Limbach Holdings, Inc.
Code of Conduct & Ethics

Last Updated: December 2025

Our Collection of Brands

With 21 locations across the eastern United States, our company is built on a unique collection of brands that bring together a wide range of expertise, dedicated people, and mission-critical customers. Our brands span union, non-union, and professional services, united by shared values, a commitment to excellence, and the principles outlined in this Code of Conduct.

Though we operate under different logos, we are united by our mission to help optimize our clients' existing infrastructure, uphold the highest ethical standards that reflect our core values, and foster a safe, respectful workplace built on a culture of belonging.

LIMBACH

LIMBACH COMPANY

LIMBACH JAKE MARSHALL

LIMBACH ACME

LIMBACH KENT ISLAND MECHANICAL

Consolidated Mechanical
A Limbach Company

PIONEER POWER
A LIMBACH COMPANY

LIMBACH
LIMBACH FACILITY & PROJECT SOLUTIONS

HARPER

industrial air

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A MESSAGE FROM OUR CEO

"As part of the Limbach family, each of you plays an important role in maintaining our reputation with our mission-critical customers and our stockholders. Our mission is simple but impactful: to optimize existing buildings, leaving the environment and our world better than we found it. At Limbach, our Core Values are truly part of our DNA. This Code of Conduct and Ethics ("Code") explains how these values apply in everything we do, from the field to the office. Our commitment to doing the right thing should come first anytime we make decisions for the company, its customers, its stockholders and the communities we serve.

We encourage you to speak up if you ever face uncertainty about the right path forward, especially if our job performance, reputation, people or business interests are at stake. If you believe our Core Values or compliance with this Code or any laws are in question, it is your responsibility to raise the concern. Embrace our open door culture by reaching out to your supervisor or to People & Culture. You may also report concerns to Limbach's AlertLine, available 24/7 by phone at 1-888-572-8031 or online at the Limbach AlertLine web reporting site. Reporting to Limbach's AlertLine gives you the option to remain anonymous and ensures confidential routing and investigation of concerns. We will not tolerate any form of retaliation for raising concerns in good faith.

Thank you for living our Core Values every day and adhering to this Code of Conduct - it is the Limbach Way."

Michael McCan
President and Chief Executive Officer

1.

WE ACT WITH
INTEGRITY

WE CARE

WE ARE
INNOVATIVE

WE ARE
ACCOUNTABLE

WE ARE
ACCOUNTABLE

WE ARE
INNOVATIVE

1.1 OUR CORE VALUES ARE PART OF OUR DNA

WE CARE

We are a team made up of passionate people who take care of each other. We ensure safe, productive work with a focus on everyone returning home without incident. Our culture of caring helps build our 1st Choice brand in the hearts and minds of our employees and customers.

WE ACT WITH INTEGRITY

We are committed to doing the right thing to drive business. We always strive to build trust with our customers, stockholders and the communities we serve.

WE ARE ACCOUNTABLE

We are reliable because we have drive and discipline. We maintain integrity in our financial reporting and business records. We take responsibility for our actions and hold all of our people and partners to high standards.

WE ARE INNOVATIVE

We are constantly improving by looking for better ways to do our jobs, support our customers and leverage new technologies. We embrace change that enables us to grow and become more efficient, adding value to our customers and stockholders.

1.2 OUR CODE OF CONDUCT IS THE LIMBACH WAY

Why Does Our Code Exist?

The Code exists to guide the decisions we make each day and to keep our Core Values at the heart of everything we do. It demonstrates our commitment to complying with our legal and ethical requirements and doing the right thing for our people, customers, stakeholders and the communities we serve. As a publicly traded company, we must also maintain the highest ethical standards. The Limbach Employee Handbook and other internal policies are available with more detailed information on topics covered.

Who is Expected to Understand and Follow Our Code?

The Code applies to Limbach's officers, employees and board of directors. The Code also applies to our suppliers, subcontractors and other third party partners. Third parties working on our behalf are expected to follow our values.

Failure to follow this Code can result in disciplinary action or termination.

