



SEVEN SEAS WATER GROUP

Water-as-a-Service®

Supplier Code of Conduct

Effective December 2020
Revised: December 2020



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SUPPLIER CODE OF CONDUCT

SUMMARY

Seven Seas Water¹ is dedicated to making a positive contribution to society through our focus on the environment, our people, responsible business practices, and community investment. Our global social responsibility is a reflection of our core values and enhances our ability to provide superior service to our customers, our employees and our communities.

We expect our suppliers, and our suppliers' suppliers, to adhere to these key values and apply them to how they do business with Seven Seas Water and in general.

Our reputation for integrity and our continued success depends on conducting business honestly and in accordance with our legal and regulatory obligations. Fraud, dishonesty, unethical or criminal conduct on the part of any supplier or anyone doing business with the Company will not be tolerated.

This Code is not intended to address every potential situation that relates to our standards of conduct. Employees encountering situations with suppliers that are not addressed specifically by this Supplier Code of Conduct should exercise sound judgment, seek advice when appropriate and adhere to the highest ethical standard

SOCIAL

Human Rights

Seven Seas Water is committed to supporting the protection and advancement of human rights in our business and throughout our supply chain. We strive to conduct our business operations in ways that seek to respect, protect and promote the full range of human rights, such as those described in the United Nations Universal Declaration of Human Rights. Seven Seas Water's position on this is reflected in our Statement on Human Rights. We expect our suppliers to have appropriate policies and practices in place that apply to their employees and supply chains. Suppliers must ensure they are not complicit in human rights abuses, including modern slavery and human trafficking.

Employment & Non-Discrimination Practices

Suppliers must conduct all their operations in a socially responsible, non-discriminatory manner and in full compliance with applicable laws including, but not

¹ "Seven Seas Water" means Seven Seas Water Corporation, AUC Group, Inc, Bluefin Water Solutions LLC, Marlin Water Solutions Co, Yellowfin Water Solutions Co., and Tarpon Water Solutions Ltd, as well as their respective affiliates and subsidiaries. Seven Seas Water is also referred to herein as "Company".

limited to, those associated with Equal Opportunity, Child Labor, Forced or Compulsory Labor, Working Hours, Compensation, Freedom of Association, Collective Bargaining and Harassment Free Work Environment.

Suppliers must ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, creed, age, sex, sex stereotype, gender, gender identity or expression, transgender, sexual orientation, national origin, citizenship, disability, marital and civil partnership/union status, pregnancy, veteran or military service status, genetic information or any other characteristic protected by law.

Supplier Diversity

Seven Seas Water pursues diversity in every aspect of our business; the Company is committed to efforts which promote diversity through our hiring and in our interactions with our clients and suppliers/subcontractors. We recognize that equal access and equal opportunity, along with diversity in our business processes, is an important part of doing business. As such, our commitment to diversity involves providing diverse-owned businesses including, but not limited to, Minority and Women Business Enterprises (MWBES), Disadvantaged Business Enterprises (DBEs), Veteran Business Enterprises (VBEs) and Lesbian, Gay, Bisexual, Transgender (LGBT) owned businesses, with an opportunity to provide goods and services to the Company.

Our ethical business practices and entrepreneurial spirit help to keep Seven Seas Water at the forefront of the water industry. Working with diverse-owned companies not only fosters strategic and business relationships, but also stimulates economic development and strengthens the communities where we live and work. Seven Seas Water encourages suppliers to make a good faith effort to ensure that diverse-owned enterprises have the opportunity to participate as second tier subcontractors and/or suppliers to service the Seven Seas Water account.

Health & Safety

Seven Seas Water takes health and safety seriously and aims to create an office environment that is both pleasant and safe to work in for its employees and visitors. We expect our suppliers to prioritize the occupational health and safety of their employees and meet legal, regulatory and contract specific requirements when performing their contractual obligations for Seven Seas Water.

ENVIRONMENTAL SUSTAINABILITY

Seven Seas Water recognizes the critical importance of a healthy environment to our global society, our economy, our business and our people. We support the transition to a low-carbon economy through policies, activities, products and services that seek to mitigate climate risks and capitalize on environmental opportunities. We believe that a meaningful commitment to protecting the environment must begin with our internal operations. To this end, Seven Seas Water is committed to enhancing our conduct and carrying out policies and programs that minimize our direct impact on the environment. We aspire to best practices in facilities management and product procurement, and we seek to develop effective relationships with contractors and suppliers to encourage

environmental awareness and support for Seven Seas Water’s environmental objectives. We expect suppliers to adhere to our policies as well as all applicable environmental laws, regulations and standards. We encourage suppliers to implement policies and measures that aim to reduce the environmental impact of their operations.

ETHICAL BUSINESS PRACTICES

Compliance with applicable Laws, Rules and Regulations

Suppliers are required to comply with both the letter and spirit of all laws, rules, regulations and regulatory guidance that would be applicable to Seven Seas Water if Seven Seas Water were providing the goods and services, including those laws, rules and regulations addressing corruption, kickbacks, bribery and other prohibited business practices.

