Supplier Code of Conduct

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".

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1. PURPOSE

Matrix Service Company and its affiliated companies/subsidiaries ("Matrix") are dedicated to conducting business with the highest ethical standards and integrity and in compliance with all domestic and international laws. We require the same of our suppliers, vendors, subcontractors and other third parties (each and all “Supplier(s)”), as our Suppliers play a critical role in our ability to remain a world-class provider of quality engineering, construction, services, and products to the markets we serve, while also living our core values and fulfilling our commitment to corporate social responsibility.

2. SCOPE

Matrix requires all employees to adhere to our Code of Business Conduct and Ethics, and to comply with all U.S. and international laws and regulations. We do not compromise in this regard, and we require the same from our Suppliers.

Our Supplier Code of Conduct is an extension of our Code of Business Conduct and Ethics and is also based on national and internationally recognized standards, including the United Nations Universal Declaration of Human Rights and the International Labor Organization’s Conventions. Supplier compliance with this Supplier Code of Conduct is subject to audit at the discretion of Matrix. Failure to comply with this Code may result in discontinuance of current and/or the prevention of future business relationships between Matrix and the Supplier.

Core Values

Foundational to Matrix are our Core Values which guide our work and define us as an industry leader. These values are:

- Safety
- Integrity
- Positive Relationships
- Stewardship
- Community Involvement
- Delivering the Best

We require our Suppliers to commit to and reflect these Core Values at all times in providing products or services to Matrix and its clients.

3. CONFIDENTIALITY, DATA PRIVACY & INFORMATION SECURITY

Except as may be otherwise be allowed by separate agreement, our Suppliers are prohibited from using, disclosing, or retaining confidential or proprietary information about Matrix (including Matrix’s employees, clients and/or other Suppliers) where such information is obtained in the course of their business dealings with Matrix. Further, our Suppliers will follow all applicable data protection, privacy and information security laws in effect in the places in which they operate and shall be committed to respecting and protecting the privacy of individuals (including Matrix, its employees, clients and/or other Suppliers).

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4. ETHICS AND LEGAL COMPLIANCE

4.1 Import/Export

Our Suppliers must comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods and services, to include software and technology. All invoices and any Customs-related documentation submitted by a Supplier to Matrix or any governmental agency in connection with any transaction involving Matrix must accurately describe the goods, services, and prices.

4.2 Anti-Corruption Laws

Our Suppliers must comply with all applicable anti-corruption laws that govern their operations in the countries in which they conduct business. Our Suppliers must have anti-corruption policies and programs to verify compliance with these laws and regulations. This includes, but is not limited to, the U.S. Foreign Corrupt Practices Act ("FCPA") and Canada's Corruption of Foreign Public Officials Act ("CFPOA").

Suppliers must prevent and refrain from making or offering illegal payments or anything of value to any individual, including a foreign government official, including gifts of any type or entertainment with any value, given for purposes of influencing the company, foreign government, or the person. This includes anyone the giver knows will pass it to a foreign official or anyone else for purposes of inducing that person to give an improper benefit.

4.3 Antiboycott

Our Suppliers will not participate or cooperate in any unsanctioned boycott in accordance with the U.S. 1977 Export Administration Act and the 1976 Tax Reform Act.

4.4 Antitrust

Our Suppliers will conduct business in compliance with all applicable antitrust or competition laws and regulations, both national and international, which includes avoiding business practices such as entering into arrangements that improperly restrain competition, improperly exchanging competitive information, fixing prices, rigging bids with their competitors or improper market allocation.

4.5 Conflict of Interest, Gifts and Entertainment

Our Suppliers will avoid conflicts of interest in all business-related decisions, which at all times will be impartial and unbiased. Matrix prohibits its Suppliers from giving our employees gifts or providing entertainment of more than a nominal amount, which in any event should be infrequent and in full compliance with the Matrix Code of Business Conduct and Ethics. Suppliers must not otherwise offer or provide to any Matrix employee anything of value in connection with contract bidding, evaluation, or award, and a Supplier shall never conduct itself with the intent to improperly influence a business decision or create a potential conflict of interest or the appearance of impropriety.

Matrix prohibits any Supplier from entering into any business relationship with any Matrix employee without prior written consent from the Matrix Service Company Legal Department.

4.6 Counterfeit Parts

Our Suppliers must develop, implement, and maintain methods and processes consistent with their products and services to minimize the risk of using counterfeit parts and materials in their products, and processes should be implemented to detect counterfeit parts and materials.

