

A background image showing a close-up of two hands shaking in a firm grip. The person on the left is wearing a blue denim shirt, and the person on the right is wearing a white shirt and a blue plaid tie. The background is slightly blurred, suggesting an office or business setting.

Willdan Suppliers and Subcontractors Code of Conduct & Diversity Program

Willdan
2401 E. Katella Avenue
Suite 300
Anaheim, CA 92806

www.willdan.com

Purpose

As part of Willdan's ongoing commitment to operating ethically, sustainably, and responsibly across all areas of its supply chain, Willdan expects all supplier and subcontractors engaged in connection with Willdan projects or operations to read, acknowledge (***sign Section 4 – Supplier Acknowledgement Form***) and follow the content of this document.

This document provides guidance on expected conduct, reporting, and commitments while working with or behalf of Willdan. Please note that requirements may scale up or down, depending on the structure and size of your organization; more detail on what this means for you is provided within this document. For questions, please contact vendors@willdan.com.



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Section 1 – Supplier and Subcontractor Code of Conduct

Willdan Group, Inc. (“Willdan”) is committed to operating ethically, sustainably, and responsibly across all areas of its supply chain. This Supplier and Subcontractor Code of Conduct (“SSC Code”) sets forth the minimum standards that Willdan expects from all suppliers and subcontractors (collectively, “Suppliers”).

For purposes of this SSC Code, “Supplier” means any entity or individual that directly or indirectly provides goods or services to Willdan, including, without limitation, suppliers and subcontractors engaged in connection with Willdan projects or operations.

This SSC Code incorporates guidance from international best practices, widely used environmental and occupational health and safety management frameworks, and corporate sustainability standards common to large global companies. Willdan recognizes that Suppliers vary in size, capacity, and resources. Where appropriate, scalable implementation options and alternative compliance pathways may be provided, particularly to support small, emerging, and Minority- and Women-Owned Business Enterprises (MWBE), Veteran-Owned Small or Service-Disabled Veteran-Owned Small Businesses (VOSB and SDVOSB), HUBZone, and LGBTQ+ Business Enterprises (LGBTBE).

1.1 Overview

This SSC Code applies to all Suppliers providing materials, equipment, consulting, subcontracting, or other services to Willdan anywhere in the world. Suppliers must ensure that their own suppliers, subcontractors, and temporary labor agencies implement and comply with equivalent standards set forth in this SSC Code.

1.2 Compliance with Laws, Regulations, and Standards

Suppliers must comply with all applicable international, federal, state, and local laws and regulations, including those relating to labor and employment, nondiscrimination, occupational health and safety, environmental protection, anti-corruption, fair competition, privacy, and data security and protection. Where this SSC Code establishes higher standards than local law, Suppliers are expected to align with the higher standard. Suppliers should obtain, maintain, keep current, and comply with the conditions of any applicable permits required for the scope of their work with Willdan.

1.3 Ethical Business Practices

Suppliers shall conduct business with integrity and in accordance with the highest ethical standards. At a minimum, Suppliers shall:

- Prohibit all forms of bribery, corruption, extortion, and embezzlement, including bribes, kickbacks, or improper payments to obtain or retain business.



- Comply with applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and similar international legislation.
- Avoid unfair trade practices such as collusive bidding, price fixing, or other anti-competitive conduct.
- Disclose actual or potential conflicts of interest that could influence business decisions made in the course of Willdan-related work.
- Maintain accurate and complete business records in accordance with applicable laws and accepted accounting practices.
- Respect Willdan's policies and procedures as set forth in this SSC Code. Additional details can be found in **Section 1.11 Code of Ethical Conduct**.

1.4 Intellectual Property, Confidentiality, and Data Protection

Suppliers shall protect the intellectual property and confidential information of Willdan, its clients, and other business partners. Suppliers shall:

- Use confidential information only for its intended business purpose and safeguard it from unauthorized use or disclosure.
- Respect copyrights, trademarks, patents, trade secrets, and other intellectual property rights.
- Implement reasonable and proportionate information-security safeguards consistent with their size and risk profile.
- When transmitting confidential information electronically, use secure methods and encryption protocols approved by Willdan.

