

Tutor Perini Corporation
Code of Business Conduct and Ethics
June 12, 2020

1. POLICY

It is a basic objective of Tutor Perini Corporation (the “Company”) to be a good corporate citizen throughout the world and to achieve commercial and corporate objectives in a manner consistent with the applicable laws and regulations of each country in which it does business. The Company requires absolute honesty and integrity from every director, officer, employee and agent collectively referred to hereinafter as “Employee” in all dealings with the client, vendor, supplier, subcontractor, government employee or official, the business community to include any public agency employee or official or, any labor union or official, and the public collectively referred to hereinafter as “Business Partner”, the Company and with each other.

2. PURPOSE

The purpose of this Code of Business Conduct and Ethics (“Code”) is to establish guidelines for all Employees in order to achieve the highest ethical standards in the operations of our business.

3. SCOPE

This Code applies to all Employees of the Company, its Subsidiaries and Joint Ventures.

This Code and the items cited within it are intended as guidelines outlining the Company's commitment to the highest ethical standards; no written code can possibly describe every situation that the Company or an Employee may encounter. The Company expects every Employee to adhere to the spirit of this Code, as well as to its particular provisions.

4. RESPONSIBILITY

4.1. All Employees are responsible for reading, understanding and adhering to this Code, and for appreciating the necessity for sensitivity to ethical standards.

4.2. The monitoring and periodic revision of this Code shall be the responsibility of the Corporate Compliance Committee.

All proposed revisions shall be reviewed and approved by the Board of Directors.

4.3. Any Employee who is aware of or suspects that business conduct of a nature other than that which is in compliance with this Code is occurring is required to immediately report the suspected violation to one of the following:

- The Employee's supervisor/manager
- Human Resources Director (HRD)
- Corporate Vice President of Human Resources
- Corporate Compliance Officer
- Another member of the Corporate Compliance Committee
- The Company's Ethics & Audit Alert Line at 1.800.489.8689

The supervisor/manager and the HRD must notify the Corporate VP of HR or the Corporate Compliance Officer in a reasonable and timely manner of receipt of a report. The Corporate VP of HR and/or the Corporate Compliance Officer must notify the Chair of the Audit Committee within a reasonable and timely manner of receipt of a report of a suspected violation.

4.4. No Employee shall engage as an Employee or consultant anyone who is an alleged member of or an associate of an Organized Crime Group; and any relationship with any such individual shall be immediately terminated upon learning of such alleged membership or association;

4.5. Ethics & Audit Alert Line (800.489.8689)

The Ethics & Audit Alert line was established so that an Employee may report their concerns about a known or perceived violation regarding ethics, accounting or auditing matters in a confidential message for the Audit Committee Chair. Concerns may be reported anonymously, if preferred, and will be treated in a confidential manner. For more information see Attachment A – Ethics & Audit Alert Line – Employee Reporting Procedures.

The Ethics & Audit Alert Line may be used to clarify Company policy on any business matter as well as to report concerns. For example, the Ethics & Audit Alert Line may be used to obtain advice on how to assure compliance in a particular situation, or to learn whether conduct encountered in the workforce is contrary to the policy.

The Ethics & Audit Alert Line may also be used if an Employee believes their concern has not been appropriately resolved after (1) reporting to one of the Employees noted in Section 4.3 of this Code or (2) to report a known or perceived violation.

5. CONFLICTS OF INTEREST

A conflict of interest occurs when an Employee's private interest makes it difficult to act objectively in the best interest of the Company or creates the appearance of impropriety. Although it is not intended to be a complete list, some examples of a conflict of interest may include a situation when an Employee (or an Employee's relative):

- Causes the Company to engage in business relationships with relatives or friends (for more information see Section 6 - Related Party Transactions);
- Hires or supervises a family member or someone with whom they have a romantic relationship;
- Competes with the Company;
- Accepts gifts, favors, or entertainment from Business Partners when such item or service exceeds nominal value or ordinary social hospitality;
- Solicits gifts, favors, or entertainment from Business Partners;
- Has a business or financial relationship with another Employee, particularly if there is a direct or indirect reporting relationship between the Employees involved;
- Seeks a loan, or a guarantee for borrowed money, from the Company (unless the loan or guarantee has been authorized by the Company); or
- Uses the Company's property or information or the Employee's position for personal gain.

