TETRA TECH

Vendor Code of Conduct

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Leading with Science®

Contents

Section 1: Introduction **1**

Section 2: Human Rights and Labor Standards of Vendor Engagement **1**

2.1 Vendor Engagement 1

2.2 Non-discrimination and Harassment 1

2.3 Working Conditions and Occupational Health and Safety 2

2.4 Controlled Substances and Intoxicants 3

2.5 Allegations of Unlawful Conduct 3

2.6 Confidential Information and Intellectual Property 3

2.7 Media, Social Media and Public Relations 4

2.8 Anti-Slavery and Human Trafficking 4

2.9 Child Labor and Wage and Working Age Laws 4

2.10 Environmental Sustainability 5

2.11 Environment, Social and Governance 5

2.12 Freedom of Associations and Collective Bargaining 5

Section 3: Business Ethics **6**

3.1 Accurate Records and Reporting 6

3.2 Quality 6

3.3 Legal Compliance 6

3.4 Anti-Corruption and Avoidance of Conflict of Interest 6

3.5 Anti-Competitiveness and Bribery 7

3.6 Money Laundering Prevention 7

3.7 Trade, Export, Import, and Sanctions Laws 7

Section 4: U.S. Government Business Conduct **8**

4.1 Special Nature of Government Business 8

4.2 Vendor Negotiation and Pricing 8

4.3 Subcontracting and Anti-Competitiveness 8

4.4 Gifts, Meals or Gratuities 8

4.5 Kickbacks 9

Section 5: Reporting **9**

5.1 Reporting Violations of the Code 9

5.2 U.S. Government Contract Reporting.....9
5.3 False Reporting.....9

Section 1: Introduction

For over 50 years of business, one thing has remained constant at Tetra Tech — our commitment to integrity and ethical business practices. Tetra Tech maintains business practice standards that command the respect of everyone with whom the Company conducts business including our vendors and subcontracting partners. These standards are intended to protect the Company's reputation and brand, the quality of its products and services, and the best interests of its clients, shareholders, and employees.

The standards of conduct that guide our worldwide business operations are set forth in our Corporate Code of Conduct ("Corporate Code"). Each of our employees is expected to comply with the Corporate Code and to work diligently in maintaining the highest standards of ethical conduct.

As part of the Company's supply chain management, Tetra Tech requires all vendors, suppliers, contractors, subcontractors and their agents (collectively "vendors") to share this commitment and conduct themselves in accordance with this Vendor Code of Conduct ("Vendor Code"). We expect vendors to be familiar with our Vendor Code, to operate in accordance with the expectations outlined herein and to comply, at a minimum with all applicable laws, rules, regulations and standards within the geographies in which they operate.

Section 2: Human Rights and Labor Standards of Vendor Engagement

2.1 Vendor Engagement

Tetra Tech (the "Company" or "Tetra Tech") understands that effective relationships with our vendors are based on the recognition of the value of each party and the need to provide a working environment conducive to the success of our projects. We require all vendors to abide by the standards outlined in this Vendor Code.

2.2 Non-discrimination and Harassment

We are committed to equal opportunity for our employees and vendors and to creating, managing, and valuing diversity in our business practices. No vendors shall engage in discrimination based on age, race, religion, ancestry, sex, gender identity, ethnic or national origin, marital status, disability, veteran status, sexual orientation, political affiliation, or genetics.

It is also the Company's policy to provide a workplace free of harassment which flows down to our vendors. Vendors must not engage in, condone, or tolerate physical, verbal, mental or sexual harassment against or among their workers.

Tetra Tech's commitment to diversity and inclusion includes recruiting and retaining employees from diverse backgrounds and experiences, creating awareness of diversity issues and benefits, and fostering a supportive environment where inclusivity is expected and prioritized. We seek vendors who value and promote diversity and inclusion in their business, products and services.

2.3 Working Conditions and Occupational Health and Safety

The Company's policy is to provide and maintain a workplace and all project sites free of safety and health hazards. The protection of vendor employee health and the prevention of work-related injuries and illnesses are a vital and integral part of Company operations. Tetra Tech has developed a comprehensive health and safety program to meet or exceed the applicable occupational health and safety requirements globally. The Company will continuously monitor and improve operations, procedures, technologies, and programs that are conducive to maintaining a safe, secure, and healthy working environment.

