



SUSTAINABLE PROCUREMENT CODE OF CONDUCT

Procedural Policy Form

Procedural Policy Name: Sustainable Procurement Code of Conduct

Issue/Review Date: November 19, 2025

Statement: Husch Blackwell provides a full and extensive range of legal services to a diverse range of clients. This Responsible Procurement Code of Conduct applies to Husch Blackwell suppliers and their subsidiaries, affiliates and subcontractors (each a “Supplier”; collectively, “Suppliers”) providing goods and/or services to Husch Blackwell, or for use in connection with Husch Blackwell services or products. If there is any aspect of this Code of Conduct that conflict with an existing contractual term between Husch Blackwell and a Supplier, the contract term shall prevail.

Objective: Husch Blackwell is committed to ethical business practices, acting in accordance with all applicable laws, and supporting the long-term sustainability of the global environment and the communities in which we and our clients operate. We expect Suppliers to share our commitment and to have their own internal code of conduct in place to support such commitment.

Responsibility: Environmental Sustainability

Husch Blackwell is devoted to protecting the environment and encourages Suppliers to develop, implement, and maintain environmentally responsible and sustainable business practices consistent with the best industry standards and practices.

- **Air Emissions Management:** Supplier shall identify, manage, reduce and responsibly control air emissions emanating from its operations that pose a hazard to the environment.
 - **Hazardous Substance Management:** Supplier shall implement a systematic approach to identify, manage, reduce and responsibly dispose of or recycle hazardous substances.
 - **Non-Hazardous Waste Management:** Supplier shall implement a systematic approach to identify, manage, reduce and responsibly dispose of or recycle non-hazardous waste.
 - **Pollution Prevention and Resource Reduction:** Suppliers are expected to minimize pollution as well as improve resource efficiency, conservation and substitution measures.
 - **Resource Efficiency:** Sustainable businesses minimize their use of natural resources. Vendors are expected to have commitments to improve resource efficiency, including minimizing use of scarce or non-renewable resources, by
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using recycled materials where possible and by recycling the materials that they use.

- Greenhouse Gas (Carbon) Emissions: Vendors should understand where greenhouse gas or carbon emissions occur in their products, services, and supply chains. They should have targets and processes to reduce emissions from operations and products over their life cycle.

Ethics

Husch Blackwell expects the highest standards of ethical conduct in all endeavors. Supplier shall be ethical in the way it conducts its business, including relationships, practices, sourcing and operation. Supplier shall always act with integrity; make decisions that serve the best interests of Husch Blackwell and its clients; and never deceive, defraud or misrepresent the facts.

- Business Integrity: Supplier shall not practice or tolerate any form of corruption, extortion, embezzlement or bribery to obtain an unfair or improper advantage while doing business and shall abide by all applicable laws pertaining to anti-corruption, fiscal and tax compliance, anti-bribery, and corruption. Supplier shall ensure that management systems and practices are in place to prevent inadvertent use of Husch Blackwell's business activities for money laundering or terrorist financing.
 - Business Solicitation: Supplier shall refrain from speculatively soliciting business directly or indirectly from unknown Husch Blackwell employees/contractors by letter, email or telephone (e.g. cold calling, direct marketing etc.).
 - Community Engagement. Supplier is encouraged to help foster social and economic development and contribute to the sustainability of the communities in which it operates.
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- **Competition:** Supplier shall apply fair business practices in the course of doing business and comply with all applicable anti-trust and global competition laws.
 - **Conflicts of Interest:** Supplier shall be aware of situations that can present a conflict, and will avoid even the appearance of bias. Supplier shall immediately disclose to Husch Blackwell any situation that may appear as a conflict of interest, including, without limitation, close personal or family relationships, and Supplier shall immediately disclose to Husch Blackwell whether any Husch Blackwell employee or contractor may have an interest in the Supplier's business or any kind of economic ties with the Supplier.
 - **Disclosure of Information:** Supplier shall comply with all applicable laws and contractual obligations to safeguard the confidentiality of Husch Blackwell's name and information, including, without limitation, both client data and employee personal information. In addition, Supplier shall protect, respect and not misuse proprietary information and intellectual property belonging to Husch Blackwell or any third party.
 - **Insider Trading:** Husch Blackwell clients may be publicly listed, and any information pertaining to those clients may potentially constitute material, non-public information within the meaning of applicable securities laws. Supplier and its employees shall not use such insider information for personal gain or in violation of any applicable securities laws.
 - **Professional Behavior:** Supplier shall comply with relevant laws, rules and regulations in the countries and jurisdictions in which it operates and shall avoid any action that may discredit or disparage the reputation of Husch Blackwell or its clients. Supplier shall not make any statements or speak to reporters on Husch Blackwell's behalf. Supplier shall only engage in social media in a way that complies with law. If Supplier posts any content that relates to Husch Blackwell, Supplier shall have obtained permission first and include disclaimers indicating that the views expressed do not represent those of Husch Blackwell.
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Health & Safety

