

## Constellation Supplier Code of Conduct

Constellation values its relationships with its contractors, consultants, suppliers, and vendors, collectively referred to as "Suppliers". We rely on Suppliers to help us deliver reliable, clean energy and innovative solutions while exercising the highest standards in safety, conduct, quality, and excellence.

The Constellation Supplier Code of Conduct, grounded in [Constellation's values](#), sets the expectations for contracting with Constellation. Constellation's highest priority is the health and safety of its employees, customers, Suppliers, and the public. Constellation is fully committed to ensuring that our nation has the reliable, sustainable energy it needs to thrive. Our policy includes consideration of Suppliers' environmental performance in our procurement decisions. Constellation values respect, belonging, diversity and inclusion, driving the way we work and do business. Constellation protects confidential information related to its personnel, customers, Suppliers, operations, business affairs, and commercial opportunities. We seek Suppliers who share these values, conform to the highest ethical standards, can support our core strategies, and deliver innovative, cost-effective solutions while bringing diverse perspectives and capabilities.

Constellation Suppliers and their employees, agents, subcontractors and representatives, must adhere to the requirements below when working with Constellation and will be held accountable for doing so. References to Suppliers in this Code also apply to Supplier employees, subcontractors and subcontractor employees, agents, and representatives.

### Relationship with Contract Documents

- The Constellation Supplier Code of Conduct complements contract terms with Suppliers, but in case of any conflict, Suppliers should adhere to contract requirements and report inconsistencies to Constellation's Supply Department and business representative.

### Compliance with Laws and Highest Ethical Standards

- Suppliers must comply with all applicable laws, rules, and regulations in the jurisdictions in which the work is performed and with respect to the operation of their production and manufacturing facilities and their other business and labor practices.
- Suppliers must conform to the highest standards of integrity and ethical conduct.
- Supplier interactions with Constellation personnel must reflect honesty, integrity, and transparency.
- Suppliers must ensure required training of their workforce has been completed prior to starting any work for Constellation and during the term of the contract between Constellation and the Supplier.
- Suppliers must also ensure that all Supplier and subcontractor employees supporting Constellation's operations are aware of the standards described in this Constellation Supplier Code of Conduct.

### Health, Safety and Environment

- Suppliers must manage hazards, provide safety information, and empower workers to stop unsafe work.
- Suppliers delivering on-site services at Constellation facilities must comply with all Constellation safety standards.
- Suppliers must identify and prepare for potential emergencies by establishing response plans and providing workers with thorough instruction on relevant procedures.
- Suppliers must ensure their employees can safely perform their duties without impairment.
- Supplier's must ensure their employees do not introduce or consume alcoholic beverages, illegal drugs, unprescribed medications, or weapons at its facilities.
- Suppliers must ensure their employees do not carry firearms or other weapons on Constellation property, facilities, or job sites without Constellation's prior written approval, even if the employee possesses a concealed weapons permit.
- Suppliers must not tolerate any form of violence or intimidation on Constellation property, job sites, or work.

## **Social Responsibility and Human Rights**

- Suppliers must provide humane working conditions and respect the worth, dignity, and basic human rights of all workers.
- Suppliers must comply with all applicable laws regarding work hours, wages and minimum living wages, minimum legal worker age limits, and education standards.
- Suppliers must honor applicable collective bargaining rights, including the rights of workers to voluntarily choose whether to be a member or not, be a member of a trade union or to bargain collectively, without unlawful interference.
- Suppliers must prohibit the use of child labor, forced labor, or involuntary labor whether bonded, imprisoned, or indentured, including debt servitude.
- Suppliers must prohibit engaging in trafficking in persons, procuring commercial sex acts, or using any form of threat, force, coercion, fraud, or exploitation in the performance of contracts.
- Suppliers must prohibit the destruction of, confiscation of, or denial of access to employee identity or immigration documents, passports, or work permits, the use of misleading or fraudulent recruiting practices or the charging of employee recruitment fees.
- Suppliers must provide legally required employment, recruiting, or work documentation to its workforce and legally required return transportation or transportation pay at the end of employment.
- Suppliers must meet the required host country housing and safety standards and provide sanitary and safe working conditions.
- Suppliers should make a positive and responsible impact on the communities in which they operate.