Any actual or potential conflict of interest must be reported immediately to one of the Employees outlined in Section 4.3 or reported through the Ethics & Audit Alert Line as outlined in Section 4.5 of this Code.

No Employee shall induce, or attempt to induce any Employee, a Business Partner, or anyone else to engage in conduct that would constitute a conflict of interest.

Any questions regarding the interpretation of a conflict of interest should be directed to one of the Employees noted in Section 4.3 of this Code.

6. RELATED PARTY TRANSACTIONS

The Company is required to evaluate and potentially disclose any and all transactions between the Company and a related party. A “Related Party Transaction” is any transaction directly or indirectly involving the Company and a related party. A related party transaction also includes any material amendment or modification to an existing related party transaction. While the great majority of related party transactions are perfectly normal; the special relationship inherent between the involved parties creates potential conflicts of interest which can result in actions which benefit the people involved as opposed to the shareholders. (For more information see Related Party Transactions Policy – Supplement to Code of Business Conduct & Ethics (CP 4.002).

A “Related Party” means any of the following:

- An Employee including Directors & Officers of the Company;
- A person known by the Company to be the beneficial owner of more than 5% of the Company’s common stock; or
- A person known by the Company to be an immediate family member of any of the foregoing.

“Immediate family member” means a child, stepchild, brother, sister, stepbrother or sister, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law or sister-in-law of such director, executive, officer, nominee for director, beneficial owners or Employee, and any person (other than a tenant or Employee) sharing the household of such Employee.

Examples of potential transactions that the Company might engage a Related Party:

- Joint Venture partner;
- Provider of management, consulting, bonding or insurance services;
- Supplier, vendor or subcontractor; and
- Lessor of equipment or office space.

Any exception to this Code must be approved, in advance, by the Chairman & CEO and the Corporate Compliance Officer.

Transactions must be reported immediately to the Chairman & CEO and the Corporate Compliance Officer. The Chairman & CEO may delegate sole approval responsibility to the Corporate Compliance Officer to be administered as he or she deems to be appropriate.

7. PROCUREMENT ETHICS

It is the policy of the Company to award business solely on merit, at the lowest reasonable price, and, wherever practical, on a competitive basis. This Code requires that Employees with procurement responsibilities not engage in any activities that might impair their independent judgment, or could create the appearance of an impropriety.

Employees with procurement responsibility must immediately report any perceived or potential conflict with this Code to their Business Unit CEO/President, or to the Corporate Compliance Officer in a timely manner.

7.1. New Business Ethics

Employees responsible for obtaining new work, or participating in bids or proposals for new work, shall ensure that the Company submits only bona fide and legitimate bids when seeking to procure business through the competitive bidding or proposal process and will not participate in, or cause the Company to participate in, any form of “bid rigging” or the submission of bids or proposals in collusion with any other entity or entities.

7.2. Payoffs

It is prohibited to obtain or retain business through any offer, payment (direct or indirect), promise to pay or authorization of the payment of any money, or offer, or gift, or promise to give or authorization of the giving of something of value to improperly influence any Business Partner. The prohibition applies to every Employee of the Company. In situations where it is expected that the question of “payoffs” may arise, adequate warning should be given to the Business Partner that the Company will not participate in any such payoffs and if asked to do so, will refuse.

7.3. Gifts, Gratuities, Entertainment, Hospitality and Favors (Solicited or Unsolicited)

Gifts, gratuities, entertainment, hospitality and favors can foster goodwill in business relationships; however, concerns arise when they may compromise, or appear to compromise the propriety of our business relationships or create an actual or potential conflict of interest. A gift, gratuity, entertainment, hospitality and favor is defined as any tangible item or service of value, any purchase at a price lower than that which is widely available, and any favor that enhances the Employee materially, including but not limited to monies, credit, discounts, seasonal or special occasion presents.

Therefore, an Employee may give and/or accept an occasional gift, gratuity, entertainment, hospitality, favor and similar business courtesies (e.g. seasonal gift of a bottle of wine, lunch, dinner, invitation to a sporting event, etc.) that are considered customary and conform to reasonable ethical practices of the market place and provided;

- They are not so frequent, or so lavish in type or value as to appear improper or to create an inappropriate obligation or expectation;
- They do not appear intended or designed to induce the Employee or Business Partner to act in a manner inconsistent with the best interests of the Company or the Business Partner; or
- Create the appearance that the Employee is entering into a business transaction based on factors other than the merits of the product or service offered or as a result of the expertise and quality of the professionals involved.