Our Leaders Set the Tone By:

- **Leading by example** and establishing high standards for their teams
- **Fostering an open door environment** that encourages speaking up, asking questions and reporting concerns
- **Looking out for unethical or illegal behavior** taking steps to prevent misconduct
- **Championing our values** based culture that supports ethical behavior

All of Our People and Third Party Partners Are:

- **Supported** by Limbach to do the right thing
- **Entrusted** with responsibility to protect our reputation and culture
- **Resourced** for when help is needed, including the Limbach AlertLine
- **Empowered** to speak up and voice concerns when something is not right
- **Protected** from retaliation of any form for reporting good faith concerns

1.2 OUR CODE OF CONDUCT IS THE LIMBACH WAY

Making The Right Decision: Identify, Pause, Review & Take Action

- **Identify Potential Problem or Situation**
  - Be on the lookout for situations or decisions that may result in conflicts
- **Pause for a Values Check**
  - When something seems off or if you're unsure, pause to determine whether the decision agrees with Limbach's Core Values.
- **Review Applicable Resources, Policies or Laws**
  - Check if what you are being asked to do, choosing to do or asking others to do involves Limbach's Code of Conduct, company policies or any laws, so you can review the resources available.
- **Take Action or Get Help**
  - Make your decision based on what is right, not what is easy or high gain. If you're not sure, get help. If you have concerns about decisions or behavior, report them right away to your manager or supervisor, as instructed in this Code or to the Limbach AlertLine. Limbach does not tolerate retaliation against employees or partners for raising good faith concerns.

1 IDENTIFY **2 PAUSE** **3 REVIEW** **4 TAKE ACTION**

2. WE CARE

2.1 GETTING HELP & REPORTING CONCERNS

When to Ask for Help

If you have questions about ethics or laws, or if you see something that might violate this Code, raise it, whether you're in an office or on a job site. Our customers, suppliers or other third party partners may report questions or concerns to Limbach directly or to the Limbach AlertLine.

What to Expect

It is Limbach Open Door policy and culture to encourage open, honest two-way conversation between employees and supervisors. All employees are encouraged and supported to speak up, ask questions or share feedback with any leader, from your direct supervisor to senior management. We are committed to listening and working together to find the best solution, while maintaining confidentiality. Retaliation, punishment or negative treatment for speaking up in good faith is never tolerated.

Where to Go For Help

- **Your Manager or Supervisor** For any concerns, they know your role best and may often be able to help right away
- **People & Culture** For workplace-related concerns including harassment and discrimination, or labor, scheduling and compensation issues you can't resolve with your manager (HR Business Partner)
- **Environmental Health & Safety** For unsafe work conditions or practices, quality concerns and stop work authority (Regional EHS Director)
- **Technology** For concerns about employee or customer data privacy and cybersecurity threats or incidents (IT Help Desk)
- **Legal** For any other matters in this Code, or legal or contract issues and concerns
- **The Limbach AlertLine** is a system available 24/7 for confidential reporting, where you have the option to remain anonymous. You may report by phone at 1-888-572-8031 or file a report online at the Limbach AlertLine web reporting site. Your concern will be confidentially reviewed within 2 business days. All concerns are investigated and responded to based on the nature of the report. Additional information can be found in the Whistleblower Policy.

Q: *I am working on a job for a top customer who is asking me to do something that feels like it is unethical, against our core values and possibly against our Code of Conduct. I think if I report this to someone like my supervisor or even anonymously to the Limbach AlertLine, people won't want to hear it or do anything about it since it could harm a relationship with the customer. Should I just do what the customer is asking or try to handle it myself?*

A: No - it is your responsibility to speak up in this situation. Limbach is all about customer service, but we care deeply about our employees and we will always support you in addressing this type of situation whether it's with a customer, peer, leader or any other party. You should never face this type of situation alone, especially if it is big or feels difficult to address.

LIMBACH'S ALERTLINE

CONTACTING

Report a question or concern to the Limbach AlertLine by phone (1-888-572-8031) or web to create a confidential AlertLine case. Reporters have the option to remain anonymous and may update or add information to the case anytime while it is under review. The Limbach AlertLine is available 24/7 and is run by an external third party company.

