Antitrust Policy

The policies, procedures and/or work processes set forth in this document are intended to represent Matrix Service Company and all Operating Companies, herein referred to as the "Company".

1. PURPOSE

Matrix Service Company and its subsidiary companies (collectively "Company") competes based on the quality of the services and products we provide and are committed to promoting fair competition in full compliance with competition laws, including the U.S. Antitrust laws. While competition laws may vary between different countries where the Company performs work, the Company must never engage in any activity that would improperly restrain trade. It is a violation of the law for businesses to engage in business practices that unreasonably deprive companies and consumers of the benefits of competition by restraining trade.

Restraint of trade is defined as an agreement among two or more persons or entities that affects the competitive process. Criminal prosecutions are typically limited to intentional and clear violations such as when competitors fix prices or rig bids. Examples of types of restraints on trade include:

- **Bid Rigging** – Coordination among bidders that undermines the bidding process. For instance, competitors may agree to take turns being the low bidder, or sit out of a bidding round, or provide unacceptable bids to cover up a bid-rigging scheme.
- **Price Fixing** – An agreement among two or more competitors on what prices to charge.
- **Customer Allocation** - Agreements between or among competitors to divide customers by class or by geographic location.

It is the policy of the Company to compete fairly and in compliance with the Antitrust Laws and this Policy. No employee, agent or representative of the Company shall approve or take any action by a Company which is in violation of these laws or this Policy. Violations of this Policy may subject an employee to disciplinary action, up to and including termination.

2. MATRIX REPORTING PROCEDURES

Any Matrix employees, agents, consultants or other third parties who becomes aware of a potential or actual antitrust violation must report the violation to Matrix immediately. To guarantee that no Matrix employees shall be adversely affected in employment for reporting the violation, the employee may make report through their manager, human resources, an attorney in the Legal Department, the Corporate Compliance Officer (Vice President, General Counsel) or by using the Matrix Hotline (English/Korean/Spanish), which is toll free, 24 hours a day, 7 days a week, for calls originating from:

a. United States/Canada	(855) 414-0002
b. Australia	+61-800-958-125
c. South Korea	+82-70-7914-7978

The matter can also be reported via e-mail to hotline@matrixservicecompany.com or mailed to:

Matrix Service Company
Attn: Corporate Compliance Officer, or Chair of the Audit Committee
15333 JFK Blvd., Ste. 400
Houston, TX 77032

You may remain anonymous. Matrix does not tolerate any form of retaliation for reports made in good faith to our Hotline.

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3. RETALIATION

Matrix strictly prohibits supervisors, managers and other associates from retaliating against an employee or business associate who makes a report in good faith of a possible violation under these Policies. Retaliatory actions against employees or business associates could result in severe disciplinary measures for the offending person, up to and including termination from the Company.

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