



HITT Code of Conduct

At HITT, our focus goes beyond simply getting the job done; it's about how we conduct ourselves while we do it.

Our team members' actions are a direct representation of the company—an organization that strives to do the right thing with passion, professionalism, and respect for everyone in our industry.

This document serves as our official Code of Conduct and should be used to guide ethical conduct and behavior both in and out of the office. With the understanding that each one of us is an ambassador for The HITT Way, those that do not conduct themselves in alignment with the principles outlined in this Code will be subject to disciplinary action up to and including termination.

THE HITT CODE OF CONDUCT IS FOUNDED ON THESE FIVE PRINCIPLES:

- Always Take the High Road
- Respect All Individuals
- Compete with Integrity
- Respect the Process
- Responsibility for People and Planet

ALWAYS TAKE THE HIGH ROAD

HITT's legacy and future success is a direct result of our team members' developing strong client connections and exceeding expectations on our projects. By always taking the high road, employees foster trust and credibility, laying the foundation for strong, enduring relationships with clients, subcontractors, and vendors.

SETTING THE TONE

Our team members set the tone for ethical behavior by conducting themselves with integrity and transparency in all their interactions. HITT teams are expected to exhibit and encourage clear and direct communication, all while fostering a positive and ethical work environment.



Conduct yourself with integrity.
Follow the law and be a person
of your word.

To ensure their behavior adheres to this expectation, team members should ask themselves the following questions about their actions:

- Is this consistent with the values and ethics of The HITT Way?
- Does this comply with the law (and spirit of the law)?
- Will it further foster trust and credibility in myself and my company?
- Will it strengthen this relationship without compromising our values?
- Would I be comfortable having this discussed at a staff meeting?

These questions apply to interactions with colleagues, the public, clients, subcontractors, and vendors, whether in the office, at the jobsite, in email correspondence, or on social media.

UPHOLDING THE LAW (AND THE SPIRIT OF THE LAW)

All HITT team members must respect and obey both the spirit and letter of all applicable local, state, and federal laws, rules and regulations. While not expected to know the details of all possible requirements, we expect that HITT employees will use common sense and be informed enough to make wise decisions. Should any team members be in doubt, they are encouraged to seek advice from peers or other advisors.

RESPECT ALL INDIVIDUALS

HITT is an Equal Opportunity Employer that embraces diversity and prohibits discrimination against any of its employees or applicants for employment on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions), sexual orientation, national origin, ancestry, disability, protected veteran status, age, genetic information, marital status, political affiliation, or any other basis protected by applicable law. Everyone is entitled to a work environment that is free of discrimination, harassment, intimidation, and coercion.

We believe an inclusive and supportive work environment promotes productivity, work performance, and job satisfaction. We strive to foster an environment where all are treated with respect and their unique strengths are valued, and we expect our team members to do their part to maintain that culture. As such, we encourage employees to always think before both speaking and acting. These same principles apply to the manner in which our team members engage with clients, vendors, subcontractors, colleagues, and beyond.

All employees are responsible for abiding by our discrimination and harassment policies located within the Employee Handbook and reporting any misconduct to Human Resources.

Treat others with respect. Always hire the best, most qualified candidates and suppliers, and remember that diverse experience and points of view drives innovation and success.

COMPETE WITH INTEGRITY

Personal reputation and company reputation are intertwined, and we must therefore avoid interactions and activities that compromise (or appear to compromise) our ability to have fair dealings with, or make objective decisions when performing our work. In an industry filled with great competition, we at HITT keep our clients' interests at the forefront while maintaining an open and fair competitive environment. Avoid making negative comments about our competition. Our clients care about the way we conduct ourselves, not our opinion of others.