SECURELY VIEWING

The case is immediately sent to the secure EthicsPoint system where Legal, Compliance or People & Culture will review the report. Within 2 business days, reporters will receive an initial response in the EthicsPoint system. Additional information or questions may be sent to you through the system, so be sure to follow up. Access to the EthicsPoint system is restricted to relevant trained company leaders who will review and address AlertLine reports. The system automatically restricts any one mentioned in a case from accessing it.

CONFIDENTIALLY INVESTIGATING

A specific, trained leader relevant to the subject of the case will be assigned the case for investigating and addressing. Once the review is complete and any relevant actions are taken, a comment will be sent through the EthicsPoint system to reflect the status to the reporter. Most cases will be closed within 30 days.

PROTECTING

Limbach will not tolerate any retaliation for concerns raised in good faith. Whether a concern involves a leader, peer, top customer or any other party, we want to hear it.

2.2. INVESTIGATION OF VIOLATIONS & ENFORCEMENT | 2.3 NO RETALIATION | 2.4 DISCRIMINATION & HARASSMENT

2.2. Investigation of Violations & Enforcement

When a possible violation is reported (except for financial or accounting concerns handled under Limbach's Whistleblower Policy), depending on the type of allegation, the Company's senior HR officer, senior legal officer, or the Audit Committee will take prompt action to thoroughly investigate. Any individual covered by this Code is expected to cooperate in any internal investigation of misconduct. When an investigation is completed, if it is determined that a violation of this Code has occurred, appropriate preventative or corrective action may be taken, including disciplinary action up to and including termination.

2.3. No Retaliation

Limbach does not tolerate retaliation for concerns that are reported in good faith. Examples of retaliation include denial of benefits, demotion, changes in job (duties, location, or schedule), harassment, threats or any adverse actions that may result in a hostile work environment because someone spoke up. Concerns reported maliciously or in bad faith may result in disciplinary action. If you feel you have been retaliated against, we encourage you to report your concern to People & Culture or the Limbach AlertLine.

2.4. Discrimination & Harassment

Limbach treats all people with respect and strives to maintain an environment that is free of discrimination and harassment for our people, customers and partners. Limbach hires, promotes and treats people based on equal opportunity only. Comments or actions that create a hostile or offensive environment (bullying, jokes, slurs, or inappropriate touching) will not be tolerated. If you experience or witness discrimination or harassment, report it to your leader, People & Culture or the Limbach AlertLine.

2.5. Environmental Health & Safety

Our Hearts and Minds Safety Culture is at the core of everything we do. This means we engage both our hearts (looking out for one another) and our minds (following job-specific processes & procedures) to make safe decisions and keep a safe environment for our people, our customers and the communities we serve. Pre-planning for jobs is a critical part of our Hearts & Minds safety culture. Pre-planning ensures we follow best in class safety standards, including wearing the right PPE for the job.

Company field leadership prepares risk assessments supported by appropriate training, evolving hazard identification skills, equipment and PPE for all tasks to be reviewed and assessed. When using hazardous substances, operating materials and auxiliaries, the defined protective measures must be strictly observed. All Limbach employees are encouraged to use their Stop Work Authority if they encounter unexpected hazards and conditions, or tasks that were not planned or staffed for safely and correctly. Stop Work is key for the success of our We Care culture and employees are trained to stop if they feel unsafe or identify an unsafe environment, regardless of the situation.

Limbach embraces opportunities to refine existing processes, procedures and policies. All work incidents or environmental releases must be reported immediately to the company through the Environmental Health & Safety (EHS) team, no matter the severity of the incident and a report must be prepared. Be prepared to respond to emergency situations or injuries and always report unsafe or unhealthy conditions to your supervisor or EHS.

We care deeply about everyone returning home safely and that is why everyone at Limbach has a personal responsibility for their own safety and those around them. If you see something, it is your responsibility to say something. If you feel your safety concerns are not being addressed, or you prefer to report them anonymously, you may report them to the Limbach AlertLine.

