

The logo is a circular seal. The outer ring contains the text "GREAT LAKES" at the top and "DREDGE & DOCK" at the bottom. In the center of the seal is a stylized anchor. The year "1890" is printed below the seal.

SUPPLIER CODE OF CONDUCT

A large, light gray silhouette of a ship, likely a tugboat or a dredger, is positioned horizontally across the lower half of the page. It features a prominent superstructure with a mast and various equipment.

GREAT LAKES DREDGE & DOCK CORPORATION

TO OUR BUSINESS PARTNERS

GREAT LAKES DREDGE & DOCK CORPORATION (GLDD) is North America's dredging industry leader, the largest provider of marine dredging, and the *only* U.S. company with substantial overseas operations. Established in 1890, GLDD owns and operates a diverse dredging fleet comprised of numerous specialized maritime vessels, and operates marine yards across the nation.

Safety and integrity are paramount at GLDD, and we strive to ensure that our employees, partners and community members in the areas where we conduct work remain safe every day through our culture of safety excellence. This safety-oriented mindset helps eliminate work-related incidents and injuries, and is a key driver of our success.

We know that you, our partners, are also a critical component to our success and one of the reasons that we maintain our industry-leading status. We provide you with our *Supplier Code of Conduct* so that *together* we remain committed to proper business ethics, safety and integrity in the workplace, as well as complying with the letter and intent of the law.

We thank you for your partnership and the key role you play in our continued success.

With Regards,

Lasse Petterson

Chief Executive Officer
Great Lakes Dredge &
Dock Corporation





1890

WHAT'S INSIDE

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SECTION 1.0 PURPOSE & SCOPE

Great Lakes Dredge & Dock Corporation (“GLDD” or the “Company”) is committed to conducting all business activities with a strong sense of ethics, honesty, and integrity. We require all Suppliers (“Supplier”) of products or services to GLDD to also comply with these standards. The *Supplier Code of Conduct* (“Code”) is intended to highlight the minimum expectations of all Suppliers. Together, we can ensure that all activities performed are not only in compliance with laws but also have a positive impact on all key stakeholders.

GLDD requires that Suppliers implement and be fully compliant with this Code. Additionally, should any customer of GLDD require that GLDD comply with its code of conduct, then Supplier acknowledges and agrees that it will abide by such code(s) upon receipt of a copy of the code from GLDD. Violations of this Code may result in adverse consequences, including removal of Supplier personnel from GLDD offices or facilities, immediate termination as a GLDD Supplier and/or legal action.

Should Suppliers be permitted to subcontract all or any portion of their services to third parties, Suppliers will ensure that they require their subcontractors to comply with the provisions of this Code and any applicable customer code(s) of conduct and provide the subcontractors with copies of the applicable code(s) of conduct. It is the responsibility of the Supplier to ensure full compliance of all subcontractors with the Code.

Nothing in this Code is intended to, in any way, grant any additional rights or expectations to a Supplier or, in any way, modify or otherwise limit any of GLDD’s contractual or legal rights.



SECTION 2.0 ENVIRONMENTAL, HEALTH & SAFETY

Suppliers must share GLDD's commitment to providing a safe and healthy workplace and conducting operations in an environmentally responsible manner.

2.1 PROVIDE A SAFE & HEALTHY WORK ENVIRONMENT

The health and safety of our team members, contractors and all visitors to our sites is our top priority. Through our Incident and Injury Free® ("IIF®") safety philosophy, GLDD establishes specific safety related policies and procedures desired to ensure safety and to address any safety incidents that might occur. Suppliers shall establish and implement procedures that promote a safe and healthy work environment including eliminating physical hazards, identifying and addressing potential risks to prevent accidents, providing appropriate training to ensure staff performs work safely and providing all necessary Personal Protective Equipment ("PPE") to reduce risk of injury or illness.

Workers shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of reprisal. Suppliers shall establish procedures and systems to manage, track, and report occupational injury and illness. Further, to the extent applicable and upon notice by GLDD, Supplier will comply with more stringent requirements from GLDD customers including specific requirements from the U.S. Army Corps of Engineers ("USACE").

2.2 ENVIRONMENTAL COMPLIANCE

At GLDD, environmental considerations are an integral part of our business practices. Suppliers shall conduct operations in an environmentally responsible manner in accordance with all applicable laws and specific requirements by customers of GLDD, including the USACE. Suppliers shall be sensitive to their impact on the environment (including but not limited to air emissions, water discharge, toxic substances and hazardous waste disposal) and local communities. Suppliers must use care in handling hazardous materials or operating processes or equipment that use hazardous materials to prevent unplanned releases into the workplace or the environment.

2.3 DRUGS & ALCOHOL

Suppliers are expected to be free from the influence of alcohol, drugs and improperly used prescription medicine when conducting business on behalf of GLDD, whether on or off the Company's premises.



SECTION 3.0 LABOR & HUMAN RIGHTS

All workers have the right to work in an environment that provides them basic labor and human rights. Suppliers must uphold the human rights of workers and treat them with dignity and respect.

