

UN Global Compact Communication on Progress (COP)
January 2021 – December 2021

January 8, 2022

To our stakeholders:

While we continue to navigate the new “normal” that the COVID-19 pandemic has created, our future is filled with promising, exciting, and limitless possibilities.

Since our founding in 1888, our company has grown and changed and embraced new opportunities at every step along the way.

Our vision is to be the industry leader in corporate social responsibility (CSR). As we enter the new year, we will be dedicating more resources to this pursuit by hiring subject matter experts in the field, adopting technology to track our environmental impacts, and focusing our charitable efforts to create the most lasting impact. Our commitment to the UN Global Compact principles remains unwavering and we will continue to share this information through our primary channels of communication. Thank you for being on this journey with us.

Sincerely,



Eric M. Foster
Chief Executive Officer

Description of Actions

Human Rights

We believe that to feel safe, respected, valued, and heard are basic rights for all our employees. Swinerton prohibits discrimination against any applicant or employee based on any legally-recognized basis, including, but not limited to: race, color, religion, sex (including pregnancy, lactation, childbirth, or related medical conditions), sexual orientation, gender identity, age (40 and over), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status, citizenship status, or any other status protected by federal, state, or local law. In conjunction with this Equal Employment Opportunity (EEO) policy, the Company has adopted an Affirmative Action Plan (AAP) to further promote diversity as a valued strategic initiative. The AAP and EEO policy are distributed and posted on an annual basis. We also require that every employee complete mandatory training so that they can be a positive influence in the workplace. The training takes a close look at issues like harassment, discrimination, and retaliation.

We support the principles in the UN Universal Declaration of Human Rights and commit to:

- A workplace that is free of abuse, bullying, harassment, and discrimination.
- Employment that is voluntary and only offered to persons over the age of 16.
- Working hours that are not deemed excessive by definition of the law.
- Compensating our employees in a timely manner.

Swinerton's Code of Conduct is the playbook for not only complying with the law, but for raising the level of discussion about ethics and integrity inside and outside the Company. It helps us navigate the inevitable gray areas that arise in the workplace and protect the reputation we have worked so hard to build. Each employee is required to acknowledge that they have read and understood the Code of Conduct.

Our Contractor's Code of Conduct defines standards for fair, safe, and healthy workplaces throughout our supply chain. This Code binds our subcontractors, suppliers, and vendors, and their supply chain, to minimum standards, which are based on the Ten Principles of the UN Global Compact and the UN Sustainable Development Goals. The Contractor's Code of Conduct can be found on our website.

Employees can submit their good faith questions or concerns about conduct they believe may violate Swinerton's Code, policies, or the laws and regulations under which it does business to their supervisor or manager; any Company leader; Human Resources; the Ethics and Corporate Responsibility Committee; Legal/Compliance; or Swinerton's anonymous and confidential Ethics hotline.

Labor

Swinerton and its Partners are required to adhere to specific requirements to ensure a working environment free of recognized hazards, including: develop and maintain safety programs and procedures to meet or exceed federal, state, and local laws, regulations, and standards; ensure employees are properly trained and provided with the proper equipment to perform safe work; and encourage employees to stop any unsafe work, act, or condition. Swinerton employs over 50 safety professionals throughout the United States. Employees completed over 5,000 hours of health and safety training last year.

In accordance with the U.S. Fair Labor Standards Act, Swinerton abides by the federal minimum wage requirement, overtime pay requirement, and child labor regulations. The Company requires proof of authorization to work in the United States. Additionally, Swinerton abides by local and state minimum wage and prevailing wage requirements in all geographies where it does business. These pay requirements are posted in all offices and project locations.

To the extent permitted by law, Swinerton and its business partners respect their employees' rights to freedom of association and collective bargaining.

The Company offers a full range of employee benefits to promote health and well-being, including medical, dental, and vision insurance; paid vacation and sick days; flexible spending accounts and health savings accounts; wellness membership; short-term and long-term disability insurance; life insurance; and an employee assistance program.

Environment

Swinerton protects human health and the environment by meeting applicable regulatory requirements pertaining to air emissions, waste, and water. The Company encourages its Partners to favor the use of non-hazardous products and materials, and choose recycled and reclaimed materials whenever possible.

Anti-Corruption

Swinerton conducts its business with absolute honesty and integrity. Every Swinerton employee must adhere to Swinerton's Code of Conduct (the "Code"). In its Code, the Company outlines its standards of conduct pertaining to false claims and accuracy in records; gifts, gratuities, and kickbacks; and conflicts of interest.

Swinerton requires all its business partners to sign the Contractor's Code of Conduct and expects all its Partners to act in accordance with the highest standards of business ethics and to avoid any appearance

of impropriety, including, but not limited to: fraud, deception, and dishonesty; bribery and corruption; and false claims.

Swinerton employees and Partners have free, unlimited access to our third-party anonymous and confidential incident reporting system. Swinerton encourages those who know of any activity that is in violation of laws, regulations, or contracts to report such activity promptly through this service, which is available 24 hours a day, 7 days a week.

Communication

Swinerton will communicate its progress to support the UN’s Global Compact by posting its annual COP on the Company website and publishing it within the Company’s Annual CSR Report.

Measurement of Outcomes

In order to determine success, Swinerton will set Global Compact goals and measure the outcomes of its initiatives towards those goals.

Human Rights

Swinerton reserves the right to monitor and audit our Partners at any time to ensure that the responsibilities outlined in our Contractor’s Code of Conduct are being honored. The reporting of violations is particularly important to us. We will immediately investigate any report of misconduct that comes to our attention. It is our intention to voluntarily disclose misconduct involving or affecting us, and we do not tolerate retaliation or discrimination against anyone who raises an issue in good faith.

Labor

Swinerton’s number of recordable safety cases in 2020 was 105, a 64% increase. The number of lost time days was 584, a 1.5% decrease. Swinerton’s overall Experience Modification Rating (EMR) as of August 2021 is 0.61 in California.

We have an employee satisfaction for diversity, equity, and inclusion of 4.4 on a five-point scale.

Anti-Corruption

Swinerton has not been involved in any legal cases, rulings, or other events related to corruption or bribery.

Environmental Sustainability

Swinerton began conducting a Materiality Assessment in 2021 with completion slated in Q1 2022. The Company also benchmarked each of its offices and will finalize new Green Office and Jobsite guides next year.