Q: *I am working on a job that is already running behind and I realized I don't have the right parts or tools to complete one of the final tasks safely. I think I could still just get the job done and avoid disappointing the customer. Should I do what it takes to keep the customer happy or stop working until I have what I need?*

A: You should always Stop Work if you do not have the right parts or tools to complete a job safely and properly. We always prioritize safety and quality, so leadership will support you using the Stop Work Authority, even if you face customer push.

2.6. Drug & Alcohol Policy

We work in safety-critical roles and as a federal government contractor. We are committed to maintaining a drug free workplace as described in Limbach's Drug & Alcohol Policy. We may be required by our customers to do project specific drug testing.

If you struggle with substance abuse, confidential assistance is available through our Employee Assistance Program (EAP) at Uprise Health.

LIMBACH
3.
WE ACT WITH
INTEGRITY

3.1 ETHICAL SALES & MARKETING | 3.2 FRAUD & BRIBERY

3.1. Ethical Sales & Marketing

At Limbach, we win with our customers by providing honest, data-driven solutions. Our marketing materials, bids and proposals are created with integrity. We only promise timelines or solutions that we believe we can stand behind. Our reputation as an indispensable partner to our mission critical customers depends on identifying and offering the best solutions for our customers.

Q: *I know a competitor exaggerated their capabilities in a proposal. Should I point this out to the customer to win the job?*

A: Our reputation depends on providing honest, data-driven solutions, not on undermining competitors. Keep the focus on presenting Limbach's strengths, capabilities and proven results rather than making negative or unverified claims about others.

3.2. Fraud and Bribery

We have zero tolerance for any form of fraud, bribery or kickbacks regardless of the situation. Never offer or accept bribes in the form of money, goods or favors intended to sway a decision. Even a small gift could be seen as improper. If you suspect fraud or bribery, whether it involves a Limbach employee, subcontractor, supplier or customer, report it to the Legal or the Limbach AlertLine.

3.3. CONFLICTS OF INTEREST

3.3. Conflicts of Interest

It is our responsibility to make decisions in the best interest of Limbach, without consideration of the personal benefits. A conflict of interest can be any situation, event, relationship or circumstance in which your personal and professional interests interfere, or appear to interfere with those of the company. If you or a close family member has a relationship with another party (e.g., competitor, supplier, subcontractor or customer) that could influence, or appear to influence business decisions, it could be damaging to both you and the company.

Q: *My cousin owns a company that wants to bid on a Limbach project at our branch location. I know the project manager and could influence the decision. Can I help my cousin's company win the bid?*

A: No. That is a conflict of interest. You should disclose this right away so that the company can ensure a fair bidding process by ensuring you do not take part in any decisions about that bid. Limbach needs fair, open competition, and personal relationships should never sway our decisions

Conflicts of Interest can arise in many different situations. Some common examples of conflicts of interest include:

→ Personal or Family Financial Interests

- Significant ownership interest in a supplier, customer or competitor
- Any other financial transaction or relationship involving the company

→ Personal or Family Relationships

- Serving as a director, officer, partner, consultant or in any other role in unaffiliated organizations, including not-for-profit organizations
- Consulting or employment relationship with a supplier, sub-contractor, customer, or other company that Limbach does business with
- Social or romantic relationships with current, former or future suppliers and service providers
- Internal personal relationships whether employees or contractors

→ Outside Employment

- Consulting or other employment with a supplier, subcontractor, customer or other company outside of Limbach

Be on the lookout to avoid conflicts of interest, and if one is unavoidable, be sure to disclose it to Legal/ Compliance at compliance@limbachinc.com so it can be reviewed and documented, managed correctly. Transparency is key, so actual and potential conflicts of interest must be disclosed for review prior to proceeding. You may also report conflicts of interest to Limbach's AlertLine. Directors or officers should make such disclosures to the Chair of the Audit Committee. All transactions that could potentially give rise to a conflict of interest involving a director, executive officer, or principal financial officer must be approved by the Audit Committee, and any such approval will not be considered a waiver of this Code.

