

SJW Group
Human Rights Policy
Approved as of November 10, 2020

Policy Statement

Human rights are fundamental rights, freedoms and standards of treatment to which all people are entitled. This belief is deeply rooted in our core values of Integrity, Respect, Service, Compassion, Trust, Teamwork and Transparency. We believe that developing and sustaining a culture that supports diversity, equity and inclusion is more powerful than any individual program, policy, initiative or metric. This is why we are investing in our team and our communities to collaborate, learn and support each other as we execute on our mission to create an environment where diversity, equity and inclusion are fundamental to everything we do. This value is foundational to our Code of Conduct, our workplace policies and practices, and our commitment to diversity, equity and inclusion. SJW Group and its subsidiaries abide by all applicable laws and regulations and strive to uphold and respect human rights.

Application

Consistent with our Code of Conduct, we expect our third party providers to be governed by values that are consistent with ours. All directors, officers, and employees are responsible for complying with this policy, and everyone working with the Company, including consultants, agents, vendors and other business partners, will be encouraged, through contractual language, to adopt their own policies and procedures that are consistent with this policy. This policy, along with our [Code of Conduct](#), is publicly available on sjwgroup.com.

Prevention of Discrimination and Harassment

We do not tolerate any form of discrimination, bullying, sexual harassment, insult, physical abuse or violence against any person. Employees may not discriminate against or harass any person based on their race, color, ethnicity, national origin, age, gender (including gender identity and expression), religion, sexual orientation, marital status, veteran status, physical or mental disability, pregnancy, childbirth, or related medical conditions, or any other characteristic protected by applicable laws while working or while involved in work or workplace activities. We not only prohibit discrimination on account of a physical or mental disability, but also will provide reasonable accommodation to individuals with a known physical or mental disability, provided such accommodation would not impose an undue hardship on the Company, and would enable the individual to apply for, or perform the essential functions of the position in question. We also will endeavor to reasonably accommodate the religious beliefs of our applicants and employees provided such accommodation does not pose an undue hardship on the operation of our business. We provide regular training to employees and supervisors on the prevention of discrimination and harassment, including the Company's policy on this topic. Reports of misconduct are promptly investigated.

Diversity

We strongly believe that our success is based on diversity, including the different ideas and the individual experiences and skills of our employees. We also believe that diversity offers an increased variety of viewpoints and perspectives, allows for better problem solving, and contributes to the Company's overall effectiveness. Our employees are expected to respect diversity and foster an atmosphere of trust, fairness, openness, and candor. We place high value on a respectful and fair working atmosphere, both internally as well as with our business partners. Furthermore, we have a supplier diversity program, and

strive to work with diverse suppliers, vendors, contractors and consultants, as well as to support and encourage their efforts. Finally, we have established a National Diversity, Equity & Inclusion Council (“Diversity Council). The Diversity Council (i) supports and advocates for diversity, equity and inclusion initiatives, (ii) promotes knowledge, skills and practices that support diversity, equity and inclusion, (iii) provides a forum for consultation on diversity issues that may arise, and (iv) takes into consideration how diversity, equity and inclusion can help us serve our external stakeholders - customers, communities, shareholders and the environment. The Diversity Council maintains an active line of communication with our CEO, as well as our Executive Leadership Team.

Equal Opportunity Employment

In all Company operations and employment practices we comply with applicable laws governing equal employment to recruit, hire, train, and advance the most qualified candidates. The Company seeks opportunities to partner with people, organizations and resources that allow us to target underrepresented groups in recruitment. We ensure that advancement opportunities are available to all employees.

Minority Rights and Gender Equity

We believe in the protection of minority rights and gender equity, which together with economic inclusion are priorities for our long-term success. We strive and plan for diverse representation in our workforce, our leadership team and our Board of Directors. We value diverse thoughts and input, and look to bring different ideas and perspectives forward in developing our Company’s culture, vision, values, policies and practices. We employ women at all levels of the Company. Several of our female employees hold leadership roles, including executive level positions. We provide parental leaves and flexible work arrangements for new parents whenever possible. We also support women- and minority-owned suppliers as part of our supplier diversity program. Finally, as noted above, we have established a Diversity Council to look more closely at areas where the Company can continue to make improvements in the areas of minority rights and gender equity, both in the workplace and in our community. Our Human Resources Department conducts a gender pay review annually for all of our subsidiaries.

