



# 2024 Constellation Supplier Code of Conduct





Constellation values our business relationships with our contractors, consultants, suppliers and vendors (collectively our “Suppliers” for the purpose of this code). We count on our Suppliers to help us fulfill our mission to provide clean, reliable, affordable energy and innovative energy products, and deliver the best service to our customers. Constellation works with a diverse group of Suppliers who support and share our commitment to the highest standards of safety, professional conduct, quality, value, service, reliability, availability, and technical excellence. Because our Suppliers and their employees and subcontractors are integral to our work, we expect them to share our values and hold our Suppliers accountable for adherence to this Constellation Supplier Code of Conduct.

The Constellation Supplier Code of Conduct outlines Constellation’s expectations and standards for ethical conduct with which all Suppliers, their subcontractors, and their respective workforces must comply when working for or on behalf of Constellation, and is grounded in the values Constellation employees live by every day:

- **Safety and Operational Excellence.** It’s about trust. Our customers rely on us to be up and running 24/7, 365 days a year. Solving problems. Keeping promises. Putting safety first. Operational excellence is a matter of pride and at the core of everything we do.
- **Competitive Spirit.** We are motivated by the challenge. To be the best operators. To deliver new technology to the market. To continuously improve and relentlessly innovate. Our competitive spirit sets us apart.
- **Respect, Belonging, and Equity.** We bring people together equitably so all voices can be heard, and every perspective is valued. Respecting differences, collaborating, being inclusive, and striving for balance. Bringing our whole self to the job, so we can come together as one.
- **Catalyst for Change.** It’s about having an impact. Driving economic progress, improving lives and reflecting the diversity of our society in our workforce. It’s a can-do attitude that says: Together we can be a catalyst for positive change in communities across America.
- **Climate Champion.** Our role has never been more essential. Leading the transition to a clean energy economy. Advocating for change. Preparing our communities for the future. We must be champions for climate.

All references to Suppliers in this Supplier Code of Conduct are also applicable to subcontractors and their respective workforces, unless expressly stated otherwise.

## Relationship to Contract Documents

The expectations and standards set forth in the Constellation Supplier Code of Conduct are intended to be complementary with, and do not supersede, the terms and conditions of the contract documents agreed to between Constellation and our Suppliers. In the event of any conflict or apparent conflict between the requirements of the contract documents and this Supplier Code of Conduct, the Supplier will comply with the requirements of the contract documents and bring the inconsistency to the attention of Constellation’s Supply Department and the designated business representative for the applicable contract documents.

## Compliance with Laws and Highest Ethical Standards

Suppliers must comply with all applicable laws and regulations governing the work they perform for Constellation. In addition, Constellation holds Suppliers to the same high standards of integrity and ethical conduct to which it holds itself and its employees. 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 employees supporting Constellation’s operations are aware of the standards described in this Constellation Supplier Code of Conduct.

## Health and Safety

The safety of the public, employees and Suppliers is Constellation's highest priority. Suppliers must ensure their employees comply with all applicable occupational health and safety laws and regulations, including but not limited to requirements that address occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, injury and illness recordkeeping and reporting, and physically demanding work.

Suppliers must also: (i) control exposure to workforce hazards by and to workers and to the public; (ii) make available safety information to all employees to educate, train, and protect them from workplace safety hazards; and (iii) ensure all members of their workforce are trained and empowered to stop work any time unsafe conditions or behaviors are observed until the job can be completed safely.

Basic safety and health expectations and requirements are set forth below. Additional requirements specific to the work undertaken by Suppliers may be specified in contract documents.

### Public Safety

Suppliers shall identify and take reasonable measures to eliminate, where practical, or mitigate potential safety hazards to the public associated with the Supplier's work for or on behalf of Constellation. Any concerns or challenges in protecting the public safety shall be shared promptly with Supplier's Constellation business contact(s).

### Occupational Safety

Suppliers shall identify and take reasonable measures to eliminate, where practical, or mitigate potential workplace hazards. Suppliers shall provide their workforce with appropriate, well-maintained personal protective equipment (PPE).

### Vehicle Safety

Suppliers shall ensure all vehicles used and transportation activities undertaken in the execution of Constellation business are compliant with applicable Department of Transportation and state regulations and codes. When operating a vehicle for Constellation business drivers shall carry a valid driver's license, including commercial driver's license where applicable, comply with the state vehicle code, obey all posted road regulations, and operate their vehicles safely, including minimizing all distractions while driving.