3.4 GIFTS & ENTERTAINMENT

3.4 Gifts & Entertainment

We should always be mindful of the gift policies of our customers, suppliers and other partners when we are giving gifts or entertaining. In many cases, giving gifts to win or keep business is unethical or illegal. All gifts and entertainment should be reasonable and follow our Business Expense Reimbursement Policy.

Giving and accepting entertainment (including meals and transportation) and gifts to/from current or future customers and other people or entities that do business with Limbach is only allowed when:

- **Manager/Supervisor approved**
- **Allowed based on the policy of the customer or other third party**
- **Reasonable and infrequent**
- **Legal and ethical**
- **Non-cash or cash equivalent (ex. gift cards or checks)**
- **The customer or other party is not a government entity**

If you are ever unsure, reach out to Legal/Compliance for help and seek approval from your Regional Manager or VP. You may also contact the Limbach AlertLine with questions or concerns related to gifts and entertainment.

→ Total Gift/Entertainment Value Under $50

It is generally acceptable if the total value of gifts and entertainment given to or received from a customer or other third party is under $50 in one calendar year and meets the above criteria.

→ Total Gift/Entertainment Value Between $50 and $500

For gifts and entertainment between $50 and $500 in one calendar year that meet the above criteria, employees must answer yes to all applicable questions below to proceed.

1. Is the gift/entertainment standard or expected given your job responsibilities, position/title and seniority?
2. Would the gift/entertainment reflect positively on you and the company if it became public knowledge, such as through media coverage?
3. Does the gift support or strengthen a company relationship?
4. For entertainment or hospitality, is the other party attending with you?

→ Total Gift/Entertainment Value > $500

When gifts and entertainment would exceed $500 in a calendar year, special pre-approval must be obtained from your Regional Manager or VP and Legal/Compliance must be notified by contacting compliance@limbachinc.com.

Q: *A supplier offers me a $200 gift card every year at the holidays to thank me for Limbach's business partnership. Can I accept it?*

A: No. Our policy only allows infrequent, non-cash or cash equivalent gifts. Accepting a $200 gift card every year could look like it's influencing our decision to keep going back to that supplier. You should politely decline and let your manager or Legal know. If you're ever unsure about a gift or invitation, check first before accepting.

3.5 Insider Trading

Insider trading is illegal and unethical. Insider trading is using or sharing material non-public information for the purpose of trading stocks in Limbach or any other publicly traded company.

Material non-public information is information that is not publicly available, that may influence stock prices or that an investor may consider important when deciding to buy, sell or hold stock. Examples of material non-public information include:

- **Unreleased financial results**
- **Updates or changes to guidance/forecasting**
- **Potential or future mergers and acquisitions**
- **Major contract wins or losses**
- **New product or service offerings**
- **Leadership changes**
- **Business strategies**

While you may be made aware of material non-public information through the normal course of business, it should never be used to trade stocks in Limbach or any other publicly traded company. Material non-public information should be kept confidential and should never be shared with anyone outside the company, including family, friends or customers.

Any Limbach director, officer, employee, or other individual in possession of inside information should not:

- **Trade in securities of the Company or any other company while in possession of inside information**
- **Share material non-public information about Limbach or any other company, unless it's needed for a legitimate business purpose, allowed by the Communications Policy, and you reasonably believe the information will not be traded on or shared with someone for trading purposes**
- **Engage in any other behavior or activity to take advantage of inside information**

Additional information can be found in Insider Trading and Dissemination of Public Information. If you are aware of Insider Trading activity or if you need assistance determining whether information is material and non-public, you should contact Legal or Limbach's AlertLine.

Q: *I work in the field and a close friend at one of our branch locations told me that Limbach is about to acquire another company OR win a contract with a major customer. The deal hasn't been announced to the public yet. Is it okay if I share the exciting news with my family and recommend they buy stock?*

A: Definitely not. The details that were shared with you are considered material non-public information that would give your family an unfair advantage. If you or your family purchase stock based on that information, it is a violation of federal securities laws and company policy.

3.6. Protecting Confidential Information

We treat all confidential and proprietary information carefully and only share such information internally with specific individuals who require the information. Confidential information may include project plans, bids, customer lists, financial data, trade secrets, and technical drawings.