For small and emerging Suppliers that may not have enterprise-level systems, Willdan may accept secure, lower-cost technology solutions or manual data controls, provided these controls are documented and reviewed for adequacy by Willdan's Information Security team.

Promptly notify Willdan of any suspected or actual data breach, cybersecurity incident, or unauthorized access involving Willdan information, and cooperate fully in any investigation, mitigation, or remediation efforts.

Ensure that any subcontractors, agents, or third parties engaged by the Supplier that have access to Willdan information are subject to confidentiality, data protection, and information-security obligations that are no less protective than those set forth in this SSC Code. The Supplier remains responsible for the data-handling practices of such parties.

Additional details can be found in **Section 1.11 Code of Ethical Conduct**.

1.5 Environmental Responsibility

Willdan expects Suppliers to operate in an environmentally responsible manner and to work toward continuous improvement in environmental performance.



Suppliers shall:

- Comply with all applicable environmental laws, regulations, and permits.
- Obtain, maintain, and keep current all required environmental permits and registrations.
- Implement processes to identify, assess, and reduce substances of concern (SoC) and hazardous chemicals, including through substitution where feasible, and maintain appropriate inventories and safety data sheets (SDS).
- Properly manage, store, handle, reduce, and dispose of hazardous materials and hazardous waste in accordance with applicable permits and legal requirements.
- Identify, monitor, control, and reduce or treat hazardous air emissions (e.g., volatile organic compounds, particulate matter, NO_x/SO_x), where applicable, using proper control technologies and in accordance with applicable permits and legal requirements.
- Seek to reduce energy, water, and raw material consumption and improve efficiency.
- Track and, where feasible, reduce greenhouse gas (GHG) emissions.
- Reduce waste generation and increase reuse and recycling where possible.

Suppliers should establish and maintain an Environmental Management System (EMS) appropriate to the size, nature, and risk profile of their operations.

Suppliers with sufficient capacity should align their EMS with recognized standards such as ISO 14001. Small and Emerging Business Suppliers that do not hold ISO 14001 certification should nonetheless maintain documented EMS components [see *Section 2.1 Environmental Management (ISO 14001 Alternatives)* for details].

1.6 Labor Practices and Human Rights

Suppliers are expected to treat all workers fairly, with dignity and respect, and to support basic human rights in the workplace. This includes following recognized standards such as the United Nations Global Compact (UNGC) Principles 1–6 on human rights and labor, as well as applicable International Labour Organization (ILO) guidelines.

At a minimum, Suppliers shall comply with the following standards:

- **Freely Chosen Employment** – No forced, bonded, indentured, or prison labor.
- **No Child Labor** – No employment under age 15 (or higher legal minimum); no hazardous work under age 18.
- **Wages and Benefits** – Suppliers shall pay at least the legally required minimum wage and premium overtime rates.
- **Compensation** – Suppliers' compensation practices shall be transparent, documented, and communicated to workers.
- **Wage Statements or Documentation** – Workers shall be provided wage statements or equivalent documentation detailing hours worked, pay rates, deductions, and benefits.
- **No Disciplinary Wage Deductions** – Disciplinary wage deductions are prohibited.



- **Working Hours** – Maximum 60 hours per week including overtime; minimum 24 consecutive hours of rest every seven days.
- **Humane Treatment** – No harassment, abuse, coercion, or threats.
- **Nondiscrimination & Equal Opportunity** – Equal opportunity without discrimination.
- **Freedom of Association** – Respect for lawful collective bargaining rights and workers' freedom to associate, consistent with applicable law.
- **Inclusive Labor Practices** – Suppliers are encouraged to promote inclusive workplaces and merit-based advancement opportunities, including for underrepresented groups.

1.7 Health and Safety

Suppliers performing work in support of Willdan operations are expected to actively manage health and safety as a core business function, not solely as a compliance obligation. This includes establishing and maintaining a structured approach to identifying risk, protecting workers, and continuously improving safety performance in both office and field environments.

