



Supplier Code of Conduct

Sidewalk Labs is committed to treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible, ethical operations. We expect suppliers in our operations and supply chain, and their suppliers, to embrace the following social, environmental, and ethical responsibilities.

Supplier Conformance with Sidewalk's Supplier Code of Conduct

1. **Underlying Obligations.** In addition to these responsibilities, suppliers must comply with all applicable laws; legal regulations, directives, and guidelines; and all obligations in any contract a supplier may have with us.
2. **On-Site Work.** Suppliers using our properties or facilities will comply with all of our applicable policies and requirements.
3. **Certifications.** If Sidewalk Labs requests additional certifications, such as ISO 50001, 14001 or OHSAS 18001, suppliers will make good faith efforts to obtain such certifications in a timely manner.
4. **Information Disclosure.** Suppliers will accurately disclose information regarding their labor, health and safety, environmental practices, business activities, structure, financial situation, and performance, in accordance with prevailing industry practices.
5. **Cooperation.** Suppliers will cooperate with any information requests or audits we may initiate to confirm their fulfillment of these responsibilities. Though we seek to work with suppliers to improve conditions, we may terminate our relationship with any supplier that fails to meet these responsibilities.

LABOR AND HUMAN RIGHTS

Sidewalk is committed to upholding the human rights of workers and treating them with dignity and respect. This applies to all workers, including temporary, migrant, student, contract, direct employee, and any other type of worker. As a result, suppliers must manage their own workforce in order to achieve the following results:

1. **Freely Chosen Employment and Combating Modern Slavery.** Suppliers will not use or permit any form of forced, bonded, or indentured labor. All work must be voluntary, and all workers must be free to terminate their employment at any time. Suppliers will not hold workers' identity, immigration, or work permit documents longer than reasonably necessary for administrative processing. Suppliers are expected not to require workers to pay recruitment fees or other fees for their employment, either directly or through third parties, and are expected to repay any worker that has paid such fees. Suppliers will not unreasonably restrict workers' freedom to move into, out of, or at working facilities. As part of the hiring process, suppliers are expected to give each worker a written agreement describing the worker's terms



of employment in a language understood by the worker, and, if internationally relocating, the written agreement will be provided before they leave their country of origin.

2. **Young Workers and Student Interns.** Suppliers will not use child labor. “Child” means any person under age 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 will not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers may use legitimate, properly-managed apprenticeship programs, such as student internships. Unless otherwise addressed by local law, suppliers are expected to pay student workers, interns, and apprentices at least the same wage rates as other entry-level workers performing equal or similar tasks.
3. **Wages.** Suppliers will pay legally-mandated wages and benefits, will comply with the law regarding wage deductions, and will provide workers with the basis on which workers are paid via pay stub or similar documentation. Suppliers are expected not to deduct from wages as a disciplinary measure.
4. **Working Hours.** Except in emergency or unusual situations, for suppliers’ workers paid hourly, workweeks are expected not to exceed 60 hours per week (including overtime) or, if less, the maximum set by local law. Workers should be allowed at least one day off every seven days.
5. **Fair Treatment, Non-Discrimination, Diversity and Inclusion.** Suppliers will not permit harassment, abuse, corporal punishment, or inhumane treatment. Suppliers will not subject workers or potential workers to unlawful medical tests or physical exams. Suppliers will not discriminate in screening, hiring, or employment practices based on race, color, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, ethnicity, national origin, caste, disability, genetic information, medical condition, pregnancy, religion, political affiliation, union membership, covered veteran status, or body art. Workers’ religious practices will be reasonably accommodated. Suppliers will not inquire about potential workers’ criminal histories on employment applications or before initial interviews, or, if no interview is conducted, before making conditional offers of employment. In addition, suppliers will demonstrate a commitment to identify, measure, and improve a culture of diversity and inclusion through all aspects of workplace management.
6. **Freedom of Association and Collective Bargaining.** Workers will be permitted to associate freely, bargain collectively, and seek representation in accordance with local laws. Suppliers are expected to permit workers to openly communicate and share grievances with management about working conditions without fear of reprisal or harassment.

HEALTH AND SAFETY

Suppliers will integrate the following health and safety management requirements into business processes to provide workers with a healthy and safe work environment:

1. **Occupational Safety and Health.** Suppliers will comply with all applicable safety and health laws and regulations, and identify, evaluate, and control worker exposure to safety and health hazards, including chemical, biological, physical, and ergonomic stressors, through proper design, engineering controls, maintenance, safe work procedures, and ongoing health and

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safety guidance. Where these means cannot adequately control hazards, suppliers will protect workers with appropriate personal protective equipment and provide them with information about risks to them from these hazards. Suppliers will implement procedures to prevent, manage, track, and report occupational injury and illness, including encouraging worker reporting, classifying and recording cases, providing medical treatment, investigating cases, implementing corrective actions, and facilitating workers' return to work.

