspiring competitors agree in advance who will submit the winning bid on a contract being let through the competitive bidding process. Bid-rigging can take different forms, including bid suppression, complementary bidding, and bid rotation. Market division is an agreement by competitors in which they will divide the market among themselves, agreeing to not bid on contracts or sell to potential customers in "other" market(s).

While these practices may, at times, be disguised as ill-fated attempts to create market or operational efficiencies, whatever the motivation, they are all illegal. Compliance with antitrust laws is a serious matter, and the Company is committed to only engaging in legal competition in the marketplace.



Bribes and kickbacks hurt business by interfering with healthy competition in the marketplace.

BRIBES, KICKBACKS AND CORRUPTION

Bribes and kickbacks hurt business by interfering with healthy competition in the marketplace. A bribe is anything (including, but not limited to, money, gifts, credit or property) given for the purpose of persuading or inducing the individual recipient to make a favorable decision or give a favorable referral that results in the award of a business transaction or contract. A kickback is a type of bribe that requires the company that wins the contract to give up some portion of the compensation earned for the performance of the contract as consideration for its selection.

Employees and representatives of Burns & McDonnell are prohibited from offering or accepting bribes, kickbacks or other similar remuneration or consideration that is intended to secure or influence any contract or exercise of professional judgment. Such conduct is barred by state and federal criminal statutes, as well as licensing regulations and professional codes of ethics.

Such conduct is prohibited regardless of the custom, practices or culture that may exist in any jurisdiction where Burns & McDonnell might be working. The Foreign Corrupt Practices Act (FCPA) is a federal law that prohibits giving, offering or promising anything of value, directly or indirectly through the use of an intermediary, to foreign political parties, officials or candidates for the purpose of influencing them to misuse their official capacity to obtain, keep or direct business or to gain any improper advantage. As a result, violations of policy may result in criminal penalties, as well as disciplinary action by a licensing board.

If you are approached to make or receive a bribe or kickback, or witness someone else in this situation, you must report it.

Remember that retaliation is not tolerated, so there will be no repercussions for reporting in good faith.

GOVERNMENT CONTRACTS

Government contracts may require pricing in compliance with the regulations applicable to that specific agency. In addition, government contracts may require the need to deliver additional documentation (i.e. financial statements, various representations and certifications, etc.). When working with the government, be sure to check with the Company's designated federal contract experts prior to quoting any pricing.

Their contact information can be found in Appendix C.

CORPORATE CONFLICTS

Our success, in part, is based on our diverse range of services and clients; however, all employees need to be aware that conflicts of interest can arise when we are providing professional services to clients that have competing interests. In many cases, Burns & McDonnell agrees by contract to avoid such conflicts, but sometimes they cannot be totally averted. When such conflicts arise, employees should notify company management to get approval to inform the clients who are affected and disclose the nature and extent of the conflict. If a compromise or waiver cannot be reached that would allow Burns & McDonnell to continue on the projects, we have to be prepared to withdraw from the work.

Q&A

I'm licensed in one state, but I've been asked to help out with a project in another state. Does it really matter that my license isn't for the state I will be working in, as long as I am licensed?


State licensing regulations generally require that a professional licensed in that state be in "responsible charge" of the design for a project. Other designers can work under the direction of the professional in "responsible charge." Our policy is to follow the licensing requirements for all projects.

PROFESSIONAL LICENSING

All applicable employees will maintain appropriate professional licenses and only perform professional services in jurisdictions where licensed to do so, unless otherwise exempted by applicable law.



PROTECTING OUR COMPANY



When you have something you value, you want to protect it from harm. The Burns & McDonnell brand, reputation and assets are valuable to each one of us, and we should treat them as such. This section of the Guide outlines our responsibilities in protecting our Company.



All communications, correspondence and records should be accurate, complete and timely.

ACCURATE COMMUNICATIONS AND RECORDS

Burns & McDonnell does not condone or tolerate dishonesty or deceitful actions in any form.

Examples of prohibited actions regarding communications and records include:

- Making misrepresentations to clients or potential clients
- Improperly altering or changing client documents
- Making false or misleading entries on the Company's books or ledgers
- Inflating expense reports
- Falsely recording hours worked on time cards
- Omitting or misrepresenting the facts regarding your personnel record, including your employment application

All communications, correspondence and records should be accurate, complete and timely. The contents of any written communication should be legible and unambiguous. If, after making any communication, correspondence or record, you discover that you have made a mistake then you should make a reasonable attempt to correct the mistake.

