CALIFORNIA WATER SERVICE GROUP
SUPPLIER CODE OF CONDUCT

Introduction

California Water Service Group and its subsidiaries (together "Group") conduct business in accordance with the highest standards of corporate leadership and citizenship. We expect our suppliers to act in accordance with the highest standards of professional integrity. We believe such standards are essential to our long-term success. Therefore, we strive to conduct business solely with suppliers who share our commitment to these high standards.

This is why we make this Supplier Code of Conduct a part of our supplier relationship and reference such standards in each supplier agreement. In addition to complying with all applicable laws, rules, and regulations, our suppliers shall adhere to this Supplier Code of Conduct. This Supplier Code of Conduct applies across the entire supply chain of our suppliers, and our suppliers must ensure their employees, contractors, or any other supplier-associated personnel adhere to these standards. Any non-compliance may negatively impact our business relationship with such suppliers.

Group will take no retaliatory action against anyone who raises concerns about possible violations of these standards.

Fair Dealing

Our suppliers must engage in fair dealing practices to ensure a competitive and ethical business environment.

- Suppliers shall not engage in coercive, collusive, corrupt, fraudulent, obstructive, or otherwise prohibited practices, including during any competitive procurement process.
- Suppliers shall not seek to obtain competitive advantage through unethical, anticompetitive practices, such as agreeing with competitors to fix prices or other terms, rig bids, or divide territories or markets. Suppliers shall not take unfair advantage of anyone through manipulation, exaggeration, concealment, misrepresentation of facts, abuse of confidential or privileged information or any like practices.
- Suppliers shall not engage in any form of corruption or bribery. Consistent with these prohibitions, suppliers must comply with the U.S. Foreign Corrupt Practices Act (FCPA), and any applicable local anti-corruption and anti-bribery laws. Group encourages its suppliers to have anti-corruption and anti-bribery policies in place.
- Suppliers shall not offer or accept bribes, kickbacks, facilitation payments, or any other similar inducements with the expectation of favored treatment.
- Group employees are prohibited from soliciting or accepting gifts or business courtesies, including services, discounts or anything else of value from Group suppliers when doing so may influence, or be perceived as influencing, a decision or action when conducting business with Group. Group employees may not accept non-cash gifts from Group suppliers unless

that gift is $150 or less in value. Cash gifts or cash equivalents such as gift cards, gift certificates, checks, or loans are never permitted. Immediate family members of Group employees are subject to the same policy. Suppliers shall not offer or provide any gift or business courtesy to Group employees or their immediate family members that would violate this policy.

Conflicts of Interest

- Our suppliers and their respective personnel and affiliates shall not have conflicts of interest when conducting business with Group.
- A supplier may be considered to have a conflict of interest if:
  - It has one or more controlling partners with a significant financial interest (more than 5% of business ownership or more than 1% of the outstanding securities of a public company) in another bidder during a competitive procurement by Group;
  - It uses a relationship to access undisclosed information about a competitive procurement that could influence the decisions of Group;
  - It participates in more than one bid for a single sourcing event for Group; or
  - It has a family relationship with a member of Group's board of directors, senior executive team, or staff directly or indirectly involved in any part of a procurement decision unless the conflict stemming from this relationship has been disclosed and resolved in a manner acceptable to Group.
- Suppliers shall disclose to Group's Procurement Department whenever they become aware of an individual who, in the course of performing their work, is, can be, or appears to be influenced to subvert a Group decision-making process for their or others' gain.
- Suppliers shall disclose to Group's Procurement Department any actual or potential conflicts of interest that impact or may impact their capacity to serve the best interest of Group. Suppliers may also contact Group's Ethics Hotline (see "Supplier Compliance with This Code of Conduct" below) with any concerns.

Providing a Safe and Secure Workplace

Our suppliers must ensure a safe and secure workplace that supports our operations and the well-being of all involved.

- Suppliers must comply with all federal, state, and local safety laws and OSHA regulations.
- Suppliers shall establish and maintain a safe work environment integrating industry best-practice safety management processes and procedures across their businesses.
- Suppliers shall have a written, zero-tolerance policy regarding the possession and use of alcohol, drugs, fireworks, and firearms while on any Group property or while engaged in work for Group.
- Suppliers shall regularly conduct employee health and safety training.

Maintaining Proper Conduct in the Workplace

Our suppliers must maintain proper conduct in the workplace to foster a respectful and professional environment.

