

Walbridge Supplier Code of Conduct

At Walbridge, we recognize the critical role our suppliers play in building a sustainable future. We believe in fostering strong, collaborative relationships with our suppliers built on mutual trust, respect, and supply chain transparency. This Supplier Code of Conduct (“Code”) establishes the expectations we have for our partners to ensure a safe, ethical, and high-quality construction experience.

Walbridge strives for open communication. Should any concerns arise regarding adherence to this Code, we are committed to working collaboratively to find a solution. However, repeated or unresolved breaches may necessitate a reevaluation of our business relationship.

Commitment to Continuous Improvement

Walbridge is committed to continuous improvement in all aspects of our operations, including our supply chain. We encourage our suppliers to share this commitment and actively seek ways to improve their labor practices, environmental performance, and ethical conduct.

Training and Supply Chain Optimization

Walbridge believes in the importance of training and supply chain optimization to achieve a sustainable and ethical supply chain. We are committed to providing resources and opportunities for our suppliers to enhance their knowledge and capabilities in areas such as:

- Responsible sourcing practices
- Sustainable construction methods
- Worker safety and health
- Business ethics and anti-corruption

Our Expectations 1. Labor Practices and Standards

At Walbridge, we are dedicated to creating a safe and respectful work environment for all individuals involved in our construction projects. This commitment extends to our supplier network. We expect our suppliers to uphold the highest standards of labor practices, including:

- Compliance with all applicable labor laws and regulations: This includes laws governing minimum wage, overtime pay, working hours, and holidays.
- Respect for worker rights: We believe in the right to fair treatment, freedom from discrimination, and the ability to join or form a labor union.
- Providing a safe and healthy work environment: This includes implementing proper safety protocols, providing essential personal protective equipment (PPE), and offering training on hazard prevention.
- Eradicating all forms of forced or child labor and human trafficking: Our supply chain must be free from exploitation.

- Ensuring fair compensation and benefits: Workers deserve fair wages and benefits that meet their basic needs and contribute to their well-being.

2. Environmental and sustainability issues

Being dedicated to building a sustainable future, Walbridge expects our suppliers to share this commitment and integrate environmentally responsible practices into their operations. Here are some key principles we expect you to uphold:

- Sustainable sourcing of materials: We encourage the use of recycled or sustainably harvested materials whenever possible.
- Resource conservation and waste reduction: Implement practices to minimize waste generation and promote resource efficiency throughout your operations.
- Energy efficiency: We encourage the use of energy-efficient technologies and practices to reduce your environmental footprint.
- Compliance with environmental regulations: Operate in accordance with all applicable environmental laws and regulations.
- Pollution prevention: Implement measures to minimize air, water, and soil pollution associated with your activities.

3. Ethics and anti-corruption

Walbridge operates with the highest ethical standards. We expect the same from our suppliers. Here are some key principles that guide our conduct and that we expect you to uphold as well:

- Zero tolerance for fraud: We strictly prohibit any form of fraudulent activities, including but not limited to bribery, kickbacks, or deceptive practices to gain an unfair advantage.
- Fair business practices and competition: We believe in fair competition and ethical business practices. All business dealings should be transparent and conducted with integrity.
- Transparency and accurate record-keeping: Maintain accurate and transparent financial records. We expect all business transactions to be documented truthfully.
- Responsible sourcing of minerals (if applicable): If your business involves sourcing minerals from conflict-affected regions, you must comply with relevant conflict minerals legislation.

4. Data security and privacy

In today's digital age, protecting sensitive information is crucial. Walbridge takes data security and privacy very seriously and expects our suppliers to do the same. Here are some key principles to keep in mind:

- Safeguarding confidential information: Any data or information shared with us, such as project details, employee records, or trade secrets, must be treated with the utmost confidentiality. Implement appropriate security measures to protect this information from unauthorized access, disclosure, or misuse.
- Data protection protocols: Establish clear data protection protocols that outline how you collect, store, and use personal data. Comply with all relevant data privacy regulations.

- Limited data access: Restrict access to confidential information on a need-to-know basis. Employees handling sensitive data should receive proper training in data security best practices.

5. Diversity and inclusion

At Walbridge, we value diversity and believe in creating a workplace environment that is welcoming and respectful for all. We expect our suppliers to share this commitment and foster similar practices within their own organizations. Here are some key principles to consider:

- Commitment to diversity in the workplace: Actively promote diversity in your workforce by creating a culture of inclusion and equal opportunity for all, regardless of race, ethnicity, gender, sexual orientation, religion, age, or disability.
- Fair and inclusive business practices: Conduct your business dealings in a fair and inclusive manner, ensuring opportunities for diverse suppliers and subcontractors to participate in your projects.

Reporting Concerns

If you suspect a violation of law, this Supplier Code of Conduct, or have any questions about its interpretation, you can report your concerns confidentially through the following channels:

- Online option: <http://walbridge.ethicspoint.com/>
- Phone: 866.418.4026
- Email: ethics@walbridge.com

Walbridge is committed to maintaining the confidentiality of your reports. Your identity will be protected, except in limited legal circumstances. We have a zero-tolerance policy for retaliation against anyone who raises such concerns in good faith. To ensure the effectiveness of this Code, we will be conducting periodic monitoring activities to assess compliance.

By working together, we can ensure a safe, ethical, and sustainable work environment throughout our entire supply chain. We encourage you to familiarize yourself with this Code and integrate its principles into your own business practices.