CHARGING TIME

Each employee has a responsibility to complete his or her time card daily and to report accurately the actual hours worked on any particular work order or project. Time worked on a project must be charged to that project and no other. Government regulations and many of our contracts require complete and accurate daily records. Each supervisor has a responsibility to see that the time card he or she is approving is accurate and reflects actual hours worked by the individual employee. While chargeability is an important goal, mischarging time is a serious offense that can subject Burns & McDonnell and the responsible individual to criminal and civil liability.

Q&A

A co-worker told me that he felt pressure to increase his billable hours, so he charged his training time to a project code. I convinced him this was wrong and told him to change his time card to reflect true hours worked. Did I do the right thing?

Absolutely. It is imperative that we keep accurate records, including the time we are charging to all projects and overhead codes. In addition, it would be important to talk to a member of management to ensure the change was ultimately made.

CONFIDENTIAL, PROPRIETARY AND PERSONAL INFORMATION AND DATA

As a part of doing business, employees may come in contact with information and data that is not publicly available. This information may be described as confidential, personal and/or proprietary. Regardless of the classification, every employee is expected to protect this information, which includes business, financial, technical, intellectual property and personnel information.



Confidential information also includes third-party confidential information, examples of which are listed below:

- Any proprietary information shared with us by our clients and business partners
- Certain information about our suppliers
- Certain information that has been acquired by an employee during the course of working for a former employer

We are expected to take reasonable steps to protect against the unauthorized disclosure or misuse of such third-party confidential information.

Employees should respect, trust confidentiality and refrain from infringing upon or taking unfair advantage of, the intellectual property and confidential information of our competitors, clients, and third parties with whom we do business.

If you are unsure whether particular information is confidential, consult with the Corporate Compliance Officer, the Security Management Office, or the Legal Department for guidance before making any disclosure of the information in question.

INFORMATION SECURITY

Information security is the practice of preventing unauthorized access, use, disruption or destruction of sensitive information and systems to maintain confidentiality, integrity, and availability. By securing our information and systems, we are protecting our brand and reputation, minimizing financial employee productivity loss when impacted, safeguarding company sensitive information and complying with client data security requirements.



Though the Company has technology safeguards in place to mitigate risks, employees also play a key role in information security. Employees are expected to safeguard information by:

- Not granting access to buildings, files or equipment to those that are not authorized
- Never sharing passwords or login information
- Being aware of malicious attacks on our networks (i.e. phishing, spams, hacks) and reporting them immediately to IT



CONFLICTS OF INTEREST

Employees are generally free to engage in personal financial and business transactions; however, such freedom is not without constraints. We should avoid situations in which our personal interests could conflict with, or even appear to conflict with, interests of the Company. A conflict of interest arises when an individual takes advantage of or assists others with taking advantage of a business-related opportunity for gain and/or profit that is inconsistent with the interests of Burns & McDonnell. Conflicts of interest may arise in any number of situations, but it is impossible to describe every possible instance. As a general guideline, if you think that any situation may be a potential conflict of interest you should consult with your supervisor or the Corporate Compliance Officer.

Examples of potential conflicts of interest include without limitation:

- Accepting concurrent employment with, or acting as a consultant or contractor to, any Burns & McDonnell competitor, client or supplier
- Serving on the board of directors or technical advisory board of any entity whose interests may be inconsistent with Burns & McDonnell interests
- Holding a significant financial interest in any Burns & McDonnell competitor, client or supplier*
- Acquiring real estate or other property that is of known interest to the Company
- Diverting business opportunities that are within the scope of Burns & McDonnell's business to yourself, a family member or other third parties
- Accepting or receiving gifts or favors, compensation, loans, or excessive entertainment from any individual or organization that is a competitor or who does business or wants to do business with Burns & McDonnell
- Acting as our client's representative on a project on which the construction contractor is also a joint venture partner of Burns & McDonnell on another unrelated project, without disclosing this partnership to our client
- Disclosing or using any confidential information learned or obtained while employed at Burns & McDonnell for any personal or private advantage or in any manner which is inconsistent with the interests of Burns & McDonnell

*Note: Ownership in a publicly traded company normally is not a conflict of interest.

Q&A

My department is interested in purchasing new software. My husband works at the software company but is not on the sales team working with us. Can we still purchase his company's product?

To avoid the appearance of a conflict of interest, you should remove yourself from the decision-making process on whether to choose your husband's company's product. You should inform your supervisor of the relationship, as well. In almost every conflict situation, full disclosure is the first and best step.

CLAIMS

All requests or demands for payment made on behalf of Burns & McDonnell pursuant to any contract or business agreement shall truthfully and accurately reflect the value of the goods or services provided.

