

# Vendor Code of Conduct

November 2025

This Vendor Code of Conduct (“Code of Conduct”) applies to companies, partnerships, and individuals supplying goods and/or services to Manatt, Phelps & Phillips, LLP (“Manatt” or the “Firm”). It serves as a commitment to sustainable and ethical practices through our supply chain. To the fullest extent permitted by law, we expect our vendors to share these commitments and follow these practices. Vendors are expected to obtain Manatt’s prior written consent before subcontracting the performance of their service obligations to a third party. Any approved subcontractor is also expected to follow this Code of Conduct. In the event of non-compliance, Manatt reserves the right to cease working with such suppliers.

# General Expectations

- **Compliance With Laws.** Vendors will abide by all local, national, and international laws in the jurisdictions in which they operate, including those with respect to anti-corruption, anti-money laundering and the prevention of financial crime, anti-competition, environmental, labor & human rights, health and safety, and data protection. Vendors will have management processes in place to ensure compliance in their own business and their own supply chains.
- **Product Compliance.** All products supplied will meet the requirements of applicable product safety laws.
- **Commitment to Responsible Procurement.** Vendors will apply the principles of responsible procurement to their own suppliers and supply chains. This means that they should, as applicable and necessary, have their own responsible procurement policy and related vendor code of conduct.
- **Whistleblowing.** Vendors will have policies and procedures to support employees raising good faith concerns about legal or ethical issues. Whistleblowers will be provided with appropriate support, including anonymity if requested, and will not be subject to harassment or retribution.
- **Vendor Responsiveness.** By providing goods and/or services to Manatt, all Vendors agree to respond to reasonable inquiries and provide supporting data as reasonably requested by Manatt with respect to their practices relating to this Code of Conduct.

# General Expectations (cont'd)

- **Contacting Manatt Personnel.** Vendors will not use the contact information of Manatt personnel for the purpose of making unsolicited telephone calls or sending any marketing or unsolicited emails, nor will Vendors sell any Manatt or Manatt personnel data.
- **No Use of Manatt's Name or Logo.** Vendors will not refer to Manatt in their marketing or promotional materials nor use Manatt's logo or other marks in any way or in any medium, including but not limited to digital, print, social or other forms of media, for any purpose without Manatt's prior written consent.

- **Fiscal and Tax Compliance.** Vendors will comply with all applicable laws and regulations related to fiscal and tax compliance, including having reasonable procedures to prevent tax evasion and its facilitation by Vendors and their associated persons.
- **Anti-Bribery and Corruption.** Vendors will comply with all applicable laws and regulations, including the Foreign Corrupt Practices Act (United States), relating to anti- bribery and anti-corruption, and shall have policies and processes to ensure compliance.
- **Unfair Business Practices.** Vendors will have appropriate policies, systems, and procedures to guard against money laundering, insider trading, conflicts of interest, and fraud.
- **Confidentiality, Personal Data and Intellectual Property Protection.** Vendors will comply with all applicable laws and contractual obligations, and have appropriate safeguards and processes, to protect personal and business information. Vendors will also support Manatt's compliance with applicable laws relating to privacy and the protection of personal data, including the prompt notification to Manatt of personal data breaches affecting the Vendor and any data subject requests received.
- **Gifts and Entertainment.** Vendors will not give or offer to any Manatt personnel anything of value or gift(s) in order to secure, induce or reward an improper benefit or improper performance of a function or activity.

- **Overall Environmental Impacts.** Manatt encourages Vendors to adopt appropriate environmental policies and sustainable systems. Vendors should understand, and take account of, the environmental impacts of their own operations and their supply chains. Vendors are also expected to adopt appropriate global environmental standards where local laws and regulations are absent.
- **Resource Efficiency.** Sustainable businesses minimize their use of natural resources. Vendors are expected to have commitments to improve resource efficiency, including minimizing use of scarce or non-renewable resources, by using recycled materials where possible and by recycling the materials that they use.
- **Energy.** Vendors should aim to lower their energy consumption in the creation and use of their products and services, in the interest of reducing the use of resources and reducing costs.
- **Greenhouse Gas (carbon) Emissions.** Vendors should understand where greenhouse gas or carbon emissions occur in their products, services, and supply chains. They should have appropriate targets and processes to reduce emissions from operations and products over their life cycle.

# Sustainability (cont'd)

- **Water.** Vendors should aim to sustainably manage their use of water in their own operations, supply chains, and their products and services. This includes minimizing the use of water in regions where water is scarce and ensuring that water discharges are free from pollution.
- **Waste.** Vendors should have appropriate targets and processes to reduce waste from their own operations. This should include seeking to reduce waste and endeavoring to ensure proper waste disposal. Vendors should also seek reasonably to be aware of waste issues in their supply chains and work with their own suppliers to minimize impacts.
- **Biodiversity.** Vendors should aim to understand and to protect biodiversity in their local environment and communities. They should also seek to understand and reduce impacts from their own supply chains.
- **Product Standards.** Vendors should ensure that their products meet the highest quality standards and do not contain ingredients or components that might pose a threat to human health or the environment. Vendors should strive to manufacture physical products in a sustainable manner that minimizes environmental impacts.

- **Overall Labor Principles.** Vendors should have working conditions that meet all applicable standards of human rights.
- **Modern Slavery and Human Trafficking.** Vendors will comply with all applicable anti-slavery and human trafficking laws (including Code of Federal Regulations, 48 CFR 52.222-50 in the United States) and not use any slave, bonded, child, illegal or compulsory labor. Vendors will be immediately responsive to any requests from Manatt to verify their compliance with the obligations of these laws.
- **Freedoms of Expression and Association.** Vendors will respect the rights of their employees to freedom of expression and freedom of association, including the right to join workers' organizations, as permitted by law.
- **Anti-Harassment, Abuse and Disciplinary Action.** Vendors will not tolerate physical, mental, verbal, sexual or any other abuse, inhumane or degrading treatment, corporal punishment or any form of harassment or discrimination. This includes prohibiting harassment or discrimination on the basis of any protected category covered by applicable law, including but not limited to age, gender, sexual orientation, gender identity or expression, race, ethnicity, color, disability, religion, political affiliation, union membership, national origin, or marital or pregnancy status during any recruitment or employment activities. Formal disciplinary and grievance appeal procedures should be documented and communicated to all workers in clear and understandable terms, consistent with applicable law.

# Human Rights (cont'd)

- **Working Hours.** Vendors will ensure that working hours comply with all local, national, and international laws and standards in the jurisdictions in which they operate and should not expect workers to work more than the statutory hours set out in relevant working time legislation or other applicable legal limits.
- **Wages and Benefits.** Vendors will ensure that its employees' wages and benefits meet, at a minimum, applicable legal standards or industry standard benchmarks.