



CODE OF CONDUCT
CORE VALUES & COMPLIANCE



**THERE IS NO RIGHT WAY
TO DO A WRONG THING**



MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER

Tom McCormick
Chief Executive Officer
Primoris Services Corporation

Colleagues,

Primoris Services Corporation, including all of its subsidiaries, (“Primoris” or the “Company”) has a strong history of commitment to excellence and performance in meeting our employee, customer, and investor expectations. We are committed to the highest ethical standards for safety, integrity, excellence, accountability and respect in all our business dealings. To serve our clients and business partners, we have an obligation to do what is right and conduct ourselves with integrity at all times. Therefore, we maintain policies to guide you with respect to standards of conduct expected in areas where improper activities could damage the Company.

We must ensure that our activities take care to avoid conduct that would compromise the integrity of, or public confidence in Primoris. Every one of us has an important role to play in this on a daily basis. In every business unit, management is responsible to instill these values and ensure adherence in our Code of Conduct. All of us are expected to use good judgment and consult with management or refer to the Code of Conduct if we are uncertain of the correct action to take.

This Code of Conduct articulates our core values and ethical standards and provides guidance for the application of these principles. It is intended to serve as a set of practices, goals and rules for all employees with the intent of having our actions meet our core values, and its principles focus on affirming our commitment to transparency and compliance. Taking ownership for doing the right thing means acting accordingly, asking the right questions, and speaking up if you have concerns.

Our Code of Conduct is periodically reviewed by a team of Primoris employees to ensure that it continues to be relevant in addressing current challenges and issues.

As you all know, our reputation is integral to our success, and reputation comes from our collective actions. Your performance in conducting our business in a manner that is consistent with the principles contained in the Code of Conduct will enable us to keep and enhance that reputation. Thank you for taking time to review this document, understand what it means, and for your ongoing commitment to make all of us proud to work at Primoris.



Tom McCormick
Chief Executive Officer
Primoris Services Corporation

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PRIMORIS VISION, MISSION & CORE VALUES

VISION

To be a leader in every market we serve and be a trusted service provider and partner to our clients.

MISSION

Built on a foundation of trust, we provide our clients with unmatched value, our employees with a safe work environment and entrepreneurial culture, our shareholders with results, and the communities we serve with innovation and excellence.

CORE VALUES

Passion: We are passionate about our success and the success of our customers.

Resilience: We get stronger with every challenge.

Inspiration: We seek to inspire an entrepreneurial spirit within the company.

Motivation: We believe in motivating our people to be the best they can be.

Openness: We are open to all forms of diversity.

Reliability: We always follow through on our commitments.

Integrity: We act with integrity in everything we do.

Safety: We believe that “No business objective is so important that it will be pursued at the sacrifice of safety.”

“PRIMORIS, it’s who we are”

OUR ACTIONS DEFINE US

THE PURPOSE OF OUR CODE

The Primoris Code of Conduct (“Code”) explains who we are, what we stand for, how we conduct ourselves and provides the standard of behavior by which we conduct business. Our Code is built on our Core Values, which are the heart, soul, and character of our company. Our Code embodies the collective vision of our leadership and encompasses the values that have been part of our history and will continue to be vital to the future success of the Company.

You are an important member of the Primoris family, and it is your responsibility to maintain and embrace this Code. You and your co-workers have a duty to hold one another accountable to this high standard of behavior.

Violations of our Code, values, policies or the law may carry serious consequences for the individuals involved, as well as for Primoris. Those engaging in unethical or illegal behavior, and those who direct, condone, approve, or facilitate such behavior, may be subject to legal action and disciplinary action, up to and including termination of employment. Such behavior puts Primoris at risk of a damaged reputation, it negatively affects our stakeholders, and may subject Primoris to fines and/or other legal liability.

The requirements set forth in this Code help us maintain the responsibility and integrity required by our work. Our Code exists not only to demonstrate Primoris’ commitment to doing the right thing, but also to ensure our Company’s continued success. It gives us the tools to act appropriately as we strive to reach our business goals and meet the needs of our employees, customers and shareholders in an ethical and sustainable way.

COMPLIANCE PROGRAM AND GUIDELINES

Primoris’ board of directors has endorsed this Code for Primoris, and Primoris’ General Counsel has been designated as our Corporate Compliance Officer with responsibility for this program. However, each of us has a responsibility to help ensure that our Company always does the right thing and complies with the law.

WHO IS EXPECTED TO FOLLOW OUR CODE

Our Code applies to everyone at Primoris, including those who do business on our Company’s behalf. You must read, understand, and abide by the Code. You must also be familiar with our Company policies, several of which are referenced in the applicable sections of this Code. We encourage our vendors, suppliers, subcontractors, or other business contacts to adhere to our Code.

ETHICAL RESPONSIBILITIES

As you perform your job, you may find situations where the ethical course of action conflicts with your ability to meet financial or budgetary goals or a deadline. This is an area where the Code can help by providing you with resources and guidance when the right course of action may be unclear. In addition to the Code, you can also seek out guidance from your manager or supervisor by asking questions for help on how to proceed.