### Industrial Hygiene

Suppliers shall identify and take reasonable measures to eliminate, where practical, or mitigate potential workforce exposure to hazardous chemical, biological and physical agents and provide ongoing monitoring and surveillance of affected personnel. Engineering or administrative controls shall be used to control overexposures.

### Emergency Response

Suppliers shall identify and plan for potential emergencies and 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.

### Fitness for Duty

Suppliers shall ensure their employees are safely and efficiently able to perform the essential physical, psychological and cognitive requirements of their jobs without risk to self, others or the environment, and ensure they are not impaired by drugs, alcohol, disabling medical conditions or fatigue.

### Use of Drugs and Alcohol

Constellation prohibits the use, possession, purchase, sale, or the offer to sell, transfer, provide or share illegal drugs or medication prescribed for someone other than the user, during the execution of work for or on behalf of Constellation, or while on Constellation property. The use of prescription or over-the-counter medication that may impair the ability to safely or efficiently complete work is also prohibited.

Work for or on behalf of Constellation must never be performed while impaired by alcohol or marijuana, or any other drug or intoxicating substance.

### **Weapons in the Workplace and Workplace Violence**

Suppliers must ensure their employees do not carry firearms or other weapons on any Constellation facility or any Constellation job site without Constellation's prior written approval, even if the employee possesses a concealed weapons permit. Suppliers must also ensure that employees of Suppliers follow Constellation's security requirements that, among other things, prohibit storage of a firearm in an employee's vehicle on Constellation property, except where employers are expressly required by state law to allow employees to transport weapons in their vehicles when commuting to and from work. Any person who possesses a firearm or other weapon at a nuclear power station other than in the course of their assigned job duties will be prosecuted to the fullest extent of the law.

Additionally, Suppliers' commitment to safety must include adopting and enforcing rules imposing zero tolerance for any threats or acts of violence, including intimidation, bullying, and attempts to instill fear in others.

## **Human Rights and Labor**

Suppliers must uphold, and take reasonable steps to ensure that suppliers at all tiers in their supply chains who are performing work for Constellation uphold the human rights of all workers, including temporary or contract employees, providing them with safe and humane working conditions. Expectations include the following:

### **Dignity and Respect**

Suppliers shall treat employees with dignity and respect, support diversity, equity and inclusion and diverse opinions, promote equal opportunity for all and help create an inclusive and ethical culture. Verbal abuse, threats, harassment, public shaming, intimidation, and mental or physical coercion are prohibited.

### **Equal Opportunity and Non-Discrimination**

Suppliers must provide equal employment opportunities to employees and job applicants and maintain a workplace free from unlawful discrimination and retaliation. Suppliers are expected to provide equal opportunity to all, regardless of age, color, disability, ethnicity, gender, race, religion, veteran status, sexual orientation, and other protected characteristics. Suppliers must accommodate all disabilities to the extent required by law.

### **Work Hours**

Suppliers shall not require their workforce to work beyond daily and weekly work hour limits as defined and required by applicable local, state, and federal/national law.

### **Wages and Benefits**

Suppliers must comply with all applicable wage and benefit laws and regulations, including laws of other countries as applicable. Deductions from wages as a disciplinary measure are not permitted.

### **Right to Collective Bargaining**

Suppliers must comply with all applicable laws relating to employees' rights to engage in concerted activity or collective bargaining, including laws of other countries as applicable.

### **Forced Labor**

Suppliers shall neither use, nor incorporate into their work, materials and services resulting from the use of forced or involuntary labor whether bonded, imprisoned, or indentured, including debt servitude and all forms of human trafficking. This includes the use of any form of threat, force, coercion, fraud, or exploitation. All members of the Supplier's workforce must understand the terms of their employment. Supplier may not withhold or destroy employee identity or immigration documents, passports or work permits.

## Child Labor

Suppliers shall neither employ, nor incorporate into their work materials and services resulting from the employment of, any person under the minimum legal age for employment as prescribed by the relevant local authority, or under the age for completing compulsory education, whichever is greatest. Legitimate workplace apprenticeship programs, which comply with all laws and regulations, are supported. Workforce members under the age of 18 shall not be hired into positions in which hazardous work is required.

## Diversity, Equity and Inclusion

At Constellation, we share a passion for diversity, equity and inclusion that guides the way we work and conduct business. We realize competitive advantages from the energy and talents each of us brings to the workplace. Constellation serves customers across the United States, including some of the nation's largest and most ethnically diverse geographic areas. This means our supplier base, as well as our workforce and culture, must reflect the diversity of our customers and the communities we serve.