Notwithstanding the above, Employees are prohibited from offering anything of value to (a) any labor organization or official in a labor organization that has represented, represents, or may represent the Company’s Employees and (b) any public employee or official.

An Employee may never solicit a gift, gratuity, entertainment, hospitality or favor from an existing or a potential Business Partner.

All Employees who conduct negotiations with prospective Business Partners are fully informed of the Company's position regarding gifts, gratuities, entertainment, hospitality and favors.

In the event an Employee is aware of a violation of this Code they should report the matter to their respective Business Unit CEO/President and to the Corporate Compliance Officer or report it through the Ethics & Audit Alert Line.

Any question or concern in the interpretation of this Section should be directed to the Employee's respective Business Unit CEO/President or to the Corporate Compliance Officer in a timely manner.

7.4. Donations and Charitable Contributions

Tutor Perini, like other good corporate citizens, makes donations and charitable contributions from time to time to national and local organization and institutions. All requests for corporate contributions and donations must be submitted in writing on the Donations and Charitable Contributions Approval Request form, Attachment B of this policy, to the Corporate Compliance Officer for the written approval of the Chairman & CEO.

It is against Company policy for an Employee to include, directly or indirectly any charitable contribution or donation on their expense report or in any other way that causes the Company to reimburse the Employee for that expense.

Any questions regarding corporate contributions and contributions should be addressed to the Corporate Compliance Officer.

7.5. Political Contributions

Employees are encouraged to participate in the political process and vote for the candidates or issues of their choice. Active political participation is the personal choice of each Employee and should be conducted on the Employee's own time in their role as a private citizen and not on behalf of the Company.

The Company prohibits an Employee using Company funds or its name, assets or property for political purposes or endorsement, whether directly or indirectly, unless approved in writing, in advance by the Corporate Compliance Officer. It is also against Company policy for an Employee to include, directly or indirectly, any political contribution on their expense report or in any other way that causes the Company to reimburse the Employee for that expense. In general, the cost of fund-raising tickets for political functions is considered a political contribution. Therefore, including the cost of any such fund-raising on an expense report, even if business is in fact discussed, is against Company policy and in some cases illegal.

The political process has become highly regulated, and an Employee who has any question about what is or is not proper should consult with the Corporate Compliance Officer before agreeing to do anything that could be construed as involving the Company in any political activity at either the federal, state or local level in the United States or in any foreign country.

7.6. Government Relations

It is the Company's policy to never intentionally breach a contract or subcontract related to a government contract.

7.7. Foreign Corrupt Practices Act (FCPA) – Anti Bribery

The Foreign Corrupt Practices Act of 1977 ("FCPA") makes it a crime to give, or to offer to give, anything of value to non-U.S. government officials to improperly influence the performance of the officials' duties. The FCPA also includes requirements that public Companies have strong internal controls and accurate books and records. The Company requires full compliance with the FCPA by all of its Employees, suppliers and subcontractors.

It is prohibited to give or agree to give, offer or agree to offer, receive or agree to receive or solicit or agree to solicit, money, gifts, or "anything of value" to or from any foreign official, or any foreign political party, candidate or official, for the purpose of influencing any act or failure to act, in the official capacity of that official or party; or inducing the foreign official or party to use influence to affect a decision of a foreign government or agency, in order to obtain or retain business for anyone, or direct business to anyone.

The prohibition applies to every Employee of the Company.

In situations where it is expected that the question of "bribery" may arise, adequate warning should be given to all Business Partners that the Company will not participate in any such bribe and if asked to do so, will refuse.

All Employees who conduct negotiations with prospective suppliers or subcontractors will make certain the suppliers' and subcontractors' representatives are fully informed of the Company's position on this matter.

7.8. Kickbacks – Subcontractors and Suppliers

No Employee of the Company shall offer or accept money, gifts, or "anything of value" from a subcontractor, vendor, supplier, equipment dealer, or any other Company doing business with the Company in the performance of any contracts to include contracts with the Federal Government. For purposes of this policy "kickback" is defined as "any money, fee, commission, credit, and gift, and gratuity, thing of value or compensation of any kind which is provided, directly or indirectly, to any prime contractor, subcontractor or Employee of either for the purpose of improperly obtaining or rewarding favorable treatment in connection with either a prime or subcontractor."