All vendors must provide a safe and healthy working environment that complies with local laws and minimizes occupational hazards. If vendors provide residential facilities for their workers, they must be safe and sanitary. All vendors are responsible for upholding the health and safety standards established by the Company. Specifically, each vendor employee shall be responsible for the following:

- Taking personal responsibility for his/her own health and safety, and for actions that affect others.
- Integrating health and safety elements into all aspects of their work.
- Abiding by established rules, regulations and safe work practices.
- Maintaining appropriate working hours, wages, and benefits that meet or exceed all local, state, and federal regulations and guidelines.
- Adhering to all health and safety standards, and providing input on new hazards and continuous improvement measures.
- Immediately reporting to a supervisor any unsafe act or condition that may exist in the workplace.
- Immediately reporting injuries, illnesses, or other incidents where an undesired event results or could have resulted in harm to people, or loss/damage to property, production, or the environment.
- Actively participating in Company-sponsored health and safety training as required for role or job function.
- Properly using assigned personal protective equipment at all times.

- Seeking to maintain good health to enable the safe performance of jobs, tasks, and responsibilities.
- Arriving fit to perform jobs, tasks, and responsibilities in a safe, secure, productive, and effective manner during the entire duration of the work.
- Refraining from behavior that could impair safety in the workplace.
- Notifying his/her line manager, supervisor or HR Representative when he/she is not fit for work, or face situations or concerns that may adversely impact his/her ability to perform work safely.
- Refusing to work when faced with the possibility of serious injury or imminent danger of death.

Tetra Tech's health and safety culture also extends to how we approach environmental sustainability. It is important that our vendors follow sustainable business practices that balance public wellbeing, economic, and environmental aspects of their businesses, as we do for our customers.

2.4 Controlled Substances and Intoxicants

The use, possession, manufacture, sale, or distribution of any controlled substance is prohibited on Company property or any of vendor's owned, leased, or managed property, and all job sites. Vendors are prohibited from providing any services to Tetra Tech while under the influence of controlled substances or intoxicants. Controlled substances include alcohol, illegal drugs, or prescription drugs without a valid prescription.

2.5 Allegations of Unlawful Conduct

Any vendor employee who is arrested or charged with illegal activity for any action that is related to his/her service to Tetra Tech or involves the use of Company property must promptly report the incident to his/her point of contact at Tetra Tech. As a standard practice, the Company will notify the vendor that the offending employee will be no longer be allowed to provide services to Tetra Tech.

2.6 Confidential Information and Intellectual Property

Vendor employees may occasionally be exposed to Tetra Tech's or our customers' confidential or proprietary information or intellectual property. Vendors must maintain and protect the confidentiality of all confidential or proprietary information and use such information only as it is authorized and intended. No vendor employees should access any confidential information without proper authority.

Confidential or proprietary information includes, but is not limited to:

- Computer software, programming code, systems, network equipment configuration settings, databases, documentation and all date therein;
- Financial data (including investments, profits, pricing, costs, and accounting);
- Procurement plans, vendor lists and purchase prices;

- Technical information relating to products, processes, and techniques;
- Customer and supplier lists;
- Marketing, advertising and sales programs and strategies;
- Information relating to acquisition or divestiture activity;
- Personal identifying information about personnel, as well as nonpublic recruiting and training materials;
- Strategic business plans;
- Systems, programs, and procedures; and
- Nonpublic business secrets that might be of use to Tetra Tech competitors, or harmful to Tetra tech or its clients, if disclosed.

2.7 Media, Social Media and Public Relations

Media relations are the responsibility of Tetra Tech's Corporate Media and Communications department. All contacts with the media, including statements or responses, shall be handled through that department. If a vendor is contacted by a member of the media or is asked for a statement regarding Tetra Tech or any Company project, the vendor should immediately direct the inquires to the Tetra Tech Media and Communications Department at (626) 470-2439.

Given the wide access to the internet and the accompanying proliferation of blogs, social media, chat rooms, and message boards, as well as the widespread use of cellular phones with video capability, the traditional definition of the media has broadened. Any inquiry from a blogger, writer, reporter, or social media community member irrespective of the medium, should be referred to the Media and Communications Department. Vendors should not publish or comment via social media in any way that suggests they are communicating on behalf of Tetra Tech in any capacity.

2.8 Anti-Slavery and Human Trafficking

Tetra Tech does not tolerate slavery, forced labor, or human trafficking in any form, in our supply chains or any part of our business. Vendors shall comply with all applicable laws against forced labor, involuntary servitude, debt bondage, and trafficking in persons, including but not limited to the Trafficking Victims Protection Reauthorization Act and the Federal Acquisition Regulation anti-human trafficking regulation. Vendors may be required to follow additional policies and procedures in connection with goods and services pertaining to Tetra Tech contracts with or for the U.S. government.

2.9 Child Labor and Wage and Working Age Laws

Vendors will comply with all local minimum working age laws and requirements and not utilize child labor. Vendors must provide wages and benefits that meet or exceed local law requirements and are paid/provided in a timely manner.