We are committed to maximizing opportunities for minority, women, veteran/service-disabled veteran and LGBTQ-owned business enterprises. We work with a diverse group of Suppliers that share our commitment to the highest standards to help us deliver the best service for our customers. We search for Suppliers that share this value and expect our Suppliers to support our goals for diverse Suppliers, including utilization of diverse prime and subcontractors, accurate reporting of diverse subcontracting and development of their own diversity programs. We view diversity-certified businesses as valued partners in our efforts to serve our customers, and we believe that partnership will help diverse business enterprises develop and grow. Not only does this benefit Constellation, but it also empowers the community.

## Environment

Constellation's commitment to the environment is integral to meeting customers' expectations and reducing Constellation's environmental impact on future generations, while also ensuring that we meet or exceed all environmental laws and regulations. Constellation intends to be the leading American clean energy company. We expect Suppliers to share these goals by identifying and implementing opportunities to reduce or eliminate energy usage, greenhouse gas emissions, waste and pollution at its source, and continually improving efficiency of resource and materials use.

## Conflicts of Interest

Suppliers must exercise reasonable care and diligence to prevent any actions or conditions that could result in either an actual conflict with Constellation's interests or the appearance of such a conflict of interest, or that may compromise the exercise of independent judgment during the execution of Suppliers' work for or on behalf of Constellation. Specifically:

### Personal Relationships

To combat the appearance of favoritism or a conflict of interest, Suppliers shall disclose to the Constellation Compliance and Ethics Office any close personal relationships between members of the Supplier's workforce doing business with Constellation, or their family members, and any Constellation employee in a position to influence business decisions regarding the supplier. No Constellation employee who may be in a position to influence business decisions regarding a Supplier may hold any position with or have a significant financial interest in a Supplier.

### Gifts and Entertainment

Suppliers may not provide gifts or anything of value to Constellation employees or their family members for the purpose of receiving business from Constellation or obtaining preferred treatment from Constellation in any business transaction.

Constellation discourages the giving of gifts to Constellation employees. However, Constellation employees may accept reasonable and infrequent gifts of modest value for which there is no likelihood of actual or perceived improper influence. Suppliers may also provide infrequent meals or entertainment that serve a business purpose at business-appropriate locations and are of reasonable value; however, the Supplier's employees must be present (otherwise these are gifts). Gifts of cash or cash equivalents, such as gift cards, securities, or loans, are prohibited.

Suppliers in a bid process or contract negotiations, or engaged in a pending dispute with Constellation, may not offer gifts, meals, or entertainment of any kind to Constellation employees involved in these processes or employees in positions involving direct influence over the Supplier's work for Constellation.

## Bribery and Corruption

Constellation has no tolerance for bribery and corruption. Suppliers conducting business on behalf of Constellation will not offer or make any improper payments of money or anything of value to government officials, either domestic or foreign, political parties, candidates for public office, or other persons. Suppliers will not, and will take reasonable steps to ensure their personnel do not, offer or accept any bribe or kickback to and/or from any Constellation customer, Supplier, or employee. Suppliers must comply with anti-corruption laws that govern their operations in all relevant jurisdictions. Constellation's compliance program includes reporting of requests, recommendations and referrals from public officials relating to work for Constellation to ensure that such communications do not inappropriately influence Constellation's supplier selection. The program further requires disclosure by Suppliers to Constellation of elected or appointed office held by an officer, director or key employee of a Supplier in a jurisdiction in which Constellation conducts business. The policies can be found on the [Ethics and Governance page](#) of Constellation's website. Any questions regarding these policies or reporting should be directed to [EthicsOffice@Constellation.com](mailto:EthicsOffice@Constellation.com).

## Fair Competition

Suppliers must compete fairly. Suppliers will not enter into agreements, formal or otherwise, with their competitors to restrain trade, such as agreements to fix prices, rig bids, or divide territories/markets. Suppliers must not misrepresent their products or services, or their competitors' products or services.

Suppliers are expected to help safeguard and maintain the integrity of Constellation's bid and contract negotiation process. Suppliers shall refrain from initiating or participating in private discussions about a bid or proposed contract (prior to an award) with any Constellation employee or business contact not specifically authorized to speak on Constellation's behalf in order to influence the outcome of a bid or contract award. This prohibition does not apply to a Supplier's disclosure and notification of potential conflicts of interest or reporting violations or concerns to Constellation.