Under no circumstances may you or a co-worker intentionally or recklessly make a false claim on behalf of Burns & McDonnell. A few examples of false claims include billing time not spent working on a project, charging for materials not used in a project, or artificially inflating a claim in order to negotiate additional compensation from our client. Accordingly, any employee who knowingly or recklessly makes false claims shall be disciplined, which may include termination. Additionally, any employee who knows that another employee has submitted, or intends to submit, a false claim and fails to report it will be subject to discipline, which may include termination.

EXTERNAL AUDITS

We may have contractual or legal obligations to allow our records and business practices to be audited, and in these situations, we will fully comply and cooperate. Employees are expected to furnish accurate and complete information in a timely manner, be truthful in all communications with auditors and in no way interfere with the work of the auditors.

If you receive a request to provide information for an audit, contact your supervisor, the Legal Department or the Corporate Compliance Officer immediately.

RECORDS RETENTION

Protecting our company's records and assets doesn't end when a project is complete or when we no longer need regular access to information at Burns & McDonnell. We have specific procedures, which can be found on MacCentral, that outline how to properly close out electronic and hardcopy project records for proper long-term storage. Everyone has a responsibility to fully comply with these procedures.

If you believe, or if someone informs you, that the records could be relevant to a current or potential lawsuit, the relevant records must be kept. This situation is sometimes called a "Litigation Hold." If you ever receive requests to provide documentation as a part of legal action, be sure to contact the Legal Department immediately.



STATEMENTS AND CERTIFICATIONS

All statements, representations and certifications made on behalf of Burns & McDonnell, whether written or oral, shall be accurate and truthful. Additionally, employees are routinely required to certify that they and the Company are in compliance with various contractual provisions and regulatory requirements. Examples of common certifications include those pertaining to environmental, safety, personnel and health matters, product quality and material certifications, and quality control and quality assurance testing certifications. We should be aware of the requirements applicable to our jobs and confirm that all certifications are accurate and that there is neither a material omission of fact nor materially misleading statements.

USING COMPANY AND CLIENT ASSETS

We have an obligation to use and maintain Company property, and clients' property with which Burns & McDonnell has been entrusted, with care to guard against waste and abuse. Appropriate use of Company and client property, facilities and equipment is everyone's responsibility. Using, removing or borrowing Company or client property without proper approval is prohibited.

These assets include networks and information systems. The Company is committed to maintaining all government cybersecurity requirements and to protecting the security and integrity of these systems



SERVING OUR COMMUNITIES

Our vision is to improve the quality of life. To fulfill this vision, we must be role models and good stewards of the environment and our communities. This section of the Guide describes our commitment to being good corporate citizens and how we must act when serving our communities.



BUSINESS DIVERSITY

Business Diversity contributes to effective, ethical, and equitable business practices. It is a sound procurement strategy that considers all qualified suppliers. This leads to a wider pool of sources, innovation, and cost savings. It also supports our commitment and our Clients' commitment to provide opportunities to local project communities and stakeholders.

The Company's endorsement of this initiative does not reduce the expectations that we establish for all suppliers. It does not increase the expectations that we establish for all suppliers. It does, however, encourage our employees to be mindful and inclusive in our sourcing and outreach activities as we build

relationships with entities that can likely provide the goods and services that we need to continue to make our clients successful.

Burns & McDonnell is committed to maintaining a diverse mix of suppliers who can provide innovative ideas and a service oriented attitude. The solutions we are seeking are apportioned to a broad base. Our responsibility is to source a broad and diverse base — to find the best solution for our projects and company operations.

RESTRICTIONS ON MATERIALS AND SUPPLIES

There may be times, particularly when working with government entities, that contractual obligations restrict or require the purchase of materials and supplies for both the Company and any subcontractors working on the project. The Company will exercise vigilance and care to ensure contractual obligations are met lawfully in the performance of its contracts.

ENVIRONMENTAL COMPLIANCE

Burns & McDonnell strives to preserve and protect the environment. This is an important component of our obligation to our communities and our good reputation. It is essential that each employee involved with regulated air emissions, water discharges, hazardous materials, other regulated pollutants, or other environmental constraints comply with applicable federal, state and local environmental laws, standards and guidelines. Concealing an improper use, discharge, disposal or storage of hazardous materials or other pollutants is prohibited.

Q&A

I saw another vendor on a job site improperly dispose of hazardous materials. Since it wasn't a Burns & McDonnell employee, I don't need to report what I saw, right?

Not quite. Our participation with the project leads to an expectation that we will help protect the environment. In this situation you should notify your supervisor of what you saw so that he or she can determine who else should be notified, including the client, the vendor's compliance executive or any governmental agencies.

