

Environmental Policy

Region/Country: Global

Number: FAC 501

Effective Date: April 1, 2024

Supersedes: FAC 501

Dated: April 1, 2021

Scope

Conduent Incorporated, LLC and its subsidiaries (“Conduent” or the “Company”) provide this policy as a guide for associates. This policy applies to Conduent Incorporated, including its Operating Units, Global Real Estate, Environmental Health & Safety teams.

Summary

This policy establishes and describes Conduent’s commitment to the environment, customers, suppliers, associates 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 ongoing efforts to reduce energy costs wherever feasible. All Conduent Operating Units will continuously ensure that energy resources are effectively and efficiently utilized.

Definitions

Operating Units: All revenue generating businesses and corporate functions across the company, globally.

Conduent Safety Standards: Set of requirements and performance criteria for Conduent workplaces and services in fulfillment of this Environmental Policy. Standards are available through [ConduentConnect>Resources](#).

GRE: The Global Real Estate Department.

GSP: The Global Sourcing and Procurement Department.

ESG Team: Responsible parties within Conduent that manage the strategy, implementation and reporting of company-wide Environmental, Social and Corporate Governance (ESG) practices and programs.

EH&S Team: The Environment, Health & Safety Team.

Environmental Assessment: A standard assessment completed by GRE and/or a defined third-party facility partner intended to determine any risks and/or impacts a real estate transaction will have on Conduent or within the community proximity.

ESG Matters: A collective term referring to the Company’s ongoing commitment to environmental, diversity and inclusion, health and safety, corporate governance, other non-financial risks and opportunities, and other public policy matters relevant to the Company.

Policy

It is the policy of Conduent to:

- Comply with applicable environmental rules, regulations, and established Conduent Safety Standards
- Take appropriate measures to minimize environmental risk of our operations, solutions and services.

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- Strive for continual improvement to conserve natural resources, reduce or eliminate the use of toxic and hazardous materials, prevent pollution, and reuse/recycle paper, plastic and electronic devices.
 - GSP to require suppliers to adhere to applicable environmental rules, regulations, and Conduent Safety Standards by acknowledgement and agreement during the onboarding process. GSP is also accountable for all material suppliers' agreements and adherence to any and all environmental stipulations within our environmental policy.
 - GRE to complete an environmental assessment prior to finalizing any Real Estate Transaction & Renewal
 - Remediate environmental contamination to levels specified by EH&S standard operating procedures.
 - Strive for continual improvement to conserve natural resources, eliminate the use of toxic and hazardous materials, prevent pollution and reduce waste.

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Standard Practice

- Conduent will adhere to legislation and cooperate with government agencies and local utilities in matters related to energy management and conservation in the countries and municipalities in which we operate.
- All Conduent associates are responsible for energy conservation during their working hours which includes behaviors such as recycling, consciously using energy/lighting, limiting document printing and traveling only for business necessity, etc.

Environmental Protection

This policy commits to reducing Conduent's impact on the environment through:

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

Climate Change and Biodiversity

Conduent acknowledges the specific impact it 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 Carbon Disclosure Project (CDP) Climate Change questionnaire and reports Scope 1, 2, and 3 emissions.
- Recycling of paper and related products at production facilities and Conduent's headquarters utilizing third-party companies to track such waste.
- Through participation in the Task force on Climate-related Financial Disclosures (TCFD) and other efforts, Conduent continuously 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 to the company's associates, clients, and communities.

Exceptions

Any exception to this policy requires prior written approval from the Chief Administrative Officer.

Responsibilities

I. Operating Units:

- Evaluate energy usage and optimize equipment utilization to manage energy supplies and minimize energy

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costs, including but not limited to work sites and modes of transportation.

- Be accountable for implementing energy management practices and reporting on such annually to the ESG Steering Committee (SteerCo).
- Work with GRE to obtain Environmental approval for any real estate transaction and renewal through the completion of an Environmental Assessment.
- Apply facilities standards and specifications concerning procurement and design for energy conservation and management in new construction and leasing programs and other projects for which the Operating Unit has implementation responsibility.
- 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.
- Inform and collaborate with GRE, relevant EH&S colleagues, Government Affairs and as necessary, External Communications prior to engaging or when contacted directly by governmental authorities or agencies responsible for environmental oversight.
- Comprehend and comply with environmental rules and regulations, internationally recognized standards and codes, and Conduent Safety Standards that apply to their operations.
- Assign resources necessary to maintain compliance with this Policy.
- Inform relevant departments/teams (e.g., GRE, ESG, etc.) of any Operating Unit specific environmental programs being implemented and provide regular progress reports accordingly.

GRE:

- Apply published Conduent Safety Standards and specifications concerning procurement and design for energy conservation and management in new construction/leasing programs, renewals and other projects for which the GRE Team has implementation responsibility.
- Be accountable for implementing energy management programs related to building efficiency and management of the Company's facilities/assets.
- Collect energy consumption data (direct and sub-metered from landlords) and provide to the ESG Team and Steering Committee for reporting as required by government agencies and ESG disclosures practices.
- Annually, conduct, directly or through a third-party facility partner, facility energy audits and share such findings/outcomes with ESG Team annually and with other internal parties as required.
- Develop and implement energy purchasing strategies and award all 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.
- Be responsible for the building and facility management related environmental protocols when contacted directly by agencies responsible for environmental oversight.
- Consult with Conduent's Legal Department to ensure comprehension and compliance with environment rules, laws, regulations, globally recognized standards/codes, and Conduent Safety Standards that apply to Conduent's operations in respective jurisdictions.
- Strive for continual improvement as a corporate citizen to conserve natural resources, eliminate the use of toxic and hazardous materials, prevent pollution, minimize waste, reuse, and recycle.

