GroundWork Renewables Supplier Code of Conduct

Version 2.1 · Effective November 5, 2026 · Next review November 2027
Compliance Owner: Ali Seidel, ESG Manager · Executive Sponsor: Cameron Hunter, EVP Corporate Development
Locations: Sand City, CA (HQ); Burbank, CA; Salt Lake City, UT; Albuquerque, NM (the Lab and a storage warehouse); and remote employees in the US, Mexico, and Canada

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GroundWork Renewables, Inc. expects its suppliers to meet the same standards of integrity it holds itself to. This Code sets out those standards for business ethics, labor and human rights, health and safety, the environment, and product quality.

Version 2.0 (September 2026) reorganized the Supplier Code of Conduct published in March 2023 without changing its requirements, and added the GroundWork Ethics Complaint Form and Human Resources as reporting channels in Section 12. Version 2.1 adds requirements on international standards, human trafficking, competition law, environmental law and precaution, protection for supplier workers who report concerns, and steps for breaches. It also raises the minimum working age from 15 to 16 and prohibits hazardous work for workers under 18. Version 2.1 also adds requirements on subcontractors, inspections, anti-corruption law, recruitment practices, conflict minerals, and security.

1. Scope

This Code applies to every company that supplies goods or services to GroundWork, including manufacturers, distributors, contractors, and service providers. It covers their employees, agents, and subcontractors whenever they work on GroundWork business. Suppliers make sure their subcontractors working on GroundWork business agree to and follow this Code. Following this Code is a condition of doing business with GroundWork.

This Code is based on the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Global Compact, and the OECD Guidelines for Multinational Enterprises.

2. Compliance with law and this Code

Suppliers comply with this Code and with all laws and regulations that apply in the countries where their workers are employed, at the federal, state or provincial, and local level. GroundWork may review, audit, or inspect a supplier's compliance with this Code, directly or through a third party, including site visits, which may be unannounced, and review of relevant records. Where this Code sets a higher standard than local law, suppliers follow this Code, as long as doing so does not break the law. Suppliers keep the records needed to show they follow this Code and share them with GroundWork on request.

If a supplier does not meet this Code, we will ask for a corrective action plan. We may stop placing orders or end the relationship if the supplier does not fix the problem or commits a serious breach. GroundWork keeps a record of each confirmed breach and the corrective action taken.

Over time, GroundWork will work with its suppliers to find where we can do more together on working conditions, environmental impact, and support for the communities we operate in.

3. Business ethics and anti-corruption

Suppliers conduct business fairly, lawfully, and honestly. They keep controls in place to prevent and detect corruption, bribery, extortion, embezzlement, improper gifts, and misuse of company assets, and to avoid conflicts of interest, including the appearance of one. They comply with competition laws. Their books and records accurately reflect their business dealings. Suppliers comply with the U.S. Foreign Corrupt Practices Act and all other anti-corruption laws that apply to them.

Any business courtesy a supplier extends to a GroundWork employee is infrequent and of no more than moderate value. Under GroundWork's Code of Ethics, our employees do not accept cash or cash equivalents such as gift cards. Suppliers report to GroundWork right away if a GroundWork employee asks them for a bribe, gift, or favor, and report any conflict of interest they become aware of.

4. Labor and human rights

Suppliers respect the rights and dignity of everyone who works for them. At a minimum:

- **Forced labor.** No use of forced labor or human trafficking in any form, including prison, indentured, or bonded labor. Suppliers do not hold workers' identity documents, charge workers recruitment fees, or mislead workers about the terms of their work.
- **Child labor.** Workers are at least 16 years old or the applicable minimum legal age, whichever is higher. Workers under 18 do not do hazardous work, meaning work likely to harm their health, safety, or development, including night work (ILO Conventions No. 138 and No. 182). Suppliers follow all child labor laws, including those on hiring, wages, hours worked, overtime, and working conditions. They encourage and allow eligible workers, especially younger workers, to attend night classes and take part in work-study and other government-sponsored education programs.
- **Harassment and abuse.** Every worker is treated with respect and dignity. No one is subject to physical, sexual, psychological, or verbal harassment or abuse.
- **Discrimination.** No one faces discrimination in hiring, pay, benefits, advancement, discipline, termination, or retirement based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.
- **Freedom of association.** Workers are free to join organizations of their own choosing. Suppliers recognize and respect their right to freedom of association and collective bargaining.
- **Employment relationship.** Suppliers adopt and follow terms of employment that respect workers and, at a minimum, protect their rights under national and international labor and social security law.