ORGANIZATIONS AND ACTIVITIES

We encourage employees to join and actively participate in advisory boards, public office positions, professional societies, trade associations and industry associations. However, if an employee's participation interferes with the employee's job responsibilities or conscientious performance of his or her job, such involvement may be deemed an impermissible conflict of interest. You may not use the Burns & McDonnell name to lend weight or prestige to an outside activity without prior approval from your Global Practice or Regional Office Manager.

Q&A

I'm a member of a not-for-profit board, and we are looking to hire an engineering firm to help us with an upcoming expansion project. How should I handle this situation?

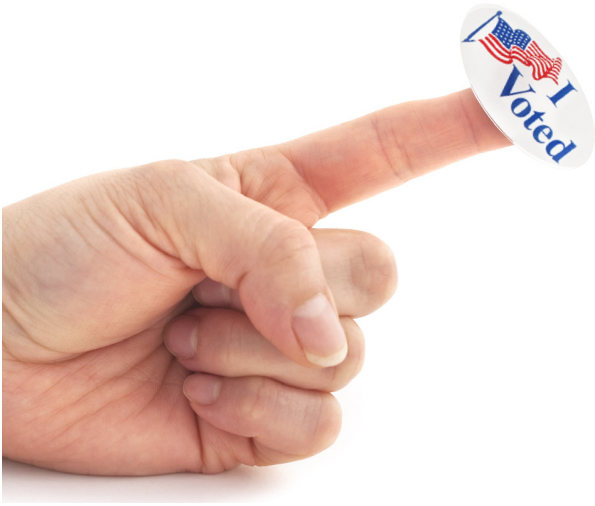
There is nothing wrong with alerting the Company to this opportunity. However, if Burns & McDonnell will be proposing on this project, you should not participate in the firm selection process for the not-for-profit organization. We encourage participation in outside activities, but it is still imperative that conflicts of interest — or appearances of conflicts of interest — are avoided.

As a member of a not-for-profit organization, I help out with fundraising activities. Can I take up a collection for this organization at work?

Taking collections during working time is prohibited. See the Employee-Owner Handbook for additional details.

POLITICAL ACTIVITIES

Burns & McDonnell believes a strong political system helps build healthy communities. Employees are encouraged to participate in and contribute to political organizations or campaigns through personal actions but not on behalf of the Company. If you choose to get involved in political activities, you must do so on personal time with personal funds and in your own name. Such activities are prohibited on company premises without proper permission.



An employee may take time off from work to vote in elections if she or he is unable to vote during nonworking hours.

The Company has the right to express political views through contributions to campaigns where permitted or through political activities that do not involve the election of candidates. Company contributions to federal election campaigns are prohibited. Certain states permit corporate contributions to candidates for election to state and local offices. However, Company participation in state or local political activities occurs only at the direction of the Burns & McDonnell Chief Executive Officer, as authorized by the Board of Directors.

Burns & McDonnell has established the Burns & McDonnell Political Action Committee to facilitate contributions to federal political campaigns by eligible employees. Employee contributions to the Political Action Committee are personal and voluntary. Except for the activities stated above, no representative of the Company may make any contribution on behalf of Burns & McDonnell or agree to contribute Company money, property or services to any political candidate, party, organization, committee or individual or for any other political purpose.

APPENDIX A

CROSS-REFERENCE TO OTHER CORPORATE POLICY MANUALS

This Guide	Corporate Policy Manuals
Working Together	
Equal Employment and Nondiscrimination	Burns & McDonnell Employee Handbook Section 1.1.3.1 Equal Opportunity Section 1.1.1.2 Anti-Harassment Equal Employment Opportunity Policy
Gifts and Entertainment	Burns & McDonnell Travel and Business Entertainment Policy Section 2.12 Business Entertainment Global Anti-Bribery Anti-Corruption Policy Policy Manual – Chapter 20 Purchasing Policy Section 20.2.3 Policy
Outside Employment	Burns & McDonnell Employee Handbook Section 1.1.3.9 Outside Employment
Safety and Health	Burns & McDonnell Employee Handbook Section 1.1.1.3 Threat of Violence Section 1.1.6.14 Weapons Policy Section 1.2 Substance Abuse Policy Policy Manual – Chapter 8 Employee Safety & Health All Chapters Policy Manual – Chapter 19 Facilities Manual
Subcontracting	Policy Manual – Chapter 20 Purchasing Policy Subcontracting Policy
Competing in the Marketplace	
Antitrust	Policy Manual – Chapter 20 Purchasing Policy Section 20.2.1 Confidentiality
Bribes, Kickbacks, and Corruption	Policy Manual – Chapter 20 Purchasing Policy Section 20.2.3 Policy Global Anti-Bribery Anti-Corruption Policy
Professional Licensing	Burns & McDonnell Employee Handbook Section 1.1.3.1 Professional Registration