2.10 Environmental Sustainability

Vendors are expected to share Tetra Tech's commitment to protecting and improving our environment with its projects around the world. At Tetra Tech, we are committed to *Leading with Science®* and innovation in our projects, our operations, and our communities to help achieve a more sustainable world. Tetra Tech is a member of the United Nations Global Compact — the world's largest corporate sustainability initiative — as part of its effort to continue to follow key environmental principles. Tetra Tech's sustainability program is documented in our annual Sustainability Report published each year on tetratech.com. Our sustainability program includes the following key components:

- Minimize greenhouse gas emissions and energy consumption.
- Prevent pollution prevention and manage wastes.
- Increase resource efficiency.
- Enhance biodiversity, encourage land conservation, and avoid deforestation.

Vendors are encouraged to comply with the above principles and take steps to minimize their use of natural resources and any negative impact their operations have on the environment. Vendors must operate in compliance with all applicable environmental laws.

2.11 Environment, Social and Governance

Tetra Tech considers Environment, Social, and Governance (ESG) metrics and standards when selecting potential supply chain sources. Environmental criteria gauge how a vendor safeguards the environment. Social criteria examine how it manages relationships with employees, suppliers, customers, and communities. Governance measures a company's leadership, executive pay, audits, internal controls, and shareholder rights.

Significant suppliers of services to Tetra Tech will be given a higher priority for selection if they demonstrate ESG policies that are in line with our own. Tetra Tech aims to identify companies with lower supply chain risk profiles, either through supply chain characteristics or through appropriate management of existing risks. In addition, we seek to select significant suppliers that are using sustainable supply chain management as an opportunity to improve our own long-term sustainability performance. Screening of suppliers will be conducted through our internal Supplier Qualification Module (SQM) which, among other things, helps screen out vendors who do not provide a safe work environment for their employees.

2.12 Freedom of Associations and Collective Bargaining

Vendors should provide workspace and working conditions that allow for freedom of associations and collective bargaining.

Section 3: Business Ethics

3.1 Accurate Records and Reporting

Vendors are required to record and report information accurately and honestly. Reporting, organizing or destroying information to mislead or misinform is prohibited. No entry shall be made or purposely omitted on any records or data that intentionally hides or disguises the true nature of the transaction, project, plan, or other business information, nor shall any data regarding Company business or services be falsified or distorted in any way. Vendor employees are responsible for promptly reporting any concerns regarding records and reporting to their Tetra Tech point-of-contact.

Vendors must keep employee records in accordance with all applicable laws and regulations.

3.2 Quality

Tetra Tech is dedicated to delivering high quality services to all its customers. We strive to deliver the highest quality services that exceed our customers' expectations through our Leading with Science © approach. Vendors must have the same commitment to quality in the work products and other services they provide.

3.3 Legal Compliance

Tetra Tech's policy is to comply with all laws and regulations that are applicable to its business both in the United States and in other countries in which it conducts business. Vendors are not permitted to take any action that would constitute a violation of law. Vendors must be familiar with and comply with the laws and regulations that govern their areas of responsibility.

3.4 Anti-Corruption and Avoidance of Conflict of Interest

The Company maintains offices and conducts operations around the world. Many of the countries in which the Company conducts business have laws and regulations that are significantly different than those in the United States. Vendors outside the U.S. are responsible for knowing and complying with these laws. Vendors must also take care to understand and respect the cultures and customs of the people with whom they work in these countries.

Tetra Tech's good reputation in the global marketplace relies on its commitment to complying with laws that prohibit bribery and corruption in international transactions. In conducting international business, vendors must know and comply with United States and non-U.S. laws that apply to the transaction.

Vendors must comply with the U.S. Foreign Corrupt Practices Act ("FCPA"), together with similar laws in other countries such as the Corruption of Foreign Public Officials Act in Canada, the U.K. Bribery Act of 2010, and the Brazilian Clean Companies Act. The FCPA is a federal law that makes it unlawful to, directly or indirectly, through partners, agents or intermediaries, bribe foreign government officials to obtain or retain business. The FCPA prohibits paying, offering, promising to pay (or authorizing to pay or offer) money or anything of value. The prohibition extends to corrupt payments to a non-U.S. official (employee), a political party or party official, or any candidate for non-U.S. political office. The FCPA also requires companies whose securities are listed in the United States to make and keep books and records that accurately and fairly reflect the transactions of the corporation and to devise and maintain an adequate system of internal accounting controls. No undisclosed or unrecorded Company fund shall be established. No false or artificial entry shall be made on the books and records of the Company for any reason.

3.5 Anti-Competitiveness and Bribery

Vendors must not engage in acts or omissions that would interfere with competitiveness or involve bribery. Vendors may not offer, authorize, or give a bribe to a government official, or create the impression that a bribe has been offered, authorized or given. Vendors must take affirmative steps to prevent those doing business directly or indirectly before a government official on the Company's behalf from engaging in bribery. Vendors must promptly report any suspected violations to their Tetra Tech primary point-of-contact.

