



MAGNUM CONSTRUCTION SERVICES INC.

CODE OF ETHICS

Established: 2005
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COMPANY OVERVIEW

Magnum Construction Services Inc. is a Florida-based **Certified General Contractor (License No. CGC1509043)** dedicated to excellence in every phase of construction. Established in 2005, Magnum has built a solid reputation as a trusted leader in the **residential, commercial, hospitality, and institutional** sectors.

Our company's foundation is built upon more than **four decades of executive leadership experience** and a **global portfolio exceeding \$4 billion in successfully managed projects across seven countries**. This depth of experience allows Magnum to deliver innovative solutions, maintain strict quality standards, and consistently exceed client expectations.

At the core of Magnum's success is a steadfast commitment to **integrity, quality, and accountability**. Every decision and action taken by our team reflects our belief that ethical conduct and professional excellence are inseparable. We prioritize the safety of our people, the satisfaction of our clients, and the sustainability of the environments in which we build.

Magnum Construction Services operates with a culture of transparency, collaboration, and continuous improvement. We believe that every project is an opportunity to demonstrate our values — ensuring that our workmanship, business practices, and relationships embody the highest standards of honesty, respect, and responsibility.

CODE OF ETHICS FOR MAGNUM CONSTRUCTION SERVICES INC.

PREAMBLE

At Magnum Construction Services Inc., we are deeply committed to upholding the highest standards of integrity, professionalism, and responsibility across every facet of our operations. Founded on principles of excellence and ethical conduct, our company has grown into a leading general contracting firm dedicated to delivering innovative, high-quality construction solutions that stand the test of time. We understand that in the dynamic and demanding field of construction, our decisions and actions have far-reaching consequences, not only for the structures we build but also for the lives they touch. This includes our valued clients who entrust us with their visions and investments; our dedicated employees who bring skill, passion, and hard work to every project; our trusted partners and suppliers who collaborate to ensure seamless execution; the vibrant communities where we operate, contributing to economic growth and social well-being; and the natural environment, which we strive to protect through mindful practices.

In an industry where safety, compliance, and sustainability are paramount, we recognize the profound responsibility we hold to mitigate risks, foster innovation, and promote positive change. This Code of Ethics is more than a set of guidelines—it is a foundational document that embodies our core philosophy, providing a clear and comprehensive framework for ethical decision-making and behavior. It empowers us to navigate complex challenges with transparency, accountability, and foresight, ensuring that every project aligns with legal requirements, industry best practices, and our unwavering moral compass. By integrating these principles into our daily operations, we aim to prevent ethical lapses, build lasting trust, and drive long-term success for all stakeholders.

This code applies universally to all employees, from entry-level team members to executive leadership, as well as contractors, subcontractors, consultants, and any other stakeholders associated with Magnum Construction Services Inc. We expect full adherence, with ongoing training, open dialogue, and robust enforcement mechanisms to support compliance. Through this collective commitment, we cultivate a culture of trust, excellence, and mutual respect, where ethical behavior is not just encouraged but celebrated as the cornerstone of our identity. Ultimately, by living these values, we not

only enhance our reputation but also contribute to a more ethical, sustainable, and prosperous construction industry for generations to come.

CORE VALUES

Our ethical foundation is built on the following core values, which guide every aspect of our work at Magnum Construction Services Inc. These values are not mere aspirations but actionable commitments that shape our culture, inform our strategies, and define our interactions. We integrate them into training programs, performance evaluations, and decision-making processes to ensure they are lived out daily by every member of our team.