AVOID CONFLICTS OF INTEREST

Avoiding conflicts of interest is crucial to fair and open competition and developing trust. Conflicts of interest arise when a subcontractor, consultant or employee has past, present, or future personal or competing interests in a project that may diminish their ability to provide impartial, objective assistance, or result in being given an unfair competitive advantage. HITT team members must not engage in situations with clients, subcontractors, suppliers or competitors that could impair their ability to make fair business decisions. Employees and members of their immediate families must avoid having interests in entities that could create an appearance of impropriety in your dealings on behalf of HITT. Any perceived conflicts of interest must be reported immediately.

TREAT SUBCONTRACTORS FAIRLY

All subcontractors deserve equal consideration. They are the lifeblood of our industry, and we have a responsibility to communicate directly and honestly. HITT encourages supplier diversity and the utilization of small business enterprises. We expect our employees to select subcontractors and suppliers based on best value, including quality, service, schedule, and price. Therefore, all subcontractors' bids must be objectively reviewed and given equal attention.

DO NOT ENGAGE IN ANTI-TRUST & ANTI-COMPETITIVE PRACTICES

HITT complies with antitrust laws, which promote free and open competition in the marketplace. In doing so, our clients benefit by receiving the best product at the lowest price, and HITT benefits by competing on a fair and level playing field with competitors. Price-fixing, bid-rigging and market division are among the practices strictly prohibited under anti-corruption laws.





Never give preferential treatment for personal or financial gain. Always make decisions and subcontractor selections based on what is best for the client and company as a whole. Be watchful of possible conflicts.

RESPECT THE PROCESS

HITT fosters an entrepreneurial culture, given our core belief that new and different approaches and perspectives enhance value. However, we do so with respect to the processes and policies that have been developed throughout our company's long history. Guidelines may come from internal sources, clients, or our responsibilities as a government contractor. As we function as a government contractor in some of the work we do, we are particularly mindful of the processes and expectations outlined for those projects.

Compromising our process compromises our corporate reputation. All team members and representatives are expected to follow corporate policy, especially those that govern gifting, confidentiality, and record keeping.

Respect company guidelines and never compromise accuracy, integrity, or confidentiality.

CONFIDENTIALITY

Maintaining the trust and confidence of our clients is of the utmost importance. While performing the duties of their job, HITT team members may become privy to confidential, proprietary and/or government provided sensitive information. In these situations, team members may not disclose this information during or after their employment, except as necessary for performing the responsibilities of their role.

RECORD-KEEPING & REPORTING

All team members are responsible for properly accounting for their labor, travel, material and other costs and bear ultimate responsibility for ensuring that their charges not only comply with applicable policies but are also accurately recorded and charged to HITT's records. Costs incurred on a job must stay on the original job. Moving costs from one job to another is not permitted unless the cost was posted incorrectly. The integrity of our record-keeping and client billing processes shall not be compromised.

GIFTING (MEALS, REFRESHMENTS, ENTERTAINMENT, ETC.)

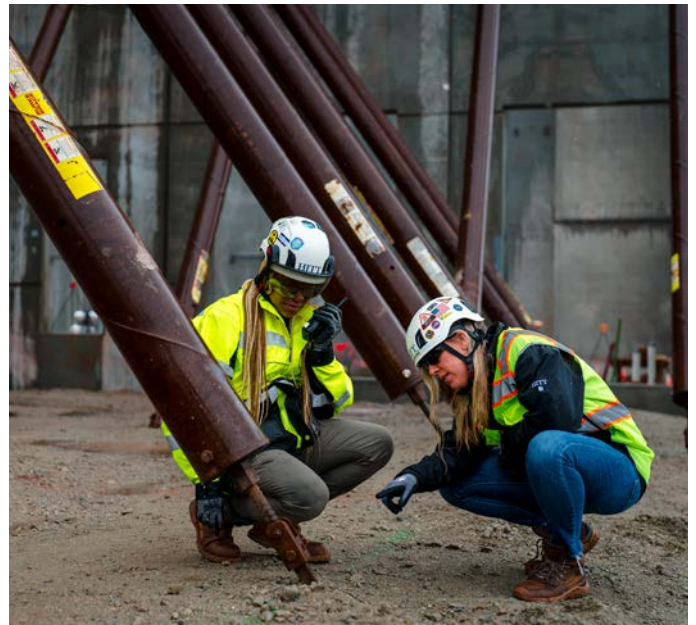
When building a relationship or working with a government entity, team members must be mindful of the following: The giving or receiving of gifts by government personnel must follow the guidelines set forth by the Federal Acquisition Regulation ("FAR") pursuant to FAR Part 3.

