

CONCRETE PUMPING HOLDINGS, INC.

WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Adopted on: January 28, 2019

Concrete Pumping Holdings, Inc. (together with its subsidiaries and affiliates, the “*Company*”), is committed to the highest possible standards of ethical, moral and legal business conduct. In line with this commitment and the Company’s commitment to open communication, this Whistleblower and Anti-Retaliation Policy (this “*Policy*”) applies to and provides an avenue for employees, officers, directors, advisors, contractors, customers and vendors of the Company (“Whistleblowers”) to raise concerns while being protected from reprisals or retaliation for whistleblowing in good faith. A whistleblower is a person who raises a concern about wrongdoing occurring in an organization or body of people.

1. Purpose

The purpose of this Policy is to provide an avenue for Whistleblowers to raise concerns about alleged or potential wrongdoings within the Company while being protected from reprisals or retaliation for whistleblowing in good faith. Usually, a whistleblower works within the organization about which he or she is concerned. The alleged or potential misconduct may be classified in several ways. The most common allegations relate to fraud, ethics violations, safety issues or serious concerns about human resource matters, such as interactions between employees. Whistleblowers may make their allegations internally (for example, to other people within the Company), through the Whistleblower hotline established by the Company, or externally to regulators or law enforcement agencies.

2. Scope

This Policy is intended to cover serious concerns that could have a significant impact on the Company, such as actions that:

- may lead to incorrect financial reporting;
- are unlawful;
- are not in line with Company policy, including the Ethics Policy or other similar code of business conduct and ethics policies and guidelines; or
- otherwise amount to serious improper conduct.

Examples of reportable conduct include, but are not limited to, the following:

- all forms of financial malpractices or impropriety such as fraud, corruption, bribery or theft;
- actions detrimental to health and safety or the environment;
- any form of criminal activity;
- improper conduct or unethical behavior that undermines universal and core ethical values such as integrity, respect, honesty, accountability, fairness etc.;
- failure to comply with regulatory directives, administrative or internal policy framework;
- failure to comply with legal obligations or statutes;
- other forms of corporate governance breaches;
- improper-related party transactions;
- insider abuse;
- non-disclosure of interest;
- sexual or physical abuse of any staff, customer, applicant, service provider and other relevant stakeholders;
- serious and/or intentional accounting irregularities;
- conduct translating to gross waste; and
- attempts to conceal any of the foregoing activities.

Concerns regarding regular business matters that do not require anonymity should be directed to the employee's supervisor and are not addressed by this Policy. Employment-related concerns should be reported through normal channels to the employee's supervisor or to a Human Resources representative.

3. Categories of Whistleblowers

There are two categories of whistleblowers:

- Internal whistleblowers – employees, officers and directors of the Company who report alleged incidents of misconduct involving other employees, officers and directors; and
- External whistleblowers - customers, suppliers, service providers and other members of the public who report alleged Company wrongdoing by employees of the Company.

The reporting procedures outlined below apply to internal whistleblowers (and may be used for external whistleblowers, as well).

4. Reporting Procedures

The whistleblowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct should be reported. The following should be considered and/or included when making a complaint:

- timing: express concerns early; and
- seriousness of the concern: demonstrate to the person contacted that there are sufficient grounds for further inquiry; and
- specificity: be prepared to describe the allegation in detail (parties involved, timeline, location).

Complaints may be submitted in one of the following ways:

a. Reports Made in Person. Reports may be made in person, by telephone or in writing (including e-mail). Generally, an employee should report prohibited conduct to his or her supervisor. If the complainant is a member of the Board of Directors (a “**Director**”), such complaint may be reported to the Chairperson of the Board of Directors of the Company (the “**Board of Directors**”).

b. Alternate Reporting

If an employee is uncomfortable, unsatisfied, or unable to report the prohibited conduct to his or supervisor for any reason (e.g., the prohibited conduct involves the supervisor), the employee should report the prohibited conduct via:

- Online website: www.lighthouse-services.com/concretepumpingholdings
- Toll free hotline phone number:
 - United States English: **833-700-0032**
 - United States Spanish: **800-216-1288**
 - United Kingdom English:
 1. Enter the Access Code for the telephone system you are calling from: **British Telecom 0800 890011** or **C&W 0500 890011**
 2. You will then hear a 'bong' and an English-language voice prompt will ask for the number you are calling, enter toll-free number: **800-603-2869**. (There is no need to dial "1" before the toll-free number.)
- Email: reports@lighthouse-services.com (must include company name with report)
- Fax: **215-689-3885** (must include company name with report)

Whistleblowers have the option to (1) identify themselves or (2) reporting can be done anonymously. Employees are encouraged to identify themselves when reporting misconduct under this policy, as anonymous reporting is difficult to investigate. Management will make every effort to protect the complainant’s identity and maintain discretion and confidentiality of complaints submitted. However, your identity may become known during the course of the investigation.

Concerns expressed anonymously will be investigated, with consideration given to:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

4. Follow-Up and Investigation

The action taken will depend on the nature of the complaint. When a complaint is expressed through the Alternate Reporting method, a report is sent to the member of the committee (the “Committee”) based on the report type. Complaints will be classified as either Human Resources, Safety, Compliance / Legal or Fraud / Accounting. For example, any Human Resources related complaints are addressed by one Committee member while Safety related complaints are addressed by a different Committee member. Complaints involving a Committee member are not sent to the Committee member and instead are routed to the Chief Financial Officer (the CFO”) (or the Chairperson of the Audit Committee of the Board of Directors (the “Chairperson”) if a complaint involves the CFO). All Fraud-related complaints under this Policy are also provided directly to the Chairperson.

All complaints are received by an Internal Audit representative (or CFO if the complaint involves Internal Audit) to monitor independence of the Committee and confirm complaints are adequately considered. Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take, if necessary. Some concerns may be resolved by agreed action without the need for investigation.

Upon receipt of a claim the complainant will receive an acknowledgement of receipt and that their concerns will be addressed in the most expeditious manner possible. The amount of contact between the complainant and the person investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the complainant remains accessible for follow-up. Further information may be sought from the complainant. Subject to legal constraints, the complainant will receive information about the outcome of any investigations.

Management will determine, in consultation, as needed, with the General Counsel or independent, outside legal counsel to the Company, the proper method of investigation of the complaint, including whether the complaint can be investigated internally.

As an additional measure to support our commitment to ethical conduct, the Audit Committee has adopted and approved the following policies and procedures for (a) the receipt, retention, and treatment of complaints received by the Company regarding accounting, internal controls, financial reporting or auditing matters and (b) the confidential, anonymous submission by employees of concerns regarding questionable accounting, financial reporting or auditing matters.

5. Anti-Retaliation

Any individual who, in good faith, reports a possible violation or complaint under this Policy, even if the report is mistaken, or who assists in the investigation of a reported violation, will be protected by the Company. Retaliation in any form against these individuals will not be tolerated. Any act of retaliation should be reported immediately and will be disciplined appropriately.

Specifically, the Company will not discharge, demote, suspend, threaten, harass, or in any other manner discriminate or retaliate against any employee in the terms and conditions of the employee's employment because of any lawful act done by that employee to either (a) provide information, cause information to be provided or otherwise assist in any investigation regarding any conduct that the employee reasonably believes constitutes a violation of any provision of the Ethics Policy, law, rule, or regulation, including any rule or regulation of the Securities and Exchange Commission or any provision of federal, state or local law relating to fraud against shareholders or (b) file, cause to be filed, testify, participate in, or otherwise assist in a proceeding filed or, to the employee's knowledge, about to be filed relating to an alleged violation of any such law, rule or regulation.