1. **Integrity:** We act with unwavering honesty and transparency in all dealings, whether in client negotiations, supplier contracts, or internal communications. This means avoiding any conflicts of interest by disclosing potential issues promptly and recusing ourselves when necessary. We ensure that our words align with our actions by fulfilling promises, maintaining accurate documentation, and admitting errors openly. Integrity builds the trust that is essential for long-term relationships and our reputation in the industry, fostering an environment where ethical dilemmas are resolved with fairness and without compromise.
2. **Safety:** The well-being of our employees, clients, subcontractors, and the public is paramount and non-negotiable. We prioritize safety in every project phase, from planning and design to execution and handover, by implementing comprehensive risk assessments, providing state-of-the-art protective equipment, and conducting regular safety training and audits. Our goal is to prevent harm through proactive measures, such as hazard identification and emergency preparedness, while promoting a secure work environment that encourages reporting of unsafe conditions without fear of reprisal. By embedding safety into our DNA, we not only comply with regulations but also create a culture where everyone returns home safely, every day.
3. **Quality:** We deliver superior workmanship and services that consistently meet or exceed industry standards, client expectations, and regulatory requirements. This commitment involves selecting reliable materials from vetted suppliers, employing skilled professionals, and leveraging innovative practices such as advanced technology for precision and efficiency. We conduct thorough quality control checks at every stage, from initial blueprints to final inspections, to ensure durability, functionality, and aesthetic excellence. Quality is our promise to clients that their investments will yield lasting value, reducing rework, enhancing satisfaction, and positioning Magnum as a benchmark for excellence in construction.

4. **Respect:** We value diversity in all its forms—cultural, experiential, and ideological—and treat everyone with dignity, fairness, and empathy. This means fostering an inclusive workplace free from discrimination, harassment, or bias, where all voices are heard and contributions are recognized regardless of background. We promote mutual respect through policies that support work-life balance, equal opportunities for advancement, and open forums for feedback. By respecting our employees, clients, partners, and communities, we build stronger teams, drive innovation through diverse perspectives, and create a positive ripple effect that extends beyond our projects.
5. **Sustainability:** We commit to environmentally responsible practices that minimize our ecological footprint and promote resource efficiency throughout the project lifecycle. This includes incorporating green building techniques, such as energy-efficient designs, renewable materials, and waste reduction strategies, while adhering to certifications like LEED or similar standards. We actively assess and mitigate impacts on air, water, soil, and biodiversity, partnering with experts to innovate in areas like carbon reduction and circular economy principles. Sustainability is our pledge to future generations, ensuring that our constructions contribute to a healthier planet while delivering economic benefits through cost savings and enhanced resilience.
6. **Accountability:** We take full responsibility for our actions, outcomes, and impacts, viewing accountability as a pathway to growth and improvement. This involves owning mistakes without deflection, conducting root-cause analyses to learn from them, and implementing corrective measures to prevent recurrence. We hold ourselves to high standards through transparent reporting, performance metrics, and regular reviews, while encouraging a culture where feedback is welcomed and acted upon. Accountability strengthens our operations, builds credibility with stakeholders, and drives continuous improvement, ensuring that Magnum Construction Services Inc. evolves as a resilient and ethical leader in the field.

ETHICAL PRINCIPLES

1. COMPLIANCE WITH LAWS AND REGULATIONS

At **Magnum Construction Services Inc.**, compliance is the cornerstone of our ethical and operational integrity. We are fully committed to adhering to all **local, state, federal, and international laws and regulations** governing our business activities. This commitment extends to every aspect of our operations—from construction practices and labor standards to financial management, environmental stewardship, and corporate governance.

LEGAL AND REGULATORY ADHERENCE

- We rigorously comply with all applicable statutes, ordinances, and codes, including **OSHA 29 CFR 1926, Florida Building Code, EPA regulations**, and all **Department of Labor** and **Department of Transportation** requirements.
- We ensure that all permits, licenses, and certifications are maintained, up to date, and displayed as required by law.
- We actively monitor changes in legal and regulatory frameworks and adapt our policies and procedures accordingly.

FINANCIAL INTEGRITY AND RECORDKEEPING

- Magnum Construction Services maintains **accurate, transparent, and verifiable financial records** in accordance with **Generally Accepted Accounting Principles (GAAP)** and other applicable standards.
- All transactions are properly documented and approved through established internal controls to prevent fraud, misrepresentation, or misuse of funds.
- Employees are prohibited from falsifying, concealing, or altering records for personal or professional gain.

