

coDesign**Code of Conduct & Business Ethics Policy***Employee Conduct, Compliance, and Integrity Standards*

Version 3.2 · Effective March 2026

coDesign is an integrated design-build firm operating in California, New York, Florida, and other states. This Code of Conduct & Business Ethics Policy (“Policy”) sets out coDesign's formal commitments to ethical conduct, compliance, and integrity. It has been agreed upon by coDesign's senior management and applies to all coDesign employees, officers, and directors, at every location where coDesign operates.

coDesign designates senior management representation accountable for compliance/business ethics, and reviews this Policy at least annually and whenever there is a material change in our operations or in applicable law. All employees receive training on this Policy appropriate to their role, and coDesign communicates its substance to relevant business partners through its separate Code of Conduct for Business Partners. Any coDesign employee, worker, or business partner may raise a concern about a possible violation of this Policy through the reporting channel described in Part II, Section 10, without fear of retaliation.

Part I — Code of Conduct

This Code of Conduct is the umbrella framework for how everyone at coDesign is expected to act. It incorporates, and should be read together with, Part II of this document (the Business Ethics Policy) and coDesign's separate Human Rights and Working Conditions Policy, Health and Safety Policy, and Environmental Policy.

1. Our Commitment

coDesign conducts its business in compliance with all applicable laws and in a manner consistent with internationally recognized standards, including the UN Guiding Principles on Business and Human Rights, the ILO core labor conventions, the OECD Guidelines for Multinational Enterprises, and the Universal Declaration of Human Rights. We hold ourselves, our employees, and our business partners to standards of honesty, fairness, and respect in every project and relationship.

2. Expected Conduct

Every coDesign employee is expected to: comply with applicable law and coDesign policy; treat colleagues, clients, subcontractors, and members of the public with dignity and respect; avoid and disclose conflicts of interest; safeguard coDesign's and our clients' confidential information and assets; perform work safely and in accordance with our Health and Safety Policy; and promptly report any suspected violation of this Policy through the channels described in Part II, Section 10.



3. Governance and Oversight

coDesign's senior management is responsible for the content, implementation, and periodic review of this Policy, and designates individuals responsible for compliance/business ethics and for monitoring related risks across our operations and, where relevant, our supply chain.

4. Training

coDesign provides employees with training on this Code of Conduct covering, as appropriate to their role: expected behaviors and company values; how to report misconduct; human rights and working conditions; health and safety; business ethics; and environmental responsibility. New employees receive this training as part of onboarding, and coDesign refreshes training on a periodic basis.

5. Consequences of Violation

Violations of this Policy are taken seriously and may result in disciplinary action up to and including termination of employment, and, where a business partner is involved, action under coDesign's Code of Conduct for Business Partners up to and including termination of the business relationship. Where conduct may be unlawful, coDesign will consider referral to appropriate authorities.

Part II — Business Ethics Policy

coDesign conducts business with honesty, integrity, and fairness, in compliance with applicable law and consistent with international guidance including the UN Global Compact and OECD standards. Every employee is expected to uphold the standards below in every interaction with clients, business partners, competitors, and government authorities.

1. Anti-Corruption and Anti-Money Laundering

coDesign strictly prohibits bribery and corruption in any form — the abuse of entrusted power for private gain, whether financial or non-financial. Employees may never offer, promise, give, solicit, or accept a bribe, kickback, or improper payment (including a “facilitation payment”), and coDesign complies with applicable anti-money-laundering laws.

2. Data Protection and Data Security

coDesign respects every individual's right to control who can access their personal data and for what purpose, and safeguards personal data belonging to employees, clients, and building occupants against unauthorized access, loss, or corruption throughout its lifecycle, in compliance with applicable data protection law.

3. Financial Responsibility (Accurate Records)

coDesign accurately records, maintains, and reports its business documentation — including financial accounts, invoices, timesheets, certified payroll, and expense reports — in accordance with applicable law and generally accepted accounting principles.



4. Disclosure of Information

coDesign discloses financial and non-financial information to clients, partners, and regulators in accordance with applicable regulations and prevailing industry practice, including as relevant regarding labor practices, health and safety, environmental practices, and business activities.

5. Fair Competition and Anti-Trust

coDesign competes fairly and complies with applicable antitrust and competition laws. Employees may never engage in bid-rigging, price-fixing, improper exchange of competitively sensitive information, or unlawful market allocation with competitors or subcontractors.

6. Conflicts of Interest

coDesign requires employees to avoid situations where personal interests could exploit their professional position for personal or corporate benefit, and to promptly disclose any actual or potential conflict of interest to management.

7. Counterfeit Parts

coDesign maintains processes appropriate to our work to minimize the risk of introducing counterfeit materials or parts into our projects, and to identify, quarantine, and appropriately report any counterfeit materials that are detected.

8. Intellectual Property

coDesign respects the intellectual property of others — including patents, copyrights, and trademarks — and protects its own and its clients' designs, drawings, and proprietary information from unauthorized use or disclosure.

9. Export Controls and Economic Sanctions

coDesign complies with applicable import/export control and economic sanctions laws restricting trade with certain countries, entities, and individuals.

10. Whistleblowing and Protection Against Retaliation

coDesign maintains a grievance mechanism through which any employee, worker, or business partner may report a suspected violation of this Policy — including human rights, environmental, or business-ethics concerns — confidentially and, if preferred, anonymously. Reports may be made to an employee's supervisor, to coDesign's Human Resources/Compliance team, or by email to hello@codesign.us. Every report is acknowledged, the identity of the complainant is kept confidential, and coDesign strictly prohibits retaliation against anyone who makes a good-faith report or participates in an investigation. coDesign reviews the effectiveness of this mechanism at least once every 12 months.



Training

coDesign trains employees on this Business Ethics Policy, including how to recognize and respond appropriately to bribery, fraud, corruption, privacy, and data-protection issues, at onboarding and on a periodic refresher basis.

Policy Governance and Approval

This Policy is reviewed at least annually by coDesign senior management and updated as needed to reflect changes in our operations, applicable law, and industry guidance. This Policy is communicated to all coDesign employees and is available to clients and business partners upon request.

