



**WHISTLEBLOWER POLICY AND  
PROCEDURES  
(Revised August 22, 2022)**

**1. Purpose**

The purpose of this Whistleblower Policy and Procedures (the “Policy”) is to set forth the procedures established by the Audit Committee of the Board of Directors of Limbach Holdings, Inc. and its subsidiaries and divisions (together, the “Company”) for:

- the receipt, retention and treatment of complaints received by the Company’s employees and non-employees regarding accounting, internal accounting controls, or auditing matters; and
- the confidential, anonymous submission by the Company’s employees regarding questionable accounting or auditing matters.

**2. Complaints Covered by the Policy**

The procedures set forth in this Policy relate to complaints and concerns regarding:

- irregular accounting methods, auditing conduct, or financial reporting practices (each, a “Covered Matter”), including without limitation:
  - fraud or deliberate error in the preparation, evaluation, review, or audit of any Company financial statement;
  - fraud or deliberate error in the recording and maintaining of the Company’s financial records;
  - deficiencies in or noncompliance with the Company’s internal accounting controls;
  - misrepresentation or false statement to, or by, a senior officer or accountant regarding a matter contained in the Company’s financial records, financial reports, or audit reports; or
  - deviation from full, fair, accurate, timely, and understandable reporting of the Company’s financial condition; or
- retaliation against employees who, in good faith, make reports regarding any of the foregoing.

**3. Procedures for Making Complaints**

*Employees*

Employees should discuss any compliance concerns regarding Covered Matters with their immediate manager or supervisor. All managers and supervisors are responsible for supporting this Policy by maintaining an “open door” for employees who may reach out to them.

If an employee prefers not to contact their immediate manager or supervisor regarding a Covered Matter, or believes that the Covered Matter ought to be addressed at a higher level, the employee should contact the Company’s senior legal officer, or report it through the Ethics Hotline by phone at 1-888-572-8031 or via the Internet at [ethicspoint.com](http://ethicspoint.com). Information about the Ethics Hotline is located on Company Intranet, including a detailed “Question and Answer” document. Employees may provide a report either by phone at the Ethics Hotline number, or via the web-based reporting system. In either case, the report will be initially received and recorded by a third-party provider, and not a Company employee. The system is designed so that no report is shared with implicated parties. Employees are encouraged to provide sufficient detail about the issue, so that proper investigation and follow up can be conducted. Reports may be made completely anonymously, and reports will be kept confidential to the fullest extent possible, subject to applicable laws, regulations, and legal

proceedings.

#### *Non-Employees*

Reports from non-employees, including customers and suppliers, regarding Covered Matters may be submitted in writing to:

Limbach Holdings, Inc.  
797 Commonwealth Drive  
Warrendale, PA 15086  
Attention: Senior Legal Officer

Reports from non-employees generally will not be subject to confidential, anonymous treatment.

#### **4. Treatment of Complaints**

##### *Receipt and Investigation*

The Audit Committee is responsible for overseeing the receipt, retention, and investigation of, and response to, all complaints received regarding Covered Matters (each, a "Report"). With respect to each such Report, the Audit Committee shall determine whether it, the senior legal officer, another officer, or an external party will be responsible for investigating such complaint, after considering all relevant facts and circumstances.

In connection with the investigation of a Report, the Audit Committee, the senior legal officer, or their designee(s) may consult with, and obtain the assistance of, any member of the Company's management who is not the subject of the Report, and independent legal, accounting, or other advisors may be retained as necessary or appropriate. Upon completion of the investigation of a Report, prompt and appropriate corrective action shall be taken. In addition, confidentiality of Reports by employees will be maintained, unless necessary to conduct an adequate investigation or compelled by judicial or other legal process.

##### *Follow-Up to Reports*

The Audit Committee and/or its designee will, to the extent appropriate and practicable, provide each person who files a Report with an update or response on the status of the investigation.

##### *Retaliation Prohibited*

Retaliation or reprisal of any kind by the Company, the Audit Committee, or any director, officer, employee, contractor, subcontractor or agent of the Company, against an employee for reporting a violation (or potential violation) of this Policy in good faith is strictly prohibited. The fact that an employee has raised a concern regarding a Covered Matter, or provided information in an investigation relating to a Covered Matter, cannot be a basis for denial of benefits, termination, demotion, suspension, threats, harassment, or discrimination. Anyone retaliating against an employee who, in good faith, reported a violation (or potential violation) of this Policy will be subject to disciplinary action, up to and including termination of employment. If an employee believes that he or she, or another colleague, has been retaliated against for raising a good faith concern regarding a Covered Matter, such employee should contact the Company's senior legal officer, or report it through the Ethics Hotline.

##### *Retention of Reports and Investigations*

The Audit Committee and/or its designee will maintain a log of all Reports, as well as track their receipt, investigation, and resolution. Copies of Reports and such log will be maintained in accordance with the Company's Document Retention Policy.