At a minimum, Suppliers shall implement and maintain a compliant Occupational Health and Safety Management System (OHSMS) that reflects the scale and complexity of their work. This system should be capable of supporting both routine activities and higher-risk operations such as construction, field services, and work performed on active client sites.

Supplier responsibilities include:

- Proactively identify hazards associated with planned work activities, evaluate risk exposure, and implement effective controls prior to and during execution. This includes job-specific planning for higher-risk tasks.
- Establish and enforce work procedures that reduce risk to workers, clients, and the public. Controls should reflect recognized industry practices and regulatory expectations applicable to the work being performed.
- Maintain workspaces, job sites, and any provided accommodations in a condition that supports worker health, including access to potable water, sanitation, and appropriate environmental controls.
- Ensure personnel are trained, qualified, and competent to perform assigned work safely. Training must be relevant to job duties and include hazard recognition, emergency response, and task-specific requirements.
- Provide and require the use of appropriate personal protective equipment (PPE) based on the hazards present, at no cost to workers, and ensure proper use, maintenance, and replacement.
- Maintain a system to report, investigate, and document incidents, including near misses. Root causes shall be identified and corrective actions implemented to prevent recurrence. Lessons learned should be communicated to affected personnel.



- Apply equivalent health and safety expectations to subcontractors and labor providers. Suppliers are accountable for ensuring that all parties under their control perform work in a manner consistent with these requirements.
- Promptly notify Willdan of any serious injury, fatality, significant safety event, or regulatory action associated with Willdan-related work. Suppliers are expected to cooperate fully in incident reviews and corrective actions.
- Track safety performance using both leading and lagging indicators (e.g., observations, near misses, recordable incidents) and use this information to drive continuous improvement.

Suppliers with established safety programs are expected to align their systems with recognized frameworks such as ISO 45001. Smaller or emerging Suppliers are not required to maintain certification but must demonstrate a documented and functioning approach to managing health and safety risks, including written policies, hazard assessments, training, and incident management processes [see **Section 2.2 Occupational Health & Safety Management (ISO 45001 Alternatives)** for details].

Regardless of size or certification status, Suppliers are expected to demonstrate that health and safety risks are actively managed, communicated, and continuously improved as part of normal business operations.

1.8 Commitment to Supplier Diversity

Willdan is committed to building an inclusive and diverse supply chain that promotes opportunities for all suppliers, including those that may identify as MWBE, VOSB, SDVOSB, HUBZone, or LGBTBE.

All Suppliers are expected to:

- Support fair and merit-based opportunities for diverse participation.
- Avoid procurement practices that create unnecessary barriers for small businesses.
- Be transparent regarding capacity constraints and collaborate with Willdan on reasonable scope and timelines.
- Provide all requested information related to contract requirements, including participation, related to Willdan engagements.
- Consider the inclusion of small and emerging business subcontractors in their own supply chains, where feasible.
- Comply with all applicable laws, regulations, and Executive Orders, including assisting Willdan with its obligations to comply with all applicable laws, regulations, and Executive Orders, as required.

1.9 Monitoring, Audits, and Corrective Action

Willdan conducts supplier audits, risk assessments, and ongoing monitoring to assess compliance with this SSC Code. Willdan provides an audit-compliant monitoring tool for Suppliers to respond to annually (see **Section 5 – Supplier Annual Audit Questionnaire**).



Risk assessments are conducted on a regular basis and may consider, at a minimum: country-specific human rights and environmental risk; sector/industry risk; nature and criticality of services provided; use of subcontracted or temporary labor; Supplier location(s) and operating context; and prior audit findings, incidents, or grievances.

Willdan reserves the right to conduct supplier audits (including social and environmental audits where relevant) and may perform on-site assessments, document reviews, and worker interviews as part of its due diligence program.

By signing and acknowledging this SSC code, Suppliers must cooperate with audits, site visits, document reviews, and interviews.

Corrective action plans are required where noncompliance is identified and must include defined actions, responsible parties, and reasonable timelines.

Willdan will work collaboratively and in good faith with Suppliers to address identified non-conformities and support timely corrective action, except where violations pose a serious risk to worker safety, human rights, the environment, or Willdan's business, in which case Willdan may take immediate corrective or contractual action.