This Guide	Corporate Policy Manuals
Protecting Our Company	
Charging Time	Burns & McDonnell Employee Handbook Section 1.1.4.4 Time Entry Section 1.1.4.5 Charges
Communications and Records	Burns & McDonnell Employee Handbook Section 1.1.1.5 Reporting of Arrest Section 1.1.1.6 Name Changes Section 1.1.1.11 Expense Reporting Section 1.1.1.13 Electronic Information Policy Policy Manual – Chapter 20 Purchasing Policy Section 20.2.2 Ethical Practices
Confidential, Proprietary and Personal Information and Data	Burns & McDonnell Corporate Information Security Policy
Conflicts of Interest	Policy Manual – Chapter 20 Purchasing Policy Section 20.2.2. Ethical Practices Section 20.2.3 Policy
Using Company and Client Assets	Burns & McDonnell Employee Handbook Section 1.1.6.3 Personal and Company Property Electronic Information Policy
Social Media	Social Media Policy
Information Security	Electronic Information Policy
Serving Our Communities	
Business Diversity	Subcontracting Policy
Environmental Compliance	Corporate Sustainability Report
Organizations and Activities	Burns & McDonnell Employee Handbook Section 1.1.1.9 Office Collections
Political Activities	Policy Manual – Chapter 20 Purchasing Policy Section 20.2.3 Policy

APPENDIX B

DEFINITIONS

Authorized Representatives: Any persons authorized by contract or agreement to serve as a Burns & McDonnell agent or proxy in business or professional transactions with current, past or potential clients, subcontractors or suppliers.

Business Conduct Guide (Guide): This written statement of the Burns & McDonnell standards of ethical conduct and business practices.

Corporate Compliance Officer: The company official appointed by the Chief Executive Officer and approved by the Board of Directors to be responsible for implementing and administering the Business Conduct and Ethics Compliance Program.

Business Conduct and Ethics Compliance Program: The system used by Burns & McDonnell consisting of procedures and policies for communicating expectations, assessing risks, auditing compliance, training personnel, reporting suspected violations, investigating concerns and overseeing implementation of Burns & McDonnell business and ethics policies as set forth in this Guide.

Contingent Worker: Person employed by Burns & McDonnell as an independent contractor for a limited duration or for a specific purpose.

Employee: Any person employed by Burns & McDonnell, whether full-, reduced full- or part-time, including without limitation all employee-owners, officers, directors, regular or contract staff, or interns.

Full-Time Staff: Persons who are employed on a regular, full-time basis.

Interns: Persons who are students or recent graduates who work as trainees undergoing supervised practical learning.

Part-Time Staff: Persons who are employed on a temporary or irregular basis.

Reduced Full-Time Staff: Persons who work less than 40 hours per week but at least 32 hours per week on a regular basis.

Regular Staff: Persons hired by Burns & McDonnell to work as full-time or reduced full-time staff on a permanent basis.

Supervisor: An employee of Burns & McDonnell charged with the responsibility of directing or overseeing others for the purpose of enforcing Burns & McDonnell corporate policies and practices. Generally, the Supervisor is a Department Manager, Global Practice Manager or Regional Office Manager.

APPENDIX C

ADDITIONAL CONTACT INFORMATION

When seeking advice or reporting violations of law or company policy, your supervisor and/or the following contacts are available to you:

Corporate Compliance Officer

Renita Mollman
816-652-2537
rmollman@burnsmcd.com

Corporate Compliance & Ethics Manager

Donovan Diaz
816-605-7940
ddiaz@burnsmcd.com

Federal Government Compliance Manager

Sara Fields
816-601-3913
scfields@burnsmcd.com

Director, Corporate Security

Robert J. "RJ" Hope
816-708-1923
rjhope@burnsmcd.com

General Counsel

Paul Odum
816-822-3993
podum@burnsmcd.com

Vice President, Human Resources

Renee Gartelos
816-822-3962
rgartelos@burnsmcd.com

Vice President, Director of Federal Projects

David Barr
816-823-7138
dbarr@burnsmcd.com

Chief Financial Officer

Alissa Schuessler
913-486-0562
aschuessler@burnsmcd.com

Chair and Chief Executive Officer

Leslie M. Duke
832-797-7261
lduke@burnsmcd.com

APPENDIX D

REVISION HISTORY

Rev #	Date	Description
1	04/26/2021	First Publication
2	11/04/2024	Updated CEO
3	04/24/2025	Updated “Gifts and Entertainment” Policy