

BUSINESS PARTNER CODE OF CONDUCT

Dewberry conducts its business ethically and in compliance with applicable laws and regulations. Dewberry expects each of its business partners (which include subcontractors, vendors, suppliers, consultants, and other providers) to do so, as well, and to adhere to this Dewberry Business Partners Code of Conduct. While conducting business as a Dewberry business partner, integrity must guide the business relationship.

ANTI-CORRUPTION | BRIBERY | GIFTS

Dewberry conducts business in accordance with applicable laws, regulations, and anti-corruption laws including, but not limited to, the U.S. Foreign Corrupt Practices Act and the Anti-Kickback Act. Business partners are expected to follow these laws and conduct themselves accordingly, as Dewberry will not tolerate any bribery, kickbacks or corruption from its business partners. Business partners must not make any gifts or donations on behalf of Dewberry and should follow its policies on gifts and entertainment to avoid the appearance of an improper relationship.

BUSINESS INTEGRITY

Business partners must avoid any behavior that could leave Dewberry vulnerable to allegations of conspiring with our competitors. Dewberry follows the requirements of the Procurement Integrity Act and expects that its business partners will never intervene in the procurement or selection process for a public contract by bid, manipulation, or controlling the outcome. Business partners must not engage in any activity prohibited under anti-trust laws including boycotting, price-fixing, refusal to deal, price discrimination, or disparate treatment. Dewberry and its business partners are prohibited from using federal funds to pay persons (i.e., lobbyists or consultants) to influence or attempt to influence executive or legislative decision making in connection with the award and/or modification of any U.S. Government contract. Business partners are to seek guidance if there is a question regarding a particular discussion, deal, offer or other action being contemplated that might have anti-trust or competition implications.

CONFLICTS OF INTEREST

Business partners are expected to avoid any activity or situation that could put Dewberry or the business partner in a conflict. Personal conflicts of interest occur when individual interests, including financial gain, career development, reputation advantage, etc., interfere (or appear to interfere) in any way with Dewberry's business interests or the individual's ability to make objective and fair decisions when performing work. Organizational conflicts of interests can occur when a business partner has obligations, interests, duties or loyalties that conflict with the interests of Dewberry. Business partners must immediately disclose any personal or organizational conflict of interest (whether real or potential) to Dewberry.

CYBERSECURITY | INTELLECTUAL PROPERTY | INFORMATION TECHNOLOGY

Properly protecting and safeguarding confidential and proprietary information of both Dewberry and its clients is critical. Dewberry's intellectual property, trade secrets, and confidential information (information), are only to be used for legitimate business purposes for work on Dewberry projects and is not to be discussed with others within Dewberry except on a strict need-to-know basis. Business partners shall use software in accordance with the terms of Dewberry's license agreements under which the software is supplied. Dewberry has an obligation to its Federal Government clients to securely handle the sensitive information that is received or created on the client's behalf. It is the business partner's responsibility to understand what information is being handled, and how to properly protect the information.

EXPORT CONTROLS | INTERNATIONAL BUSINESS

Dewberry's business partners must comply with certain laws and regulations when exporting materials, equipment, weapons, technology, data, software, information and services (items). Prior to transferring an item outside of the United States, it is the responsibility of the business partner to confirm all relevant export laws and

regulations are followed. Any business partner that conducts business internationally are to comply with the laws of the United States as well as the countries involved in the activities or transactions.

NON-DISCRIMINATION | TRAFFICKING | WORKPLACE

Laws regarding employment and the workplace are to be followed by Dewberry business partners. Dewberry will not tolerate any unlawful harassment or discrimination by a business partner, and retaliation against anyone making a report is not allowed. There is a zero-tolerance policy on engaging, or supporting, any form of trafficking to include coerced or forced labor, human trafficking, misleading practices during recruitment, or involuntary servitude. Dewberry's policy on equal opportunity employment prohibits discrimination based on race, creed, color, religion, national origin, sex, age, disability, marital status, sexual orientation, gender identity, citizenship status, or any other status or classification protected by applicable federal, state or local law. The distribution, or possession of, any illegal drugs or other controlled substances (except for medically approved purposes) at any Dewberry office or project site is prohibited. No business partner is permitted to be under the influence of alcohol, illegal drugs, or controlled substances while present at any office or project site.

RECORDS AND SUPPORTING DOCUMENTATION

Documents and other records must be maintained in accordance with the applicable law, regulation, and contract. Business partners are expected to keep all records related to projects for Federal Government clients as those records may be audited by the Government.

REPORTING

Business partners are responsible for reporting any ethical or legal concern and/or violation of this policy to Dewberry. Dewberry reserves its right to use any lawful method of investigation deemed necessary to determine whether any person has engaged in conduct that interferes with, or adversely affects, its business.

Dewberry has established the following contacts for reporting violations:

- Immediate Dewberry Contact
- Dewberry Compliance Officer
- Dewberry General Counsel
- Dewberry Ethics Hotline
 - Phone Number: 1-844-982-3422
 - Online: [EthicsPoint - Dewberry](#)