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# Supplier Code of Conduct





# The ContourGlobal Commitment

*ContourGlobal generates electricity around the world and wherever we work, we do so according to the highest ethical standards. We support the United Nations Global Compact principles and our procurement policy requires that our suppliers embrace our commitment to these principles. Our Supplier Code of Conduct (the “Supplier Code”) is based on the ContourGlobal Code of Conduct and Business Ethics and the ContourGlobal Anti-Corruption Compliance Guide. The Supplier Code is incorporated into our contracts with suppliers and our suppliers are responsible for ensuring the compliance of any subcontractors with our Supplier Code.*

# Supplier Code of Conduct

## ETHICS & TRANSPARENCY

**BRIBERY AND CORRUPTION** Suppliers will comply with all applicable anti-bribery laws and with ContourGlobal's anti-corruption policies. Suppliers will not engage in any form of bribery or offer any improper incentives, including money or anything of value, to ContourGlobal employees, government officials, or any other person in connection with the supplier's business with ContourGlobal in order to obtain or retain business with ContourGlobal.

**GIFTS AND HOSPITALITY** Bribery and corruption may involve providing hospitality, accommodations, travel, meals, or gifts with corrupt intent or under circumstances where corrupt intent may be inferred. Suppliers may not provide any corporate hospitality or any other items of value to any government official or employee in an attempt to influence official action, i.e., with corrupt intent, in connection with the supplier's business with ContourGlobal. Any gift, travel, meal, hospitality, entertainment, or accommodation must comply with the ContourGlobal Anti-Corruption Guide and Code of Conduct.

## HUMAN RIGHTS & LABOR

**CHILD LABOR** Suppliers will comply with all applicable child labor laws and only employ workers who meet the applicable minimum legal age requirement in the country. Suppliers will document verification of workers' ages and implement procedures for immediate remediation upon discovery of child labor, including any required reporting to relevant authorities.

**FORCED AND COMPULSORY LABOR** Suppliers will not use any form of forced, involuntary, bonded or indentured labor in any part of their operations or within their supply chain. Suppliers must ensure that (i) any and all overtime is voluntary and tracked to ensure adequate rest periods, (ii) workers freely enter employment terms and conditions with right to terminate without penalty, (iii) no fees or payment are required from workers to obtain employment, (iv) workers' identification and personal documents are not withheld, destroyed or made inaccessible for any reason with safe storage provided for personal documents if workers are required to travel between job sites, and (v) all workers have the unrestricted right to leave any work site or are free to return to their home country at any time.

**WAGES AND HOURS** Suppliers will comply with all applicable working time laws and pay overtime when required under law. Additionally, suppliers will comply with all applicable laws on wages and benefits. If contracts of employment are used, suppliers must ensure that the rights of its workers are clearly specified (e.g. wages, hours worked, benefits), and details of working conditions, with changes to such working conditions made with workers' voluntary consent and without threat, penalty or coercion.

**FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING** Suppliers will respect employees' lawful right of free association, as well as their lawful right to join, form or not to join a labor union or

otherwise engage in collective bargaining without retaliation.

**DISCRIMINATION AND HARASSMENT** Suppliers will not discriminate with respect to any condition of employment on the basis of race, color, national origin, sex, religion, age disability, HIV/AIDS status, trade union membership, sexual orientation or any particular characteristic unrelated to job performance and will comply with all applicable employment discrimination laws. Additionally, suppliers will maintain and enforce policies against harassment, any type of violence or any form of abusive conduct.

**GRIEVANCE PROCEDURES** Suppliers must implement and maintain an effective grievance mechanism to ensure that workers have a safe, accessible and confidential way to raise concerns. This mechanism must be clearly communicated to all workers in their native language and must be available without fear of retaliation.

## HEALTH, SAFETY & ENVIRONMENTAL

**RESPECT THE ENVIRONMENT** Suppliers will comply with all applicable environmental laws and ContourGlobal's environmental policies. Further, suppliers shall implement environmental management systems to monitor and reduce their environmental impacts throughout their operations.

**PROTECT HEALTH AND SAFETY** Suppliers will provide a safe and healthy workplace for their employees and comply with all applicable health and safety laws and ContourGlobal's health and safety policies, including but not limited to, conducting workplace assessments to identify hazards, providing appropriate personal protective equipment (PPE), and providing appropriate training with right to stop work if conditions are unsafe.