When contemplating the best course of action, you need to consider the following:

- » Are my actions unsafe? Do they present any risk of endangering myself or others?
- » Which option represents the best legal and ethical course of action?
- » Which choice is most honest?
- » How will others be affected by the decision?

- » How would the action and its outcome be perceived by a co-employee, customer or a shareholder?

All employees are expected to demonstrate their personal commitment to this Code. Employees must foster a workplace that promotes compliance by promptly reporting any known or suspected violation of our Code or policies. Managers and supervisors are expected to lead by demonstrating personal commitment to the Code.

In this respect, managers and supervisors should also:

- » Lead by example and ensure all employees are aware of and abide by this Code, other Company policies and procedures, and applicable laws and regulations.
- » Create an environment where employees feel comfortable asking questions, making reports, or raising concerns.
- » Promptly take required action concerning any known or suspected violations of our Code or policies.
- » Consider an employee's demonstration of their commitment to ethics and compliance when providing regular ongoing feedback and evaluations.
- » Take extra care in monitoring the use of all safeguards in the workplace, including Company procedures and safe work practices.
- » Complete and ensure that employees under their supervision complete all required compliance training programs.

PERSONAL COMMITMENT

Primoris believes that asking questions and reporting known or suspected misconduct benefits all of us. Our Company is committed to promoting open communication, answering all questions promptly and taking all reports seriously. You are encouraged to talk to someone of authority (see list below) if you see something that does not seem right. You are encouraged to do so even if you are not positive that a violation has occurred. Since this Code cannot possibly address every situation you may face, it is up to each of you to use good judgment and common sense to ensure that our Company maintains the highest standards of integrity. Placing complaints or other notifications on social media is not the proper way to communicate.

REPORTING CODE OF CONDUCT VIOLATIONS

If you know or suspect that misconduct has occurred, or simply have a question about the right course of action, you are offered several different options. You are encouraged to make full use of these resources by asking questions, expressing concerns and reporting possible violations of the Code, any Company Policy or the law.

Internal Reporting is encouraged for regular business issues and matters not requiring anonymity and are protected via PSC's Non-retaliation Policy (see below). Speak to any one of the resources available to you:

- Your supervisor or manager
- The head of your business unit
- Human Resource Service Center at 833-PSC-HRSC (833-772-4772) or HRSC@prim.com
- Any executive officer
- Primoris' Legal Department

Primoris treats reported information in a confidential manner to the extent reasonably possible and as allowed by law. However, you may make a report anonymously if you feel more comfortable doing so.

Anonymous Tip Line Services are available, in addition to the resources listed above, for any employee may that feels the need to remain anonymous via tip line. PSC's Code of Conduct Tip Line is managed by Lighthouse Services, an independent third-party, to ensure that any employee wishing to submit a report can do so anonymously and without fear of retribution. Reports to the Code of Conduct Tip Line can be done by any of the following options:

- **Phone:** 833-PSC-TIPS (833-772-8477)
- **Web:** www.lighthouse-services.com/PSC
- **Mobile App:** Go to the Apple Store or the Google Play store and search for "Anonymous Reporting". Enter keyword: **PSC**

The above Tip Line is available 24 hours a day, seven days a week. The Tip Line offers the ability to have interactive communication via a report reference number and anonymous PIN. This allows you to report and interact with an investigator that may need additional information, while you maintain your confidentiality to make the investigative process more effective. You may also have the opportunity to get a report back to you on the results of the investigation.

Whistleblower Reporting. For more information about reporting concerns about any violations relating to corporate reporting and disclosure, accounting and auditing controls and procedures, securities compliance and other matters pertaining to fraud against shareholders, refer to the Audit Committee Whistleblower Policy. As referenced in the Whistleblower Policy, employees may report their concern to the Primoris Whistle-Blower Hotline (WBH), a Confidential and Anonymous Financial Concern Hotline, at <https://www.whistleblowerservices.com/prim/>.

NON-RETALIATION COMMITMENT: INVESTIGATIONS AND CONSEQUENCES

Primoris strives to apply consistent principles when conducting investigations. When a report is made through any hot-line, the information is forwarded to the proper resource for investigation. Our Company will promptly, discreetly, and professionally follow up on any indication of a breach of the law or this Code. If you make reports to the Code of Conduct hot-line you will receive a case number. This number enables you to check on the status of the investigation. You may be asked to provide additional information, and you will be notified when an investigation is completed.

As an employee, you are required to cooperate with all investigations, subject to applicable law. This means that all communications you make about the topic of an investigation are to be delivered honestly and completely. It also means retaining complete records and any other type of information you may have, as directed in our Records Retention Policy. Failure to do so will subject you to disciplinary action.

WE ARE COMMITTED TO EXCELLENCE

SAFETY

At Primoris, we work diligently and safely at all times. No business objective is so important that it should be pursued at the sacrifice of safety. You should not allow or create unnecessary dangers to yourself, your co-employees, our customers, our Company or to others. Primoris maintains a comprehensive Health and Safety Management System for prevention of accidents.

