



Code of Conduct / Business Ethics

It is the policy of G•UB•MK Constructors to conduct all business with the highest level of ethical standards.

The success of G•UB•MK Constructors depends on the integrity and professionalism that we demonstrate in our day to day dealings with others. As a business, G•UB•MK Constructors is committed to complying with the law and conducting all activities with the highest level of integrity and ethical standards.

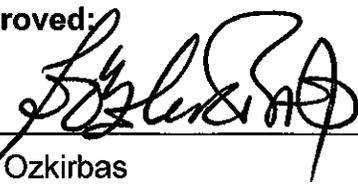
We uphold this commitment by conducting ourselves in a manner that protects the reputation of G•UB•MK Constructors, is consistent with current community and corporate standards, and complies with all applicable laws. A copy of the G•UB•MK Constructors *Code of Conduct* is available for review at all Site/Area offices.

Contract Requirement – In accordance with our current TVA contract, G•UB•MK Constructors is required to timely disclose to TVA whenever, in connection with award, performance or closeout of our contract any credible evidence that a principal, employee, agent or a G•UB•MK Constructors subcontractor has committed (i) a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in title 18 of the United States Code; or (ii) a violation of the civil False Claims Act.

If you are ever in doubt as to whether or not you are doing the right thing, or you need information about issues that are not covered by our company policies, your most immediate resource for any matter related to the G•UB•MK Constructors *Code of Conduct* is your supervisor. They may have the information you need or be able to refer the question to an appropriate source. There may be times when you prefer not to go to your supervisor. In these instances, you should feel free to discuss your concerns with the G•UB•MK Resource Manager or one of the G•UB•MK parent company hotlines listed below.

- Contacts:
- Immediate Supervisor or Site / Area Manager
 - G•UB•MK Resource Manager, 865-632-1085
 - G•UB•MK Parent Company hotlines:
 - 866-462-4224 (URS)
 - 866-851-4078 (Williams)
 - 866-557-0683 (WorleyParsons)

Approved:



Erol Ozkibas

G•UB•MK Program Director

5/15/2009

Date