3.1 EQUAL EMPLOYMENT OPPORTUNITY

Equal Employment Opportunity (“EEO”) is a core value of GLDD. The Company will not tolerate any incidents of discrimination. Suppliers shall not discriminate against any worker based on race, color, age, gender, sexual orientation, gender identity, ethnicity, disability, religion, national origin, veteran status, genetic information or any other characteristic prohibited by law in hiring and employment practices including recruitment, hiring, discipline, training, promotion, compensation, or other term or condition of employment.

Those who allege discrimination in good faith, or assist other employees who complain about discrimination or harassment, are protected from any retaliation.

3.2 NON-HARASSMENT

Suppliers shall commit to a workplace free of harassment. Suppliers shall not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse, or unreasonable restrictions on entering or exiting company-provided facilities. Suppliers shall prohibit harassment and unlawful discrimination in the workplace and complete thorough investigations of all such allegations.

3.3 PREVENTION OF INVOLUNTARY LABOR AND HUMAN TRAFFICKING

Suppliers shall ensure that all work performed is done so without the use of forced, compulsory, bonded or indentured labor. Supplier will not directly or through agents require workers to make any payments to secure employment. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Suppliers shall ensure that third-party agencies providing workers are compliant with the provisions of the Code and all local, state and country-specific laws or those of Customers of GLDD.



SECTION 3.0 LABOR & HUMAN RIGHTS (continued)

3.4 PREVENTION OF UNDERAGE LABOR

Child labor is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be 18 years of age. This Code does not prohibit participation in legitimate workplace internships or apprenticeship programs provided that such programs are compliance with law and the work performed is not of high risk or likely to jeopardize worker health or safety.

3.5 WORKING HOURS, WAGES & BENEFITS

Suppliers must establish work weeks in accordance with the maximum hours allowed under local, state or national laws and regulations and will provide workers overtime compensation in line with these laws. Suppliers shall pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. Suppliers shall pay workers in a timely manner and clearly convey the basis on which workers are being paid.

3.6 FREEDOM OF ASSOCIATION

Suppliers must respect the right of workers to associate freely with, form, and join workers' organizations of their own choosing, seek representation, and bargain collectively as permitted by and in accordance with applicable laws and regulations. Supplier employees shall not be subject to intimidation or harassment in the exercise of their right to join or to refrain from joining any organization.



SECTION 4.0 ETHICAL BEHAVIOR & COMPLIANCE WITH LAWS

GLDD is committed to the highest ethical standards and requires all employees of the Company to adhere to a strict set of business ethical standards. Likewise, we require all Suppliers to show commitment to the highest standards of ethical behavior.

Suppliers shall be in full compliance with all local, state and country specific regulations. Any notice of violation of any law by Supplier will promptly be addressed by Supplier, and Supplier agrees to notify GLDD of any such alleged violations including specific actions taken to address the issues.

The following are strictly prohibited: bribery, corruption, conflict of interest, falsification of documents, collusive bidding, price fixing, price discrimination, unfair trade practices, and participation in or support of an illegal boycott. Supplier shall take appropriate steps to protect confidential and proprietary information belonging to GLDD and its customers.

4.1 BUSINESS RECORDS AND INTERNAL CONTROLS

Suppliers must maintain accurate and complete financial and operational records and maintain a system of effective internal controls including the retention and disposal of business records in accordance with applicable laws and contractual obligations. Such records include accurate and complete records of all transactions with GLDD, and must be available for review by GLDD as necessary.

4.2 CONFIDENTIALITY

Suppliers agree not to disclose non-public information related to GLDD except as required by law or with the explicit written consent of GLDD. Suppliers may not use or share insider information concerning GLDD for the purpose of trading in GLDD or other securities.

4.3 ANTI-BRIBERY & COMPLIANCE WITH THE FOREIGN CORRUPT PRACTICES ACT

Bribery and corruption are unacceptable and prohibited. The Company is committed to complying with the U.S. Foreign Corrupt Practices Act ("FCPA"), as well as other applicable anti-corruption and anti-bribery laws and expects all Suppliers to commit to compliance with these laws. Suppliers shall not offer or accept bribes or other means to obtain an undue or improper advantage.



SECTION 4.0 ETHICAL BEHAVIOR & COMPLIANCE WITH LAWS (continued)

4.4 CONFLICTS OF INTEREST

Suppliers and their employees may not benefit personally from their relationship with GLDD or engage in activities that conflict with the interest of GLDD. GLDD employees are prohibited from giving or accepting any gifts of more than token value. Suppliers should promptly report any potential conflicts of interest to GLDD to avoid any possible violations of this policy.

4.5 FAIR COMPETITION

GLDD is committed to fair and open competition in markets around the world. It is the policy of the Company to comply in all respects with the antitrust and competition laws of the United States, individual states, and other jurisdictions in which it operates. Suppliers are expected to compete fairly, comply with antitrust and competition laws and generally refrain from any practices that could be construed as anti-competitive.

SECTION 5.0 SUPPLIER COMMITMENT

GLDD recognizes that each Supplier is unique. As such, Suppliers must adopt or establish their own management system to ensure compliance with this Code and applicable laws and regulations, including appropriate processes to identify and mitigate risks.







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