The Company makes every effort to comply with all occupational safety and health standards and regulations established by The Occupational Safety and Health Act of 1970 (OSHA) and related laws and regulations that have been enacted in recent years by both state and federal governments.

SAFE OPERATIONS:

The Company is committed to providing a safe and secure workplace for its employees. The Company provides information to employees about workplace safety and health issues through regular internal communication channels such as supervisor-employee meetings, bulletin board postings, memos, or other written communications. A safety advisory group has been established to assist in these activities and to facilitate effective communication between employees and management about workplace safety and health issues.

Employees and supervisors receive periodic workplace safety training. The training covers potential safety and health hazards and safe work practices and procedures to eliminate or minimize hazards. Some of the best safety improvement ideas come from employees. Those with ideas, concerns, or suggestions for improved safety in the workplace are encouraged to raise them with their supervisor, or with another supervisor or manager, or bring them to the attention of a member of the safety advisory group. Reports and concerns about workplace safety issues may be made anonymously if the employee wishes. The Company will not tolerate retaliation against any employee who raises such concerns.

Each employee is expected to obey safety rules and to exercise caution in all work activities. Employees must immediately report any unsafe condition to the appropriate supervisor. In the case of accidents that result in injury, regardless of how minor the injury may appear, employees should immediately notify their supervisor, the Company's Safety Director, and/or the Company's Claims Administrator. Employees who violate safety standards, who cause hazardous or dangerous situations, or who fail to report unsafe conditions or injuries, may be subjected to disciplinary action, up to and including termination of employment.

SAFE ENVIRONMENT:

To further ensure a safe environment, the Company will not tolerate verbal or physical violence of any kind. The Company has established a strict policy that prohibits any employee from threatening or committing any act of violence in the workplace, while on duty, while on Company-related business, or while operating any vehicle or equipment owned or leased by the Company.

This list of behaviors, while not inclusive, provides examples of conduct that is prohibited:

- » Causing or threatening physical injury to another person;
- » Aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress;
- » Intentionally damaging Company or customer property or property of another employee;
- » Committing acts motivated by, or related to, harassment, in any form, or domestic violence.

Employees may not possess firearms or weapons of any kind on their person while at work or on Company property, including any Company offices, and Company-owned or a leased vehicle, except as follows:

Employees may [only as allowed by state or local law] store lawfully possessed firearms or other weapons in their personal vehicles while parked on Company property provided the vehicle is locked and such firearms or other weapons are hidden from plain view or locked in a case or container within the vehicle. The Company reserves the right to alter or amend this policy in accordance with changes in applicable law. This policy will be strictly enforced, and any violations will result in disciplinary action up to and including termination of employment.

Any potentially dangerous or suspicious situations must be reported immediately to your supervisor or human resources, and reports should be as specific and detailed as possible. Reports may be made anonymously. The Company will promptly and thoroughly investigate incidents and reports of threats of

violence, actual violence, or suspicious individuals or activities. Reports or incidents warranting confidentiality will be handled appropriately and information will be disclosed only on a need-to-know basis. The Company will not retaliate against any employee making a good faith report under this policy.

Due to the importance of this policy, employees who violate any of its terms, who engage in or contribute to violent behavior, or who threaten others with violence will be subject to prompt disciplinary action, up to and including immediate termination of employment.

SAFE DRIVING:

If you operate a company vehicle or are issued a vehicle allowance, you must operate your vehicle in a manner that follows all traffic rules, including the Company's policy of "hands free" communication while driving. For more information, refer to the Safety Department's Fleet & Driving Safety Program and the Primoris Vehicle Policy.

Employees are also responsible for complying with the requirements of the Company's Substance Abuse Policy.

CONTINUAL IMPROVEMENT

A critical element of our commitment to excellence is our relentless focus on improving our business processes and project execution. Our focus is on reducing waste, standardizing processes, and reducing variability—all in an effort to optimize efficiencies while lowering costs and improving quality across our business operations. Our ultimate goal is for continual improvement to become a standard practice for all of our people and processes.

EMPLOYEE DEVELOPMENT AND CAREER PATH

Another cornerstone of our commitment to excellence is employee retention and recruitment through policies, training and educational programs that allows for inclusion and upward mobility across the organization. We fully understand that it is ultimately our people who help make our collective workplace safer, more efficient and our Company more sustainable and prosperous.

Our employee development is focused on the three following objectives:

- » Training, education with focus on career path and advancement
- » Team learning and corporate knowledge
- » Employee empowerment

WE MAINTAIN ACCURATE RECORDS

When it comes to ensuring the accuracy of our financial and other records, we each have a role to play in ensuring that the information is accurate. As a publicly traded company, it is imperative that we prepare all of our financial statements in accordance with generally accepted accounting principles and properly represent the financial condition and results of our Company. All reports that we file with a government agency must be complete and accurate and must not mislead, misrepresent, or omit information.