Depending on the circumstances, giving or receiving gifts and entertainment from non-governmental personnel can be inappropriate or even illegal, and must be approached with sensitivity.

Additional guidance can be found within the HITT Employee Handbook and the Travel & Expense Policy.

THE DO'S & DON'TS OF GIFT-GIVING AND RECEIVING:

- Never engage in giving or receiving money.
- Never give or receive a gift or entertainment that is (or could be) intended to influence team member behavior.
- Never encourage or solicit gifts or entertainment of any kind.
- Only accept non-monetary gifts or entertainment from an individual or entity with which the company conducts business, provided that such gifts or entertainment are for a legitimate and identifiable business purpose.
- Yield to the acting Corporate Compliance Officer to authorize the expenditure of a non-monetary gifts or entertainment with a value equal to or less than \$500 in the aggregate over any calendar year to an individual or entity with who the Company conducts business provided it is for a legitimate and identifiable business purpose



RESPONSIBILITY FOR PEOPLE & PLANET

We take our obligation to protect the health and safety of our team members, subcontractors, and others very seriously. This includes both physical health and workplace safety concerns. Similarly, we see it as our corporate responsibility to care for the environment and give back to the communities where we do business. All team members are expected to act in a way that promotes these core values.

SAFETY & HEALTH

As a condition of employment, team members are required to review and comply with HITT's Drug and Alcohol Free Workplace Policy, which includes drug testing of all prospective team members. We expect all team members to review and understand the HITT Safety Manual, ensuring they are well-versed in the Company's safety program and applicable laws.

All of us are responsible for keeping one another safe and to protect the planet in which we all work and live.

Any and all team members are empowered to stop an unsafe act. Never instruct or allow an employee to perform a task that could cause harm to themselves or another person. The health and safety of the public, our employees, subcontractors, and clients is priority number one. Any safety concerns or suggestions for improvement should be directed to the Vice President of Safety, or delivered anonymously via the Compliance & Ethics Hotline.

ENVIRONMENTAL & SOCIAL RESPONSIBILITY

HITT fully complies with all applicable federal, state and local environmental laws, standards and guidelines. From properly storing and disposing of hazardous materials and recycling construction waste to using low emitting products or regionally manufactured products whenever feasible, we pride ourselves on operating in a manner that is environmentally responsible. Additionally, we see helping clients achieve their sustainability goals through third party certifications as a direct an extension of our responsibilities.



CONTACTING THE COMPLIANCE & ETHICS HOTLINE

The five principles outlined within this Code reflect HITT's expectation for responsible and ethical conduct by all team members. Our people are our most valuable resource and play a vital role in the quality of our projects, client and contractor relationships, as well as the ongoing success of our company. HITT hires the best and brightest with the expectation that each team member will adhere to the guidelines set forth in this Code.

Should any team member feel they've witnessed or been part of a behavior that violates this code, we encourage they come forward and share this information.

All inquiries, complaints and investigations will be treated confidentially. Every effort will be made to ensure the protection of complainants and witnesses from retaliation, which will not be tolerated under any circumstances. All feedback is catalogued and is used to promote continuous improvement within the company. Additional detail on any element of the five principles outlined within this Code is available upon request by emailing TellHITT@GetInTouch.com.

To anonymously report an issue or to ask a question, please contact the Compliance & Ethics Hotline at 844.640.4488 or by email at TellHITT@GetInTouch.com. Team members may also contact HITT's acting Corporate Compliance Officer, Ashley Campbell, Senior Vice President of Human Resources.