When handling customer or supplier confidential information, do not share it and only use it for the business purpose. Avoid discussing sensitive information where unauthorized people can hear or see it.

If you're ever unsure whether you can share something, check with Legal or raise the question through Limbach's AlertLine.

3.7. CONFIDENTIALITY AND NON-SOLICITATION | 3.8. FAIR COMPETITION & ANTITRUST | 3.9. POLITICAL ACTIVITIES & CONTRIBUTIONS

3.7. Confidentiality and Non-Solicitation

All salaried employees are expected to understand and follow Limbach's Confidentiality Agreement. This means that if you leave the company for any reason, information, resources and relationships that you gain and access during your employment with the company must not be leveraged at a competitor or other business.

3.8. Fair Competition & Antitrust

Limbach is committed to competing fairly for business, respecting the rights of other parties, including the legitimate business relationships and contracts between the Company's competitors and prospective customers. We do not engage in price fixing or bid rigging. This includes any kind of joint action or agreement with a competitor that influences the price of services sold, allocates customers or potential customers, limits competition or production or avoids production innovation.

The Company will not use unfair methods of competition, or unfair or deceptive acts or practices in commerce, such as false or misleading advertising, any other form of misrepresentation made in connection with sales, or unfair comments about competitors' products.

Q: *Another company in the industry reached out and suggested we coordinate our bids on an upcoming project. They said that if we each bid for different parts of the work, we'd all win smaller contracts without undercutting one another. Can I agree to this?*

A: No. That's classic bid rigging, which is illegal and against our Code. You must never discuss or agree with competitors on how to divide projects, set prices or allocate customers. Always submit your own independent bid based on Limbach's true costs and capabilities. If a competitor ever raises this kind of proposal, decline immediately and report it to Legal or the Ethics Hotline.

3.9. Political Activities & Contributions

No employee or director is authorized to make any direct or indirect political contribution of any kind on behalf of the Company, including using the Company's name, email address, or mailing address. In making personal political contributions, consideration should not be given to the possibility that such contributions will be helpful to the interest of the Company, nor should they be made for that purpose. The Company will not reimburse any employee or director for any personal political contributions.

The Company cannot give employees time off with pay for political activity, as it would constitute an "inkind" political contribution. Political activities include any time spent running for public office, serving as an elected official, or campaigning for a political candidate or cause. Employees may use their paid time off (PTO) for such activities, in accordance with the procedures governing all PTO scheduling.

4.

WE ARE ACCOUNTABLE

4.1 FOLLOWING LAWS, COMPANY POLICIES & STANDARDS | 4.2 CUSTOMER SERVICE | 4.3 QUALITY | 4.4 PRIVACY & CYBER SECURITY

4.1. Following Laws, Company Policies & Standards

Limbach is committed to following all applicable federal, state and local laws (including laws and regulations of any foreign country in which the company conducts business). When working on government contracts, we recognize the importance of understanding and following all applicable regulations, procurement requirements and reporting requirements.

Employees, officers and directors are responsible for understanding and following all Company policies. They are there to help you do your job safely and correctly. Other policies can be found on the company intranet or through UKG.

Any employee, officer, director or representative of Limbach should report suspected or observed violations of this Code, company policies or the law to management or through the Limbach AlertLine. Failure to follow this Code may result in disciplinary action, up to and including termination.

4.2. Customer Service

Customer satisfaction and loyalty are top priorities for Limbach. We listen to our customers' concerns and visions, striving to exceed their expectations with best in class building systems solutions. We encourage customers to share feedback so we can maintain a great experience. We prioritize professionalism and timely response or follow up when interacting with current and future customers.

4.3. Quality

Limbach strives to meet customer needs by ensuring quality solutions, products and services. We establish clear expectations for employee performance, emphasizing diligence, attention to detail and a commitment to high standards while minimizing deviations. Our culture of continuous improvement through feedback and lessons learned sets benchmarks for evaluating performance. We are driven by honesty, integrity and professionalism in business interactions. We believe quality should be embedded in every stage of our processes to prevent errors from occurring and effectively handle the issues that may arise during or after service delivery.