Suppliers must comply with annual audit questionnaires within 120 days of receipt.

Willdan tracks audit activity related to labor, health, safety, and environmental compliance, in addition to small and emerging business enterprise participation for its contracts. Aggregate metrics (e.g., the number of suppliers audited) are disclosed through Willdan's sustainability reporting.

1.10 Reporting Concerns and Non-Retaliation

Suppliers, their employees, and other stakeholders may report suspected violations of this SSC Code or any unethical, illegal, or unsafe conduct through Willdan's confidential reporting channels (visit willdan.ethicspoint.com for more information). Reports may be made anonymously where permitted by law. Willdan strictly prohibits retaliation against any individual who, in good faith, raises a concern or participates in an investigation.

Willdan will acknowledge receipt of reported concerns within a reasonable timeframe and will seek to review and respond to substantiated reports promptly, generally within thirty (30) days, subject to the nature and complexity of the matter.

1.11 Code of Ethical Conduct

It is the belief of Willdan that a strong commitment to principles of ethical conduct is essential for success. Each Supplier shall act with integrity. Integrity requires, among other things, being honest, fair, and candid. Deceit, dishonesty, and subordinating one's principles are inconsistent with integrity. Service to Willdan should never be subordinated to personal gain or advantage.



Willdan has adopted this Code of Ethical Conduct to promote:

- Honest and ethical conduct
- Full, fair, accurate, timely, and understandable disclosure in reports and public communications
- Compliance with applicable laws, rules, and regulations

Conflicts of Interest

Willdan respects all individuals' rights to engage in activities that are private in nature (social, community, political, or religious). However, each Supplier is expected to avoid situations and relationships that involve the appearance of a conflict of interest or an actual or potential conflict of interest. A "conflict of interest" exists when the interests of a Supplier's employee or representative interfere in any way with the interests of the Supplier's contract with Willdan, or when the Supplier's employee or representative has interests that may make it difficult to perform their work objectively and effectively. Suppliers are expected to avoid conflicts of interest and to conduct their personal, off-duty affairs in a manner that does not adversely affect Willdan's integrity, reputation, or credibility.

Personal or Business Opportunities

Suppliers are prohibited, without the consent of Willdan, from taking advantage of personal opportunities that are discovered through information or work pertaining to Willdan's contract. No Supplier may use Willdan property, information, or position for improper personal gain.

Securities Laws and Insider Trading

Federal and state laws prohibit trading in securities by individuals who have material information that is not generally known or available to the public. Suppliers or their representatives are not allowed to purchase or sell Willdan stock while in possession of material, nonpublic information concerning Willdan. In general, information will be considered material if a reasonable investor would consider it important in making their investment decision. This information includes, but is not limited to, earnings results, acquisitions, divestitures, or pending changes in management or control. In addition, the use of any material nonpublic information to tip others who might make an investment decision on the basis of this information is not only unethical, but also illegal.

Antitrust Laws and Competition

The antitrust laws of the United States are intended to protect and promote vigorous and fair competition. Suppliers are expected to adhere to applicable antitrust laws. A violation of these laws may result in civil or criminal prosecution. To that end, Suppliers and their representatives are prohibited from entering into any agreement or understanding – even an informal understanding – with a competitor to (i) set prices on their products and services, (ii) divide territories, markets, or customers, (iii) prevent another company from entering the market, (iv) participate in any form of bid rigging, (v) refuse to deal with a customer or supplier for improper reasons, or (vi) boycott another company.

Entertainment, Gifts, and Anti-Bribery

The purpose of business entertainment and gifts is to create goodwill and sound working relationships. The purpose is not to gain unfair advantages with customers, suppliers, or personnel who work for the



government or an organization that regulates Willdan's business operations. No entertainment or gift should ever be offered, given, provided, or accepted by any Supplier or Supplier's representative unless it:

- Is not a cash gift;
- Is consistent with customary business practices;
- Is of nominal value;
- Cannot be construed as a bribe or payoff;
- Does not violate any laws or regulations; and
- Does not imply that additional business opportunities are contingent upon the gift/gratuity.