All Employees are required to have "anything of value" offered from a subcontractor, vendor, supplier, equipment dealer, or any other Company doing business with the Company in the performance of all contracts including contracts with the Federal Government reviewed by their respective Business Unit CEO/President before acceptance thereof.

All Employees who conduct negotiations with prospective suppliers or subcontractors will make certain that the suppliers' and subcontractors' representatives are fully informed of the Company's position on this matter.

Any question or concern in the interpretation of this section should be directed to the Employee's respective Business Unit CEO/President, or to the Corporate Compliance Officer within a timely manner.

- 7.9. In order to avoid even the appearance of a conflict of interest, no Employee, without the prior written approval of the Chairman & CEO or the Corporate Compliance Officer shall obtain and/or use services, materials, equipment and/or supplies from any person or entity that has been a subcontractor, vendor and/or supplier to the Company or any of its subsidiaries or joint ventures within a two (2) year period.

Further, no Employee shall use the labor of the Company or any of its Subsidiaries without prior approval from the Chairman & CEO. If approved, the work being performed will go through the standard appraisal process and the Employee will be charged the current industry rates for work performed.

8. ACCOUNTING AND FINANCIAL CONTROLS

- 8.1. The Company's books and records should accurately and fairly reflect transactions in reasonable detail, and the Company's internal accounting controls provide reasonable assurances that:

- Transactions are carried out in a manner authorized by Company management.
- Transactions have been reported and recorded to permit correct preparation of financial statements and to maintain accurate records of assets.
- Access to assets is in accordance with management's authorization.

Compliance with accepted accounting rules and controls is required of the Company, its Subsidiaries, and Joint Ventures, and all financial records and supporting data are to be prepared based on this requirement.

No unrecorded fund shall be established or maintained for any purpose. All transactions, receipts, expenditures, assets and liabilities shall be recorded on the books of the Company or its Subsidiaries at all times, unless specifically exempted by Corporate accounting policy or approved by the Chief Financial Officer.

No false entry or document that obscures the true purpose of the underlying transaction shall be made in the books and records or in the reports of the Company or its Subsidiaries for any reason.

8.2. Using Company Computers and Other Technology

Computers, mobile devices, electronic information and access to the Company network are essential tools for Employees to perform their job functions. In addition to Company provided devices, a select use of Employee's personal devices on the Company network are permitted provided it is approved in advance by the VP of IT. This access whether through a Company owned or personal device, is governed by the Company's IS Policies and carries certain responsibilities and obligations as to what constitutes acceptable use in the course of conducting Company business.

The following actions shall constitute unacceptable use of the Company's network, systems and email. This list is not exhaustive, but is included to provide a frame work of reference for types of activities that are deemed unacceptable. The Employee may not use the Company's network and/or systems to:

- Engage in activity that is illegal under local, state, federal, or international law.
- Engage in any activities that may cause embarrassment, loss of reputation, or other harm to the Company.
- Disseminate defamatory, discriminatory, vilifying, sexist, racist, abusive, rude, annoying, insulting, threatening, obscene or otherwise inappropriate messages or media.
- Engage in activities that cause an invasion of privacy.
- Engage in activities that cause disruption to the workplace environment or create a hostile workplace.
- Make fraudulent offers for products or services.
- Perform any of the following: port scanning, security scanning, network sniffing, keystroke logging, or other IT information gathering techniques when not part of the Employee's job function.
- Install or distribute unlicensed or "pirated" software.
- Reveal personal or network passwords to others, including Employees, family, or friends.
- Open email attachments from unknown senders, or when such attachments are unexpected.
- Send confidential or proprietary information via email, regardless of the recipient, without proper encryption.
- Engage in spamming, harassment, communicating threats, solicitations, writing or forwarding of chain letters, or pyramid schemes.

The Company's systems, networks and emails must be used for business purposes only. Incidental personal use is permissible if the use: (a) does not consume more than a trivial amount of resources that could otherwise be used for business purposes, (b) does not interfere with an Employee's productivity, and (c) does not preempt any business activity.

To keep the Company's computer systems and information secure, the Company and the Employee need to take necessary actions to safeguard all passwords and identification codes to prevent unauthorized access. Confidential data must not be: (a) shared or disclosed in any manner to an Employee or non-Employee of the Company, (b) should not be posted on the Internet or any publicly accessible systems, and (c) should not be transferred in any insecure manner.