Work Hours, Wages, and Benefits

We comply with all applicable labor and employment laws and rules. The Company pays employees at least minimum wages and overtime rates required by law and any governing collective labor agreements.

Child and Forced Labor

We prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required. In addition, we oppose compulsory or forced labor and any form of human trafficking. We expect all those working with the Company to demonstrate similar intolerance for such practices.

Freedom of Association and Collective Bargaining

We respect our employees’ right to form, join or not join a labor union, seek representation, bargain or not bargain collectively in accordance with applicable laws, and without fear of reprisal, intimidation, or harassment. Where employees are represented by legally recognized unions, we seek and support constructive dialogues with their chosen representatives and bargain in good faith with such representatives.

Safe and Healthy Workplace

We have an unwavering commitment to ensure that our employees work in a safe and secure environment. In order to achieve this goal, employees must comply with all applicable laws and relevant industry standards of practice concerning the protection of health, safety, and security of our employees in the workplace and other persons affected by our business activities. Our Code of Conduct requires that employees take immediate action, regardless of their role, if they see or perceive a situation that could put others at risk. We have a “do no harm and leave it better than you found it” vision.

Land and Water

We recognize the significant human rights implications of land and water use in our operations, which we address through our policies and actions, including our [Human Right to Water Policy](#).

Engagement

We understand the impact we have on the communities in which we operate. We seek to engage with stakeholders in those communities to ensure that we listen to, learn from, and consider their views as we conduct our business. Our comprehensive Corporate Social Responsibility program includes supporting nonprofit organizations, encouraging employee volunteerism, creating opportunities for local businesses through supplier diversity, and enhancing environmental protection in the communities we serve. We pay particular attention to individuals or groups who may be at greater risk of negative human rights impacts due to their vulnerability or marginalization. Supporting local organizations with financial contributions and employee volunteer time are the foundation of the Company’s ongoing commitment to improving quality of life in the communities we serve. We make charitable contributions across the communities in which we operate – donations are made to local non-profits, community organizations, and other philanthropic entities.

Education

Each employee has a duty to be familiar with and comply with this Human Rights Policy and other Company policies, programs, standards and procedures regarding human rights. As part of this duty, each employee has an obligation to complete all required training with respect to human rights, including but not limited to the Company’s Code of Conduct.

Customer Equality

Our customers are one of the key Building Blocks of our Company and our goal is to deliver exceptional and reliable service. Customer service representatives are available to respond to customer questions or concerns Monday through Friday, and emergency services are available after hours and on weekends. We work with customers who are having difficulty paying their bills, and offer customer assistance programs to assist with payment arrangements and courtesy leak adjustments. We also offer assistance programs in California, Connecticut and Maine for customers who meet certain income requirements, the details of which are specific to each local community. We do not discriminate against any customer, and provide service to any customer within our service area.

Reporting and Accountability

If an employee, officer, director, or other stakeholder witnesses or learns of any incident that may involve a violation of this policy, they may (i) call or send a confidential note to our General Counsel, Chief Accounting Officer or Chief Administrative Officer to report their concern, or (ii) anonymously report their concern via our toll-free ethics hotline at 1-800-461-9330 or via the internet (multiple languages [Compliance Portal](#)). Reports can be submitted 24 hours a day, seven days a week. Every report is reviewed, and where appropriate, investigated. We do not tolerate retaliation against individuals who report concerns in good faith.

Any violation of this policy, or refusal to cooperate with an investigation under this policy, is subject to disciplinary action, up to and including termination.

Governance

This policy was approved by our Board of Directors. Our Board of Directors oversees implementation of this policy, and management oversight of this policy rests with our Legal, Human Resources, Procurement and Regulatory and Government Affairs Departments.

The Board will periodically review and evaluate compliance with this policy. Amendments to this policy require Board approval.