

**Conduent Environmental Policy:** *Combines Previous EHS and FAC 500 Policies*

**Effective Date:** April 1, 2021

**Supersedes:** Policy dated 1/1/2020

**SCOPE**

The content of this policy applies to Conduent Incorporated, its Operating Units, Global Real Estate, and suppliers.

**Definitions**

*Conduent Standards* - set of requirements and performance criteria for Conduent workplaces and services in fulfillment of the corporate Environmental policy. Standards are available on Conduent connect.

*Operating Units* - all organizations and employees across the company globally

**SUMMARY**

This policy establishes and describes Conduent's commitment to the environment, customers, suppliers, and the communities where we do business. It outlines energy management and conservation and establishes functional responsibilities, including maintaining operations in the event of an energy shortage and on-going efforts to reduce energy costs wherever feasible. All Conduent Operating Units will continuously ensure that energy resources are effectively and efficiently utilized.

It is the policy of Conduent to:

- Comply with applicable environmental rules, regulations, and Conduent Standards
- Take appropriate measures to protect the environment of our employees, customers, suppliers, and neighbors from unacceptable risk
- Assess environmental impacts before starting a new activity or project and eliminate unacceptable risks from facilities, services, and processes
- Comprehend environmental impacts in the design and acquisition of products and services
- Strive for continual improvement to conserve natural resources, reduce or eliminate the use of toxic and hazardous materials, prevent pollution, reuse, and recycle
- Require suppliers to adhere to applicable environmental rules, regulations, and Conduent Standards
- Complete an environmental assessment prior to finalizing any Real Estate Transaction
- Remediate environmental contamination to levels specified by the EH&S department
- Strive for continual improvement to conserve natural resources, eliminate the use of toxic and hazardous materials, prevent pollution, recover, reuse, and recycle

## **STANDARD PRACTICE**

- Conduent will cooperate with government agencies and local utilities in matters related to energy management and conservation.
- All Conduent employees are responsible for energy conservation.

## **OVERSIGHT**

### **Board Oversight**

- The Board of Directors of Conduent is responsible for overseeing the management of the Environmental Policy and strives to ensure an appropriate balance between environmental responsibility and Conduent's business goals. Conduent is committed to operating in a manner that protects the environment and the communities in which we conduct business.

## **MANAGEMENT**

### **ESG Steering Committee**

- The purpose of the ESG Steering Committee ("Committee") is to support and provide guidance to the Board of Directors (the "Board") of Conduent Inc. (the "Company") regarding the Company's ongoing commitment to environmental, corporate social responsibility, health and safety, corporate governance, sustainability, and other public policy matters relevant to the Company (collectively "ESG Matters").

### **Duties and Responsibilities**

- Set strategy, long-term targets, and budget for Environmental, Social and Governance initiatives company-wide
- Oversee/provide guidance in EH&S, climate change, social, and public programs, policies, practices, partnerships, activities, and goals to ensure compliance, consistency, and impact on strategy
- Oversee progress on key environmental sustainability targets and relative initiatives, and provide advice on how to improve performance
- Maintain oversight of communications on sustainability matters
- Consider and bring attention regarding current and emerging sustainability matters
- Advise management on stockholder proposals and share concerns related to sustainability
- Review the sustainability strategy, policies, practices, and disclosures for consistency
- Review sustainability development strategies, policies and practices, compliance related to HSE incidents/laws, current pending legal actions against the company, emerging issues, inspection audits, and corrective action reports
- Assist management in overseeing internal and external communications with employees, investors, and other stakeholders regarding the Company's position on or approach to ESG Matters, including the coordination and review of, as appropriate, draft responses, corporate social responsibility reports, or other disclosures to stakeholders

### **Members & Chair**

- Members of the Committee shall be approved by the Executive Management Team as the responsible body to manage and coordinate the sustainability process. It reports to a team of executive sponsors.
- Investor Relations, Co-Chair

- Marketing, Co-Chair
- Diversity and Inclusion
- Real Estate
- Human Resources
- Legal
- Risk Management
- Additional members, as necessary, to include sales and business unit leaders

#### Structure, Operations, Cadence, & Annual Calendar

- The Committee shall meet quarterly with additional meetings, as necessary
- The Committee will report to the Board once a year on ESG Matters
- The Committee will provide ongoing direction to the internal tactical team to execute on annual ESG strategy, goals, and progress