4.4. Privacy & Cyber Security

Maintaining Employee and Customer Data Privacy

We treat employee and customer data with intentional care and security. It is our responsibility to protect and respect customer data (project details, contact names, financial information) and employee data (contact details, performance records, medical information). This data should only be accessed as authorized and for legitimate business purposes.

Securely Supporting Our Customers

We take intentional steps when connecting to customer environments to ensure safe and secure access as we work to support our customers' mission-critical needs.

Retention of Company Records

Employees are responsible for retention and disposal of company records in accordance with the company's Records Management Policy and Record Retention Schedule. Questions about records management should be sent to Legal.

Upholding the Highest Cyber Security Standards

Everyone plays a role in protecting the company and our customers. It is your responsibility to comply with Limbach's Acceptable Use Policy and other IT policies to ensure safe use of company devices. If you ever suspect a data breach, hacked account, phishing or lost device, report it immediately by contacting IT directly or to the Limbach Help Desk.

Q: *I clicked on a link that looked like it was from IT and appeared to be harmless, but now my laptop is acting strange. I think it might be a coincidence. Should I just restart my computer or try to fix it myself?*

A: Notify IT immediately by contacting the Limbach Help Desk. When in doubt, IT is there to help. It may be a coincidence, but in case it was a phishing attempt, it is important to involve IT as soon as possible. You are always better to play it safe. Delaying or ignoring the potential issue could make the problem worse and put customer or company data at risk.

4.5 KEEPING ACCURATE RECORDS | 4.6 SHARING INFORMATION PUBLICALY | 4.7 USING COMPANY RESOURCES

4.5. Keeping Accurate Records

Limbach is committed to maintaining integrity in our financial reporting and business records. We prioritize complete, accurate and timely disclosure in all required public company documentation and reporting, and in our everyday documents, such as expense reports, estimates, contract proposals and presentations to our people, customers, stockholders and the communities we serve. False or altered records to hide improper payments are strictly prohibited. There is zero tolerance for dishonesty with our management, independent and internal auditors and our stockholders. Any financial, accounting or audit concerns should be reported immediately to the Limbach AlertLine, where you may choose to remain anonymous.

4.6. Sharing Information Publicly

Any report or document we file with the SEC, or share in public communications must be complete, accurate and timely. We do not intentionally misrepresent facts about the company to regulators, auditors, media or the public. Limbach's officers, directors and employees that are involved in the company's disclosure processes are responsible for understanding and following all relevant requirements and procedures.

4.7. Using Company Resources

Company Property

Our employees put Limbach's interests first. This means that Limbach assets, including property, funds and vehicles should only be used for legitimate business purposes. Company property, information and position may not be used for personal benefit. You may never sell, donate, loan or dispose of Company assets, regardless of their value or condition, without seeking approval from finance per Limbach's Asset Disposal Policy. When budgeting or spending Company funds, you are responsible for ensuring that the transaction is legal and documented according to the relevant internal policies, and that Limbach receives the correct goods, services and value in return.

Corporate Opportunities

If you learn about a business opportunity through or because of your job, or by using Company property or information, you must discuss it with your supervisor before proceeding. Your supervisor will work with leadership and the Legal Officer to decide if the Company wants to pursue the opportunity. If the Company chooses not to, you may pursue it under the same terms you shared and all company rules must be followed.

Q: *I finished a project and there's a pallet of copper pipe left over. Can I bring it back to the shop for storage just in case we need it later?*

A: No. Unused materials should not be returned to the office or shop. They should either be returned to the vendor for credit, donated to a charity or scrapped if they have commodity value. For copper, if the scrap value exceeds $2,000 in total, coordinate with your Project Team to sell it and ensure the proceeds are deposited into a Limbach account and coded to the original project.

5.