- Suppliers shall not discriminate against employees or applicants for employment based on race, national origin, age, sexual orientation, gender identity, medical condition, marital status, disability, immigrant status, veteran status, union status, or any other characteristic protected by law or any other non-job-related factor.
- Suppliers shall prohibit unlawful harassment, including sexual, discriminatory, physical, verbal, psychological, or personal harassment or abusive behavior.
- While engaged in any business related to Group, or whenever present on Group property or property of Group's customers, suppliers shall prohibit conduct of their employees, subcontractors, and representatives that is discriminatory, assaulting, threatening, sexual or of suggestive nature, hostile, or in any other manner that might reasonably be construed as confrontational.
- Suppliers shall provide excellent service and care to Group customers and the general public. Providing excellent service and care includes treating all personal interactions with professionalism, friendliness, and courtesy, regardless of the circumstances of the interaction. At no time shall suppliers' employees or subcontractors use profane language or insult, demean, or otherwise use any disparaging terms, colloquialisms, or racially biased language in communicating with Group, its customers, government officials, government employees, or the general public in connection with any business related to Group.

Safeguarding Confidential Information and Material Nonpublic Information

Protecting confidential information is crucial to maintaining trust and integrity in our business relationships.

- Confidential Information is any information that is designated by Group as confidential or proprietary at the time of disclosure or which would be reasonably considered confidential due to its nature or the circumstance of disclosure, including information relating to critical infrastructure, trade secret information, or any other Group intellectual property.
- These assets include, but are not limited to, physical property, services, business plans, customer information, employee information, vendor information, electronic resources and trade secret information and other Group intellectual property. Intellectual property includes, but is not limited to, patents, copyrights, trademarks/branding and confidential and proprietary business information. Suppliers shall take all reasonable steps, including cybersecurity protections, to safeguard Confidential Information and prevent disclosure of Confidential Information to any third parties without prior approval by Group.
- Confidential Information does not include information that is:
    1. Now in the public domain or subsequently enters the public domain through no action or fault of the supplier;

2. Known by or available to the supplier from its own independent sources;
3. Received from any third party having a legal right to transmit such information without any obligation to Group to keep such information confidential; or
4. Independently developed by the supplier.

- Suppliers shall use Group assets and Confidential Information solely for authorized business purposes.
- Suppliers shall implement and maintain such internet and electronic information security standards that may be required under agreements with Group and, in the absence of such provisions in any such agreement, shall utilize standards that are acceptable within the industry in which Group operates.
- Suppliers shall promptly notify Group in writing if Confidential Information pertaining to Group or its customers has been accessed by any third party without prior authorization by Group.
- Suppliers shall comply with all applicable information protection, data security and privacy laws in connection with their work with Group.
- Suppliers shall comply with the U.S. securities laws that prohibit individuals from trading in securities when they are aware of material nonpublic information and shall prohibit sharing such information with others. This includes information related to Group and trading in Group securities.

Environmental Management

Our suppliers must conduct business in an environmentally responsible manner to mitigate environmental risks and conserve natural resources.

- Suppliers shall establish a systematic approach to manage environmental risks, hazards, and opportunities.
- Suppliers shall be able to demonstrate a culture of continual improvement to reduce resource consumption. This includes identifying and enabling measures to reduce energy and water consumption as well as materials use and waste.
- Suppliers shall ensure appropriate end-of-life treatment for the waste they generate and comply with all federal, state, and local waste disposal laws.
- Suppliers shall conduct their operations in a manner that protects and minimizes impacts to biodiversity, including natural habitats, wetlands, waterways, protected species, and sensitive ecosystems.
- Suppliers shall obtain, maintain, and adhere to all environmental permits required for their operations. In addition, suppliers must comply with all applicable environmental laws and regulations, including, but not limited to, those relating to management of emissions, hazardous substances, and waste disposal.
- Suppliers shall introduce product and service options and alternatives, where applicable, that have added sustainability attributes.
- Suppliers shall adopt innovative, low-carbon solutions to reduce embodied and operational carbon, such as using renewable energy and electric vehicles.

- Suppliers shall monitor industry best practices and technological developments in environmental management.
- Suppliers shall be able to, upon request:
  - Provide the full material content of products supplied to Group.
  - Provide product energy consumption and energy efficiency information for equipment, vehicles, appliances, and electronics where applicable (e.g., EnergyGuide or Fuel Economy labels and/or any information compiled for third-party eco-labels).
  - Provide product and/or service lifecycle information, especially energy usage and greenhouse gas emissions data, from the supplier or the products the supplier supplies to Group from other businesses.
- To ensure compliance with environmental management standards and product safety, Group may, from time to time, conduct on-site audits and assessments of suppliers or obtain information from any such suppliers about their programs, plans, metrics, and policies.

Human Rights and Labor Practices

Respecting human rights is fundamental to our values and operations. Our suppliers must adhere to fair labor practices to ensure the well-being of their employees.

