



SEVEN SEAS WATER GROUP

Water-as-a-Service®

Charitable Contributions Policy

EFFECTIVE DATE: January 31, 2022

PURPOSE

The Seven Seas Water Group of companies (“Company”) supports projects, activities, organizations and various good causes in the communities in which we do business. This policy addresses monetary support to organizations whose mission is to serve the public welfare within such communities.

Any donations, and requests for donations, made pursuant to this policy must comply with the SSWG Code of Business Conduct and Ethics, and in particular comply with any and all applicable anti-corruption, anti-bribery, and anti-kickback laws, rules and regulations in each jurisdiction in which the Company operates.

CHARITABLE CONTRIBUTIONS COMMITTEE

The Charitable Contributions Committee (the Committee) is a team made up of the General Counsel, Chief Commercial Officer, Chief Financial Officer, and the Charitable Contributions Coordinator. The Committee is responsible for reviewing and approving all requests for donations proposed by the employees and consultants of the Company.

SUBMISSION OF PROPOSED RECIPIENTS

Any employee or consultant of the Company may nominate organizations to receive donations. All requests should be submitted to the Charitable Contributions Coordinator, with a completed Charitable Contribution Application form (*attached hereto*) via email to: CharitableContributions@7seaswater.com. The Charitable Contributions Coordinator will be responsible for shepherding the request through the approval and payment process.

ELIGIBLE CONTRIBUTIONS

Recipients of donations must be private non-profit charities, foundations or organizations that provide a public welfare service to their communities in which the Company operates. To be eligible, all organizations must be screened via the SSW internal compliance screening database.

Examples of eligible recipients are:

- Organizations that provide a service to those in need, like food pantries or meal preparation
- Educational organizations
- Research foundations such as the American Heart Association, American Diabetes Association or local affiliates of such types of organizations
- Sporting events/groups that serve a specific population such as Special Olympics or Susan G. Komen Race for the Cure

- Organizations that provide relief in the event of natural disasters like hurricanes, tornadoes, tsunamis or earthquakes
- Facilities that provide food and shelter for homeless adults or children.
- Environmental organizations

INELIGIBLE CONTRIBUTIONS

Examples of contributions which are generally ineligible under this policy include:

- Organizations that discriminate on the basis of race, color, creed or national origin
- Organizations that directly benefit an employee or an employee's family member, unless otherwise approved by the Committee
- Animal rescue groups or shelters
- Organizations that promote or benefit a particular political party or point of view
- Organizations that use the proceeds to promote or benefit a particular religious group or point of view
- For-profit organizations, regardless of the service they provide to the community

APPROVALS AND BUDGET

The Committee will consider all Charitable Contribution Applications and evaluate the benefit the organization provides, the mission and values of the organization and its record of fiscal responsibility. The culture and legal regulations of the specific location of the requested contribution will also be considered by the Committee when considering approval for a charitable contribution request.

At the beginning of each calendar year, an overall budget will be set and approved by the Committee. The budget will include specific budget limits for each jurisdiction. Actual spending may differ from the specified contributions in the budget, but the total spending cannot exceed the budgeted amount unless approved by the Committee. The Committee has complete discretion to establish initial budgets and to reallocate funds based upon need and circumstances.

DOCUMENTATION

It is important that the Company maintain proper documentation of all donations made. The Charitable Contributions Coordinator and the requester shall coordinate the receipt of any necessary documentation.

Written acknowledgment required to substantiate a charitable contribution of \$250 or more must contain the following information:

- Name of the organization;
- Amount of cash contribution;
- Description (but not value) of non-cash contribution;
- Statement that no goods or services were provided by the organization, if that is the case;
- Description and good faith estimate of the value of goods or services, if any, that organization provided in return for the contribution

Policy End



INSTRUCTIONS: Complete the information below and attach to the original donation request from the non-profit organization. If the original request is in email format, provide a pdf of the request. This information should be forwarded to the Charitable Contribution Coordinator for approval processing.

Country:	
Requestor:	
Organization Name & Description: (A thorough description of the non-profit organization, the associated activity or event being sponsored, as well as the benefit in SSW's contribution should be provided here.)	
Amount of Request:	
Country YTD Spend: \$/% (To be completed by Coordinator)	