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- Establish and maintain any appropriate third-party environmental certification systems, such as ISO 14001, where appropriate.
 - Inform and collaborate with the Operating Units, relevant EH&S colleagues, Government Affairs and as necessary, External Communications prior to engaging or when contacted directly by governmental authorities or agencies responsible for environmental oversight.
 - 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.
 - As requested, in conjunction with Enterprise Risk Management, develop insurance and property protection criteria to reduce the potential for property losses and maintain levels of protection acceptable to the Company.
 - Assign resources necessary to comply with this Policy.

EH&S:

- Provide technical subject matter expertise and knowledge to enable the Operating Units and GRE Team to satisfy requirements specific to Conduent's workforce.
- Maintain environmental standards that align with Conduent's business model and reflect current and anticipated regulatory requirements.
- Partner with all Operating Units to maintain a library of all safety protocols, procedural documents, training, assessments, etc., active throughout Conduent.
- Be accountable for maintaining a comprehensive summary of EH&S throughout Conduent globally and reporting on such annually to the ESG Team, ESG Steering Committee and Senior Leadership, as necessary.
- Interface with internal and regulatory agencies, industry groups, and other stakeholders on environment and sustainability topics; any external engagement should be conducted in partnership with GRE and as necessary, Government Affairs, External Communications and respective Operating Unit(s).
- Maintain and regularly update Conduent Safety Standards.
- Promote required risk assessments, involving applicable Operating Units, GRE and appropriate subject matter experts.
- Consult on environmental audits implemented by GRE.
- Investigate and action accordingly any EH&S grievances submitted through the Ethics and Compliance Helpline.

Oversight

I. Board Oversight

The Board of Directors ("Board") 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. Conduent's environmental initiatives and performance are overseen by the Board's Corporate Social Responsibility and Public Policy Committee. The CSR & PP Committee assists the Board in reviewing of the company's material ESG strategies, initiatives, investments and policies, with priorities including the impact of climate change and other environmental matters and energy and natural resource conservation.

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II. Management

SteerCo

SteerCo is a cross-functional management committee at Conduent that provides input and guidance on ESG strategy, initiatives and policies, stakeholder communications and macro/micro developments related to ESG. The additional purpose of SteerCo is to support and provide guidance to the Board regarding ESG Matters.

SteerCo Duties and Responsibilities

- Coordinate with the CEO and the Management Operating Team on incorporating ESG matters into Operating Unit strategies.
- Set strategy, long-term targets, and budget for ESG Matters 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 corporate strategy.
- Oversee progress on key sustainability targets and related initiatives and provide advice on how to improve performance.
- Maintain oversight of communications on ESG Matters.
- Consider and bring attention regarding current and emerging ESG Matters to Management Operating Team, the CSR & Public Policy Committee and the Board of Directors.
- Advise Management on stockholder proposals and share concerns related to ESG Matters.
- Review the sustainability strategy, policies, practices, and disclosures for consistency.
- Integrate ESG Matters into strategies, policies and practices, compliance related to health and safety incidents/laws, emerging issues, inspection audits, and corrective action reports.
- Assist Management in overseeing internal and external communications with associates, 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.

SteerCo Members and Chair

- Members of the SteerCo shall be approved by the ESG Practice Lead as the responsible body to manage and coordinate the sustainability process. It reports to the Public Policy (PP) & Corporate Social Responsibility (CSR) Committee.
 - Chief Communications Officer, Chair
 - Legal
 - Diversity and Inclusion
 - Real Estate
 - Procurement
 - Human Resources
 - Risk Management
 - Operations
 - Additional members, as necessary

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Structure, Operations, Cadence and Annual Calendar

- SteerCo shall meet monthly with additional meetings, as necessary.
- SteerCo will report to the PP & CSR Committee quarterly on ESG Matters.
- SteerCo will provide ongoing direction to an internal tactical team, (SME Task Force) to ensure appropriate integration of ESG Matters into corporate strategy and monitor related goals and progress.

Forms/Exhibits

Conduent’s Corporate Responsibility [Page](#).

References

This policy combines previous EH&S and GRE policies.

Conduent Ethics and Compliance Helpline – Contact Conduent’s Ethics and Compliance Helpline if you have questions or to report a concern about potential unethical conduct or noncompliance.

- For online reporting visit www.conduent.com/ethicshelpline.
- By phone in US, Canada and Jamaica call (844) 330-0221. Additional country phone numbers can be found in the [Ethics Grievance Directory](#)
- For traditional mail use: Conduent Incorporated Business, Ethics & Compliance Office, 100 Campus Drive, Suite 200, Florham Park, NJ 07932

Revision History

Date	Description
April 1, 2024	Revised