2. **Emergency Preparedness.** Suppliers will identify and plan for potential emergencies, and will implement emergency plans and provide guidance to workers on emergency response procedures, including emergency reporting, worker notification and evacuation, drills, fire detection and suppression equipment, exit facilities, and recovery plans.
3. **Sanitation, Food, and Housing.** Suppliers will provide workers with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. If suppliers provide workers with residential facilities, those facilities will be clean and safe, with adequate personal space, entry and exit privileges, emergency egresses, heat and ventilation, and hot water for bathing and showering.

ENVIRONMENTAL

Sidewalk recognizes that environmental responsibility is integral to producing world-class products. In manufacturing operations and construction, suppliers will strive to create regenerative processes and will minimize adverse effects on the community, environment, and natural resources while safeguarding the health and safety of the public. In addition:

1. **Environmental Permits and Reporting.** Suppliers will obtain and keep current all required environmental permits, approvals, and registrations, and follow their operational and reporting requirements.
2. **Resource Efficiency and Clean Energy.** Throughout their operations, suppliers will work to reduce consumption of resources, including raw materials, energy, and water. Suppliers will track, document, and seek to minimize energy consumption and greenhouse gas emissions, and seek ways to improve energy efficiency and use cleaner sources of energy.
3. **Hazardous and Restricted Substances.** Suppliers will identify and manage chemicals and other materials that pose a hazard to the environment, to ensure their safe handling, use, storage, and disposal. Suppliers will identify, monitor, control, treat, and reduce hazardous air emissions, wastewater, and waste generated from its operations. Suppliers will adhere to our requirements restricting use of specific substances, including labeling for recycling or disposal.
4. **Waste Mitigation: Wastewater, Solid Waste and Stormwater Management.** Suppliers will work to reduce or eliminate waste of all types. Where waste cannot be eliminated, suppliers will manage and control all waste streams to comply with applicable laws and regulations, and in an environmentally responsible and secure way; this includes, but is not limited to, preventing illegal discharges and spills from entering storm drains, and treating as required prior to discharge or disposal of all wastewater and solid waste from operations, industrial processes, and sanitation facilities.



ETHICS AND COMPLIANCE

Suppliers will uphold the highest standards of ethics to promote honesty and integrity in business operations, including:

1. **Business Integrity.** Suppliers will avoid even the appearance of conflicts of interest in their work with us, and will immediately disclose any known family or other close personal relationships with our employees who have an influence over their engagements with us. If suppliers extend any business courtesies to our employees, they will do so infrequently and the courtesies must be of no more than moderate value. Suppliers will also accurately reflect their business dealings in their books and records. Suppliers will not offer or accept any form of bribery, corruption, extortion, or embezzlement. Suppliers will not make illegal payments directly or indirectly. Suppliers will implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.
2. **Intellectual Property.** Suppliers will respect intellectual property rights, and will conduct technology and know-how transfers in a manner protecting intellectual property rights.
3. **Responsible Materials Sourcing.** Suppliers will maintain a policy reasonably assuring that any tantalum, tin, tungsten, and gold in products they manufacture does not directly or indirectly benefit armed groups that commit human rights abuses in or near the Democratic Republic of the Congo. Suppliers will exercise, and will make available to us upon request, due diligence on the source and chain of custody of these minerals.
4. **Privacy and Information Security.** Suppliers will protect the privacy of personal information of everyone with whom they do business, including suppliers, customers, consumers, and workers.
5. **Accessibility.** Suppliers will embed relevant web accessibility standards, innovation, and best practices to deliver inclusive products and services for our users and stakeholders.

MANAGEMENT SYSTEM

Suppliers are expected to adopt or establish a management system to carry out these responsibilities. The management system will be designed to ensure suppliers' operations: (a) comply with our requirements and applicable laws and regulations; (b) conform to these responsibilities; and (c) identify and mitigate operational risks related to these responsibilities. It should also facilitate continual improvement:

1. The management system should contain the following elements: executive level commitment and accountability; processes to identify, monitor, and comply with all applicable laws, regulations, standards, and requirements; risk management processes; communications and training for all workers and suppliers as determined by suppliers; ongoing assessments, monitoring, and continued improvement, including corrective action processes; a program that provides workers with a means to report grievances anonymously and without fear of retaliation, unless prohibited by law; and a program to ensure suppliers will continuously monitor these reporting processes, record issues raised, and take appropriate action.