Employees should not expect privacy when using e-mail and the Internet. The Company monitors email and Internet access to ensure they are used professionally and responsibly. The Company reserves the right to block offensive, illegal and non-business related sites and to monitor and intercept the entire content of any messages transmitted or stored in its system, including information that has been deleted by an Employee.

If an Employee receives an inappropriate communication or witnesses any inappropriate use of the Company's systems and network, he or she should notify their supervisor/manager, their HRD, and the VP of IT immediately.

Employees will only use software that is licensed or authorized by the Company. Employees may not download or copy any of the Company's computer software or systems, even for business reasons, without the advanced, written approval from the VP of IT.

8.3. Company Funds

Employees with control over Company funds are accountable for such funds. When spending Company money or personal money that will be reimbursed, the Employee must make sure the expense is warranted and justifiable, and obtains advance written approval and any additional approval as required and in accordance with the Company's Travel & Expense policy. An Employee approving or certifying the correctness of any voucher, bill, or expense report, should have reasonable knowledge that the expense and amounts involved are warranted and justifiable.

8.4. Company Property

Company property shall not be sold, loaned, given away, intentionally damaged, destroyed or otherwise disposed of, regardless of its condition or value without prior written approval from the appropriate officer of the Company assigned responsibility over the item.

In addition, Company materials, equipment, tools or other property should not be used for non-Company purposes without prior written approval from the appropriate officer of the Company assigned responsibility over the item.

Any use of Company owned vehicles, over and above that which is authorized for business use, must be approved by the appropriate officer of the Company.

8.5. Compliance with Laws

The Company seeks to conduct its business in compliance with applicable laws, rules and regulations. No Employee shall engage in any unlawful activity in conducting the Company's business or in performing his or her day-to-day Company duties, nor shall any Employee instruct others to do so.

9. ENVIRONMENTAL COMPLIANCE

- 9.1. There are many federal, state and foreign laws which govern environmental cleanup and prohibit pollution of the air, soil and water. The Company will comply with those laws in the jurisdictions in which we do business. Although the Company does not expect its Employees to become environmental law experts, it does expect the use of common sense by not knowingly and illegally polluting the environment. Further, those Employees whose duties, if improperly performed, could result in an adverse impact on the environment should become sufficiently familiar with the environmental laws which apply to the projects on which they are working to properly complete the contracted work.
- 9.2. Additionally, the contracts the Company performs often contain environmental specifications which usually prohibit pollution and deal with disposal of hazardous materials. Those Employees who become involved in performing these specifications must be informed of their requirements and must inform any involved subcontractors. These specifications must be strictly followed.
- 9.3. Violations of environmental laws and contract specifications may result in fines, imprisonment, or both for Employees as well as penalties against the Company. Any questions on environmental laws and contract specifications shall be referred to the Company's counsel prior to initiating action or committing to any subcontractor work at the job site.

10. **CONFIDENTIALITY**

Employees will keep all non-public information confidential, including but not limited to technical, financial, personnel, insurance and cost information, except when disclosure is authorized by the Company.

11. **INSIDER TRADING**

In the course of their association with the Company, an Employee may have material information about the Company that is not available to the public. No Employee should purchase or sell the Company securities while in possession of material non-public information, nor should an Employee disclose this information to any other person until it has been disclosed to the public by the Company.

12. **COMPLIANCE**

12.1. All Employees are required to annually sign a certificate indicating compliance with this Code, and report any personal interests, which may represent a conflict of interest under this Code.

All Employees of the Company are required to acknowledge that they have read, understand and are in compliance with this Code in its entirety and that they agree that, as a condition of employment, they will abide by this Code and any related policies, as amended and any additional policies and procedures applicable to them. All Employees further acknowledge that they understand the laws and regulations applicable to their job responsibilities, including those pertaining to the misuse of material of non-public information.

12.2. Violations

Suspected or actual violations of this Code, any suspected or actual unethical conduct or other impropriety with respect to any public or private contract, and any suspected or actual crime relating to the Company's business activities, whether committed by an Employee or Business Partner, must be immediately reported to one of the Employees noted in Section 4.3 of this Code, or reported through the Ethics & Audit Alert Line as outlined in Section 4.5 of this Code, or, if applicable, to the appropriate integrity monitor.