In order to protect the integrity of our books and records, you have a duty to report any instances of incorrect or fraudulent record keeping, false representations (verbally or in writing), or hiding or mischaracterizing Company funds, assets or transactions—whether by another Primoris employee or a third party. You must submit any concerns or complaints through any of the reporting channels listed in this Code.

DOCUMENT AND RECORD RETENTION/DESTRUCTION:

Managing our records is a critical component of preserving corporate knowledge and standardizing our processes while building trust with our customers, employees and shareholders. Effective documentation and records management allows us to meet our business needs and ensure our documents and records are readily available when we need them. It also helps us comply with all applicable laws and regulations and preserve any relevant records in case we need them for litigation, audits, or investigations.

That is why it is important for you to follow the Company's Record Retention Policy and the retention schedule of that policy. These define what business records need to be controlled and retained, the length of time business records must be retained and the appropriate procedures for complying with litigation holds and other responsibilities.

A litigation hold issued by Primoris' Legal Department applies to documents connected with actual or anticipated litigation. Accordingly, all relevant documents must be retained for the duration of the hold.

Keep in mind that it is unlawful for you to destroy, conceal, or falsify any document for purposes of obstructing any governmental or legal proceeding, investigation, or lawsuit.

WE OBSERVE SECURITIES LAWS

In the course of your work, you may become aware of information about our Company (or other companies) before it is made public. It is important that you never disclose or use for your personal benefit, or any other parties' benefit, any material, nonpublic (or "inside") information you possess.

Material, non-public information comes in various forms. Generally, it is information that an investor would consider important when making an investment decision. Trading on material, non-public information is a violation of insider trading laws, which can subject the individuals involved to disciplinary action up to and including termination, as well as to potential civil and criminal penalties. It is also illegal to provide inside information to others (or "tip" them) in making their investment decisions. Our Company has established procedures for the release of material non-public information, including the designation of Company spokespersons. These procedures ensure that information reaches the public in an appropriate way. You may not disclose material, non-public information to anyone outside our Company, unless you are specifically authorized to do so under our guidelines for communication with the public. This includes discussions concerning Primoris business in all social media forums, as well as other verbal and non-verbal forms of communication.

For more information about this area, please see Primoris' Insider Trading policy and Primoris' Communication Policy.

If you have questions about any trading activity, direct them to your supervisor, manager or the Director of Investor Relations.

WE SAFEGUARD COMPANY ASSETS AND INFORMATION

To perform your daily work, you use various assets – assets that are placed in your care by Primoris. You are responsible for protecting all property and resources entrusted to you, including any equipment, facilities, funds, data, and documents to which you have access. You must take reasonable precautions to protect all Company assets against theft, damage, or misuse. You must keep in mind that Company assets are intended to be used for business purposes. Likewise, Company devices are important and costly assets, and should be used appropriately and responsibly at all times. You should avoid leaving any devices or technologies where they could be lost or stolen.

CONFIDENTIAL AND PROPRIETARY INFORMATION:

The assets we use in our daily work are not always tangible. In fact, one of our most valuable resources at Primoris is our confidential and proprietary information – information that is not available to the public. This kind of information must be protected as carefully as you would guard the laptops and other devices that contain it. You may only share this information with people who are authorized to have it for legitimate business purposes. You are expected to understand the types of information considered to be confidential.

Broadly speaking, confidential information can include:

- » Business plans and strategies
- » Third-party or vendor information subject to a confidentiality or non-disclosure agreement
- » Pricing policies or budgets
- » Non-public information of products, services, customers and employees (e.g., social security numbers)

Confidential information also includes trade secrets or data that give a company a competitive advantage.

Some examples of trade secrets include:

- » Customer lists and information
- » Terms and conditions, rates offered to certain customers
- » Technological developments or proprietary processes

If you possess Company trade secrets or any other confidential or proprietary information, do not disclose it without a clear-cut business need and prior authorization to do so. Properly securing your computer when you are not using it and encrypting, and password-protecting information can help protect the sensitive information in your care.

Your obligation to protect confidential and proprietary Company information continues even after your employment ends. You also have an obligation to protect the information disclosed to us by our employees, customers, and business partners. To do so, you must uphold confidentiality obligations when employees' and third parties' personal or confidential information is collected, stored, processed, trans-mitted, and shared.

INTELLECTUAL PROPERTY:

While many of us possess confidential and proprietary information about our Company, some of us may also have access to Primoris' Intellectual Property ("IP"). While it is valuable to our Company, it is not always confidential information. Much of our IP is public information but is nevertheless protected by law. For example, IP can include information such as copyrights, trademarks, designs, logos, and brands, as well as information communicated verbally, or through written and electronic documents. Like other types of information, the unauthorized release or use of our IP could prove harmful to Primoris. The rights to all IP created with Company materials, on Company time, at the Company's expense, or within the scope of your duties belong to Primoris.