Bribery and Anti-Corruption

Seven Seas Water does not tolerate bribery or corruption in any form. Suppliers and those acting on their behalf may not offer, promise, authorize, recommend, give or receive anything of value if it is intended, or could reasonably appear as intended, to influence improper action or to obtain or retain an improper advantage for Seven Seas Water.

Company Resources

Company resources include assets, intellectual property and confidential information. Suppliers are required to safeguard Seven Seas Water resources utilized in the course of performing contracted work.

Seven Seas Water resources must only be used for legitimate business purposes. Personal or other inappropriate use of Seven Seas Water resources is prohibited.

Data Protection

In the event that a supplier has access to, acquires or otherwise processes Personal Information, the supplier will comply with applicable laws, regulations and guidance concerning Personal Information. “Personal Information” includes, collectively, “Personally Identifiable Information,” “Non-public Personal Information,” “Personal Data,” and any other similar terms defined by applicable data protection or privacy laws.

If a supplier is requested or required to disclose any of the Company’s Confidential Information under a subpoena, court order, statute, law, rule, regulation, regulatory request or other similar requirement (a "Legal Requirement"), the supplier must, to the extent not precluded by law, provide prompt notice of such Legal Requirement to the Company prior to the disclosure where possible.

Monitoring

Seven Seas Water reserves the right to monitor, record and disclose all data and communications created, sent, received or stored using Seven Seas Water resources as it deems appropriate, subject to applicable laws and regulations. This includes any and all communications created by, sent to, received or stored by the supplier relating to Seven

Seas Water.

Brands and Trademarks

Suppliers may not use the Seven Seas Water brand or Seven Seas Water's trademarks without express written permission.

Accounting and Business Records

All financial books, records and accounts must reflect the underlying activity and conform to Generally Accepted Accounting Principles (GAAP). Operational reports and records must adhere to the Seven Seas Water requirements, must be accurate and timely, and must be in full accordance with applicable legal and contractual requirements.

Conflicts of Interest

Seven Seas Water manages, and where appropriate mitigates or prohibits, business conduct and practices that may pose a conflict among the interests of Seven Seas Water, its employees and its clients. It is our obligation to be alert to actual or potential conflicts and to manage and/or escalate them as appropriate. We will always deal fairly with the Company, our clients, the public, competitors, suppliers, and one another.

We expect our suppliers to maintain a similar level of adherence. Suppliers, their employees and their family members cannot receive improper benefits through their relationship with Seven Seas Water or allow other activities to conflict with acting in the best interests of Seven Seas Water.

Gifts and Entertainment

Gifts and entertainment may create an inappropriate obligation or expectation on the part of the recipient or provider. We expect our suppliers to refrain from providing personal gifts, fees, favors, other compensation or business courtesies, including entertainment activities, that are intended to influence, or might reasonably appear to influence, a business decision. Notwithstanding the above, meals and refreshments offered during a meeting is generally acceptable, provided the purpose is Seven Seas Water related, the supplier is in attendance, the cost is reasonable and customary, and it is an infrequent occurrence. Our goal is to obtain the best commercial terms for the Company instead of receiving gifts and entertainment. We expect our suppliers to work with us to obtain this goal.

Business Continuity

Seven Seas Water expects its suppliers to manage business continuity risk in terms of ensuring availability of critical services to the Company during a disaster event. Therefore, we expect our suppliers to have plans in place for their business to continue with minimal interruption in the event of an emergency, crisis situation, natural disaster or terrorist/security related event. Suppliers are expected to share these plans as requested by the Company.

Compliance

Seven Seas Water reserves the right to audit our suppliers upon provision of reasonable notice to check the supplier's compliance with the requirements of this

Supplier Code of Conduct.

Seven Seas Water encourages its suppliers to implement their own binding guidelines for ethical behavior. Any breach of the obligations contained in this Supplier Code of Conduct will be considered a material breach of contract by the supplier.

Business partners and Subcontractors

Through upfront third-party risk assessment, due diligence, ongoing monitoring and supplier testing, Seven Seas Water will maintain appropriate controls related to business partners, suppliers and outsourced arrangements. Ultimately, though, it is the supplier's responsibility to ensure that their business partners and Subcontractors comply with the required standards. Suppliers are expected to provide any information requested by Seven Seas Water that is needed to perform upfront risk assessment, ongoing monitoring and due diligence, including, but not limited to, financial information to assess financial viability, security audit report (s) where required and its operational risk framework for managing business partners and Subcontractors.

Whistle Blowing Policy

Concerns relating to ethical or business conduct matters, including accounting, internal accounting controls or auditing matters, should be brought to the Company's attention through the hotline number set up to receive calls regarding such concerns. These calls may be made anonymously and confidentially.

Suppliers should report concerns about potential legal, regulatory or ethical misconduct, such as concerns regarding:

- regulatory compliance
- bribery or other improper payments
- potential money laundering or other suspicious activity
- inappropriate conflicts of interest
- the integrity of the Company's accounting practices, internal controls, auditing matters or public filings
- improper or questionable behavior by employees, supervisors, clients, counterparties, consultants, suppliers or other third parties

To obtain Seven Seas Water's Whistleblower Hotline Numbers, at:

<https://secure.ethicspoint.com/domain/media/en/gui/41684/index.html>