It is the express policy of the Company to guarantee that no retaliation or adverse action will be taken against an Employee for reporting, in good faith, a suspected or actual violation of Company policy or any other ethical or criminal violation, in accordance with the process outlined above. The Company will diligently investigate any such reported conduct.

Except to the extent prohibited by law or lawful collective bargaining agreement, the Company reserves the right to terminate any Employee suspected of violating or actually violating a Company policy, or suspected of committing or actually committing any ethical or criminal violation, or to place such Employee on an unpaid leave of absence pending the resolution of the investigation and to terminate such Employee upon the resolution of the investigation.

Each Employee understands that any violation of the basic standards of this Code will subject the Employee to disciplinary action, up to and including dismissal from the Company.

12.3. Exception Policy

The provisions of this Code will be interpreted as the Company, at its sole discretion, deems appropriate. Additionally, a request for an exception to any part of this Code must be in writing and submitted to the Chairman & CEO and the Corporate Compliance Officer for approval. The Chairman & CEO may delegate sole approval responsibility of any portion of this policy to the Corporate Compliance Officer at his discretion. Notwithstanding the foregoing, any exception or waiver of this Code for a director or executive officer must be approved by the Board of Directors.

The Company reserves the right to make any changes to this Code, at any time, and at its sole discretion.

ATTACHMENTS

- A – Ethics and Audit Alert Line – Employee Reporting Procedures
- B – Donations and Charitable Contributions Approval Request Form

Ethics & Audit Alert Line Employee Reporting Procedures

Under the provisions of the Sarbanes-Oxley Act of 2002, the Tutor Perini Corporation Audit Committee, consisting solely of outside directors, has established procedures for the anonymous and confidential reporting by Tutor Perini Corporation Employees of concerns regarding ethics, accounting or auditing matters. The Tutor Perini Ethics & Audit Alert Line may also be used by third parties such as competitors, vendors and consumers. It is Tutor Perini's policy that:

1. Each Employee and third party has the right and obligation to report suspected irregularities of ethical behavior or accounting and/or auditing procedures through the channels established by the Tutor Perini Corporation Audit Committee.
2. Such reports can be made in writing, in an anonymous and confidential manner, to the Chair of the Audit Committee. Alternatively, Employees and third parties can place an anonymous phone call to the Tutor Perini Ethics & Audit Alert Line at 800.489.8689. Password protection procedures have been established to assure that calls to this line will be retrieved by the Audit Committee Chair, exclusively. Should the Employee wish to identify him or herself to the Audit Committee, the identity of such Employee shall be maintained in confidence.
3. It is the express policy of Tutor Perini Corporation to guarantee that no retaliation or adverse action will be taken against any Employee because he or she reports a suspected accounting or auditing irregularity. This protection extends to Employees who provide information or assist in the investigation of securities law and anti-fraud violations or who file, testify or participate in, or otherwise assist in proceedings involving alleged violations of anti-fraud laws or any SEC rule or regulation.
4. Each report received by the Audit Committee will be thoroughly investigated and a conclusion reached.
5. The Audit Committee, at its sole discretion, has the authority to engage independent counsel and other advisors, as it deems necessary to carry out its duties.
6. Any Employee has the right to contact the Chair of the Audit Committee, in confidence, with any questions or concerns regarding this policy and these procedures.

The current Chair of the Audit Committee is Dale A. Reiss, who may be contacted as follows:

By Mail at
Dale A. Reiss
c/o Tutor Perini Corporation
P.O. Box 921133
Sylmar, CA 91342-9998, or

By Email at dreiss@brockcapital.com

**DONATIONS AND CHARITABLE CONTRIBUTIONS
APPROVAL REQUEST FORM**

Business Unit: _____

Employee Requesting to Make this Contribution: _____

Position with Company: _____

Name of Organization Contribution will be Made

Proposed Amount of Donation: \$ _____

Is the Contribution Tax Deductible (Y/N): _____

Provide description / justification for donation. Attach any pamphlet or material associated with the charity / organization.

Required Segment / Business Unit Approvals:

Business Unit Controller/CFO: _____

Business Unit President/CEO: _____

Segment CEO: _____

Required TPC Corporate Approvals:

Corporate Compliance Officer (Gary Smalley): _____

Chairman and CEO (Ronald Tutor): _____

This Code of Business Conduct and Ethics of Tutor Perini Corporation was updated on June 12, 2020 to reflect a description of the role of the Board of Directors in approving amendments and exceptions to the Code.