



COMPLIANCE & ETHICS HELPLINE POLICY (VERSION 5.0)

Orion Group Holdings, Inc.

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July 31, 2024

PRESIDENT & CEO'S LETTER TO ORION EMPLOYEES

Dear Fellow Employees:

All of us need to be especially vigilant that we conduct all of our operations across the Orion family of companies (collectively, "Company") in compliance with all applicable laws, Company policies, and ethical business conduct standards. Indeed, our own internal policies require that we do so, and violations of those policies are subject to disciplinary action, up to and including termination of employment.

If you do not have copies of Company policies regarding ethical business conduct and legal compliance (or any other Company policy) and would like to review them, please contact your supervisor or our General Counsel/Compliance Officer, contact information below. In addition, certain of these policies may be found under the Investor Relations tab (Governance section) of the Company's public website, www.oriongroupholdingsinc.com or on the Intranet Site ("The Belt") located at <https://orionmarinegroup.sharepoint.com/sites/orion>.

Furthermore, if you have any questions about Company policies concerning legal compliance or ethical business conduct, including whether any particular circumstances may impact compliance with applicable laws, such policies or standards, we encourage and expect you to seek legal guidance from our Chief Compliance Officer & General Counsel, either directly or through your supervisor. Frequently, if not always, legal difficulties can be minimized or eliminated if the basis therefore is addressed to and by legal counsel at the earliest possible stage.

In an effort to ensure observance of applicable laws, Company policies, and standards of ethical business conduct, the Company has established an anonymous, confidential "Helpline" for you to report any acts, omissions or circumstances related to the Company's operations, business, or practices which may constitute or involve potential (i) suspected violations of fraud or misrepresentation; (ii) suspected violations, failures or inaccuracies in accounting, financial reporting, or auditing documents, procedures and/or controls; (iii) suspected violations, failures or inaccuracies in financial recordkeeping; (iv) suspected violations, failures to comply with any Company policy concerning accounting, internal financial controls, or financial audits; (v) any other financial improprieties or irregularities; (vi) suspected violations, failures to comply with any applicable law, rule, regulation or decision of any governmental authority; (vii) failures to comply with or questions regarding Company policies, including, without limitation, financial, accounting, auditing, and internal control policies, HS&E policies, and legal compliance policies; or (viii) otherwise unethical, unfair business conduct or behavior that is not aligned with Orion's policies. Company's leadership cannot address a problem if it is unaware of such a problem. Therefore, reporting a suspected violation is a duty of every employee.

First, you can either call the Company's Compliance & Ethics Helpline at 866-777-7840, or go online at <https://www.whistleblowerservices.com/oghi> to report suspected violations, both on an anonymous basis. You can find an online link to the Compliance & Ethics Helpline by either visiting the Company's Intranet ("The Belt") located at <https://orionmarinegroup.sharepoint.com/sites/orion> or through the Company's public website at www.oriongroupholdingsinc.com.



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Alternatively, also anonymously, you can contact the Chief Compliance Officer (who is also the General Counsel) regarding any such suspected violations, or write a letter describing the suspected violation with as much detail as possible and sending the letter to:

Orion Group Holdings, Inc.
CONFIDENTIAL/PRIVILEGED
ATTN: Chief Compliance Officer & General Counsel
12000 Aerospace Ave., Suite 300
Houston TX 77034
Phone: 713-852-6543
Email: gcounsel@orn.net or chiefcomplianceofficer@orn.net

Also, you can report any suspected violations of this Policy or other Orion internal policies directly to your supervisor, who, in turn, will contact the Compliance Department.

All “Helpline” and other reports can be made on an anonymous basis, and in such case, your anonymity will be protected. In addition, all reported information will be kept confidential except as necessary or appropriate for the Company’s investigation of the reported matter or otherwise to protect the Company’s interests. The Company will promptly investigate all “Helpline” and other reports on an objective, impartial, and fair basis. **Retaliation by any Company employee against a reporting employee for providing any report or information via the “Helpline” or otherwise is strictly prohibited, may constitute a criminal violation of law, and will be the basis for disciplinary action by the Company, up to and including termination of employment.**

The Board of Directors and management of Orion (i) are committed to compliance with applicable laws, Company policies, and ethical business conduct standards; and (ii) expect (and by policy require) that all Company employees conduct all of their activities on behalf of the Company in compliance with all such laws, policies, and standards.

As part of the implementation of these commitments, expectations, and requirements, the Board of Directors and management of Orion encourage you to use the reporting mechanisms set out above to assist in ensuring that the Company’s operations and business are conducted in accordance with all applicable laws, Company policies, and ethical business conduct standards.

Thank you for your attention to these matters. If you have any questions about them or the expectations of our Board of Directors or Company management, please do not hesitate to contact me.

Very truly yours,

/s/ Travis J. Boone

Travis J. Boone

President and Chief Executive Officer



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Policy Number: ORN_LEG013 Compliance & Ethics Helpline Policy (Version 5.0)			Supersedes: Policy Version 4.0
Version	Rev Date	Approving Authority	Revision History
0.0	2/1/12	GC	Policy adoption
1.0	1/1/15	Buchler	Change of GC and CCO
2.0	7/6/16	Buchler	Company name and logo change.
3.0	1/2/19	Buchler	Revised for new format and new logo.
4.0	1/19/23	Buchler	CEO Change and entity reference
5.0	7/31/24	Boone/Earle	Updated CCO/GC information; helpline access identification; and minor formatting; changed reference from “whistleblower” and “hotline” to “helpline”.



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Annex A

**Acknowledgment of Receipt and Certification of
Compliance with Orion Group Holdings, Inc.'s "Compliance & Ethics Helpline Policy"**

I hereby certify that:

1. I have read and understand the Company's "Compliance & Ethics Helpline Policy" and its reporting procedures. I acknowledge that I am required to comply with its provisions. I understand that the Chief Compliance Officer & General Counsel is available to answer any questions I have regarding the Policy.
2. I am and have been in compliance with and will continue to comply with the Policy for so long as I am subject to the Code.

Date: _____

Name: _____
Position: _____
Signature: _____