ANTI-CORRUPTION AND FAIR COMPETITION

- We maintain **zero tolerance** for any form of **bribery, kickbacks, extortion, or illicit payments** in the pursuit of business opportunities or the awarding of contracts.
- All business decisions are based solely on **merit, fairness, and transparency**, without improper influence or conflicts of interest.
- Gifts, hospitality, or entertainment offered to clients or vendors must never compromise—or appear to compromise—objectivity or integrity.
- We comply fully with **anti-corruption laws**, including the **U.S. Foreign Corrupt Practices Act (FCPA)** and any equivalent local regulations in international operations.

REPORTING AND ACCOUNTABILITY

- Every employee, subcontractor, and partner is responsible for understanding and following the laws relevant to their role.
- Any known or suspected violations must be reported immediately through established channels without fear of retaliation.
- Violations of legal or ethical standards may result in disciplinary action, up to and including termination of employment or contract, and possible legal prosecution.



By embedding legal compliance into our daily operations, Magnum Construction Services safeguards its reputation, protects its employees and clients, and ensures that every project is executed with **honor, transparency, and accountability**.

2. FAIR BUSINESS PRACTICES

At **Magnum Construction Services Inc.**, we conduct all business with honesty, fairness, and transparency. Ethical competition and integrity are fundamental to our success and the trust we build with clients, subcontractors, and partners. We believe that maintaining a level playing field and upholding professional conduct fosters long-term relationships, industry respect, and sustainable growth.

COMMITMENT TO ETHICAL COMPETITION

- We compete **vigorously yet fairly**, in full compliance with all **antitrust and fair competition laws**, including those prohibiting **price-fixing, bid-rigging, market allocation, and collusion**.
- All bids, estimates, and proposals are prepared independently, accurately, and free from improper influence or coordination with competitors.
- We do not engage in any conduct—verbal, written, or implied—that could distort market fairness or harm the reputation of our competitors.

SUPPLIER AND SUBCONTRACTOR SELECTION

- Magnum Construction Services selects **vendors, subcontractors, and partners** based solely on their **qualifications, performance history, technical capability, safety record, and overall value to the project**.
- Decisions are made objectively, free from personal bias, favoritism, or undue influence.
- We uphold fair payment practices, ensuring all subcontractors and suppliers are compensated promptly and in accordance with contractual terms.
- All procurement activities adhere to our internal policies for **conflict of interest disclosure** and **procurement transparency**.

CONFIDENTIALITY AND INFORMATION PROTECTION

- We treat all information entrusted to us by clients, partners, and vendors as **confidential and proprietary**.
- Confidential information—including designs, financial data, pricing, project plans, and

trade secrets—is used **only for legitimate business purposes** and shared strictly on a need-to-know basis.

- Employees are prohibited from disclosing or misusing confidential data for personal gain or for the benefit of any third party.
- We comply with **non-disclosure agreements (NDAs)** and **data protection laws** to ensure all sensitive information is safeguarded throughout the project lifecycle.

INTEGRITY IN REPRESENTATION

- All marketing, advertising, and promotional activities accurately reflect Magnum Construction Services' capabilities, past performance, and credentials.
- We do not make misleading claims or misrepresent qualifications, experience, or licensing in pursuit of business opportunities.
- Our reputation is built on **truthful communication, reliability, and consistent delivery**—values that we protect at every level of operation.

ACCOUNTABILITY

- Every team member, from senior leadership to field personnel, is responsible for maintaining fair and ethical business conduct.
- Violations of this policy, including unfair practices or misuse of confidential information, will result in disciplinary action and potential legal consequences.

By adhering to these principles, **Magnum Construction Services Inc.** fosters a marketplace defined by **integrity, respect, and equitable opportunity**—ensuring that our success is earned through **merit, quality, and trust** rather than manipulation or favoritism.

3. EMPLOYEE CONDUCT AND WORKPLACE ETHICS

At **Magnum Construction Services Inc.**, our people are the foundation of our success. We are committed to fostering a workplace culture built on **respect, safety, integrity, and opportunity**. Every employee, from field laborers to executive leadership, represents the company's values through their actions, professionalism, and interactions. Our collective behavior determines not only the quality of our work but also the strength of our reputation across the construction industry.



