



## **Business Partner Code of Conduct**

### **Purpose and General Responsibilities**

It is the general policy of Hannon Armstrong Sustainable Infrastructure Capital, Inc. and its affiliates (the "Company") to conduct its business activities and transactions with the highest level of integrity and ethical standards and in accordance with all applicable laws, rules and regulations. Obeying the law both in letter and in spirit is the foundation on which the Company's ethical standards are built. This Business Partner Code of Conduct (this "Code") sets the Company's expectations and standards for doing business and applies to agents, distributors, dealers, contractors, intermediaries, and suppliers ("Business Partners"). **The following policy applies to you, our Business Partner.**

The highest legal, moral, and ethical standards of honesty, integrity, and fairness are to be practiced in the conduct of the Company's affairs. In order to meet this standard, each Business Partner is expected (i) to read and understand this Code and its application to the performance of their business responsibilities and (ii) to conduct themselves in accordance with this Code and to seek to avoid even the appearance of wrongdoing or improper behavior. Those who violate the standards in this Code may be subject to a cessation of business dealings and/or the reporting of violative conduct to appropriate regulatory and criminal authorities.

The Company requires that all independent contractors, in-office or remote consultants, and 1099 employees, who work closely with existing full-time employees on a short-term or per-project basis, must complete the provided Code of Business Conduct and Ethics training within 30 days of business engagement.

This Code may be amended from time to time, and all updates are effective immediately upon posting. Other policies that govern the conduct of Business Partners may be established by the Company from time to time that supplement and are in addition to this Code.

### **Core Values**

- Environmental Responsibility
- Integrity
- Respect
- Partnership
- Excellence in Performance
- Ethical Business Practices

Business Partners are expected to adhere to the following requirements:

#### **Ethical Business Practices**

##### **Legal and Regulatory Compliance**

- Comply with the letter and spirit of all applicable national, state or regional, and local laws and regulations in the countries in which you operate.

##### **Freedom of Association**

- Respect employees' rights to join or not join any lawful organization, and shall comply with all applicable laws pertaining to freedom of association and collective bargaining.
- Recognize employees' freedom of association, and not to discriminate, either in favor of or against,



members of employee organizations or trade unions.

#### **Limitations on Gifts and Gratuities**

- Neither accept nor give payments or gifts to the Company's employees, directors, officers, or third parties with an explicit or implicit suggestion of "quid pro quo."

#### **Antitrust and Competition Laws**

- Comply with all applicable antitrust and competition laws that prohibit agreements or actions that unreasonably restrain trade, are deceptive or misleading, or unreasonably reduce competition without providing beneficial effects to consumers.

#### **Anti-Corruption and Bribery**

- Under the U.S. Foreign Corrupt Practices Act and other applicable anti-corruption laws in the countries where we do business, must not give or offer "anything of value" to a foreign government official or employee of a state-owned enterprise, including gifts and hospitality.
- "Anything of value" can include bribes, kickbacks, gifts, entertainment, and even contributions to a foreign government official's favorite charity.

#### **Anti-Money Laundering and Terrorist Financing**

- The Company unequivocally opposes money laundering and terrorist financing. To align with our stance, we expect our Business Partner to adhere to all applicable money-laundering laws and regulations, and to refrain from engaging in any money-laundering activities, or any other activities that may aid, result in, or be perceived to constitute money laundering in any form.

#### **No Retaliation / Reporting**

- Employ a no-retaliation policy that permits workers to speak with the Company's staff regarding violations of this Code or applicable law without fear of retaliation by management.

#### **Conflicts of Interest**

- Disclose to the Company all actual or potential conflicts of interest and make decisions impartially and based on sound business reasoning.

#### **Work Conditions and Human Rights**

##### **Wages and Benefits**

- Comply with all applicable national minimum wage and hour laws and regulations and provide legally mandated benefits.

##### **Health and Safety**

- Provide a safe work environment and conduct yourself in a manner consistent with all applicable safety standards, including governmental requirements, operations- and facility-specific safety requirements, and contractual requirements.
- Identify and respond to any public health impacts of your operations and use of your products and services.

##### **Non-discrimination**

- Must not discriminate on the basis of race, gender, religion, ethnicity, nationality, sexual orientation,



and/or political beliefs.