### **RESPONSIBILITIES**

#### **Operating Units**

- Operating Units will evaluate energy usage and optimize equipment utilization to manage energy supplies and minimize energy costs
- Operating Units are accountable for implementing energy management
- Apply facilities standards and specifications concerning procurement and design for energy conservation and management in new construction programs and other projects for which the Operating Unit has implementation responsibility
- Evaluate local work practices for methods to improve energy efficiency
- Provide input to the ESG Steering Committee
- Oversee performance of the organization and employees, then correct underperformance or recognize progress, as required
- Strive for continual improvement as a corporate citizen to conserve natural resources, eliminate the use of toxic and hazardous materials, prevent pollution, and minimize waste, recover, reuse, and recycle
- Inform the EH&S department and Global Real Estate Team prior to interfacing or engaging governmental authorities or agencies responsible for environmental oversight or when contacted directly by these agencies
- Comprehend and comply with environmental rules, and regulations, internationally recognized standards and codes, and Conduent Standards that apply to their operations
- Provide resources necessary to reach compliance with this Policy
- Work with Global Real Estate Team to obtain Environmental approval for any real estate transaction.

#### **Global Real Estate (GRE):**

- Shall apply facilities standards and specifications concerning procurement and design for energy conservation and management in new construction programs and other projects for which the GRE Team has implementation responsibility
- GRE is accountable for implementing energy management programs related to building efficiency and management of the facility/assets

- Collect energy consumption data and provide to Investor Relations and to Global Purchasing for reporting as required to government agencies
- Conduct facility energy audits as required
- Partner with Global Purchasing to develop and implement energy purchasing strategies. Global Purchasing is responsible for developing and awarding all energy contracts. GRE is responsible for managing energy contracts
- Develop contingency plans to ensure availability of energy to maintain operations in the event of an energy shortage
- Establish effective energy management and conservation efforts consistent with corporate policies, standards, procedures, and guidelines. Ensure implementation and monitoring of these programs and plans
- Assure compliance with energy laws and regulations in respective jurisdictions
- Provide input to the ESG Steering Committee
- Responsible for the building and facility management related environmental protocols or when contacted directly by agencies responsible for environmental oversight
- Comprehend and comply with environment rules, and regulations, internationally recognized standards and codes, and Conduent Standards that apply to their operations
- Strive for continual improvement as a corporate citizen to conserve natural resources, eliminate the use of toxic and hazardous materials, prevent pollution, minimize waste, recover, reuse, and recycle
- Establish and maintain any appropriate third-party environmental certification systems such as ISO 14001
- Inform the Operating Units and the EH&S department prior to interfacing or engaging governmental authorities or agencies responsible for environmental oversight or when contacted directly by these agencies
- Provide funding and resources to remediate environmentally contaminated workplaces and real estate, and ensure that Conduent facilities and workplaces conform with applicable environmental rules, regulations, internationally recognized standards, codes, and Conduent Standards
- Provide resources necessary to reach compliance with this Policy

**EH&S Dept shall:**

- Provide technical subject matter expertise and knowledge to enable the Operating Units and GRE Team to satisfy these requirements
- Maintain environment standards that comprehend the Conduent business model and reflect current and anticipated regulatory requirements
- Lead required risk assessment, involving applicable Operating Unit and GRE Leadership and appropriate subject matter experts
- Monitor and report the progress of the corporation in satisfying these requirements
- Interface with internal and regulatory agencies, industry groups, and other stakeholders on environment and sustainability topics
- Develop and maintain the environment standards and guidance
- Promote required risk assessments, involving applicable Operating Units, GRE and appropriate subject matter experts
- Consult on environmental audits

- Manage the remediation of any contaminated sites
- In conjunction with Legal, interface with governmental environmental authorities on behalf of the Corporation
- As requested, in conjunction with Corporate Risk Management, develop insurance and property protection criteria to reduce the potential for property losses and maintain levels of protection acceptable to the Corporation

## **Environmental Protection**

Conduent policy commits to reducing our impact on the environment through:

- Mitigating climate change through cleaner energy, where practicable, and managing emissions effectively
- Reducing waste generation, increasing recycling rates and working with suppliers to minimize waste and harmful environmental impacts upstream and downstream
- Promoting resource efficiency (energy, water, etc.) in our solutions and services, and within our supply chains
- Following international guidelines for disposal of electronic waste
- Designing solutions and services to optimize their environmental performance
- Addressing travel-related emissions

## **Climate Change & Biodiversity**

Conduent acknowledges the specific impact the company has on climate change and biodiversity and is seeking to reduce that impact through:

- Waste reduction and use of clean energy. Conduent responds to the CDP Climate Change questionnaire and reports Scope 1, 2, and 3 emissions.
- Recycling of paper and related products at production facilities and utilization of third-party companies to track waste.
- Conduent seeks to further understand the risks that climate change and a loss of biodiversity would have on the company's operations and supply chain. Conduent is not just looking to reduce risk in those areas, but also to explore areas of opportunity in which the company can make a positive impact regarding climate change and biodiversity.

## **Exceptions**

Any exception to this policy requires prior written approval from the Global Head of HR and a Corporate Officer.