## LEGAL REQUIREMENTS & COMPLIANCE

**COMPLIANCE** Suppliers will comply with all applicable laws in the provision of products or services to ContourGlobal, including but not limited to laws designed to prevent bribery, extortion, unfair trade practices and money laundering. Additionally, suppliers are expected to implement and maintain appropriate systems and controls sufficient to promote compliance with applicable laws and the principles in this Supplier Code, including policies, training, monitoring and auditing. All workers should receive training in their native language, upon hire and throughout the term of employment.

**CONFLICTS OF INTEREST** Suppliers will avoid any interaction with ContourGlobal employees that may conflict, or appear to conflict, with that employee's exercise of independent judgment in the best interests of ContourGlobal. This includes offering payments, gifts, entertainment, or other things of value (including employment opportunities) to ContourGlobal employees when to do so either would or would appear to interfere with that employee's duty of

loyalty or other obligations to ContourGlobal.

**FAIR COMPETITION** Suppliers will comply with fair competition and any anti-monopoly laws.

**ACCURATE ACCOUNTING AND BUSINESS RECORDS** Suppliers will keep accurate records of all matters related to the supplier's business with ContourGlobal, and with any sub-contractors working on ContourGlobal matters, and provide such records upon request.

**CONFIDENTIALITY OF INFORMATION** Suppliers may only use ContourGlobal's confidential information for authorized purposes and those necessary to discharge their contractual performance. Suppliers will protect ContourGlobal's confidential information and prevent its misuse, theft, fraud or improper disclosure. Suppliers will also safeguard sensitive or confidential information related to ContourGlobal that could impact ContourGlobal or its employees.

## IMPORTANT INFORMATION

If you have any questions about the Supplier Code, please contact [compliance@contourglobal.com](mailto:compliance@contourglobal.com). If you are aware of any potential or actual violations of the requirements set forth in this Supplier Code, please contact our Compliance team and/or General Counsel.

If you wish to remain anonymous (as applicable, pursuant to local laws) or report to a third party, ContourGlobal offers a 24/7 multi-lingual Compliance Hotline service operated by an independent company:

- Call toll-free within the U.S.: 1-877-841-1376,
- Outside the U.S., follow these dialing instructions:
  - From an outside line, dial the OneConnect number for your location. The call will be answered in English but will provide a prompt to state your language and request an interpreter. It may take 1 to 3 minutes for an interpreter. During this time, please do not hang up.
  - Due to the unreliability of local in-country telephone lines, the following countries can only report online: Armenia, Bulgaria, Chile, Colombia, France, Luxembourg, Netherlands Antilles (Bonaire), Rwanda, Senegal, Slovakia, Togo, U.K. + Northern Ireland.

COUNTRY	ONE CONNECT NUMBER
Armenia	Web Only
Austria	0800 250043
Bulgaria	Web Only
Chile	Web Only
Colombia	Web Only
France	Web Only
Italy	800 932 495
Luxembourg	Web Only
Mexico	800 099 0386
Netherlands	
Antilles (Bonaire)	Web Only
Nigeria	20 1 227 9085
Peru	(0800) 74724
Romania	0800 890 701
Senegal	Web Only
Slovak Republic	Web Only
Spain	900 752 147
Trinidad&Tobago	0 800 99 0011
United Kingdom/ Ireland	Web Only

Alternatively, you can also communicate your concerns through the confidential website: [www.contourglobeethicsline.com](http://www.contourglobeethicsline.com).

Please note that no adverse action will be taken against you for reporting information you have a good faith basis for believing may be a potential or actual violation of the Company's policies or the law (a report made in "good faith"). If you believe that anyone has taken adverse action or retaliated against you for a good faith report, you should immediately inform our General Counsel and/or Compliance team.

**If a supplier violates the ContourGlobal Supplier Code of Conduct, ContourGlobal will require that the supplier implement a documented corrective action plan to cure the noncompliance within a specified period of time. If the supplier fails to remedy its violation within the specified timeframe, ContourGlobal may terminate the business relationship.**

### AGREEMENT TO TERMS OF THE SUPPLIER CODE OF CONDUCT

\_\_\_\_\_  
SUPPLIER NAME

\_\_\_\_\_  
DATE

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
POSITION

**WE SUPPORT**

