

# Arcadia

## Arcadia Vendor Code of Conduct

Arcadia Power, Inc., together with its affiliates (“Arcadia”) is a climate technology company with a mission to connect the clean energy future by unlocking access to global energy data. Our technology is lighting a cleaner path forward for everyone, from everyday consumers and small businesses to the innovators building the next generation of energy products — because the solution to the climate crisis involves all of us.

The term “Vendors” (individually, a “Vendor”), as used in this Code, means any affiliate, subsidiary, employee, agent, supplier, subcontractor or other representative of an entity that provides goods or services to, or on behalf of, Arcadia. The provisions of this Code are in addition to those specified in any agreement between a Vendor and Arcadia.

In consideration for doing business with Arcadia, vendors are expected to operate in compliance with the guidance and principles outlined in this Vendor Code of Conduct (this “Code”). This Code is in the promotion of ethical practices, and begins with the expectation that vendors comply with all local, national, and international laws, regulations, rules, and requirements with respect to all products and services they provide to Arcadia. The Code continues to include the following:

**Employment Practices.** Vendors shall treat all of their workers fairly and with dignity, in accordance with international human rights norms and all applicable local laws. Vendors shall not (i) use any form of slave, forced, bonded, indentured or involuntary labor, and shall fully comply with all laws that prohibit the use thereof, as and when applicable, (ii) engage in human trafficking or exploitation, (iii) import goods tainted by slavery or human trafficking, or (iv) retain employees’ government-issued identification, passports or work permits as a condition of employment.

**Compensation and Working Hours.** Vendors shall provide all workers with accurate information about their wages, mandated benefits and any other basis of their compensation. Vendors shall comply with applicable labor laws governing working hours and employee compensation in all locations in which they operate.

**Underage Labor.** Vendors shall not use underage labor as defined by applicable law, and in no event employ workers below the age of 15 (or 14 in countries subject to the developing country

exception of the ILO convention 138). Vendor shall not employ anyone under the age of 18 for hazardous or dangerous work, according to the ILO convention 182.

**Anti-discrimination, Diversity.** Vendors shall provide a workplace free of harassment and discrimination in which all personnel are treated fairly and respectfully. In the United States, Vendors shall make good faith efforts to identify and, where available and appropriate, use suppliers certified as minority, women, disabled person, lesbian, gay, bi-sexual, transgender and/or U.S. veteran-owned.

**Health and Safety.** Vendors shall: (i) provide their employees with a safe workplace, (ii) have reasonable procedures to detect, prevent and handle potential risks to the health, safety and security of employees, and (iii) follow all applicable laws relating to health and safety in the workplace.

**Employment Status.** Vendors shall only employ workers who are legally authorized to work in their location.

**Freedom of Association.** Where applicable, Vendors shall respect their employees' rights to organized labor.

**Whistleblower Protection and Anonymous Complaints.** Vendors shall prohibit retaliation against whistleblowers, and, where legally permitted, provide an anonymous complaint mechanism for their employees to report grievances.

**Environment.** Vendors shall operate in an environmentally responsible manner, and take active steps to minimize the adverse impact on the environment which may be caused by its operations. Vendor shall use commercially reasonable best efforts to implement and enforce effective environmental policies to reduce air emissions, energy, wastewater, and hazardous materials. Vendor shall comply with all environmental laws in the countries in which they operate

**Responsible Sourcing of Minerals.** If applicable, Vendors shall comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas and all other applicable laws.

**Business Integrity and Anti-Corruption.** Vendors shall comply with all applicable anti-corruption laws, and shall exercise high standards of integrity in business interactions. Vendor shall keep accurate books and records in accordance with applicable laws and industry standards. Vendors shall implement and enforce appropriate controls to prevent bribery, corruption, and other financial misconduct.

**Gifts, Meals and Entertainment.** Vendors shall not, and shall not attempt to, provide any gift, meal or entertainment to an Arcadia employee in any situation which might improperly influence, or appear to improperly influence, such employee's decision in relation to a Vendor. Gifts, meals

or entertainment exceeding \$100 per head will be disclosed internally to Arcadia management during vendor contract decision making.

**Intellectual Property and Software.** Vendors shall respect intellectual property rights and software licensing obligations and use technology only in a manner that protects, and is in compliance with, the owner's intellectual property rights.

**Privacy.** Vendors shall comply with all applicable privacy and information security laws and regulatory requirements relating to the collection, storage, processing, handling, transfer and sharing of personal information. Vendors shall safeguard the privacy of the personal information of their customers and employees.

**Reporting.** If a Vendor becomes aware of or suspects misconduct relating to services rendered to or on behalf of Arcadia, or a violation of this Code, then Vendor will report it to the appropriate Arcadia procurement contact or via webform at [www.lighthouse-services.com/arcadia](http://www.lighthouse-services.com/arcadia).