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5. LABOR AND HUMAN RIGHTS

Human Rights, Forced Labor, and Human Trafficking Our Suppliers will respect and support the United Nation's Declaration of Human Rights, and ensure that they are not complicit in human rights abuses. Our Suppliers will comply with applicable international and local legal requirements in their countries of operation. Our Suppliers will not employ anyone against their own free will, and employees shall be free to leave their employment at any time, with customary notice, and shall not be subject to any coercion or restriction through methods like holding employee passports or other identity documents, or monetary deposits.

Further, our Suppliers will not use forced, bonded (including debt bondage) labor, involuntary prison labor, slavery, or trafficking of persons, nor will our Suppliers use misleading or fraudulent practices during the recruitment of employees or offering of employment. Work must be undertaken for fair compensation and must not be undertaken to repay a debt incurred (e.g. as a result of deceptive recruiting practices).

5.1 Minimum Age of Labor

Our Suppliers will adhere to local and national laws relating to minimum working age and not engage in the employment of child labor, directly or indirectly. According to the International Labour Organization Minimum Age Convention (C138) of 1973, child labor refers to any work done by children aged 15 to 17 years of age. Our Suppliers must also ensure that working hours for those of school age are not exceeding the maximum hours on a school day.

5.2 Non-Discrimination and Harassment

Matrix is committed to providing equal employment opportunities to applicants and employees, treating individuals fairly, and maintaining a work environment free of discrimination, harassment and intimidation. Likewise, our Suppliers will provide equal opportunities to applicants and employees, without regard to race, color, religion, national origin, age, military veteran status, ancestry, sexual orientation, marital status or other legally protected characteristic or category, or mental or physical disability, when the essential functions of the job can be performed with or without reasonable accommodation. Our Suppliers will maintain a workplace environment where employees can perform their work free from physical, psychological and verbal harassment, or any other type of abusive conduct.

5.3 Freedom of Association and Right to Collective Bargaining

Our Suppliers will ensure that its employees have the right to join or form a trade union without facing reprisal, harassment, or intimidation. Where freedom of association and collective bargaining is restricted under law, employee should have the right to develop parallel means.

5.4 Working Hours, Wages and Benefits

Our Suppliers will limit employee working hours according to national or local laws, including breaks. Overtime should be fairly compensated. There should be adequate rest periods and leave. Our Suppliers will, at a minimum, adhere to the legal minimum wage standard across their workforce. Employees should receive clear information about their wages, and unfair deductions from wages are not permitted.

5.5 Conflict Minerals

Matrix is committed to complying with Federal laws and regulations requiring the disclosure of the use of Conflict Minerals. Conflict Minerals refer to certain minerals such as tin, tantalum, gold, and tungsten, that may have directly or indirectly contributed to the financing of armed groups in the Democratic Republic of Congo and neighboring countries. Our Suppliers will respect human rights

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and avoid complicity in human rights abuses by utilizing supply chain due diligence processes to identify the sources of these minerals, ensure their products have an accurate country of origin and support efforts to eradicate the use of Conflict Minerals.

6. SAFETY

Health, Safety and Working Conditions

Our Suppliers must comply with all applicable local and national health and safety laws and regulations, and through continuous improvement, our Suppliers will provide a healthy, safe and secure work environment to its employees. Supplier must be aware of any industry-specific hazards and do its absolute best to prevent accidents, illness, and injury to the health of its employees and others. Supplier must also provide proper training to its employees. Further, our Suppliers will maintain a workplace environment that is free from illegal drugs, including prohibition of the illegal use, possession, sale, or distribution of controlled or illegal substances.

7. ENVIRONMENTAL

Environmental Laws and Sustainability

Our Suppliers will comply with all applicable local, national and international environmental laws and regulations and will obtain and keep current all required environmental permits. Our Suppliers are expected to minimize adverse effects on the environment and community to safeguard the health and safety of the public. Our Suppliers should seek opportunities that promote the efficient use of resources and energy (as well as clean and low energy solutions) and seek methods to reduce greenhouse gas emissions.

Suppliers shall make all practical efforts to eliminate or reduce levels of generated waste and should reuse and recycle waste materials wherever possible. The handling, storage, movement, treatment, and disposal of all waste must be carried out in accordance with applicable regulations and in an environmentally responsible manner.

8. REPORTING CONCERNS

Matrix Hotline

If anyone becomes aware that one of our employees, Suppliers, subcontractors or other third parties may be engaged in inappropriate behavior, please promptly report the item to Matrix. It can be reported to a member of Matrix management 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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9. REFERENCES

Code of Business Conduct and Ethics

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