## News Media and Social Media

Typically, Constellation does not participate (or allow its name and/or logo to be used) in supplier press releases, media statements or social media posts, unless there is a clear business case to do so. Constellation Corporate Affairs, Legal and Supply have governance on whether and how Constellation will participate in supplier press releases or other marketing vehicles. Please allow adequate time for your Constellation business partners to consult with those groups on any use of Constellation's name or logo in your materials.

- Constellation's name and logo should never be used in supplier business development, marketing or media materials without documented written permission from Constellation's Corporate Affairs department.
- Audio/video recordings and photographs of Constellation employees or facilities should never be used without documented written permission from Constellation's Corporate Affairs department.
- Suppliers shall not speak on behalf of Constellation with employees, stakeholders or the media unless authorized in writing by Constellation's Corporate Affairs department.



- If a supplier receives any media inquiries related to an existing or prospective contract with Constellation, the supplier is encouraged to notify Constellation's Corporate Affairs department immediately.
- Beyond not mentioning Constellation by name on social media as outlined above, suppliers must also have procedures in place to ensure that the use of social media by their workforce or representing agents does not negatively affect Constellation's reputation.
- Constellation documents, proprietary graphics and trademarked materials should never be used without documented written permission from Constellation's Supply department.

## Maintaining Accurate Records

Business and financial records are essential to Constellation's operations. We expect Suppliers to provide clear, complete, and accurate reporting and supporting records of financial information pertaining to business transactions, to ensure that information is maintained in a manner consistent with applicable laws and regulations and that effective internal controls are in place to protect and comply with these requirements.

Accurate, reliable, retrievable, and compliant records, information, data, and disclosures are critical to Constellation in meeting its legal, financial, regulatory, and management obligations. Suppliers shall accurately record, maintain, and report business documentation, including, but not limited to, financial accounts, quality reports, time records, operational records, expense reports, and submissions to the Company, its customers, and regulatory authorities.

Information, data, and communications provided to Constellation shall be complete, fair, accurate, and timely. The true nature of any transaction shall never be hidden, altered, falsified or disguised, nor any endorsements, approvals or authorizing signatures for any payment forged.

## Protecting Constellation Resources

Suppliers must protect Constellation resources including physical property, equipment and tools, intellectual property, confidential information, and information covered by privacy laws. Suppliers must use Constellation resources and information only for legitimate Constellation business purposes allowed under the contract.

Suppliers shall maintain and protect the confidentiality, integrity and availability of confidential information entrusted to it by Constellation, except when disclosure is legally mandated or is authorized by Constellation. In the event of an unauthorized use or disclosure of Constellation confidential information, Suppliers must promptly notify Constellation in accordance with the terms and conditions of the contract documents, and if not otherwise specified in the contract documents, by calling the Constellation Security Operations Center (CSOC) at 1-888-414-2762.

Suppliers who have access to Constellation's information systems are responsible for ensuring the security of those systems.

Suppliers whose employees receive identification cards, building keys and/or access devices or codes used to gain entry to Constellation premises shall follow all policies and procedures governing access. These items shall not be duplicated and may not be transferred without Constellation's consent. When access is no longer required or at Constellation's request, Suppliers must return all such access items.

## Reporting Concerns / Non-Retaliation

Suppliers will, and will train members of their workforce performing work for Constellation to, report to Constellation any conduct that is or is reasonably suspected of being a violation of this Code to a toll-free 24-hour helpline at (844) 927-2282 or through Constellation's [secure web portal](#). These resources are administered by a third-party global provider of ethics helpline services. Constellation reviews and addresses all the concerns received. Suppliers and their employees performing work for Constellation must fully cooperate with any investigation conducted by Constellation

must fully cooperate with any investigation conducted by Constellation relating to their work for Constellation, as well as any corrective action, when required, including legal proceedings.

Constellation prohibits retaliation in any form against a person for reporting in good faith a compliance or ethical concern. Constellation expects Suppliers to protect an individual's right to report allegations of misconduct or noncompliance with regulations or other ethical issues. Suppliers must comply with whistleblower laws and regulations, including those promulgated by the Securities and Exchange Commission (SEC) and Commodities Futures Trading Commission (CFTC). These laws can include requirements such as protecting the individual from retaliation and providing confidential reporting mechanisms.

The Constellation Supplier Code of Conduct can be found at [www.constellationenergy.com/suppliers](http://www.constellationenergy.com/suppliers).