WE USE COMPANY TECHNOLOGY RESPONSIBLY

We often draft emails, instant messages, and text messages on Company-provided technologies. When doing so, you should compose them with the same care you take in composing any other Primoris document. Electronic messages, both personal and business related, are lasting and recoverable written records that can easily be copied, altered, and forwarded worldwide without your knowledge or consent. At no time may you use Company resources for unauthorized, illegal, or unethical purposes. This includes searching, storing, or disseminating sexually, racially, or ethnically suggestive, or other offensive material.

Furthermore, you are responsible for using the Primoris network and computer systems ethically and legally and doing your part to help protect our Company's assets from cyber attacks. The Company reserves the right to monitor your use of company owned equipment. You should review and follow all security measures and internal controls for our information and communications systems. To help protect confidential business and personal information, do not respond to any emails that appear suspicious or click on any links or attachments embedded in these types of emails. If you receive a suspicious email, please forward it to helpdesk@prim.com.

As an added layer of security, you must safeguard your passwords and other access codes by not divulging them to anyone. You should never allow others to use your accounts – even co-employees. Software on your computer and other electronic devices is Company property and must be used according to licensing agreements. You may not copy it without permission.

WE DO THE RIGHT THINGS

WE PROTECT THE ENVIRONMENT

At Primoris, we comply with all environmental laws, regulations, and permit requirements. We design, engineer, and construct our projects in an environmentally sound and responsible manner. We also respond immediately and effectively to any known environmental hazards or noncompliance situations. Our commitment to the environment does not end there. We proactively pursue opportunities to exceed current environmental standards, including reducing waste and emission of pollutants, recycling materials, and conserving natural resources throughout our business operations and day-to-day work activities. We also encourage efficient use of energy and water, both within our company offices and on our jobsites. These actions are just a few examples of how we are committed to the environment.

To ensure that Primoris is adhering to its environmental commitment, we have developed environmental procedures and programs. We conduct periodic environmental self-evaluations to verify that our operations are in compliance with environmental laws, regulations, and permit requirements. Regular evaluations also help us identify best practices and opportunities for improvement.

WE AVOID CONFLICTS OF INTEREST

When working for Primoris, you make a commitment to act in the best interest of the Company. In order to perform your duties free from unfair bias, you must be alert to any situations that may create a conflict of interest. A conflict of interest arises when your loyalty to Primoris may be affected by an actual or potential benefit or influence from your personal interests or an outside source. You should be aware of any potential influences that impact or appear to impact your loyalty to Primoris. Conflicts of interest not only compromise the success of Primoris as a whole, but also confront us with difficult personal decisions.

If you believe you are involved in a conflict of interest situation, or if you have a question of whether a potential situation might create a conflict, you must disclose this potential conflict of interest situation to your manager or supervisor. A conflict of interest is not necessarily unethical, nor does it always constitute a violation of our Code. However, it is necessary for you to disclose actual or potential conflicts promptly, to ensure a fair and prompt resolution.

It is not possible to describe every potential conflict of interest, so our Company relies on each of us to exercise sound judgment and common sense and to adhere to the highest ethical standards. To assist us in this regard, a few of the more common situations in which a conflict of interest arises are described below.

PERSONAL RELATIONSHIPS:

A conflict of interest can arise if you or any related person has a personal stake in a company that is a customer, business partner, or a competitor of Primoris. A related person includes a spouse, civil partner, parent, child, sibling, stepparent, mother/father-in-law, son/daughter-in-law, any person living in the same house, any business associates, and anyone who is a close personal friend.

If you find yourself in a situation in which you or a related person has a personal stake in any third party that does or seeks to do business with us, as described above, you must not use your position to influence, in any way, the business arrangement or the administration of associated payments. If you are involved in any portion of the decision-making process regarding a transaction involving any third party in which you or a related person has an interest, notify your manager or supervisor immediately and remove yourself from the decision-making process.

To be the strongest team possible, we must all be treated fairly. When a personal or family relationship between employees exists, particularly one that is also a reporting relationship, it may seem that one employee is receiving preferential treatment or favoritism. Therefore, no family member should be placed in a position where he or she has direct reporting or decision-making authority over another family member. We discourage employment relationships that reasonably create the potential for impropriety, undue influence or favoritism.

For more information, refer to your Primoris Employee Handbook.

COMPETING AGAINST PRIMORIS:

In order to make objective business decisions, you must never compete with Primoris. This means you may not take for yourself any business or investment opportunities that you discover through your position at Primoris. In addition, you must never help anyone else take such business or investment opportunities for personal gain.

Accepting outside employment may at times create a conflict of interest. To avoid such a situation, you should not accept another job that interferes with your ability to do your work for Primoris, including outside business that conflicts with your normal working hours. Similarly, you may not use Primoris property, equipment, or information to benefit another business. To preserve Primoris' interest, you must not take employment with a Primoris business partner or competitor while maintaining your employment with Primoris. Because taking outside employment may create a conflict of interest, you must promptly disclose it to your manager or supervisor.

