

TURNER POLICY: General Sustainability (ESG) Policy

Issued by: ESG Department

Approved by: Turner Policy Committee

Effective Date: 07/01/2026

Last Revision: 06/29/2026

SUMMARY

1. Summary

At Turner, our Environmental, Social and Governance (ESG) principles guide how we build, how we lead and how we show up on our jobs for people and the planet. Our strategy is built on three core pillars: Sustain Our Planet, Protect and Actively Care for People, Purposefully Transform Our Industry. This framework unifies the work Turner continues to focus on: Safety, Environmental Responsibility and Community Impact.

2. Purpose

This Policy establishes the principles and expectations that govern Turner’s sustainability management strategy and provides employees with a clear understanding of their responsibilities. It is intended to ensure Turner operates in a manner consistent with applicable laws, regulations, and internationally recognized sustainability standards

3. Scope and Use

This policy applies to The Turner Corporation, its subsidiaries, and joint ventures of which they are a member (collectively, “Turner” or the “Company”).

POLICY

INTRODUCTION

The Turner Corporation and its subsidiary companies (“Turner”) have been committed throughout our history to support and actively care for people and our impact on the environment. This Sustainability (ESG) Policy outlines the associated practices, policies and procedures to support the implementation of our Sustainability (ESG) Strategy.

DEFINITIONS

For the purposes of this Policy, the following terms shall be interpreted in accordance with the definitions set forth below:

- **Chain of activities:** The activities relating to the production of goods or the provision of services by Turner and its subsidiaries and joint ventures.

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- **Value chain:** The full range of activities, resources and relationships related to the company's business model and the external environment in which it operates.
- **Stakeholders:** those collectives that may affect or be affected by the activities of the Turner and, in particular, the directors, managers, employees, workers' representatives, trade unions and Business Partners, as well as consumers, groupings, communities or entities whose rights or interests are or could be affected by the products, services and operations of the Company, its subsidiaries and/or its Business Partners, including national environmental and human rights institutions, civil society organizations whose purposes include the protection of the environment and the legitimate representatives of such persons, groupings, communities or entities.
- **Business Partners:** Individuals and/or entities Turner maintains a commercial or business agreement with as part of our operations or chain of activities. This may include suppliers or providers of goods or services, intermediaries such as agents or commission agents, external advisors or joint ventures.
- **Turner:** The Turner Corporation including all subsidiary companies and joint ventures

PURPOSE

The policy establishes the principles that govern the sustainability management strategy and guidelines of Turner and its subsidiaries and joint ventures consistent with all applicable laws and regulations.

This policy aligns with the Turner Corporate Governance System standards, including the General Compliance Policy, Environmental Policy, Human Rights Policy, and the Code of Conduct for Business Partners. Turner commits to continuously monitor developments in sustainability to support our internal framework and sustainability goals, ensuring activities are up to date and based on internationally recognized rules and standards that are applicable to Turner.

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PRINCIPLES OF ACTION

The sustainability of the economy and society, the promotion and respect of human rights, social and labor rights, environmental protection, climate change, the improvement of communities, innovation and the management of the legitimate interests of stakeholders are the fundamental pillars of Turner's strategy to guide activities that aim to generate and maintain sustainable value.

To this end, Turner subscribes and promotes, among others, the following principles:

- **Creation of long-term sustainable value:** Development of activities in support of an environmentally sustainable and socially inclusive management model aimed at maintaining Turner's global leadership, optimizing the resources used, managing environmental impacts and generating shared value for all its stakeholders.
- **Ethics and Integrity:** Compliance with applicable legislation in the markets where Turner operates, and implementation of measures to prevent, detect, and eradicate corruption and any other practices that constitute a breach of the corporate values defined in the Code of Conduct or that could compromise Turner's reputation.
- **Sustainability due diligence:** Adopt appropriate measures and implement internal processes to identify, assess, prioritize, prevent, and mitigate actual or potential adverse impacts on human rights and the environment arising from operations, products and services.
- **Applicability to the Chain of Activities:** Support compliance of sustainability commitments by Business Partners throughout the supply chain supporting efforts and collaborating with the implementation of the measures necessary to support their effectiveness.
- **Transversality:** Integration from a double materiality perspective of management systems with the aim of identifying priority areas relating to sustainability and evaluating their impact on the sustainable value creation strategy.
- **Equal Employment Opportunity:** Provide equal and non-discriminatory employment opportunity based on qualifications and merit, race, sex, gender, gender identity, gender expression, transgender status, sexual orientation, pregnancy, childbirth and other

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pregnancy-related conditions, color, national origin, ancestry, age, creed, religion, citizenship, marital status (including registered domestic partners), parental status, disabilities (mental or physical), medical condition, genetic information, military or veteran status (including protected veteran status), or any other protected characteristic or status.

- **Safety and Health:** Promote the safety and health of all employees and individuals who may engage with Turner, ensuring the highest standards, managing risks and promoting a safe and healthy work culture and environment aimed at eliminating or minimizing the risks through prevention and monitoring systems, adaptation of international standards and the implementation of training and awareness-raising activities on the subject.
- **Excellence and Innovation:** Promoting research, development and innovation, ensuring appropriate use of new technologies to modernize organizational processes and operations, and contribute to the transition to a low-carbon economy and the creation of sustainable value.
- **Participation and Communication:** Maintaining open channels of communication to promote participation and active listening to the concerns and legitimate expectations of Turner's employees and stakeholders.
- **Information transparency:** Implement communication practices that are honest, credible, coherent and swift, to promote transparency as a fundamental principle providing employees and stakeholders a high level of understanding of the activities and the value chain of Turner and its subsidiaries and joint ventures.