WE ARE INNOVATIVE

5.1. SUSTAINABILITY & ENVIRONMENTAL RESPONSIBILITY

5.1. Sustainability & Environmental Responsibility

At Limbach, we recognize our responsibility to protect the environment for our communities and future generations. We strive to proactively address environmental protection opportunities to uphold regulatory standards, enhance operational efficiencies, and maintain stakeholder trust. This mindset guides not only our day-to-day operations but also our approach to revitalizing existing infrastructure for our clients. Below, we highlight examples of our efforts across our branches supporting this commitment.

- Use recycled printing paper and we recycle link cartridges.
- We properly dispose of or refurbish e-waste such as laptops.
- We are piloting opportunities to use electric service vans.
- We offer a hybrid work environment that features flexible and remote options that minimize team member commuting and reduce our office space needs.

Our approach to revitalizing existing infrastructure not only focuses on enhancing energy efficiency but also significantly increases stakeholder and customer value. By conducting thorough facility assessments and developing proactive plans tailored to each client's unique needs, we ensure that their investments yield tangible returns in terms of reduced energy consumption and operating costs. Unlike opting for like-for-like replacements, we prioritize a holistic approach, designing solutions that precisely meet the facility's requirements. This ensures not only energy savings but also minimizes wastage, ultimately maximizing the value of their assets.

Proud partners of:

5.2. ENCOURAGING CONTINUOUS IMPROVEMENT

5.2. Encouraging Continuous Improvement

The evolution and growth of Limbach relies on continuous improvement of our people, processes and strategies. If you identify a better or safer way to do your job, share it with your supervisor or team. We have a best in class training and development program and employees must engage in training sessions, toolbox talks and other development activities. Limbach believes in leveraging lessons learned, whether successes or opportunities for improvement. We collaborate and embrace change because it is essential to delivering better results for the company, our customers, stockholders and the communities we serve.

Q: *I have been at Limbach longer than most of our leadership and I just don't understand why we have to change the way we do things or dedicate so much time to new training. It feels like there's always something new to take up more of my time. I find myself getting frustrated and since it's easier for me, shouldn't I stick to the way I've always done things? Every time I share my frustrations with a colleague, they agree.*

A: If you are frustrated or confused by something that is new or different, we encourage you to speak up to your manager/supervisor or other leader. Change is critical to the success of not only Limbach, but its people and customers too. While it's okay to challenge change, it's important to do so in a constructive way, so that concerns can be addressed and confusions can be cleared up. If you are frustrated by change, your leaders are there to guide and support you. Spreading negativity before taking the time to understand and discuss with those who can help goes against our Core Values.

Responsible AI Use

At Limbach, we are committed to using artificial intelligence responsibly and ethically. AI tools must only be used in ways that protect sensitive data, respect privacy, and support fair and accurate decision-making. Employees should never use AI to misrepresent information, compromise confidentiality, or replace sound professional judgment.

5.3. Waivers & Amendments

When Exceptions & Changes Are Needed

This Code should be strictly followed, but in rare situations, an exception may be appropriate with documented approval from Limbach's Legal Officer or Board of Directors (i.e., a waiver). If you think you need an exception, discuss with your supervisor. If your supervisor agrees, then a request should be submitted to Legal or through the Limbach AlertLine. All requests and decisions related to Code of Conduct exceptions are tracked and documented.

Any material amendments (changes other than technical, administrative, or other non-substantive amendments), or exceptions and waivers (approval by the Company's Board of Directors of a material departure from a provision of the code) to this Code for the Company's principal executive officer, principal accounting officer, controller or similar function, or any director may only be approved by the Company's Board of Directors and must be disclosed, as required, by SEC and Nasdaq rules.

OUR CORE VALUES ARE PART OF OUR DNA & OUR CODE OF CONDUCT IS THE LIMBACH WAY

While this Code covers many topics and situations, you may encounter a compliance or ethical dilemma that is not covered. Always remember that you are empowered to speak up, resourced to get guidance and it is your responsibility to report concerns and potential violations of the Code, company policies or the law.

Contacts

- **Your Manager or Supervisor**
- **Your HR Business Partner or People & Culture**
- **Legal/Compliance**
  compliance@limbachinc.com
- **The 24/7 Limbach AlertLine at 1-888-572-8031 or www.limbachinc.com/alertline, where you may report anonymously and in any language.**