SAFE, HEALTHY, AND SUPPORTIVE WORK ENVIRONMENT

- We maintain a **zero-tolerance policy for unsafe conditions** and are dedicated to protecting the physical and mental well-being of every employee and subcontractor.
- Magnum Construction Services provides all necessary training, personal protective equipment (PPE), and supervision to ensure compliance with **OSHA 29 CFR 1926** and all applicable safety standards.
- We actively promote wellness initiatives and encourage employees to speak up about unsafe conditions or health concerns **without fear of retaliation**.
- Our leadership strives to cultivate a workplace environment that is **inclusive, respectful, and supportive**, recognizing that safety extends beyond compliance—it is a shared moral obligation.

FAIR EMPLOYMENT AND EQUAL OPPORTUNITY

- Magnum Construction Services is an **Equal Opportunity Employer**, committed to fair employment practices and compliance with **EEOC, Title VII**, and all applicable state and federal labor laws.
- We provide **equal access to employment, compensation, training, and advancement opportunities** regardless of race, color, religion, sex, national origin, age, disability, veteran status, or any other protected classification.
- Compensation, promotions, and career development decisions are based solely on merit, performance, and contribution to the company's goals.
- We value diversity as a strategic strength, fostering collaboration and innovation through a workforce that reflects the communities we serve.

PROHIBITION OF HARASSMENT, DISCRIMINATION, AND RETALIATION

- Magnum Construction Services maintains a **strict zero-tolerance policy** toward any form of harassment, bullying, discrimination, or retaliation in the workplace.
- This includes **verbal, physical, visual, or electronic harassment** that creates a hostile or intimidating environment.
- All employees are encouraged to report misconduct immediately through established reporting channels, with full assurance of **confidentiality and protection from retaliation** under the company's whistleblower policy.
- Supervisors and managers are held to the highest standard of accountability, ensuring that all complaints are addressed promptly, fairly, and without prejudice.



PROFESSIONAL CONDUCT AND INTEGRITY

- Employees must act with professionalism and honesty at all times, upholding the company's reputation both on and off the job site.
- We expect punctuality, respect for authority, teamwork, and a commitment to high performance in every role.
- Theft, substance abuse, falsification of documents, or any form of dishonesty are grounds for immediate disciplinary action, up to and including termination.
- All company assets—including tools, vehicles, and information systems—must be used responsibly and solely for legitimate business purposes.

CONFLICTS OF INTEREST

- Employees are required to **disclose any actual or potential conflicts of interest**, including personal relationships or financial interests that could influence—or appear to influence—business decisions.
- This includes relationships with **clients, vendors, subcontractors, or competitors** that may compromise impartiality or objectivity.
- All disclosures will be reviewed confidentially by management to determine appropriate actions to mitigate risks.
- Employees are prohibited from accepting gifts, favors, or entertainment from any party seeking business advantage, except nominal items in accordance with company policy.

COMMITMENT TO ETHICAL CULTURE

- Every team member plays a vital role in maintaining Magnum's culture of ethics, accountability, and mutual respect.
- We encourage open communication, constructive feedback, and continuous ethical awareness through training and leadership engagement.
- By upholding these values, Magnum Construction Services strengthens trust internally and externally—ensuring that every project reflects **our dedication to doing what is right, every time.**

4. CLIENT AND STAKEHOLDER RELATIONS

At **Magnum Construction Services Inc.**, our relationships with clients, partners, and communities are guided by the highest standards of professionalism, transparency, and ethical responsibility. Every project we undertake represents more than a construction contract—it is a commitment to **trust, accountability, and lasting value**. We recognize that the success of our business depends on maintaining the confidence of those who place their trust in us.

Commitment to Trust and Performance

- We build relationships founded on **mutual respect, honesty, and reliability**, ensuring that every client experiences integrity in every interaction.
- Magnum is committed to **delivering projects on time, within budget, and to the agreed scope and specifications**, consistent with our contractual and professional obligations.
- We uphold our reputation by maintaining the **highest quality standards**, employing skilled professionals, and adhering to proven project management practices.
- All commitments made to clients are honored; promises are kept, and expectations are managed with transparency and care.

