

Willdan Group, Inc. Supplier/Subcontractor Code of Conduct

At Willdan Group, Inc. (“Willdan” or “the Company”), one of our core values is integrity. Inherent in this core value is our belief that acting ethically and responsibly is the right thing to do for our business.

Willdan has developed this Supplier/Subcontractor Code of Conduct (“SSCCC”) to clarify our expectations of suppliers/subcontractors in the areas of business integrity, confidentiality, labor practices, and safety. The SSCCC complements Willdan’s Code of Ethical Conduct and other Company policies referenced herein.

Willdan is committed to conducting our business in an ethical, legal, and socially responsible manner. Any employee (including temporary), agent, supplier/subcontractor, consultant, or other representative of a Willdan vendor of materials, equipment, and services (hereinafter referred to as “Affiliate”) is expected to follow Willdan’s SSCCC when performing work for or providing materials, equipment, and services to Willdan. Although there may be different legal and cultural environments applicable to suppliers, Willdan suppliers/subcontractors must meet the minimum requirements contained herein in order to do business with Willdan.

Compliance With Laws, Regulations and Published Standards

Willdan suppliers/subcontractors must comply with all applicable federal, state, and local laws, codes, or regulations. This includes, but is not limited to, laws and regulations relating to environmental, occupational health and safety, and labor practices. In addition, Willdan suppliers/subcontractors must require their suppliers (including temporary labor agencies) to do the same.

Ethical Business Practices

Suppliers/subcontractors shall conduct their businesses in accordance with the highest standards of ethical behavior and in accordance with applicable laws and regulations. Suppliers/subcontractors are expected to conform to the listed requirements in each of the following areas:

- *Fair Trade Practices.* Suppliers/subcontractors shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of antitrust laws.
- *Bribery, Kickbacks, and Fraud.* No funds or assets of the supplier shall be paid, loaned, or otherwise disbursed as bribes, kickbacks, or other payments designed to influence or compromise the conduct of Willdan, our employees, or representatives.
- *Foreign Corrupt Practices Act.* While laws and customs vary throughout the world, suppliers must comply with foreign legal requirements and United States laws that apply to foreign operations, including the Foreign Corrupt Practices Act. The Foreign Corrupt Practices Act generally makes it unlawful to give anything of value to government officials, foreign political parties, party officials, or candidates for office for the purposes of obtaining or retaining business.

Willdan Policies and Procedures

Suppliers must comply with Willdan’s published policies and procedures, including, but not limited to, the Conflict of Interest, Procurement Relationships, and other relevant provisions of Willdan’s Code of Ethical Conduct.

Intellectual Property Rights

Suppliers/subcontractors shall respect the intellectual property rights of others, including Willdan, our affiliates, and our business partners. Suppliers/subcontractors must take appropriate steps to safeguard and maintain confidential and proprietary information of Willdan and shall use such information only for the purposes specified for use by Willdan. Suppliers/subcontractors shall observe and respect all of Willdan's patents, trademarks, and copyrights and shall comply with all use requirements as established by Willdan.

Suppliers/subcontractors shall not transmit confidential or proprietary information of Willdan and our clients via the internet unless such information is encrypted in accordance with standards established by Willdan.

Environmental Practices

Suppliers/subcontractors shall comply with all environmental laws and regulations applicable to their operations. Such compliance shall include, among other things, the following items:

- Obtaining and maintaining environmental permits and timely filing of required reports
- Proper handling and disposition of hazardous materials in accordance with federal, state, and local regulations
- Monitoring, controlling and treating operation-related discharges into the environment in accordance with any permits and/or relevant regulations

Labor Practices

Willdan expects our suppliers/subcontractors to adopt sound labor practices and treat their workers fairly in accordance with federal, state, and local laws and regulations. In addition, suppliers/subcontractors must comply with the following standards:

- *Freely Chosen Employment.* Suppliers/subcontractors shall not use any forced labor, whether in the form of prison labor, indentured labor, bonded labor, or otherwise.
- *No Child Labor.* Suppliers/subcontractors shall comply with local minimum working age laws and requirements and shall not employ child labor.
- *Minimum Wages.* Suppliers/subcontractors shall pay wages for regular and overtime work and shall provide benefits that meet or exceed legal requirements.
- *Working Hours.* Suppliers/subcontractors shall not require employees to work more than the maximum hours of daily/weekly labor set by state and local laws.
- *No Harsh, Inhumane Treatment, or Abuse.* Suppliers/subcontractors shall treat each employee with dignity and respect. In no event shall supplier's/subcontractor's employees be subject to threats of violence, physical punishment, confinement, or other forms of physical, sexual, psychological, or verbal harassment or abuse.
- *No Discrimination.* Suppliers/subcontractors shall not discriminate in their employment practices on the basis of race, color, religion, sex, age, physical disability, national origin, creed, or any other basis prohibited by law.
- *Freedom of Association.* Suppliers/subcontractors shall recognize and respect the rights of their workers to join or refrain from joining associations of their own choosing and the right to collective bargaining in accordance with state and local labor laws and established practices.