Suppliers are prohibited from giving, promising, offering, or authorizing payment of anything of value to any government official to obtain or retain business or to secure some other benefit.

Suppliers must also avoid the appearance of seeking to obtain an unfair advantage with government officials.

In addition to the prohibitions of bribing government officials discussed above, Suppliers are prohibited from offering or providing corrupt payments and other advantages to, or accepting the same from, private (non-governmental) persons and entities.

The promise, offer, or delivery to an official or employee of the United States government of a gift, favor, or other gratuity in violation of any federal laws, rules, or regulations would not only violate this Code but could also be a criminal offense. Suppliers are expected to follow applicable rules from State and local governments or other regulating agencies regarding entertainment and gifts.

Confidentiality, Protection, and Proper Use and Treatment of Company Information

Information is a valuable asset that all Suppliers and their representatives must protect. Confidentiality, protection, and the appropriate treatment of the Supplier to take measures to protect or assist in the protection of all confidential and proprietary information, including technical, financial, marketing, and other business information, which, if made available to competitors or the public, would be advantageous to such competitors and detrimental to Willdan. The confidentiality responsibility extends to confidential information of third parties that Willdan has received. Each individual is expected to maintain the confidentiality of information entrusted to the individual by Willdan or its customers, suppliers, and competitors, except when disclosure is authorized by management or legally mandated. Suppliers should also refrain from sharing confidential information internally beyond those individuals who legitimately need to know it for purposes of their jobs. The obligation to preserve confidential information continues even after employment with the Supplier ends.

Communications and Record Retention

Suppliers shall ensure that all business records and communications, including electronic communications, are clear and accurate. Potential risks from inaccurate or misleading statements include, but are not limited to, claims of false advertising, misrepresentation, breach of contract, securities fraud, unfair disclosure, and antitrust violations.



In accordance with those policies, in the event of litigation or governmental investigation, each Supplier is expected to preserve all possibly relevant documents as required by applicable laws and regulations.

Equal Opportunity and Avoidance of Discrimination and Harassment

Willdan is guided by the principles of equal opportunities for all and respect for others. Willdan is firmly committed to providing equal opportunities in all aspects of employment and will not tolerate any discrimination or harassment of any kind with regard to race, religious creed, color, age, marital status, sex, sexual orientation, gender identity, gender expression, citizenship status, nationality, ethnic or national origin, ancestry, religion (or belief, where applicable), military service or veteran status, physical or mental disability, medical condition, childbirth and related medical conditions, genetic information or characteristics (or those of a family member), reproductive status, or any other classification protected by federal, state, or local laws and ordinances.

Willdan will not tolerate any form of sexual harassment. Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, and any other verbal, visual, or physical conduct of a sexual nature that has the effect of interfering with work performance or that creates an intimidating, hostile, or offensive work environment, especially where submission to or rejection of such conduct is used as the basis for decisions.

Harassment and discrimination may constitute serious misconduct, as could filing a false statement that harassment or discrimination has occurred. Either action may result in discipline or termination of contract. Harassment or discrimination may also subject the harasser to personal legal and financial liability.

If a Supplier or a Supplier's representative suspects that any discrimination or harassment has occurred, the individual is encouraged to promptly provide a written or oral complaint to their supervisor or to Willdan directly at willdan.ethicspoint.com.

Confidential Reporting and Cooperation with Investigations

Reports and complaints will be kept confidential to the extent permitted by law. In accordance with this SSC Code, Suppliers should cooperate completely in any investigation relating to Willdan and must be truthful at all times. Suppliers may never interfere with or obstruct an investigation conducted by Willdan or any government agency.



Section 2 – ISO 14001 & ISO 45001 Alternative Alignment Pathways for Small and Emerging Suppliers

Willdan recognizes that not all Suppliers, particularly small and emerging businesses, have the resources to obtain formal ISO certifications. To ensure equitable participation while maintaining robust environmental and safety standards, Willdan accepts proportionate, documented controls in lieu of ISO 14001 (Environmental Management Systems) and ISO 45001 (Occupational Health and Safety Management Systems), as outlined below.