5. Wages, hours, and training

- **Wages and benefits.** Suppliers meet every legal requirement on wages and benefits, pay accurate wages on time, and never use wage deductions as discipline. Pay equals or exceeds the minimum wage or the prevailing wage, whichever is higher, and includes any benefits required by law or contract.
- **Overtime.** Overtime is paid at the rate the law requires in the country of manufacture. Where no such law exists, it is paid above the regular hourly rate.
- **Hours of work.** The regular work week does not exceed 48 hours or the legal maximum, whichever is less. Regular and overtime hours together do not exceed 60 hours a week or the

legal maximum, whichever is less (ILO Convention No. 1). Workers get at least 24 consecutive hours of rest in every seven-day period. Overtime is voluntary and is not requested on a regular basis.

- **Training.** Suppliers periodically train all employees on business ethics and compliance, environmental health and safety, and the professional skills their work requires.

6. Health and safety

Suppliers provide a safe, hygienic, and healthy workplace, covering physical and psychosocial health. They give employees, sub-suppliers, and contractors the health and safety information, training, and protective equipment their work requires. Workers have a way to report health and safety incidents and near misses. When an incident happens, the supplier puts a corrective action plan in place to reduce the risk, provides any necessary medical treatment, and supports the worker's return to work.

Suppliers identify and plan for potential emergencies. Their emergency plans cover reporting, worker notification and evacuation, drills, fire detection and suppression equipment, exits, and recovery, and workers are given guidance on these procedures.

7. Environment

Suppliers comply with all environmental laws and permits that apply to them and take a precautionary approach to environmental risks. GroundWork looks for suppliers committed to environmental responsibility. We may ask suppliers about their own environmental practices, such as waste reduction, the environmental certifications they hold, and the materials they use to make their products.

8. Traceability

GroundWork and its suppliers share responsibility for the social and environmental integrity of our products and the claims made about them, through to finished goods at the factory level. That depends on transparency at every level of the supply chain. Suppliers map, track, and monitor all locations at every tier of their supply chain, and on request give GroundWork information on the owned and subcontracted factories and other sites involved in making our products. Suppliers of products containing tin, tantalum, tungsten, or gold take reasonable steps to make sure these minerals do not finance armed groups, following the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and share sourcing information on request. Where relevant, suppliers keep adequate security at their production and warehouse facilities, have written security procedures, and follow supply chain security procedures that prevent undeclared cargo from being added to outbound shipments.

9. Product quality

Suppliers that manufacture for GroundWork keep a documented quality system and quality improvement plan. The system includes in-process and final audits of finished goods, packaging, and printing that meet GroundWork's quality standards. A trained QA staff member provided by the factory performs these audits, with the independence and support needed to report objectively on every shipment. GroundWork monitors compliance with its quality requirements.

10. Community and animal welfare

GroundWork encourages suppliers and their employees to support local social and environmental charity efforts, by volunteering time or in other ways. We look for long-term partnerships with suppliers that hold philanthropic values.

Suppliers respect animal welfare and work progressively toward healthy and humane practices, based on the best available technology and standards.

11. Communicating this Code

GroundWork's procurement team sends this Code to suppliers with each purchase order. Accepting a GroundWork purchase order confirms the supplier has received this Code and agrees to follow it. We urge suppliers to post this Code where all employees will see it, in the languages their employees, supervisors, and managers speak, and to train current and new employees on it every year, with records of that training. This Code applies alongside any agreement between GroundWork and a supplier; if the two conflict, the agreement controls. If this Code conflicts with applicable law, the law prevails. GroundWork may update this Code at any time.

12. Reporting concerns

If you believe a supplier is violating this Code, we want to know. You can report a concern:

- Anonymously, through the GroundWork Ethics Complaint Form at grndwork.com/ethics-complaint-form
- By email to Human Resources at mnakamura@grndwork.com

Reports can be written in any language. We keep reports confidential to the extent possible and protect the identity of the person reporting. GroundWork does not tolerate retaliation against anyone, including a supplier's own workers, who raises a concern in good faith, and we expect suppliers to do the same. Suppliers keep their own way for workers to raise concerns, investigate what is raised, and protect anyone who reports in good faith.

13. Related documents

UNGC / OECD Compliance Monitoring Policy · Grievance and Complaints Handling Mechanism · Whistleblower Protection Policy · Anti-Corruption and Anti-Bribery Policy · Anti-Human Trafficking Policy · Human Rights Policy · Human Rights Due Diligence Process