Solicitations by Suppliers

Suppliers/subcontractors shall comply with all guidelines issued by Willdan relating to access to Willdan facilities, offices, and employees. No supplier/subcontractor shall use Willdan's computer or intranet, including our electronic mail system and internet site, for the purpose of sending unsolicited and/or non-Willdan business electronic mail messages within and outside Willdan.

Suppliers/subcontractors must receive prior written authorization from Willdan to use Willdan resources (e.g., banners) or demonstrate products related to Willdan's projects and/or services at trade shows and conferences.

Monitoring and Compliance

Suppliers/subcontractors shall support compliance with SSCCC by establishing appropriate management processes, including conducting reasonable audits and inspections to ensure their compliance with applicable legal requirements. Suppliers/subcontractors agree to cooperate with audits and assessments led by Willdan. If a supplier/subcontractor identifies areas of non-compliance, the supplier agrees to notify the relevant Willdan manager of their plan to remedy any such non-compliance. Willdan or our representatives may monitor a supplier's/subcontractor's activities to confirm compliance to this SCC Code, including but not limited to on-site inspections of facilities, use of questionnaires, review of publicly available information, or other measures necessary to assess compliance status.

Any supplier/subcontractor or Willdan employee that becomes aware of violations or suspects violations of the SSCCC Code may report violations or suspected violations at Willdan.com/Suppliers. Based on the assessment of information made available to Willdan, Willdan reserves the right (in addition to all other legal and contractual rights) without liability to Willdan, to disqualify any potential supplier/subcontractor or to terminate any contractual relationship with any current supplier/subcontractor found to be in violation of the SSCCC.

Occupational Health and Safety Practices

Suppliers/subcontractors shall provide their employees with a safe and healthy working environment in order to prevent accidents and injury to employees arising out of, linked with, or occurring in the course of performing work or as a result of the operation of the supplier/subcontractor.

Suppliers/subcontractors shall, among other things, provide:

- *Occupational health and safety training*
- *A system for injury and illness reporting*
- *Identification, evaluation, and control of worker exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing, and highly repetitive or forceful assembly tasks*
- *Medical treatment and/or compensation to injured employees arising as a result of working for supplier/subcontractor*
- *Identification, evaluation, and control of potential employee exposure to chemical, biological, and physical agents; when hazards cannot be adequately controlled by engineering and administrative means, employees are to be provided with appropriate personal protective equipment*
- *Machine safeguarding and other protective measures to prevent injuries/illnesses to employees*
- *Clean and safe facilities for employees, including clean toilet facilities, access to potable water, and sanitary food preparation and storage facilities*

- *Employee dormitories to be clean, safe, and with emergency egress, adequate heat and ventilation, and reasonable personal space*

Suppliers/subcontractors shall take reasonable precautions for safety of, and shall provide reasonable protection to prevent damage, injury, or loss to:

- *Employees and other persons who may be affected thereby*
- *The materials and equipment, whether in storage on- or offsite-, or under care, custody, or control of the supplier/subcontractor or their affiliates*
- *Other property at the site or adjacent thereto, such as trees, shrubs, lawns, walks, pavements, roadways, structures, and utilities not designated for removal, relocation, or replacement in the course of construction*

Suppliers/subcontractors shall give notices and comply with applicable laws, ordinances, rules, regulations, and orders of regulatory agencies on the safety of employees and/or property providing protection from damage, injury, or loss.

Suppliers/subcontractors shall provide, install, and maintain as required by existing conditions and performance of the contractual agreement with Willdan, reasonable safeguards for safety and protection, including posting danger signs and other warnings against hazards, promulgating safety regulations, and notifying owners and users of adjacent sites and utilities.

When using or storing explosives or other hazardous materials or equipment, or when unusual methods are necessary for execution of work, suppliers/subcontractors shall exercise utmost care and perform such activities under the supervision of properly qualified employees.

Suppliers/subcontractors shall promptly repair any damages on worksite or to equipment that they or their affiliates caused during the work performed for Willdan, at no cost to Willdan.

Supplier/subcontractors shall designate a responsible member of their organization at the site whose duty shall be the prevention of accidents. This person shall be the supplier's/subcontractor's superintendent unless otherwise designated in writing to Willdan.

IN WITNESS WHEREOF, the undersigned has caused this Supplier/Subcontractor Code of Conduct (SSCC) to be executed by their authorized officers as of the date and year written below.

Thomas D. Brisben

SIGNATURE

April 12, 2023

DATE

Willdan

COMPANY NAME