2.1 Environmental Management (ISO 14001 Alternatives)

Small and emerging Suppliers who do not hold ISO 14001 certification may instead:

- Maintain a written environmental policy/framework endorsed by senior leadership or ownership;
- Identify key environmental aspects (e.g., energy and water) and impacts (e.g., wastes and emissions) relevant to their operations;
- Establish basic environmental goals, objectives, and key performance indicators (e.g., reduction in energy use, proper waste diversion vs disposal, water conservation);
- Document procedures for handling, storing, and disposing of hazardous materials and waste;
- Maintain records of required environmental permits, inspections, and any enforcement actions, along with corrective actions taken; and
- Review environmental performance at least annually and update goals/objectives, as appropriate.

2.2 Occupational Health & Safety Management (ISO 45001 Alternatives)

Small and emerging Suppliers who do not hold ISO 45001 certification may instead:

- Issue a written health and safety policy/framework committing to injury and illness prevention;
- Identify key risks (e.g., lifting, chemical exposure, driving, field work) and describe how these are controlled;
- Provide basic safety training appropriate to workers' roles (e.g., PPE use, hazard awareness, emergency procedures);
- Maintain an incident and near-miss log, including follow-up actions and lessons learned.
- Ensure access to appropriate PPE and clearly communicate when and how it must be used; and
- Conduct periodic (at least annual) safety walk-throughs or reviews of the workplace.

Willdan may provide guidance or tools (e.g., templates, checklists) to assist small and emerging Suppliers in implementing these practices.



Section 3 – Supplier Diversity Program

This Supplier Diversity Program supplements the SSC Code by setting out additional information for opportunities related to all suppliers, including MWBE, VOSB, SDVOSB, HUBZone, and LGBTBE participation, as recognized by applicable law or certification. Willdan is committed to fostering an inclusive supply chain that supports fair treatment and long-term success for all partners.

3.1 Verification of Status

To support accurate reporting of supplier diversity participation, Willdan may request documentation to verify Diverse Supplier status. Acceptable forms of verification may include, but are not limited to:

- Certification issued by recognized third-party certifying organizations (e.g., NMSDC, WBENC, SBA, state or local certifying agencies).
- Government-issued certifications or registrations.
- A completed supplier diversity affidavit or self-certification, where permitted by law and applicable program requirements.
- Periodic re-verification to ensure continued eligibility.

Suppliers are expected to provide accurate and current information and to promptly notify Willdan of any changes affecting their certification or eligibility status. To achieve contract “credit” for participation, Supplier’s must adhere to the laws in the governing state the work or contract resides.

3.2 Willdan’s Commitment to Supplier Diversity

Willdan is committed to:

- Identifying and reducing structural or administrative barriers that may disadvantage small and emerging businesses;
- Complying with all reporting requirements related to Diverse Supplier participation, spend, and engagement as required by applicable laws and regulations.
- Engaging in outreach, education, and capacity-building activities to support Diverse Supplier development; and
- Promoting fair, transparent, and inclusive procurement practices.

3.3 Expectations for Prime Suppliers

Prime Suppliers to Willdan are expected to:

- Consider all suppliers when forming teams, joint ventures, or subcontracting arrangements;
- Provide transparency regarding bid opportunities, scopes of work, and reasonable timelines to support Diverse Supplier participation;



- Track and, upon Willdan’s request, report Diverse Supplier subcontracting or tier-2 spend related to Willdan projects;
- Engage Diverse Supplier subcontractors on fair, commercially reasonable terms, including payment terms that support cash flow and financial sustainability for small and diverse businesses, where practical.

3.4 Collaboration, Capacity-Building, and Support

Willdan may, from time to time, offer or facilitate:

- Supplier diversity outreach events.
- Training related to compliance, health, safety, environmental expectations, and business practices.
- Referrals to external resources such as small business development centers, certification bodies, or development programs.
- Suppliers – particularly Diverse Suppliers, and small or emerging businesses – are encouraged to actively participate in such programs where available.

3.5 Supplier Diversity Point of Contact

Questions regarding Willdan’s Supplier Diversity program, Diverse Supplier verification, or participation opportunities may be directed to:

Camille Hollingsworth
Division Controller
chollingsworth@willdan.com



Section 4 – Supplier Acknowledgment Form

The undersigned Supplier acknowledges that they have received, reviewed, and understand Willdan’s SSC Code and Diversity Program (collectively, the “Supplier Code”).