3.6 Money Laundering Prevention

Vendors must comply with all applicable anti-money laundering and antiterrorism laws. Tetra Tech only conducts business with reputable customers and suppliers involved in sound business activities with funds derived from legitimate sources.

3.7 Trade, Export, Import, and Sanctions Laws

Vendors involved with international transactions are subject to a variety of laws and regulations of the United States and other countries, such as limits on some types of exports and imports, or restrictions on doing business with certain persons or entities. These rules prohibit certain transactions and/or impose licensing or reporting requirements. A violation of these laws could result in significant civil and/or criminal penalties. It is important for vendors to understand these restrictions.

U.S. and non-U.S. laws impose sanctions on business activities, including imports, exports, and financial transactions, with certain countries, entities, and other prohibited persons. U.S.-based companies are not permitted to participate in or support international boycotts that are not sanctioned by the US Government.

Many countries, including the United States, and countries in the European Union, restrict the export and import of "dual-use" items, which are items that have both a military and commercial use. Examples include encryption technology, certain high-end computers, and some kinds of telecommunications equipment (e.g., satellite telephones).

Section 4: U.S. Government Business Conduct

4.1 Special Nature of Government Business

Tetra Tech's clients include U.S. federal, state, and local governments. Accordingly, it is necessary that all vendors on U.S. Government programs comply with all statutes, regulations, rules, and ordinances that apply to these transactions. The U.S. Federal Acquisition Regulation ("FAR"), and related laws and regulations, govern the Company's business with U.S. government agencies. Vendors will comply with all applicable rules regarding socioeconomic considerations, including affirmative action, contracts with small and small disadvantaged businesses, and labor standard requirements.

4.2 Vendor Negotiation and Pricing

Under the U.S. Truth in Negotiations Act, the FAR requires the Company to certify in writing that its cost and pricing data are current, complete, and accurate up through the date of the agreement on contract price with the government. A claim of defective pricing, which could result in financial penalties and possible criminal charges against the Company and the individuals involved, may arise from a failure to comply with the Act. Cost or pricing data from vendors is subject to specific review and approval requirements coordinated by the Tetra Tech Finance or Accounting Department.

4.3 Subcontracting and Anti-Competitiveness

All vendors must comply with the terms and conditions of their subcontract, particularly in the areas of scope, key personnel, personnel qualification, deliverable products and testing. Tetra Tech follows special procedures when purchasing materials and services from other companies for use in government contracts. Many government contract requirements must be passed down to the Company's subcontractors and suppliers.

4.4 Gifts, Meals or Gratuities

Vendors may not provide or pay for meals, refreshments, travel or lodging expenses, or give anything of value to, U.S. government employees, except as specifically permitted by U.S. law and the applicable regulations then in effect. The Company and its employees must also comply with state, local, and foreign government rules governing the acceptance of business courtesies.

4.5 Kickbacks

The U.S. Anti-Kickback Act forbids Tetra Tech and its vendors from offering, soliciting, providing, or accepting any gift, money, or other item of value for improperly obtaining or rewarding favorable treatment in connection with U.S. government prime contracts and subcontracts. The law also requires the Company to report violations to the government when there are reasonable grounds to believe that a violation exists.

Section 5: Reporting

5.1 Reporting Violations of the Code

Tetra Tech expects each vendor to promptly report to the Company any violations of this Vendor Code. If a vendor has reason to believe that such vendor or any of its representatives, or an employee of the Company or its representatives, may have violated this Vendor Code or any applicable law, rule or regulation, or otherwise engaged in unethical behavior, it is such vendor's responsibility under this Vendor Code to promptly report the violation to such vendor's primary Tetra Tech contact. If for whatever reason this is not possible or appropriate, please contact any of the following:

- Tetra Tech's Chief Compliance Officer at **general.counsel@tetratech.com**
- Tetra Tech's anonymous Ethics Hotline at **+1 800-886-2577** within in the United States
- Online anonymously at tetratech.ethicspoint.com

5.2 U.S. Government Contract Reporting

A vendor having knowledge of credible information concerning actual or potential violations of the Company's policies as related to U.S. government contracting must report these concerns. Timeliness of reporting any suspected violation is important since the Company has reporting obligations to the government. The Company encourages vendors to report even potential issues, which shall be without fear of retaliation.

5.3 False Reporting

Vendors who file reports or provide evidence which they know to be false or without a reasonable belief in the truth and accuracy of such information will not be protected, and may be subject to termination of services. In addition, except to the extent required by law, the Company does not intend this Code to protect vendor employees who violate the confidentiality of any applicable lawyer-client privilege to which the Company or its agents may be entitled under statute or common law principles, or to protect employees who violate their confidentiality obligations with regard to the Company's trade secret information. Any vendor employee who is considering the disclosure of

information that may violate these privileges or reveal Company trade secrets is advised to consult an attorney before making such disclosure.