

# SJW GROUP

## VENDOR CODE OF CONDUCT

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The vendors of SJW Group and its subsidiaries play an important role in the delivery of our core values of Integrity, Trust, Straight Talk, Transparency, Compassion, Service, Teamwork and Respect. Consistent with our values, vendors are expected to adopt business practices that support our Environmental, Social, and Governance (ESG) goals, and are aligned with our SJW Group ESG policies, including our Human Rights Policy.

We expect our vendors, at a minimum, to comply with all applicable laws and regulations. We expect our vendors, including their workforce and subcontractors, to understand and comply with our policies referenced in the Vendor Code of Conduct. Vendors will conduct their business in an environmentally, socially, and economically responsible way and have in place appropriate policies, systems, and procedures to align with the goals of SJW Group and meet the expectations in the Vendor Code of Conduct as follows:

### Working Hours and Compensation

- All applicable laws and regulations with respect to wages and benefits, working hours, and days of rest are followed.

### Human Rights, Discrimination and Diversity

- Discrimination or harassment in hiring, pay or in the workplace on the basis of race, color, sex, ethnicity, national origin, age, gender, gender identity, religion, sexual orientation, physical or mental disability, or any other status protect by law is prohibited.
- Diversity is respected and an atmosphere of trust, fairness, and inclusivity is fostered.
- Laws governing equal employment to recruit, hire, train and advance the most qualified candidates are followed.

### Ethics

- All applicable laws including those pertaining to bribery, corruption, or any type of fraudulent business practice are met.

### Environment

- All applicable environmental laws and environmental permits are satisfied.
- Practices that promote the conservation of water and energy, reduction of waste streams and pollution to minimize the impact on the environment are adopted.

### Child and Forced Labor

- All forms of forced labor or any form of human trafficking are prohibited.
- All forms of unlawful or exploitation of children are prohibited.

### Freedom of Association and Collective Bargaining

- The right to join, not join or form a labor union, seek representation, bargain or not bargain collectively in accordance with the law is respected without fear of reprisal, intimidation, or harassment.

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### Health and Safety

- Safe and healthy working conditions are provided for the prevention of work-related injury and illness.
- Applicable health and safety compliance obligations are fulfilled.
- Hazards are eliminated and controlled and risks reduced.
- Workers are trained on hazards and how to protect themselves
- Workers are provided with the appropriate tools and personal protective equipment to safely perform work.

### Reporting and Accountability

- Workers have access to an issue reporting mechanism that is confidential through which they can report violations of policies, workplace grievances or ethical violations.
- Retaliation for reporting violations is prohibited

The Company will define and communicate to vendors the approach to provide for monitoring and reporting their adherence to the Vendor Code of Conduct. The manner of documentation will be developed to be reasonable and practical for vendors based on factors such as size of their company, the extent of spend and their criticality to the business. The company reserves the right to request vendors report through tools such as:

- Complete surveys or vendor self assessments;
- Disclose relevant company policies or procedures; or
- Be subject to audits or evaluations in the form prescribed by SJW Group.

Failure to comply with the Vendor Code of Conduct could alter our business relationship.

Vendors are expected to conduct their business, where applicable, in a manner that is consistent with our policies. The SJW Group and/or its operating subsidiaries policies, available for review on SJWGroup.com, include but are not limited to:

- Code of Ethics for Financial Executives
- Code of Conduct
- Corporate Governance Policies
- Environmental Policy
- Nomination of Directors Policies
- Human Right To Water Policy
- Human Rights Policy
- Whistleblower Policy
- Health & Safety Policy