DJE HOLDINGS SUSTAINABLE PROCUREMENT POLICY

Revised:  December 2020 (reviewed annually)
Owner:       Managing Director, Global Engagement and Corporate Responsibility
Approver:    Worldwide CFO

I. Overview

This policy applies to all employees, officers, and directors throughout Daniel J. Edelman Holdings, Inc.¹ (DJEH).

At DJEH, working in a socially responsible manner means doing business ethically and treating people and the environment with respect throughout our operations. These commitments also extend to our supply chain: We are dedicated to sourcing goods and services from sustainable sources and collaborating with partners who share our values and commitments towards sustainable procurement. Through this policy, we request our suppliers to uphold these commitments, and engage with us in a process of continuous improvement in responsible and sustainable purchasing practices.

DJEH has pledged to adhere to the principles of the United Nations Global Compact (UNGC). The UNGC’s Ten Principles cover human rights, labor, environment, and corruption issues, and lay the foundation for our Sustainable Procurement Policy. We are also committed to aligning our operations with the United Nations’ Sustainable Development Goals. We also seek to fully comply, at a minimum, with relevant environmental, labor, and human rights regulations, including meeting the reporting requirements of the Guiding Principles for Business and Human Rights Framework for UNGC and the UK Modern Slavery Act.

II. Application of Law

DJEH will comply with applicable laws adopted in every country and locale where we operate.

Where local law is more or less strict than this policy, DJEH will follow the stricter law or policy.

In situations where local law is silent on human rights, environmental policy, supply chain, or procurement practices, this policy will still apply.

III. Purpose

Three key tenets of DJEH’s business include reputation, leadership, and transparency. Our company’s values drive the development of a responsible and sustainable supply chain that encompasses sustainable purchasing, supplier diversity, and supplier accountability. We embrace our duty as a globally responsible business and seek to continue to operate our business in a manner that upholds the values and principles reflected in our Code of Conduct. By operationalizing sustainable procurement to address supply chain issues we aim to extend our positive impact.

IV. Supplier Expectations

We hold ourselves accountable to this Sustainable Procurement Policy by implementing a risk-based approach to monitoring selected suppliers and requiring all our suppliers to comply with the expectations outlined in the DJEH Code of Ethics for Suppliers and Service Providers.

In accordance with the DJEH Code of Ethics for Suppliers and Service Providers, this policy, the principles of the UNGC, and the U.N. Sustainable Development Goals, we expect our suppliers to comply with the following:

Environment
Suppliers are encouraged to minimize their environmental impact where possible, including:
- Reducing energy usage by avoiding inefficiencies, making use of new energy-efficient technologies, and keeping up to date with best practices
- Minimizing greenhouse gas emissions by reducing the use of fossil fuel energy sources and decreasing operational energy needs
- Conserving water and preventing pollutants from being released into the water system
- Properly managing waste and seeking to reduce, reuse, and recycle whenever possible
- Considering products’ end-of-life disposal during their manufacture and design, including choosing environmentally friendly packaging

Labor & Human Rights
Our suppliers must be committed to treating their employees with respect and taking consideration of their quality of life and human rights, in accordance with our Human Rights Policy, including:
- Taking steps to minimize health and safety risks to all employees while at work
- Aligning employee working hours and pay with industry norms and regulations
- Giving employees opportunities to advance in their careers and develop their personal and professional skills
- Preventing child and forced labor, discrimination, and harassment

Business Ethics
DJEH shall endeavor to ensure that our Code of Ethics for Suppliers and Service Providers is incorporated by reference as part of the Independent Contractor Agreement or other contract signed by our suppliers.

DJEH’s suppliers must conduct business ethically and ensure they
- Comply with applicable laws and regulations
- Prevent corruption, bribery, fraud, and conflicts of interest
- Protect confidential employee, client, and third-party data from unauthorized release
Supplier Diversity
DJEH is committed to supplier diversity and is aligned with U.N. Sustainable Development Goal #8, which focuses on promoting sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all.

Under the scope of this policy, inclusive growth includes supporting job creation in communities where we operate while reinforcing human rights, fair wages for women and men, and in the US and Canada, capacity-building of locally based women-owned, minority-owned, LGBT-owned, disabled-owned, veteran-owned, and disadvantaged or HUB-zone businesses.

V. Monitoring

Expectations for DJEH’s supply chain sustainability monitoring and performance program is communicated to applicable suppliers through this policy and the DJEH purchasing function. The policy is available on the DJEH website.

Through a risk-based selection process, certain suppliers may receive direct communications from DJEH or its third-party business partners to provide information to enable monitoring of supplier adherence to the Sustainable Procurement Policy using a methodology and system selected by DJEH. Use of an alternative measure of sustainable business practices must be specifically approved by DJEH. Failure by a supplier to comply with a request for such monitoring information can be grounds for termination of the Supplier’s business relationship with DJEH.