

# AMERICAN WATER SUPPLIER CODE OF CONDUCT

At American Water, we are committed to an open, transparent and high integrity workplace. Acting with integrity is critical to how we do business. It is the only way to continue to maintain trust with our employees, regulators, customers, and communities. As a result, we require our business partners to share this commitment to ethical business practices. This Code of Conduct demonstrates American Water's respect for human rights, the environment and treating all workers with dignity, and it explains our expectations for all our business partners to do the same.

## I. Ethical Business Conduct

American Water is committed to conducting business ethically and lawfully. We expect our Suppliers to comply with all applicable laws and regulations of the countries where they conduct business and to conduct business responsibly, with integrity, honesty, and transparency.

**Gifts, Bribes and Kickbacks.** American Water will not tolerate any form of corruption. Bribes, kickbacks, illegal payments and any items of value offered to inappropriately influence business decisions or gain an unfair advantage are strictly prohibited. Suppliers must comply with all anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (FCPA). American Water employees may only accept modest gifts, ordinary business meals, ordinary hospitality, and modest entertainment from Suppliers. Gifts of cash or cash equivalents, such as gift cards, are never allowed. American Water employees may not give or receive a gift or entertainment from a Supplier that is actively competing in a selection process.

**Confidential Information.** When handling competitive data, proprietary information or other intellectual property, Suppliers will act lawfully and with integrity. Suppliers must take all reasonable and necessary precautions to safeguard American Water's information to which it has access.

**Fair Competition.** Suppliers will comply with all applicable antitrust, competition and public procurement laws and laws regarding accurate and truthful marketing. Suppliers may not enter into arrangements that unlawfully restrain competition, such as agreements to improperly exchange competitive information, price fixing, bid rig, or improperly divide markets.

**Conflict Minerals.** Suppliers are expected to ensure that goods and services provided to American Water comply with all relevant regulations, including exercising due diligence investigating the source of minerals used which may be defined as a conflict mineral and declare its use if required.

## II. Health and Safety

**Products and Services.** American Water expects Suppliers to provide products and services that meet applicable health and safety laws and regulations. Suppliers must also comply with applicable American Water requirements regarding health and safety. American Water expects Suppliers to perform operations in a safe manner which prevents incidents, injuries, or illness.

**Working Conditions.** Supplier shall provide employees with safe and healthy working conditions. At a minimum, employees will have potable drinking water, clean restrooms, adequate ventilation, appropriately lit workstations, fire exits and essential safety equipment, an emergency aid kit, access to emergency medical care, adequate safety training, and proper protective equipment. The Supplier's facilities are to be constructed and maintained in accordance with applicable law.

**Fitness for Duty.** Suppliers must have a process to determine whether members of the workforce are able to safely perform the essential physical and cognitive requirements of their job without risk to self, others or the environment and without impairment from drugs, alcohol, or fatigue. American Water expects Suppliers to maintain a workplace free from alcohol and illegal drugs.

### **III. Environmental Standards**

American Water strives to do business with Suppliers who share our commitment to preserving the environment. Suppliers will conduct their business in an environmentally conscious manner and in accordance with applicable law. Suppliers shall take reasonable steps to protect the environment and to provide for the health and safety of employees and the communities in which facilities are operated. Suppliers will take prudent steps to minimize solid waste by reducing, reusing, and recycling materials; encourage conservation of resources and energy; provide training and education for employees, as appropriate; and support efforts to establish and implement policies that also protect the environment.

### **IV. Human Rights and Fair Treatment**

Suppliers are expected to treat people with dignity and respect, encourage diversity, promote equal opportunity for all and help create an inclusive and ethical culture. American Water expects Suppliers to treat employees fairly and honestly, including complying with applicable laws regarding working hours, wages, overtime pay and benefits.