Transparent Communication and Collaboration

- We believe that open, honest communication is essential to successful project delivery and client satisfaction.
- Project updates, cost reports, risk assessments, and schedule adjustments are **communicated clearly and promptly**, allowing clients to make informed decisions.
- Magnum's leadership and project management teams maintain **full visibility into project milestones, challenges, and changes**, ensuring that all stakeholders share the same understanding of progress and performance.
- We do not conceal, misrepresent, or manipulate information for gain—**truthfulness and clarity** are the foundation of every professional interaction.

Accountability and Responsiveness

- We take full responsibility for our work, decisions, and actions, acknowledging and correcting mistakes promptly when they occur.
- Client concerns and feedback are handled with urgency and professionalism, with a focus on **resolution rather than deflection**.

- We maintain structured systems for **documentation, reporting, and client correspondence** to ensure transparency, consistency, and legal compliance in all dealings.
- Every Magnum representative is empowered to make ethical decisions that protect the client's interests while upholding company standards.

Respect for Communities and the Public

- As a general contractor, we understand that our projects affect not only our clients but also the communities in which we operate.
- We strive to **minimize noise, dust, traffic disruptions, and environmental impact**, ensuring that our presence is managed with respect and professionalism.
- Magnum actively engages with local stakeholders—residents, business owners, and public agencies—to maintain positive relations and resolve issues proactively.
- Whenever possible, we seek opportunities to **contribute positively** to local economies through job creation, training, and community engagement initiatives.

Long-Term Partnership Mindset

- We view every project as the beginning—or continuation—of a long-term relationship, not a one-time transaction.
- Through reliability, excellence, and ethical conduct, Magnum aims to earn repeat business and referrals from satisfied clients who value our consistency and integrity.
- We measure success not only in profits or completed square footage, but in the **trust we build and the confidence we sustain** among clients, partners, and the public.

5. ENVIRONMENTAL AND SOCIAL RESPONSIBILITY

At **Magnum Construction Services Inc.**, we recognize that every project we undertake leaves a lasting footprint—not only on the built environment but also on the communities and ecosystems surrounding it. As stewards of the construction industry, we hold a profound responsibility to operate with **sustainability, social awareness, and environmental care** at the core of our business philosophy. Our goal is to deliver exceptional results while preserving natural resources, minimizing waste, and strengthening the social fabric of the areas in which we work.

SUSTAINABLE CONSTRUCTION PRACTICES

- We are committed to integrating **sustainable design and construction principles** into every project, from initial planning through completion.
- Magnum promotes **energy-efficient designs, water conservation, and waste reduction measures**, seeking innovative solutions that reduce our environmental impact.
- Whenever possible, we specify and utilize **eco-friendly materials**—including recycled, locally sourced, and low-emission products—to reduce the carbon footprint associated with our operations.
- Our teams are trained to recognize sustainability opportunities throughout the construction process, ensuring that **environmental considerations guide decision-making** at every level.

ENVIRONMENTAL COMPLIANCE AND STEWARDSHIP

- We strictly adhere to all **federal, state, and local environmental regulations**, as well as international standards applicable to our projects.
- Magnum conducts thorough **environmental impact assessments** where applicable, proactively identifying risks related to pollution, emissions, or habitat disruption.
- We take decisive steps to **mitigate environmental harm**, including implementing dust and erosion controls, managing stormwater responsibly, and properly disposing of construction waste.
- Our company embraces **continuous improvement in environmental performance**, monitoring compliance and revising our practices to reflect evolving regulations and industry advancements.
- Environmental responsibility is viewed not as an obligation, but as an **essential part of building for the future**—ensuring our projects coexist harmoniously with nature and community needs.

RESOURCE CONSERVATION AND EFFICIENCY

- Magnum promotes the responsible use of **natural resources**, including energy, water, and raw materials, throughout the lifecycle of every project.
- We pursue construction methodologies that reduce consumption and waste, integrating **Lean construction principles** and advanced technology to optimize efficiency.
- Through our procurement practices, we collaborate with suppliers and subcontractors who share our commitment to **environmental stewardship and sustainable sourcing**.

- We track and measure resource use to identify opportunities for greater efficiency and waste minimization across all operations.