RELATED PARTY TRANSACTIONS:

Having a substantial investment in or a personal business relationship with a competitor, customer, or supplier of Primoris can also create a conflict. A substantial investment in an entity is one that is so large that it creates the appearance of a conflict of interest, whether or not your loyalties are actually divided. Likewise, you may not engage in any transaction involving Primoris if you, or a related person, has a substantial interest in the transaction or can benefit directly or indirectly, other than through Primoris' normal, approved processes.

WE EXCHANGE BUSINESS COURTESIES ETHICALLY

At Primoris, we win business based on the quality and competitiveness of our offerings – not our ability to be swayed by business courtesies or favors. To preserve our reputation, you must use caution when giving or accepting gifts or entertainment. You should not exchange business courtesies with an existing or potential supplier, contractor, vendor, business partner, or customer if the intent is to elicit an unfair business advantage for Primoris.

“Gifts” are usually goods and services but can be defined as any item of value. For example, when the person offering a meal or entertainment is not attending the meal or event, it is considered a gift.

“Entertainment” is generally defined as a situation where both a representative from the provider and the recipient are present.

You may only accept gifts if they are:

- » Reasonable (worth \$250 or less)
- » Infrequent (cannot total more than \$250 in any 12-month period per provider)
- » In good taste
- » Unsolicited
- » Customarily offered to others having a similar relationship
- » Not cash or cash equivalents (gift cards)
- » In compliance with applicable laws and regulations

You may attend the occasional meal or entertainment provided that the event is customary and reasonable, and both the provider and recipient are present. You may not accept travel or lodging, unless approved in advance by your manager or supervisor.

Even if you receive gifts that meet the criteria above, you must always remember to avoid conduct that could create even the appearance of bias. If you are unsure whether a gift conforms to our policy or might be construed as being in excess of a customary business courtesy, you should discuss the matter with a manager or supervisor.

If you are offered money or a gift that is not in line with the exceptions listed above, you must report it to your supervisor or manager, as well as to Primoris’ Legal Department. The same rules apply if money or gifts are sent to your office or home address.

WE DO NOT RESORT TO CORRUPTION OR BRIBERY

As part of our commitment to winning business ethically, Primoris does not tolerate bribery in any form. Even if we lose business or encounter delays because of our refusal to do so, we do not bribe any third party, or allow or condone third parties to do so on behalf of Primoris. We believe in ethically winning business through the quality and competitiveness of our products and services. We abide by laws, treaties, and regulations that forbid bribery, including the [U.S. Foreign Corrupt Practices Act](#).

To be a responsible member of our business community, you must follow these laws wherever you do business, regardless of local law or custom. This means you may not offer, attempt to offer, authorize, or promise any sort of payment, bribe or kickback for the purpose of obtaining or retaining business or an unfair advantage. Moreover, you may not solicit or accept an improper payment, bribe or kickback.

A kickback is the return of a sum already paid or due to be paid as a reward for awarding or fostering business. A bribe, on the other hand, is an offer or gift of anything of value or advantage that is intended to improperly influence the actions of the recipient.

Bribes may include:

- » Money
- » Gifts
- » Travel or other expenses
- » Hospitality
- » Below-market loans
- » Discounts
- » Favors
- » Business or employment opportunities
- » Political or charitable contributions
- » Any benefit or consideration, direct or indirect

You must also never agree to pay facilitating payments, even if you are working in location where they may be legal or a common practice. A facilitating payment is usually small and usually made in cash in order to expedite standard government services such as processing permits, providing police protection, or expediting utility services. Because the facilitating payment goes straight to the individual, however, they are considered bribes, and it is against our policy to pay them. You must never solicit, request, or knowingly condone any payments from a third party to a government official on behalf of Primoris.

If you are working with a government official, be especially cautious. A government official can be a national or local government official or employee, a political candidate, or an official or employee of government-owned or government-controlled entities (such as state-owned oil companies). If you have any questions about whether the person with whom you are interacting could be considered a government official, contact Primoris' Legal Department.

It is also important to note that you may not hire a third party to do something that you cannot ethically or legally do yourself. Engaging a third party to indirectly make an improper payment violates not only this Code, but also anti-corruption laws.

Anti-corruption laws are complex, and the consequences for violating these laws are severe. For this reason, you should avoid any activity that could be construed as bribery. If you have any questions, consult with Primoris' Legal Department.

For more information about this section, refer to the [Foreign Corrupt Practices Act](#) (FCPA) Policies and Procedures.

WE COMPETE WITH INTEGRITY

At Primoris, we believe in competing vigorously, but we never sacrifice our integrity to win business. This means we comply with all applicable antitrust and competition laws, wherever we do business. While they can be complex, these laws are meant to ensure a level playing field and fair competition in the marketplace. In practice, these laws require that we make independent business decisions, never engaging in unfair business practices, scheming with our competitors or making other fraudulent business arrangements.

You must take special care not to discuss any of the following with our competitors:

- » Pricing, costs, or marketing strategies
- » Market or customer distribution
- » Bids for contracts

If a competitor attempts to talk to you about any of these topics – or invites you into any other anti-competitive behavior – you should stop the conversation immediately and inform your manager or supervisor.

