

PAUL G. ALLEN FAMILY FOUNDATION GRANTEE CODE OF CONDUCT

In order to set clear expectations for the Paul G. Allen Family Foundation's (the Foundation) grantees, funding partners, vendors and contractors (collectively, "Grantees"), the Foundation created the Foundation Grantee Code of Conduct (Code). The standards outlined in this Code describe the Foundation's ethical standards with respect to employment practices, environmental stewardship and business integrity and outlines the Foundation's framework for principled business conduct.

The Foundation expects all Grantees to adhere to the following standards and to continuously strive to conduct business in accordance with the highest ethical principles. This Code supplements but does not supersede any agreements with any Foundation Grantee.

Comply with the Law. Legal compliance is fundamental to business management. Grantees must operate in compliance with all applicable laws and regulations in the countries in which they operate.

Respect Individual Rights. The Foundation recognizes and respects the dignity and rights of all individuals. The Foundation will not tolerate the use of child labor, and all Grantees' workers must be of legal age. Grantees will not participate in human trafficking, indentured labor or slavery. The Foundation requires compliance with all applicable human rights laws and regulations.

The Foundation respects the rights of employees to organize and bargain collectively without penalty. Grantees must not restrict employees' right to freedom of association or the right to organize into labor unions.

Provide Fair Compensation. The Foundation is committed to providing employees a living wage. Wages must be consistent with legal and industry standards. Grantees must compensate individuals with equal experience and qualifications equitably. Compensatory deductions as a disciplinary action are not permitted.

Provide Safe Working Conditions. Employees have a fundamental right to a safe and secure working environment. Grantees must create and maintain a safe and healthy work environment for all of its employees.

Embrace Diversity. The Foundation values diversity, equity and inclusion in the workplace. Grantees must base terms and conditions of employment on individual merit and shall not discriminate against any individual based on race, national origin, gender, gender identity, age, religion, sex, sexual orientation, pregnancy, genetic information, disability, veteran status, political affiliation, or union membership.

Speak Truthfully. The Foundation is committed to providing the public and its Grantees with honest, accurate, and consistent information. Grantees must report all business transactions fairly and accurately. Grantees shall not knowingly conceal or falsify information.

Act Fairly. The Foundation conducts all of its business interactions and activities with integrity. As a Grantee to the Foundation, Grantees may be acting on Foundation's behalf. Grantees should avoid any real or perceived relationships that would conflict with the Foundation's interests or would hinder the Grantee's ability to act with integrity in their relationship with the Foundation.

Anti-Bribery. Grantees have a responsibility to take efforts to prevent corruption. Grantees are prohibited from providing inducement, as outlined below, to gain influence or favorable business treatment involving government, commercial, or other third-party arrangements.

Grantees will not, directly or indirectly, offer payments or anything of value to gain or maintain a business advantage (including facilitation payments). Grantees shall comply with all relevant anti-bribery and anti-corruption laws. In the extraordinary circumstance where an improper payment is made to protect health, life, liberty or security of an individual; such incident must be properly recorded and reported to the Foundation.

Protect Our Assets. Proprietary information is one of the Foundation's most important business assets. The Foundation requires any Grantee (including sub-grantees) with access to non-public information of the Foundation to closely safeguard such information. Disclosure of the Foundation's proprietary information is only allowed when required by law or when approved in writing by an authorized Foundation representative. Grantees can only use the Foundation's proprietary information in furtherance of the purposes of the business relationship they have with the Foundation, or as otherwise expressly specified in any agreement with the Foundation. All information regarding the Foundation operations, projects, initiatives, employees, assets and leaders shall be treated as confidential unless the information is publicly available.

Comply with Global Trade Restrictions. Be aware that the Foundation may be subject to various global trade restrictions and requirements under federal law. Grantees will adhere to all import and export laws and regulations pertaining to business activities.

Support Local Communities. The Foundation supports its local communities. The Foundation encourages Grantees to share in this commitment by making ongoing contributions to improve social conditions.

Provide Environmental Stewardship. Sustainability is at the core of how the Foundation conducts business, and the Foundation is committed to reducing environmental harm and conserving natural resources. Grantees must comply with all environmental laws and regulations. The Foundation encourages Grantees to conduct business in a manner that minimizes impact on the environment.

Subcontracting. The Foundation expects sub-grantees, contractors, consultants and representatives to demonstrate the same level of commitment to ethical conduct and to comply with the standards described in this Code. Due diligence should be exercised during the selection of subcontracted parties. Ongoing monitoring should take place to ensure continuing compliance with this Code.

Speaking up. Grantees are expected to promote a speak-up culture that does not tolerate retaliation by providing a means for your employees, suppliers and contractors to speak up if they see something that is unsafe, unethical or potentially harmful involving business with the Foundation.

All Grantees and representatives associated with the Foundation must abide by the Foundation's Grantee Code of Conduct. Grantees shall self-monitor compliance with this Code and report all instances of non-compliance. In certain circumstances, the Foundation may request a Grantee to demonstrate compliance with this Code. If any areas of non-compliance are found, corrective action must be taken. Should a Grantee become aware of an actual or potential ethical concern related to this Code, please contact the Ethics Helpline online at Vulcan.ethicspoint.com or via phone at 1-855-792-6406