Worker health, safety and well-being is very important to Husch Blackwell. Supplier shall provide and maintain a safe work environment and integrate sound health and safety management practices into its business. Workers shall have the right to refuse unsafe work and to report unhealthy or unsafe working conditions confidentially and anonymously without fear of retaliation.

- **Emergency Response:** Supplier shall identify and assess potential emergency situations and develop and implement appropriate emergency plans and response procedures.
- **Ergonomics:** Supplier shall identify, evaluate and make adjustments that help ensure individual workspaces are comfortable and prevent known ergonomic risks.
- **Health and Safety Communication:** Supplier shall provide workers with appropriate workplace health and safety training and information.
- **Incident Management:** Supplier shall have policies and procedures in place for workers to raise genuine concerns about legal or ethical issues, as well as a system to investigate, track and manage such reports.
- **Industrial Hygiene:** Supplier should have in place procedures and systems to identify, evaluate and control worker exposure to the hazards of physically demanding tasks.
- **Occupational Health, Safety and Hazard Prevention:** Supplier shall identify, evaluate and manage occupational health and safety hazards.

Labor & Human Rights

Husch Blackwell believes all workers in our supply chain deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and Suppliers shall uphold the highest standards of human rights. Supplier shall promote behavior that is free of unlawful discrimination and harassment, abusive conduct and bullying.

- **Anti-Discrimination:** Supplier shall promote diversity, equity, and inclusion, and will not discriminate against any worker based on race, color, ancestry, national origin, sex, gender (including pregnancy), gender identity, sexual orientation, religion, age, disability, handicap, military or veteran status, or any other legally protected status in hiring and other employment practices.
 - **Anti-Harassment and Abuse:** Supplier shall prohibit and not tolerate any form of abuse of employees and commit to a workplace free of harassment and abuse.
 - **Prevention of Modern Slavery:** Supplier shall conduct themselves in a way that respects all human rights and will comply with all applicable anti-slavery and human trafficking laws. Supplier shall not traffic persons or use any form of slavery, forced, compulsory, illegal, bonded, indentured or prison labor.
 - **Prevention of Underage Labor:** Supplier shall comply with all local and national minimum working age laws, rules and regulations and not use child labor in the production or distribution of goods and/or services.
 - **Wages and Benefits:** Supplier shall compensate all workers in accordance with all applicable laws, including, without limitation, those that relate to minimum wage and overtime hours. Supplier shall ensure that all workers receive at least the legally mandated minimum wages and benefits and that there will be no deductions from wages or imposition of monetary fines as a disciplinary measure.
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- Working Hour: Supplier shall ensure working hours comply with all applicable laws, rules and regulations, and ensure that any work beyond the statutory hours must be voluntary.

Husch Blackwell commits to reviewing this Sustainable Procurement Code of Conduct and its guidelines every two years. Husch Blackwell may at its sole discretion make updates to this Code of Conduct and its guidelines at any time.