### **Human Rights**

- Must not violate basic human rights of life, liberty, and security. There shall be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers.
- To fully align with our commitment to Human Rights, the Company expects each of its business partners to evaluate their policies to ensure:
  - Equal opportunities and non-discrimination for its employees, contractors, and suppliers, regardless of their race, ethnicity, nationality, social background, any disability, sexual orientation, political or religious convictions, age, or gender.
  - The Business Partner will never under any circumstances: employ anyone against their will, force them to work, exploit anyone, or tolerate human trafficking. In addition, we expect the business partner to have in place internal measures to ensure modern slavery or forced labor is not taking place within its complete value and supply chain.
  - The Business Partner will not tolerate unacceptable treatment of employees, such as emotional abuse, corporal punishment, sexual or personal harassment, or discrimination.
  - The Business Partner will not tolerate any sexually inappropriate, intimidating, threatening, abusive, exploitative, or harassment behavior (including gestures, language or physical contact).
  - The Business Partner will observe the legal provisions regarding maximum working hours applicable in the relevant country.
  - The Business Partner will not employ, or to cause to be employed, or permit the employment of, any person who cannot be proven to be at least 15 years old, or 14 years old in countries to which the exception for developing countries provided for in ILO Convention 138 applies, where a minimum age of 14 years may be specified.

### **Records**

- Maintain and adhere to internal accounting controls and record-keeping policies.

### **Privacy and Confidentiality**

#### **Privacy**

- Abide by all regulations pertaining to the privacy of individuals and never disclose personal information to anyone outside the Company except as permitted by law and in the proper conduct of our business.

#### **Confidentiality**

- Protect the Company's confidential or proprietary information from any unauthorized access or disclosure.
- Comply with all applicable laws and regulations governing the protection, use, and disclosure of the Company's proprietary, confidential, and personal information.

#### **Inside Information**

- Do not buy or sell securities that may be affected by inside information\*, alone or with others.
- Do not pass along any inside information expressly or by way of making a recommendation for the purchase or sale of such securities based upon inside information.

\*"Inside information" is material, nonpublic information about the securities, activities, or financial condition of a corporation, public entity, or other issuer securities. Material, nonpublic information concerning market developments may also be construed to be inside information.



Information is "material" if it could have an impact on the market prices of securities involved or if it is likely that a reasonable investor would consider the information important in deciding whether to purchase or sell the securities. Information may be material to one issuer but not to another, or to certain securities of an issuer but not to all securities of that issuer, (e.g., to equity, but not to debt).

Information should be considered "nonpublic" unless it is clearly public. Information is deemed public once it has been publicly announced or otherwise disseminated in a manner that makes the information available to investors generally without a breach of any confidentiality or fiduciary duty.

### **Responsibility**

#### **Assets of the Company**

- Protect the assets of the Company, as well as the assets of its customers, employees, and other Business Partners in accordance with the highest ethical standards, from theft, waste, or other types of loss.

#### **Environmental Stewardship**

- Abide by the letter and spirit of all federal, state, and local environmental laws, as well as all applicable Company policies and procedures.

#### **Global Trade Compliance**

- Never seek to mislead or improperly or illegally avoid the payment of import duties, taxes and fees, and never engage in activities meant to evade the legal requirements of international traffic and trade.
- Know with whom you are dealing and must not engage in or facilitate business with entities or any other individuals specifically prohibited by law, including without limitation the USA PATRIOT Act and all Anti-Terror Legislation. Furthermore, be aware of, and comply with, restrictions on dealing with entities and individuals located in countries that are subject to trade embargoes or economic sanctions imposed by the United States and other countries where we do business.

### **Commitment to Business Partners**

The Company's relationships with its Business Partners must be characterized by honesty and fairness. We are guided by the following standards of behavior:

- We will not make payments to any employees of Business Partners to attain lower prices or additional business.
- We will not reveal a Business Partner's pricing, technology or other confidential information without prior written permission.
- We will not make false or misleading remarks to others about Business Partners or their products or services.
- We will hold our Business Partners to the same standards and expectations to which we hold our own operations and employees.

### **Resolving Code of Conduct or Ethics Issues**

Employees of Business Partners are encouraged to work through their own company to resolve internal ethics issues. However, Business Partners should promptly report violations of this Code or any unethical behavior by an employee of the Company to the Company's Chief Legal Officer at [legaldepartment@hasi.com](mailto:legaldepartment@hasi.com).

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