

Bowman

Code of Ethics and Business Conduct

The Company has adopted this Code of Ethics and Business Conduct (the "Code") in furtherance of its cultural values of responsible freedom and relationships, to promote (i) honest and ethical conduct, (ii) proper disclosure in the Company's periodic reports, and (iii) compliance with applicable laws, rules, and regulations. Each of our employees represents the Company and we expect everyone who works for us to demonstrate high standards of ethics and integrity. Questions about this Code and/or its application to particular situations should be directed to the employee's supervisor and/or member(s) of the Compliance Committee, consisting of the Chief Operating Officer, the Chief Legal Officer, and the Chief Human Resources Officer.

With that as background, our Code is:

- Each employee, officer and director of the Company must comply with the letter and spirit of this Code and each of the other codes, standards, policies and procedures of the Company and all applicable laws, regulations and rules that apply to the Company's business affairs, including all host country laws and regulations, and the requirements of the exchanges on which the Company's shares are listed.
- The Company's employees, officers and directors must maintain loyalty to the Company and avoid any situations that create or appear to create a conflict of interest between his or her personal interests and the interests of the Company. Persons other than directors and executive officers who have questions about a potential conflict of interest should discuss the matter with, and seek a determination and prior authorization or approval from, their supervisor or a member of the Compliance Committee. Directors and executive officers must disclose to the Board any transaction or relationship that reasonably could be expected to give rise to such a conflict.
- Each director, officer and employee of the Company who contributes in any way to the preparation or verification of the Company's financial statements and other financial information must ensure that the Company's books, records and accounts are accurately maintained, and each director, officer and employee must cooperate fully with the Company's accounting and internal audit departments (if any), as well as the Company's independent public accountants and counsel. Each director,

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officer and employee who is involved in the Company's disclosure process must take all necessary steps for the Company to provide full, fair, accurate, timely and understandable disclosure in compliance with all applicable laws and regulations in all reports of the Company filed with or submitted to applicable securities regulators and stock exchanges and in other public communications. Each director, officer and officer must comply with all standards, policies and procedures of the Company designed to promote compliance with the Company's disclosure policy and refrain from knowingly misrepresenting, omitting or causing others to misrepresent or omit any material information in any reports or communications.

- We succeed as a business by building trust and confidence with our colleagues and customers. We earn trust and confidence by keeping our promises and acting with honesty and integrity. We begin this process internally by insisting that we treat one another with respect. This goes beyond our duties as an equal employment/affirmative action employer, whereby we must maintain a workplace completely without discrimination and/or abusive, offensive or harassing conduct. Any employee who experiences harassment or discrimination should report the matter to his or her direct supervisor, Human Resources and/or to the Chief Legal Officer.
- Our cultural values dictate that any employee be able to freely voice any concern about work-related matters without fear of reprisal. Supervisors are to establish and maintain an atmosphere conducive to open and honest communication. If questionable or unethical behavior is communicated, the Company is committed to a thorough and comprehensive investigation and to taking all appropriate actions in connection therewith. Retaliation against a co-worker who has reported alleged wrongdoing is unacceptable and subject to discipline.
- Our Code requires that the Company hold our leaders to the same or higher standards as any other employees. We therefore expect their conduct to reflect their belief in and willingness to abide by this Code, and for each of our leaders to lead by example. If they fail to do so they will be subject to the same discipline as any other employee. Our Code is only effective as long as supervisors follow applicable policies and procedures to facilitate the resolution of any ethical questions or concerns brought to their attention. Therefore, reports raising any

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such questions or concerns should not be viewed as anything other than a valid form of workplace communication and welcomed as such.

- An important element of our cultural value of entrepreneurial spirit is principled competition. We provide and price our services based solely on factors deemed fair and reasonable given applicable market conditions, and we will not engage in any collusion, conspiracy or any other inappropriate/illicit practices with regards to pricing, nor will we offer or solicit unlawful payments or benefits in return for the purchase or sales of our services.
- We will respect other parties' intellectual property and we will not try to obtain any other party's trade secrets or other proprietary or confidential information. Similarly, we will safeguard our own confidential information concerning our business practices, strategies, financial status, operational results or similar information.
- In our business world, professional courtesies and gifts (including those in the form of meals and entertainment) are from time to time extended or received by Company employees. Such courtesies or gifts should not be expected and requesting them is forbidden. There is no prohibition against the occasional acceptance or provision of unsolicited professional courtesies or gifts, but Company employees should politely decline any professional courtesy or gift that could damage the Company's reputation. Similarly, when offering a courtesy or gift, a Company employee should ask him/herself, "If I was the recipient, would I feel uncomfortable accepting this courtesy or gift." If the answer is yes, then the offer should not be made. Further, the acceptance of any such courtesy should not cause the recipient to feel uncomfortable about disclosing it to his or her supervisor. Finally, the acceptance or extension of a courtesy or gift must not violate or appear to violate any applicable laws, rules, regulations or standards of conduct to which the Company is bound. Questions about the acceptance or offering of any business courtesies should be directed to your direct supervisor, manager or to the Human Resources department.
- We accurately create, retain and dispose of our official documents as part of our normal course of business in accordance with applicable company policies and procedures; and in compliance with all regulatory and legal requirements. All

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Company records must be factual, exact and absolute to the best of our ability, and kept in accordance with relevant internal and external accounting and other practices.

- Because maintenance of high standards of ethics and business conduct is crucial to the Company's success, compliance with this Code is mandatory. Our Compliance Committee is tasked with ensuring that all employees are aware of, understand and abide by this Code. Supervisors are also tasked with ensuring that their subordinates abide by the principles set forth in this Code. For this Code to be effective, employees must report any violations or suspected violations of this Code to the attention of the Compliance Committee or otherwise in accordance with the Company's Whistle Blower Policy. The Whistle Blower Policy does not encourage anonymous reporting for the reasons set forth therein, but if an employee desires to report anonymously they can do so by calling the hotline number 703-787-3400. Violations of the Code are cause for disciplinary action up to and including termination of employment.

We ask that each and every employee familiarize him/herself with this Code and act accordingly. Ask questions if you are unsure of Company policy. Contact the Compliance Committee if you have any concerns about compliance with or violations of this Code. The values and principles included herein reflect our cultural values and are part of who we are as a Company. Any violations of this Code may result in disciplinary action up to and including immediate termination. Violations of this Code may also constitute violations of law and may result in civil and criminal penalties for you and/or the Company.