Competing with integrity also means we always gather competitive information ethically and legally. We never misrepresent ourselves in order to get information. In addition, we must never ask the former employees of our competitors to share confidential data with us.

WE COMPLY WITH INTERNATIONAL TRADE LAWS

Although Primoris conducts most of its business in the United States, there may be instances when you deliver a product, service, or piece of information to, or receive a product, service, or piece of information from, an international location or non-U.S. citizen. Since you may not handle these situations often, it is important to make sure that you use caution and ask questions when handling exports or imports.

While this area does not apply to most of us or the main facets of our business, it is important that you understand what is expected of you, including potential tax, verification, licensing, and permit requirements, and direct your questions to Primoris' Legal Department.

We are also subject to U.S. anti-boycott rules, which may, as a matter of public policy, affect the way we conduct our business. Specifically, a “boycott” occurs when one person or group refuses to do business with other people or groups. The prohibited acts may be found in contracts, invoices, or other documentation.

If you receive or suspect you have received such a request, do not ignore it. Instead, immediately report it to Primoris' Legal Department.

WE GIVE BACK TO OUR COMMUNITIES

Primoris sends a strong message of support for our communities and encourages your involvement in volunteer activities to reinforce this message. You may take part in these activities on behalf of the Company, so long as the charity or the activity has been approved. You may not, however, use Company assets to raise money or awareness for an unapproved charity or any other fundraiser, unless it has been pre-approved.

The same rules apply to your participation in political activities. You have the right and are even encouraged to individually and voluntarily donate your time and money to the political process. However, your participation may not occur on Company time or at the Company's expense. This means, for example, that you should never engage with your fellow employees on behalf of a political candidate during the workday or expect to be reimbursed by the Company for your personal political contributions. If you want to use Company property, facilities, time, or funds for political activities, it must be pre-approved.

You must not engage in lobbying activities on behalf of Primoris, without prior consent from Primoris' CEO, or General Counsel. Lobbying activities may require disclosure and may be subject to specific rules that are often complicated and subject to change. It is your responsibility to ensure that you are in compliance with the applicable laws.

NON-SOLICITATION:

While your participation in community, charitable, and political activities is encouraged, you should not pressure your co-workers to join you in these endeavors. If you are involved in non-sanctioned activities, avoid using Company time and resources to solicit other employees. If you would like to raise

awareness for a charitable cause, ask your manager or supervisor for help in doing so in an appropriate, professional way.

WE COMMUNICATE TRUTHFULLY WITH THE PUBLIC

We always communicate truthfully with the public. At the same time, we are consistent in our messaging and careful to promote our Company's best interests. For this reason, only authorized individuals can speak with the media on Primoris' behalf. If you receive a request from the media or another interested party, you should refer the inquiry to your manager or supervisor. For investor inquiries, refer the request to the Vice President of Investor Relations. Do not respond yourself.

WE TREAT OTHERS THE WAY WE WANT TO BE TREATED

WE VALUE OUR EMPLOYEES

You have an important role in building and sustaining an inclusive, diverse work environment. Therefore, we want to assure that everyone is accepted and rewarded according to their unique efforts and contributions. In order to be successful in this, each of you must be dedicated to our Company's equal employment opportunity effort.

MENTORSHIP:

Primoris employees have multiple opportunities for mentorship during the course of their careers. Our training and apprenticeship programs are founded on the principle of skilled craftsmen mentoring new employees in the field. Our succession planning includes encouraging management to internally develop the next generation of leaders.

FREEDOM OF ASSOCIATION:

We are committed to respecting our employees' right to freedom of association, including:

- » The right to organize in accordance with national laws and practices.
- » The right to collective bargaining through representatives of their own choosing.
- » The right of their chosen representatives to have reasonable access to our employees in order to represent them.
- » The right to engage in other protected activities.
- » The right to refrain from such activities.

RESPECT FOR HUMAN RIGHTS:

Primoris is never tolerant of human rights abuses or any activities that cause or contribute to human rights abuses. Any concerns that our employees, contractors, suppliers, vendors, or other business partner may not be meeting our standards for the respect of human rights should be reported directly either via our Code of Conduct Hot-line or any of the methods listed in the "Personal Commitment" section of this Code.

MODERN SLAVERY STATEMENT – HUMAN TRAFFICKING:

In keeping with the principles of our Code of Conduct and Human Rights Policy, the Company is committed to ensure that slavery and human trafficking do not take place in any part of our business and supply chains. We undertake all reasonably practicable steps to uphold that commitment. PSC complies and expects suppliers and other business partners to comply with laws that promote safe working conditions and individual security, laws prohibiting slave and forced labor, and laws prohibiting child labor.

DISCRIMINATION AND HARASSMENT:

Primoris recognizes that employees are its most valuable asset. Accordingly, we do not make employment-related decisions or discriminate against anyone on the basis of: race, color, age, religion, sex, sexual orientation, gender identity or expression, national origin, ancestry, citizenship status, physical or mental disability, marital status, genetics, veteran status, or any other characteristic protected by law.

