

# SWCA SUPPLIER CODE OF CONDUCT

## INTRODUCTION

SWCA expects that all suppliers adhere to the Supplier Code of Conduct. This includes any third party affiliated with SWCA. We require supply chain partners to adhere to these guiding policies to ensure a safe, healthy, and ethical work environment for all. Our Supplier Code of Conduct is heavily influenced by [SWCA's Sustainability Policy](#) and [Human Rights Policy](#).

## SOCIAL PRACTICES

Suppliers working with SWCA are expected to uphold the same standards outlined in SWCA's Human Rights Policy and conduct business responsibly to work with SWCA.

- **Human Rights, Child Labor, Forced Labor**
  - Suppliers will respect the human rights of those involved with their business. This includes prohibiting forced and child labor as well as human trafficking.
- **Discrimination and Harassment**
  - Suppliers will prohibit the discrimination and harassment of individuals involved in their business based on sex, gender, gender expression, sexual orientation, race, color, religious creed, marital status, ancestry, national origin, medical condition, age, disability (mental or physical), or status as protected veterans. This includes complying with Equal Employment Opportunity laws and preventing discrimination in hiring practices.
- **External Stakeholder Human Rights**
  - Suppliers will respect the rights of all external stakeholders, including clients, team partners, SWCA employees, community members, and other groups.
- **Wages and Working Hours**
  - Suppliers will comply with all applicable wage laws and regulations related to working hours, compensation, minimum wage requirements, and benefits.
- **Freedom of Association and Collective Bargaining**
  - Suppliers will respect the rights of workers to participate in labor unions and collective bargaining.

## ENVIRONMENTAL PRACTICES

- **Health and Safety**

- Suppliers will comply with all applicable laws regarding health and safety matters, including recordkeeping and reporting requirements under federal, state and local laws. Suppliers will ensure that their personnel perform work in a safe and healthy environment.
- **Environmental Impact**
  - SWCA is committed to addressing environmental sustainability. Suppliers should uphold this same commitment and take steps to minimize their environmental impact. This includes using responsible sourcing methods and understanding, tracking, and reporting on their environmental performance in areas of waste, and emissions.

## ETHICS

- **Anti-bribery / Anti-Corruption**
  - Suppliers will follow all anti-corruption laws and conduct business ethically. Suppliers will not offer or accept any bribes, gifts, or kickbacks either directly or indirectly. Suppliers also will not make any political contributions to gain unlawful business advantages.
- **Confidentiality and Intellectual Property**
  - Suppliers will not use or disclose any private information relating to SWCA, its personnel, its clients or projects except as required to complete the services. Suppliers will not use or disclose any information that violates applicable laws or other requirements.
  - Suppliers will respect the intellectual property rights of SWCA, its clients, and its other suppliers and will avoid infringement of those rights.
- **Conflicts of Interest**
  - Suppliers will avoid any relationships or activities that might impair their ability to make impartial decisions.
- **Anti-competitive practices**
  - Suppliers will never engage in any anti-competitive business practices. Suppliers will comply with all applicable anti-trust laws.