SOCIAL ENGAGEMENT AND COMMUNITY IMPACT

- Magnum Construction Services takes pride in being an **active and responsible corporate citizen**. We support initiatives that improve lives and strengthen communities.
- Our social contributions include **community development projects, educational outreach, workforce training programs**, and **charitable donations** that align with our company's mission and values.
- We encourage our employees to **volunteer and engage** in community service, reinforcing a culture of empathy, compassion, and civic responsibility.
- On project sites, we engage respectfully with local residents and businesses, striving to enhance—not disrupt—the communities where we operate.

COMMITMENT TO LONG-TERM SUSTAINABILITY

- Our vision extends beyond the completion of individual projects—we are committed to **building a sustainable future** for generations to come.
- Magnum continuously evaluates its policies and practices to ensure alignment with **emerging sustainability frameworks**, including LEED certification standards, carbon reduction goals, and circular economy principles.
- Through innovation, collaboration, and ethical leadership, we aim to set a benchmark in responsible construction—demonstrating that profitability and sustainability can, and must, go hand in hand.

6. SAFETY AND RISK MANAGEMENT

- We maintain an unwavering commitment to safety as a core value, integrating it into every aspect of planning, execution, and supervision across all projects.
- We implement rigorous safety protocols that meet or exceed OSHA, state, and local regulations, ensuring all employees and subcontractors receive comprehensive safety training, certifications, and appropriate protective equipment.
- We conduct regular on-site safety audits, toolbox talks, and compliance inspections to identify potential hazards before they result in incidents.
- We promote a proactive safety culture where every worker is empowered to halt work if unsafe conditions are identified and report concerns without fear of reprisal.
- We report and investigate all incidents and near misses promptly and transparently, applying lessons learned to continuously strengthen our safety management systems.
- We integrate risk assessments and mitigation plans into every project phase—from

preconstruction through closeout—to safeguard personnel, property, equipment, and the environment.

- We utilize detailed Job Hazard Analyses (JHAs) and emergency response plans to ensure readiness and minimize impacts from unforeseen events.
- We collaborate with clients, insurers, and regulatory agencies to maintain best-in-class safety performance metrics and continual improvement of our risk management practices.

ENFORCEMENT AND REPORTING

Violations of this Code of Ethics will be taken seriously and may result in disciplinary action, up to and including termination of employment or contracts. We encourage reporting of any suspected unethical behavior through confidential channels, such as our ethics hotline or designated compliance officers. Reports will be investigated fairly and without retaliation.

PURPOSE OF THIS CODE

This **Code of Ethics** defines the guiding principles and professional standards that govern the conduct of every **Magnum Construction Services Inc.** employee, subcontractor, supplier, and business partner. It serves as a cornerstone of our corporate culture — ensuring that integrity, accountability, and respect are upheld at every level of our organization and on every project site.

Magnum Construction Services believes that ethical excellence is inseparable from operational excellence. This Code provides clear expectations for decision-making and behavior, ensuring that our actions consistently reflect the company's core values and legal obligations. It applies equally to all personnel, regardless of position or tenure, and extends to all vendors, consultants, and partners representing the Magnum name.

Our Code reflects Magnum's unwavering commitment to:

- **Honesty and Transparency:** Conducting all business dealings truthfully, openly, and without deception or misrepresentation.
- **Compliance and Accountability:** Adhering strictly to all applicable federal, state, and local laws, as well as industry regulations and contractual requirements.
- **Fairness and Respect:** Promoting diversity, equality, and mutual respect among coworkers, clients, and the communities we serve.



- **Safety, Quality, and Environmental Stewardship:** Ensuring that every task, process, and decision prioritizes the well-being of people and the protection of our environment while delivering the highest quality of craftsmanship.

Adherence to this Code of Ethics is a **condition of employment, engagement, and partnership** with Magnum Construction Services Inc. All team members and affiliates share the responsibility to maintain these standards and to report any potential violations or unethical behavior without fear of retaliation.

Through this Code, Magnum Construction Services reaffirms its dedication to **doing the right thing — always**, and to building not only exceptional structures, but also lasting relationships founded on trust, professionalism, and moral integrity.

Approved by: 
Michael Gaya
Executive Director
Magnum Construction Services Inc.

Effective Date: [Insert Date]
Revision No.: 1.0