Employment-related decisions include: hiring, promotions, transfers, recruitment, discipline, termination, compensation, and selection for training programs. Our Company does not tolerate harassment, which can take many forms. Harassment is any verbal remark, physical advance, or visual display that makes another feel intimidated, offended or belittled. This treatment may come from fellow employees, supervisors, business partners, or customers. Harassment can affect both males and females. Anyone can be a victim. Harassment is a form of discrimination and is never ignored by Primoris.

Harassment can be sexual or non-sexual in nature. Sexual harassment may include unwanted advances, inappropriate sexual jokes, sexually suggestive comments, touching, requests for sexual favors, or inappropriate comments about another's appearance. Non-sexual harassment may include offensive comments, jokes, or pictures related to race, religion, ethnicity, gender, age, or any other protected characteristic. To keep harassment out of Primoris' environment, you must be sure that your comments and actions are always appropriate and respectful.

If you have experienced or observed any discriminatory or harassing behavior, please discuss the situation with your manager or supervisor, Human Resources, or contact Primoris' Legal Department immediately.

For more information, refer to the Equal Employment Opportunity Policy in your Employee Handbook.

EMPLOYEE PRIVACY:

As an employee, you provide sensitive personal, medical, and financial information to our Company. Primoris is committed to securing this information and protecting your personal privacy.

Sensitive employee information may include: benefits, tax or compensation information, medical records, contact information, and employee information such as resume, transcript, performance evaluation materials, or interview notes.

To access any sensitive information of your co-employees, you must have specific authorization and a business need to do so. If the nature of your job requires you to come into contact with this information, you must protect it. Keep it secured from loss or theft, and use it only as is necessary, according to the law and other Company policies and procedures. When sending personal and confidential data to an outside source, use all reasonable safeguards against loss, destruction, or inadvertent disclosure.

If you have additional questions on protecting or disposing of employee data, consult with your manager or supervisor.

WE TREAT OUR CUSTOMERS AND SUPPLIERS FAIRLY

At Primoris, we let integrity and honesty guide our interactions with our customers and our suppliers. We pride ourselves on the quality of our products, services, and operations. We are honest about our work. We are committed to doing business with suppliers who provide goods and services that meet or exceed our high standards. If you experience an issue with supplier performance, contact your manager or supervisor immediately.

We do not make misleading, false, or exaggerated claims about our services. We carefully and accurately represent the quality, features, and availability of our products and services and ensure that all of our marketing and promotional materials contain an accurate reflection of our offerings.

WE PROTECT OUR THIRD PARTIES' INFORMATION AND PROPERTY

The third parties we work with (customers, suppliers, contractors, consultants, and business partners) frequently share their confidential and Intellectual Property (IP) information with Primoris. We protect that information just as carefully as we protect our own. In fact, our integrity depends on it. This helps create an environment of trust with our partners and ensures that Primoris maintains its compliance with all data protection and privacy laws.

Be careful when preparing advertising or promotional materials or when using the name or printed materials of another company. Materials belonging to others may not be used, posted on, copied, or sent through the Company's systems without permission from the IP property owner.

WAIVERS

Primoris generally will not grant a waiver of any provision of this Code. Any waiver for an officer of Primoris (as "officer" is defined in Rule 16(a)-1(f) under the Security Exchange Act of 1934, as amended) or a director must be approved by the Board of Directors, or a designated committee of the Board. Any such waiver must be promptly disclosed to shareholders in accordance with applicable NASDAQ Exchange rules. Employees seeking a waiver to any provision of this Code should consult with Primoris' Legal Department.

Primoris Services Corporation
2300 N. Field Street
Suite 1900
Dallas, Texas 75201

PLEASE READ and SIGN THE
PRIMORIS CODE OF CONDUCT CERTIFICATION

PRIMORIS CODE OF CONDUCT CERTIFICATION

As a Primoris employee and as applicable to my work responsibilities:

- I will deal fairly and ethically with Primoris and on Primoris' behalf in all matters and will at all times promote ethical behavior.
- I will avoid actual or apparent conflicts with Primoris' interests.
- I will not (a) take for myself personally any opportunities that are discovered through the use of Primoris property, information, or position; (b) use Primoris property, information, or position for personal gain; and (c) compete with Primoris.
- I will protect Primoris' assets and promote their efficient and legitimate business use.
- I will comply with all applicable laws, rules, and regulations, including insider trader laws.
- I will promptly report any illegal or unethical conduct to Primoris management or other appropriate authorities.

I have read the Primoris Code of Conduct and do certify that:

- I understand the Primoris Code of Conduct.
- I understand that I have the responsibility to ask questions, seek guidance, and report suspected violations of the Code.
- To the best of my knowledge, I am in compliance with the Primoris Code of Conduct.
- I will continue to comply with the Primoris Code of Conduct.
- I understand that the Company reserves the right to change, rescind, and add to the Primoris Code of Conduct at its sole and absolute discretion and may do so at any time in writing or otherwise.

Employee Signature: _____ Date: _____

Print Name: _____

Job Location or Division: _____