The Supplier agrees to:

- Comply with the Supplier Code in all work performed for or on behalf of Willdan.
- Communicate the Supplier Code requirements to their employees and Suppliers involved in Willdan-related work.
- Cooperate with Willdan in any audits or assessments of compliance and promptly implement corrective actions where needed.
- Notify Willdan promptly if they become aware of any material breach of the Supplier Code.
- Give notices and comply with applicable laws, ordinances, rules, regulations, and orders of regulatory agencies on the safety of personnel and/or property providing protection from damage, injury, or loss.
- Designate a responsible member of the Supplier’s organization at the site whose duty shall be the prevention of accidents. This person shall be the Supplier’s superintendent unless otherwise designated by the Supplier in writing to Willdan.

IN WITNESS WHEREOF, the undersigned have caused this Supplier Code to be executed by their authorized officers as of the date and year first written below.

SIGNATURE

DATE

COMPANY NAME

WILLDAN VENDOR ID



Section 5 – Supplier Annual Audit Questionnaire

The following is a sample of the questionnaire that Suppliers will be asked to complete electronically.

Scoring Framework (Applies to All Questions)

- **2 = Fully Compliant** → Formal policy/system in place, implemented, monitored, and supported by evidence
 - **● Low Risk** → Score = 2 with sufficient evidence
- **1 = Partially Compliant** → Informal, incomplete, or inconsistently applied controls; limited documentation
 - **● Medium Risk** → Score = 1 or incomplete documentation
- **0 = Noncompliant** → No controls, major gaps, or confirmed violations
 - **● High Risk** → Score = 0 and/or confirmed incident/violation

Section A – Legal & Ethical Compliance

1. Legal & Regulatory Compliance

Question:

Do you confirm that your organization complies with all applicable laws and regulations in the jurisdiction(s) where your Willdan project work is performed?

Response:

Yes No

If no, describe violations, investigations, or corrective actions.

Scoring:

- 2 = Formal compliance program, periodic reviews, no violations in past 12 months
- 1 = General compliance awareness but no formal tracking or minor issues
- 0 = Known violations, fines, investigations, or no structured compliance program

Evidence: Compliance register, audit reports, certifications

Red Flags: Regulatory fines, active investigations, repeat violations

2. Ethical Business Practices & Anti-Corruption

Question:

Does your organization maintain policies and controls to prevent bribery, corruption, conflicts of interest, and anti-competitive practices?



Response:

Yes No

If yes, attach your formal policy, training logs or disclosures for max scoring

If no, describe any violations in the past 12 months and remediation:

Scoring:

- 2 = Formal policies, training, reporting mechanisms, no incidents
- 1 = Policy exists but limited training or inconsistent enforcement
- 0 = No policy or known incidents (bribery, conflicts, unethical conduct)

Evidence: Policies, training logs, disclosures

Red Flags: Corruption incidents, lack of disclosures, no training

Section B – Data Protection & Confidentiality

3A. Data Security Controls

Question:

What measures are in place to protect confidential and sensitive information (including Willdan data) and prevent data breaches?

Response:

Describe controls such as policies, access controls, encryption, monitoring, training, etc. “or” attach cyber security policy.

Scoring (Controls):

- 2 = Documented security program (policies, access controls, encryption, monitoring, training) and formal incident response plan
- 1 = Basic or informal controls in place but incomplete (e.g., limited monitoring, no formal incident response plan)
- 0 = No formal controls or significant gaps in protecting data

3B. Incident Disclosure (Required)

Question:

Have you experienced any cybersecurity incidents, data breaches, or unauthorized access events in the past 12 months?



