

STERLING CONSTRUCTION
COMPANY, INC.

*Supplier Code of
Conduct*

PURPOSE

Sterling Construction Company, Inc., and each of its subsidiaries (“*Sterling*” or the “*Company*”) believe that ethical business practices and compliance with laws are essential to the successful conduct of its business. As our business partners, Sterling likewise expects its suppliers, agents, vendors, contractors, subcontractors, and joint venture partners (together referred to as “*Suppliers*”) to hold and act upon those beliefs.

The information contained in this Supplier Code of Conduct (the “*Code*”) is not a comprehensive, full, or complete explanation of all of the policies, laws, and regulations that may apply to a Supplier as a supplier of materials or services to Sterling. It is the responsibility of Suppliers to know the requirements of this Code and operate in accordance with its principles.

COMPLIANCE and APPLICATION

During the course of providing materials and/or services to Sterling, Suppliers must abide by the following:

1. Anti-Bribery and Corruption. It is Sterling's policy that directors, officers, employees, and temporary workers (such as consultants or contractors), and all Suppliers are prohibited from offering or paying, directly or indirectly, any bribe to any employee, official, or agent of any government, commercial entity, or individual in connection with Sterling's business or activities. Likewise, acceptance of any bribe in connection with Sterling's business or activities is also prohibited.

2. Anti-Discrimination and Fair Treatment. Sterling is an equal opportunity employer. Suppliers who work with Sterling shall not discriminate in worker recruitment, compensation, advancement or retention based on any criteria prohibited by law.

3. Conflicts of Interest. Supplier must not engage in any activity that would interfere with its contractual responsibilities to Sterling or that may be perceived as something that could reasonably be likely to interfere with such responsibilities. Conflicts of interest may include, but not be limited to, the appointment of Supplier's employees as directors of Sterling's competitors, and maintaining business or ownership interests in Sterling competitors. In the event that Supplier becomes aware of a conflict of interest, Supplier must notify Sterling of the conflict immediately in writing.

4. Gifts & Kickbacks. Supplier must not under any circumstances, in doing business with Sterling offer to pay, pay, or issue an authorization to pay any money, make any gift, provide any kickback, or give anything of value (including, but not limited to, trips, travel, insider information, etc.) to Sterling or its customers, vendors, employees, government officials, etc., that is or could be perceived as intended, to directly or indirectly:

a) improperly influence any business decision, any act or failure to act, any commission of fraud or opportunity for the commission of any fraud, or to obtain any unfair competitive advantage or other business advantage; or

b) violate federal, state or local laws or regulations, including, but not limited to, any federal anti-fraud or false claims laws.

In addition:

- Supplier must fully comply with any rules regarding tender and bid processes.
- Supplier may not offer employment to foreign officials if doing so would violate applicable laws.
- Supplier must maintain accurate books and records.

5. Export & Import Laws. Supplier must comply strictly with all applicable export and import laws and regulations, and may not export, re-export, transfer, divert, release, import, or disclose any Sterling products or any direct product thereof, technical data relating to such products, or Sterling confidential information to any other person or entity (or make any use thereof) except under license or as otherwise permitted under such laws and regulations.

6. Insider Trading & Securities Laws. Supplier must comply with all applicable insider trading and securities laws governing transactions in Sterling securities. If Supplier possesses or has access to material, nonpublic information about Sterling, Supplier must use that information solely for the purpose for which it was provided to Supplier. Supplier may not use that information to trade in Sterling securities, and Supplier may not provide the information to others who may use the information to trade in Sterling securities.

7. Reports to Sterling. Supplier is encouraged to report immediately events of a questionable, fraudulent or illegal nature that are, or may be, in violation of this Code, or other applicable laws or regulations, to Sterling's EthicsLine as follows:

(1) email in any language to Strlco@Lighthouse-Services.com, or

(2) telephone Sterling's EthicsLine at 1-800-398-1496 (English) or 1-800-216-1288 (Spanish).

Calls to Sterling's EthicsLine are received by an independent third-party service specifically retained by Sterling to handle such reports. Reports can be made anonymously, and will be kept confidential to the fullest extent practicable and allowed by law.

8. Supplier Internal Reports. Supplier must maintain a process by which its employees may communicate a grievance or information about illegal or unethical practices to

Supplier. Supplier must have a documented policy that details processes for remediation of abuses, including the fair treatment of employees.

Supplier must also have a policy of non-retaliation against employees for expressing grievances or reporting suspected illegal or unethical practices.

9. Privacy and Confidentiality. Supplier will comply with laws related to data privacy, the proper safeguarding and handling of confidential and personal information, intellectual property, proprietary information and other competitive data, including any Sterling branding requirements and guidelines.

10. Unfair Competition. Supplier will comply with all applicable antitrust and unfair competition laws, as well as those laws related to unfair business practices, including accurate and truthful marketing.

11. Compliance Monitoring. Supplier will provide full and timely cooperation with reasonable requests for information by Sterling to enable Sterling to determine Supplier's compliance with this Code and applicable laws. Supplier is solely responsible for ensuring that all of its directors, managers, members, partners, officers, employees, subcontractors, agents, etc. fully comply with this Code.

If requested by Sterling, Supplier will provide additional information to ensure adherence to this Code. Requests may include, but are not limited to, information on social and environmental practices, social and environmental self-assessments, product content details and specifications, environmental metrics and performance targets (e.g., greenhouse gas emissions, water use), social metrics and performance targets (e.g., labor hour data, wage information, injury rates), and information management system certifications.

Monitoring and ongoing resolution of findings are critical for advancing social and environmental responsibility. Supplier will cooperate with formal assessments and audits by Sterling and its agents (who have agreed to obligations of confidentiality similar to those agreed between Supplier and Sterling).

ACKNOWLEDGEMENT

By acceptance of any contract from Sterling, Supplier acknowledges acceptance of Sterling's Supplier Code of Conduct, and represents that they fully comply with its provisions. Supplier understands that Sterling may refuse to continue doing business with Supplier if Supplier fails to comply with this Code, or fails to advise Sterling in writing as to why it cannot or will not comply, subject to the terms and conditions of our contract.