

EDF Third-Party Code of Conduct

The Environmental Defense Fund, Inc., on behalf of its subsidiaries, affiliates and other partner organizations operating globally (collectively, “EDF”), seeks to do business with Third Parties that comply with good ethical business practices including, without limitation, the United Nations Guiding Principles on Business and Human Rights, and the laws of the United States and the countries in which EDF and its partner organizations engage in promoting EDF’s mission. To advance that objective, EDF seeks to have all suppliers, contractors, subcontractors (collectively, “Third Parties”), agree and abide by this Third-Party Code of Conduct and requires all Third Parties to commit to collaborating with EDF to assess their current practices, identify opportunity for improvement, and where applicable plan to implement identified areas of improvement.

If any Third Party has concerns that violations of this Code may occur or are occurring in connection with EDF programs or operations, they should contact EDF via email to Ethics@edf.org or the EDF Helpline at <https://secure.ethicspoint.com/domain/media/en/gui/53082/index.html>.

SUSTAINABILITY

Third Parties shall implement responsible measures to mitigate their impacts on the environment and their community, including: integrating sustainability principles into business decisions and operations, reducing the emission of greenhouse gasses, reducing waste, increasing energy efficiency, adopting cleaner production and pollution prevention measures and sustainably designing, developing, obtaining, and manufacturing products, materials and technologies.

INTEGRITY AND TRANSPARENCY IN OUR BUSINESS ACTIVITIES

ANTI-FRAUD: Fraud is the deliberate practice of deception in order to attain a financial or other benefit. The term is used to describe a whole range of activities such as forgery, theft, false representation, embezzlement, concealment or omission of material facts, and collusion. Third Parties shall not engage in any form of fraud and should use reasonable controls and procedures to prevent fraud on its contracts with EDF.

ANTI-BRIBERY AND FAIR COMPETITION: Third Parties shall not offer bribes (i.e., anything of value meant to gain or retain business) to any public official or private person (including to EDF) and shall not accept any bribes. Third Parties shall not use intermediaries, such as agents, advisers, distributors, or any other business partners, to commit or benefit from any acts of bribery.

CONTROLS AGAINST MONEY LAUNDERING AND TERRORIST FINANCING: Third Parties shall use controls and procedures to prevent engaging in or dealing with parties engaged in money laundering, the financing of terrorist activities, or other socially harmful activities defined by local law.

TRADE SANCTIONS AND EXPORT CONTROLS: Third Parties shall identify and comply with applicable trade sanctions and export control laws, including but not limited to US and EU trade

sanctions laws, and shall not engage with persons or companies that have been placed by governments on sanctioned party lists.

RECORDKEEPING: As a non-profit and non-governmental organization, EDF is required to maintain and produce financial and other records of its operation and engagements with third parties. To help EDF meet its obligations, Third Parties shall maintain accurate financial books and business records in accordance with all such requirements applicable to its work for or on behalf of EDF.

SOCIAL SAFEGUARDS

HUMAN RIGHTS: EDF requires its Third Parties to adhere to internationally recognized human rights such as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

NONDISCRIMINATION: Third Parties shall strive to provide a workplace free of discrimination based on reasons such as race, national or ethnic minority status, national origin, color, age, sex, sexual orientation, gender, gender identity or expression, social origin, disability, religion, political affiliation, union membership, pregnancy, marital status, or any other protected category as defined by local laws.

VIOLENCE AND WEAPONS BAN: EDF is committed to providing a violence-free environment for its workplace and on all the projects for which it is responsible. As such, Third Parties must not tolerate any form of workplace violence, including verbal and nonverbal threats or destruction of property, and must prohibit the possession or use of dangerous weapons on EDF property or while engaged in any way on any EDF project except for purposes of security agreed in advance with EDF.

HUMAN RESOURCES

FAIR TREATMENT: Third Parties shall provide a workplace free of threat of harsh and inhumane treatment, including any physical, sexual, verbal harassment or abuse.

LABOR RIGHTS, FAIR EMPLOYMENT PRACTICES, AND CHILD LABOR: Third Parties shall uphold human rights for workers, as set out in the Universal Declaration of Human Rights, including: not using forced labor or bonded, indentured servants, or involuntary prison labor, and not engaging in any form of human trafficking. Third Parties shall not use child labor and shall employ persons under the age of 18 only in non-hazardous work or when young workers are above the relevant country's legal age for employment and the age established for completing compulsory education.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING: Third Parties shall recognize and respect the right of employees' freedom of association and collective bargaining. Employers must develop and implement mechanisms to resolve industrial disputes, including employee grievances, and to ensure effective communication with employees. Where local laws restrict formal trade unions, workers shall be able to form worker committees or other similar groups to facilitate communication by workers, if they so choose.

HEALTH AND SAFETY: Third Parties shall provide their workers with an appropriately safe and healthful working environment with standards to help prevent accidents and injury and, if applicable, safe and healthy company living quarters. Additionally, Third Parties shall implement a non-retaliation policy, procedures, and reporting channels that enable workers to express their concerns about workplace conditions directly to management and to other parties anonymously and safely without fear of retribution, retaliation or any other adverse action.

WAGES AND BENEFITS AND WORKING HOURS: Third Parties shall pay workers according to applicable wage laws, including any applicable minimum wages, social security, tax or comparable withholdings that may be required by local law, overtime hours and mandated benefits, and shall strive to pay a level of compensation that meets workers' basic needs and provides some discretionary income, and is equitable among workers performing similar jobs. Third Parties shall communicate in a timely manner with workers regarding the basis upon which they will be paid. Third Parties are also expected to communicate with the worker whether overtime is required and the wages to be paid for such overtime.