REGULAR UPDATE OF MATERIAL SUSTAINABILITY AREAS

Turner identifies, assesses and validates the impacts, risks, and opportunities (IROs) in terms of the sustainability on a scale of relative importance, both from the financial perspective and in relation to the impact they could have on the economy, human rights, environment and society in general (impact), implementing internal processes to analyze the results obtained in order to prioritize the aforementioned IROs via a Double Materiality Matrix.

In this regard, Turner then periodically reviews and assesses the IROs to identify, manage and update resources, policies, actions, plans and targets in line with the principle of continuous improvement in sustainability.

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SUSTAINABILITY DUE DILIGENCE

Turner is aware of its responsibility to assume a relevant role in the respect for and protection of human rights and the environment in accordance with current regulations and international conventions and standards applicable in the markets in which it operates.

To achieve this objective, Turner has approved a series of Standards, disseminated internally and externally, that promote the adoption of appropriate measures to identify and assess the actual or potential adverse impacts on human rights and the environment arising from the activities of Turner and those of its Business Partners in the value chain, as well as to support the prevention and mitigation of the negative consequences of the aforementioned impacts; these measures include, most notably, the Human Rights Policy, the Environmental Policy, the Sustainable Procurement Policy, and the Code of Conduct for Business Partners.

In this regard, the Double Materiality Matrix and the risks related to Turner's sectors of activity, their geographic locations and their specific risk factors, allows Turner to identify priority areas of action for corporate sustainability due diligence.

RELATIONSHIP WITH STAKEHOLDERS

For Turner, impartial, responsible, coherent and full communication with stakeholders is essential for maintaining relationships of trust. Maintaining appropriate communication channels with stakeholders allows for increased knowledge of stakeholders' needs and interests and provides feedback that can be implemented in the continuous improvement process.

Turner has identified the following as its main stakeholders: Employees, Clients, Business Partners, Communities and Environment, and Administrative and Regulatory Authorities.

Relationships with stakeholders will be governed by the following principles:

- **Promotion of respect** as a mechanism for building mutual trust.
- **Information transparency**, communicating relevant information in relation to Turner under the principles of transparency and veracity of information.
- **Participation and involvement** by providing channels, mechanisms or tools that enable constant, two-way communication.

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- **Collaboration** to contribute to the effectiveness of Turner's sustainability strategy.
- **Identification and comprehension of concerns and expectations** regarding sustainability issues related to Turner's activities.
- **Periodic review of mechanisms** for relationships to support their effectiveness and incorporate practices or tools that enable their improvement.

All relationships with stakeholders will be developed in full compliance with privacy and data protection regulations, also establishing the relevant information security measures.

BUSINESS PARTNERS IN THE VALUE CHAIN

The management of the value chain is a priority for Turner and its subsidiaries and joint ventures. Commitment to the promotion of sustainable practices in the value chain is key to ensuring compliance with high standards of performance.

The relationship model for Business Partners established by Turner seeks to support a responsible, equitable and ethical selection process, guided by the Code of Conduct for Business Partners and the Sustainable Procurement Policy, which establishes the principles that govern the procurement and supply process of Turner.

SUSTAINABILITY GOVERNANCE

Sustainability governance is essential to both seize opportunities and manage and mitigate impacts and risks related to sustainability issues.

Executive Management Team

The Executive Management Team of Turner defines strategic and management guidelines at company level, including sustainability commitments. The Executive Management Team of Turner is responsible for supervising the implementation, development and application of this Policy with the ESG Executive Sponsors.

ESG Executive Sponsors

The ESG Executive Sponsors are responsible for periodic review and evaluation of the Company's sustainability (ESG) policy in order to support Turner's sustainability goals, taking into account, as appropriate, the legitimate interests of other Stakeholders, as well as environmental and social practices with Turner's strategy, goals and relationship with the main stakeholders.

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The ESG Executive Sponsors will support, through supervisory and control functions, the implementation and development of this Policy and the measures for its implementation, and where appropriate, will propose updates to the Executive Management Team.

Likewise, the ESG Executive Sponsors are responsible for supervising and evaluating the process of preparing and presenting information on sustainability, ensuring its integrity, and supervising the effectiveness of the Company's sustainability risk control and management systems.

Sustainability Directorate and Governance and Compliance Committee

It is the responsibility of the ESG Department of Turner to monitor compliance with the sustainability (ESG) strategy, as well as the integrity and veracity of the information that the Company must disseminate in compliance with the regulations applicable at any given time. In turn, the ESG Department will monitor and supervise the sustainability (ESG) strategy, promote the development of internal regulations on sustainability through procedures, protocols and other internal standards, reporting periodically to the ESG Executive Sponsors within the scope of their respective areas of competence.

WHISTLE-BLOWING AND COMPLAINTS CHANNELS

Employees who are aware of or have reasonable suspicion of any breach of the commitments undertaken in this policy should report this to a supervisor and/or the Compliance Department as outlined in the Ethical Channel Operating Policy.



Third Party Channel Information

Email: compliance@tcco.com

Helpline: 1-888-738-1924

<https://turnerconstruction.navexone.com>

International Helpline: 1-888-738-1924

<https://iwf.tnwgrc.com/turnerinternational>

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APPROVAL, DISSEMINATION AND ENTRY INTO FORCE

This Policy will be applicable after its approval by the executive management team on the date indicated at the beginning of this document and will be implemented and disseminated at that time.