**Anti-Discrimination and Anti-Harassment.** American Water does not tolerate discrimination or harassment in the workplace. Discrimination or harassment of any kind based on personal characteristics such as age, gender, race, ethnic background, sexual orientation, gender identity, national origin, religious beliefs, or any other characteristic protected by law is inconsistent with American Water's values and is strictly prohibited. Supplier's employees will not be subject to any form of unethical treatment, threats of violence, or other forms of physical, mental, or sexual harassment.

**Child Labor.** Child labor is strictly prohibited. Suppliers will adhere to the minimum legal employment age defined by national law or regulation and comply with relevant International Labor Organization (ILO) standards. Suppliers will never require or permit children to perform work that exposes them to undue physical risks that can cause physical, mental or emotional harm or improperly interfere with their schooling (except as may be permitted under apprenticeship or similar programs in which the minor is lawfully participating).

**Forced Labor, Slave Labor, Human Trafficking.** Suppliers will not use involuntary or forced labor, whether indentured, bonded, prison or otherwise. Suppliers will not confiscate or withhold worker identity documents or other valuable items, including passports, work permits and travel documentation. Suppliers will not keep workers' personal documents for any reason including without limitation to bind them to employment or to restrict their freedom of movement.

**Schedules and Compensation.** Suppliers' employees will work in compliance with all applicable laws pertaining to the number of hours and days worked. Employees will be provided with reasonable daily and weekly work schedules, and adequate allowance will be made for time off from work. Employees will be compensated fairly and provided with wages and benefits that comply with law, including appropriate compensation for overtime work and other premium pay situations required by applicable law.

**Supplier Diversity.** American Water seeks to positively impact the economic growth of the diverse business community. Our Supplier Diversity Program enables us to develop relationships with qualified, diverse businesses that meet our high standards for quality and cost effectiveness. Suppliers are encouraged to support American Water's diversity efforts by utilizing qualified diverse-owned businesses in support of the business that it conducts with American Water. Suppliers may be required to report their diverse supplier utilization performance to American Water on a quarterly basis.

## **V. Management Procedures**

Suppliers are expected to support compliance with this Code by having management systems in place to support compliance with laws, regulations and expectations. Suppliers are encouraged to implement their own written code of conduct and to provide their employees adequate avenues of raising issues or concerns without fear of retaliation.

**Applicability.** American Water's Supplier Code of Conduct applies to all business partners: suppliers, vendors, contractors, consultants, agents and other providers of goods or services who wish to conduct business with American Water entities (Suppliers). American Water expects all our Suppliers to engage in responsible supply chain practices. This Code of Conduct is in addition to the Supplier's obligations to American Water as set forth in any written agreement between American Water and the Supplier. If there is a conflict between this Code of Conduct and the agreement in question, the agreement will control; however, no such agreement may reduce or eliminate the Supplier's obligations as set forth in this Code of Conduct.

**Disclosure.** Suppliers must be capable of disclosing potential sources of primary origin associated with the products or services provided to American Water. American Water reserves the right to ask its Suppliers for supply chain mapping back to the origin to facilitate an assessment of upstream supply chain compliance. If Suppliers do not have this capability today, American Water expects Suppliers to share with American Water their plans in this regard.

**Supply Chain.** Suppliers are responsible for ensuring compliance with this Code of Conduct by all its suppliers that provide materials or services in the manufacture, processing and/or production of products or services that are provided to American Water. American Water expects Suppliers to apply similar standards to their own suppliers and subcontractors by communicating the expectations contained in this Code of Conduct and holding them accountable.

**Monitoring and Audits.** American Water may request that Suppliers conduct, or hire a third party to conduct, audits to monitor Supplier's compliance with this Code. American Water reserves the right to terminate its relationship with any Supplier that fails to comply with the standards set forth in this Code.

**Reporting Potential Misconduct:** If a Supplier believes that an American Water employee or someone acting on American Water's behalf has engaged in illegal or otherwise improper conduct, the Supplier should immediately report this concern by contacting the American Water Ethics Helpline at 1-877-207-4888. A Supplier's relationship with American Water will not be affected by a good faith report of potential misconduct.