



**Everus Construction Group Policy No. CORP-8**  
**CONFLICT MINERALS**  
**Effective Date: November 1, 2024**

**PURPOSE**

The purpose of this policy is for Everus Construction Group, Inc.'s (Everus) concerns with the unintentional support of armed conflict through the purchase of certain minerals from the Democratic Republic of Congo and countries that share its border ("the DRC region").

Armed conflict may be directly or indirectly financed by the trade in certain minerals, and the ores from which they originate, that are mined in the DRC region. The minerals specifically identified are tin, tungsten, tantalum, and gold (known as "3TG minerals"). The 3TG minerals are present in a wide variety of products. Certain products that are manufactured by Everus ("Our Manufactured Products") may include 3TG minerals.

To support the human rights of people in the DRC region, we are taking steps to determine if Our Manufactured Products contain 3TG minerals used to finance the conflict in the DRC region.

**SCOPE**

This policy covers all employees of Everus and all subsidiaries and entities directly or indirectly majority-owned by Everus.

**PROCEDURE**

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 requires publicly traded companies to inquire into the origin of 3TG minerals in their supply chains and to report on their due diligence processes and findings in filings with the Securities and Exchange Commission. Everus supports the goal of this regulation to stop the funding of armed conflict in the DRC region.

Everus is committed not only to compliance with all applicable laws and regulations, but also to ethical and responsible conduct in all our operations and respect for the rights of all individuals. We expect that our suppliers will share this commitment.

We will take the following steps to determine the use, source, and origin of 3TG minerals in Our Manufactured Products and document the process used in making such determinations. We will:

- Work closely with our suppliers to determine the potential use of 3TG minerals in our supply chain and, when appropriate, work with suppliers to remediate issues and source more responsibly.
- Expect our 3TG minerals suppliers to conduct the necessary inquiry and, where appropriate, additional due diligence to provide us with confirmation of the source of the materials used in their processes and ultimately present in Our Manufactured Products; and
- Encourage our suppliers to adhere to our philosophy of sourcing 3TG minerals from socially responsible suppliers, which may include conformant mines in the DRC region.

We also commit to institute and maintain systems, procedures, and strong governance processes to ensure proper implementation of these objectives across the company.

**ADMINISTRATION**

The Everus Vice President, Chief Financial Officer, and Treasurer has responsibility for the overall administration of this policy. Establishment and implementation of procedures to administer the policy are the responsibility of Everus and its subsidiaries.

Reviewed:     /s/ Maximillian J Marcy      
Maximillian J Marcy  
Vice President, Chief Financial Officer, and  
Treasurer

Approved:     /s/ Jeffrey S. Thiede      
Jeffrey S. Thiede  
President and Chief Executive Officer