

Antiboycott Policy

The policies, procedures and/or work processes set forth in this document are intended to represent Matrix Service Company and all Operating Companies, herein referred to as the "Company".

1. INTRODUCTION

A boycott is conspiracy formed and intended directly or indirectly to prevent the carrying on of any lawful business, or to injure the business of any one by wrongfully preventing those who would be customers from buying anything from or employing the representatives of said. The U.S. has adopted antiboycott laws and regulations which are designed to prohibit or penalize cooperation with international economic boycotts in which it does not participate, including boycotts of Israel. These laws apply to all Matrix Service Company subsidiaries (collectively the "Company"), domestic or international.

2. POLICY

It is the policy of the Company to fully comply with antiboycott laws and regulations. This policy applies to all employees of the Company and its subsidiaries and affiliates, wherever located, and all agents/resellers/distributors/consultants acting on behalf of the company, its subsidiaries and affiliates. This policy applies to all unsanctioned boycotts, although the current U.S. anti-boycott laws primarily focuses on the Arab League's boycott of Israel. This policy shall be updated should the list of countries be modified.

The company and its employees, agents/resellers/distributors/consultants, shall not engage in any of the following:

- Enter into any agreements, including contracts and purchase orders, to refuse or actual refusal to do business with or in Israel or with blacklisted companies. "Blacklisted companies" is a phrase used by the Arab League countries instead of overtly listing Israel.
- Enter into any agreements to furnish or actual furnishing of information about business relationships with or in Israel or with blacklisted companies.
- Enter into any agreements to furnish or actual furnishing of information about the race, religion, sex, or national origin of another person.
- Implement letters of credit containing prohibited boycott terms or conditions.

3. REPORTING REQUIREMENTS

The law requires the Company to report any requests received to take certain actions to comply with, further, or support an unsanctioned foreign boycott. Therefore, if any such requests are received, this information must promptly be reported to the Corporate Compliance Officer (Vice President, General Counsel) for proper reporting.

It is the policy of the Company to compete fairly and in compliance with the antiboycott laws and this Policy. No employee, agent or representative of the Company shall approve or take any action by a Company which is in violation of these laws or this Policy. Violations of this Policy may subject an employee to disciplinary action, up to and including termination.

4. RETALIATION

Matrix strictly prohibits supervisors, managers and other associates from retaliating against an employee or business associate who makes a report in good faith of a possible violation under these Policies. Retaliatory actions against employees or business associates could result in severe disciplinary measures for the offending person, up to and including termination from the Company.