## **Respect, Belonging, Diversity and Inclusion**

- Suppliers must provide a harassment-free work environment where the diverse backgrounds and perspectives of everyone are respected and must not tolerate disrespectful or harassing behavior.
- Suppliers must maintain a workplace free from discrimination and retaliation and provide equal employment opportunities regardless of age, race, sex, religion, or other protected characteristics.

## **Ethical Business Practices: Integrity, Compliance, and Fair Play**

- Suppliers must avoid conflicts of interest with Constellation and disclose any close personal relationships that could impact business decisions.
- Suppliers must not give cash gifts or equivalents (e.g., gift cards or certificates) to Constellation employees or agents.
- Supplier's gifts to, meals for, or entertainment of Constellation employees should be modest, infrequent, and given for legitimate business purposes.
- Other than attendance at standard industry events and reasonable items associated with such events, Suppliers in a bid process, contract negotiations, or pending dispute with Constellation must not offer gifts, meals, or entertainment of any kind to Constellation employees involved in these processes or in positions having direct influence over these processes.
- Suppliers engaged in a competitive bid process or contract negotiations with Constellation are to direct all communications concerning same to the designated Constellation employees involved in these processes.
- Suppliers must not engage in bribery, corruption, or extortion and must comply with anti-corruption laws.
- Suppliers must disclose to Constellation any Supplier officer, director, or key employee who is a public official. Constellation requires disclosure of any request, recommendation, and referral from a public

official relating to work for Constellation to ensure that such communications do not inappropriately influence Constellation's Supplier selection.

- Suppliers must not engage in money laundering or conduct business with individuals connected or linked to illegal activities, including tax evasion.
- Suppliers representing Constellation must not make, directly or through a third party, facilitation payments to government officials.
- Suppliers must adhere to the U.S and applicable foreign trade laws, including import and export regulations and prohibitions on doing business with sanctioned parties.
- Suppliers must not engage in agreements that restrain trade or influence bids or contracts unlawfully.
- Suppliers must maintain accurate, complete, and clear business and financial records, ensuring compliance with applicable laws and regulations.
- All information provided to Constellation must be timely, truthful, and transparent, with no falsification or misrepresentation of transactions or documents.

### **Confidentiality, Media Guidelines and Resource Security Expectations**

- Suppliers must obtain written permission from Constellation's Corporate Affairs department before using Constellation's name, logo, trademark, or any media involving its employees or facilities.
- Suppliers must respect intellectual property rights.
- Suppliers must ensure the security of Constellation's confidential information and personal data.
- Suppliers granted access to Constellation's systems and facilities must follow security protocols, including not sharing their own or using someone else's login credentials and returning access items when no longer needed or upon request.
- Any media inquiries related to contracts with Constellation must be promptly reported to Constellation's Corporate Affairs department.
- Suppliers must implement procedures to ensure social media use by their workforce does not negatively impact Constellation's reputation and refrain from unauthorized use of Constellation's documents and proprietary materials.
- Suppliers must use Constellation supplied confidential information and resources (e.g., entry badges, computers, mobile phones) solely for legitimate business purposes, maintaining confidentiality and security of information, and any breaches must be reported immediately to Constellation.

### **Reporting Concerns / Non-Retaliation**

Suppliers and their workforce are responsible for seeking help to understand Constellation policies, asking questions, seeking guidance, and reporting any suspected conduct violations to Constellation through the 24-hour Ethics Help Line at (844) 927-2282, secure web portal (available here [EthicsPoint - Constellation Energy](#) or by copying this path into a browser:

<https://secure.ethicspoint.com/domain/media/en/gui/82357.index.html>), or via email at [EthicsOffice@constellation.com](mailto:EthicsOffice@constellation.com). Suppliers and their workforce obligations under this Supplier Code do not limit rights to make disclosures protected under the whistleblower provisions or other provisions of applicable laws or regulations or to disclose, discuss, or report a concern to any federal, state, or local regulatory or governmental agency charged with enforcement of any laws, including, but not limited to, the Securities and Exchange Commission (SEC), Equal Employment Opportunity Commission, National Labor Relations Board, and the Nuclear Regulatory Commission. Suppliers must comply with such whistleblower laws and regulations, including requirements that prohibit retaliation and provide for confidential reporting mechanisms.