- Suppliers shall treat people with respect and dignity, encourage diverse perspectives and backgrounds, promote equal opportunity for all, and help create an inclusive and ethical culture.
- We encourage our suppliers to treat their employees and interact with their communities consistently with the United Nations Guiding Principles on Business and Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work in their business operations. We encourage our suppliers to develop and publicly disclose a similar commitment to human rights.
- We expect our suppliers to immediately inform Group of any known human rights violations in their value and supply chains and proactively take steps to eradicate violations within their business and supply chains. We may suspend our relationship with the supplier until all violations are fully addressed and corrected.
- We expect our suppliers to conform to the International Labor Organization Core Labor Standards and the California Department of Industrial Relations Sweatfree Code of Conduct.
- Forced Labor
  - Suppliers shall provide voluntary employment, where workers are free to leave work and terminate their employment or other work status with reasonable notice.
  - Suppliers shall never use involuntary labor or require the payment of fees or the surrendering of identification (immigration or work permit documents) as a condition of employment.
  - Suppliers shall never traffic workers or, in any other way, exploit workers through threat, force, coercion, abduction, or fraud.

- Child Labor
  - Suppliers shall ensure that child labor is never used. Child labor refers to any person under the minimum legal age for employment where the work is performed. Under no circumstances shall a supplier permit children to perform work that exposes them to undue risks that can harm their physical, mental, or emotional development or improperly interfere with their education or vocational needs.
- Working Hours and Wages
  - Suppliers shall follow all applicable laws and regulations regarding wages, working hours, days of rest, and worker benefits, such as a maximum of 60 hours of work per week (48 regular hours of work per week and a maximum of 12 hours of voluntary overtime), a rest period of at least 24 hours every seven days, and no exceptions to these requirements unless they are clearly defined and allowed by national laws and workers' agreements.
- Collective Bargaining
  - Suppliers shall recognize and respect the rights of employees to have freedom of association and collective bargaining in accordance with applicable laws.
  - Suppliers shall not penalize, harass or intimidate workers for the non-violent exercise of their right to join or refrain from joining such associations and worker organizations.

Quality

- Group is committed to providing the highest quality of services to our customers. Group expects our suppliers to ensure the quality, safety, performance, and statutory and regulatory compliance of the products and services they provide us.

Supplier Diversity and Inclusion

- It is Group policy that diverse and small business enterprises, including those categories recognized under the California Public Utilities Commission General Order 156 (for California Water Service Company) and Federal Subcontracting Programs (for all Group companies), shall have equitable opportunities to participate in the performance of contracts.
- Suppliers agree to use their reasonable efforts to award subcontracts (when applicable and available, the business is the best fit for the contract, and as required by contract with a Group company) with such diverse and small suppliers, consistent with the efficient performance of their contract, and accurately report diverse and small business subcontracting.

Supplier Code of Conduct Flow Down

- We encourage our suppliers to have practices in place to support compliance with laws, regulations, and expectations related to or addressed expressly within the Supplier Code of Conduct. We encourage our suppliers to implement their own written code of conduct and

to apply the principles of such code of conduct to the entities that furnish goods and services to the supplier.

Supplier Compliance with This Code of Conduct

Ensuring compliance with these standards is essential to maintaining a strong and ethical business relationship.

- Suppliers shall provide an anonymous complaint mechanism for workers to report workplace grievances.
- Group expects its suppliers to protect an individual's right to report misconduct or noncompliance with regulations or other ethical issues. Suppliers shall comply with Whistleblower laws, including those promulgated by the Securities and Exchange Commission and Commodities Futures Trading Commission.
- Suppliers shall keep accurate and auditable records of all transactions with Group. Suppliers are expected to follow a record retention policy that meets industry standards by which Group operates.
- If a supplier believes that an employee or someone acting on Group's behalf has engaged in illegal, unethical or otherwise improper conduct or violated this Supplier Code of Conduct, the supplier shall immediately report this concern to:

  Shawn Bunting
  Senior Vice President, Chief Legal Officer and Business Development
  Address: 1720 N. First Street, San Jose, CA 95112
  Email: sbunting@calwater.com

  Ethics Hotline, External: (408) 501-1720 | Internal: extension 80000
  Online Portal: calwater.ethicspoint.com
  Mobile Portal: calwatermobile.ethicspoint.com

- We reserve the right to verify compliance with this Supplier Code of Conduct. Suppliers shall maintain documentation to demonstrate their compliance and provide such documentation and any other relevant information to Group upon request.
- A good faith report of potential misconduct will not affect a supplier's relationship with Group.

Board Approved: October 27, 2026