Response:

- No
- Yes → If yes, provide details:
 - Date and nature of incident
 - Type of data impacted
 - Whether Willdan data was involved
 - Notification and response actions taken
 - Corrective actions implemented

Scoring (Incident Disclosure):

- 2 = No incidents OR incidents fully disclosed, promptly reported, and appropriately remediated with documented corrective actions
- 1 = Incident occurred with delayed reporting, incomplete documentation, or partial remediation
- 0 = Undisclosed incident, major breach, or inadequate/failed response

Final Score for Question 3:

- Score = Lower of (3A and 3B)
(This ensures a supplier cannot score high if they have weak controls OR mishandled an incident.)

Evidence Required:

- Information security policy
- Incident response plan
- Incident/breach logs
- Training and awareness records

Section C – Environmental Compliance

4. Environmental Management

Question:

Do you maintain an Environmental Management System (EMS) or documented environmental practices?

Response:

- Yes (ISO 14001 or equivalent)
- Yes (documented alternative system)
- No (explain):



Scoring:

- 2 = ISO 14001 or fully documented EMS with KPIs and annual review
- 1 = Documented practices but no formal system or limited tracking
- 0 = No environmental controls

Evidence: Environmental policy, KPIs, procedures

Red Flags: No documentation, lack of oversight

5. Environmental Impact & Compliance

Question:

How does your organization monitor and reduce environmental impacts, and were there any violations in the past 12 months?

Response:

(Describe monitoring practices and any violations)

Scoring:

- 2 = Measured impacts, reduction targets, compliant with permits, no violations
- 1 = Limited tracking or informal efforts
- 0 = No tracking or environmental violations/fines

Evidence: Emissions data, waste logs, permits

Red Flags: Violations, lack of monitoring

Section D – Labor & Human Rights

6. Labor Practices & Human Rights

Question:

Do you comply with labor standards (no forced labor, child labor, discrimination, fair wages, working hours)?

Response:

Yes No

Provide any violations and corrective actions:

Scoring:

- 2 = Formal HR policies, compliant practices, no violations
- 1 = Policies exist but limited monitoring or minor issues
- 0 = Violations (wage issues, discrimination, labor abuse)



Evidence: HR policies, payroll records, grievance logs

Red Flags: Lawsuits, worker complaints, human rights violations

Section E – Health & Safety

7. Health & Safety Management

Question:

Do you maintain an OHSMS or equivalent and report safety performance (including incidents)?

Response:

- Yes (ISO 45001 or equivalent)
- Yes (documented alternative system)
- No (explain):

Scoring:

- 2 = ISO 45001 or robust documented system with training and audits
- 1 = Basic safety program with gaps
- 0 = No formal safety system

Evidence: Safety policy, training records, hazard assessments

Red Flags: No training, unmanaged hazards

8. Incident Reporting & Corrective Actions

Question:

Describe your process for reporting and resolving incidents. Were all incidents properly reported?

Response:

(Describe process and confirm reporting compliance)

Scoring:

- 2 = Formal system, timely reporting, corrective actions implemented
- 1 = Inconsistent reporting or follow-up
- 0 = No tracking or failure to report serious incidents

Evidence: Incident logs, corrective actions

Red Flags: Fatalities, repeat incidents, non-reporting



Section F – Supply Chain Management

9. Supplier Flow-Down & Subcontractor Compliance

Question:

How do you ensure subcontractors comply with equivalent Code of Conduct standards?

Response:

(Describe approach: contracts, audits, monitoring)

Scoring:

- 2 = Formal flow-down requirements, monitoring, audits
- 1 = Contract clauses exist but limited oversight
- 0 = No requirements or visibility

Evidence: Contracts, supplier audits, policies

Red Flags: No oversight, subcontractor violations

Overall Scoring & Risk Rating

Total Possible Score: 18

Score	Risk Level	Action
15–18	● Low Risk	Approved / standard monitoring
10–14	● Medium Risk	Improvement plan required
0–9	● High Risk	Corrective action plan + escalation

Automatic Escalation Triggers (Override Score)

- Fatality or severe safety incident
- Forced labor, child labor, or human rights violation
- Bribery, corruption, or fraud
- Data breach involving Willdan data
- Repeated regulatory violations

Certification Statement

“The undersigned certifies that the information provided is accurate and complete and that the organization complies with Willdan’s SSC Code. The organization agrees to cooperate with audits and implement corrective actions where required.”

