I. CONDUCTING BUSINESS WITH INTEGRITY & COMPLIANCE WITH VENDOR CODE OF CONDUCT

Energy Recovery Inc. ("ERII" or the "Company") is committed to doing business with integrity and in compliance with applicable US laws and regulations. ERII expects the same of those with whom we have a business relationship. ERII is providing this Vendor Code of Conduct ("Vendor Code" or "Code") to ensure our expectations and standards are understood and followed by everyone involved in the Company's business operations. As used in this Code, a vendor is a business that provides goods or services to ERII, and may include agents, consultants, contractors, suppliers, vendors, their subcontractors and any other contracted third parties (collectively "Vendors").

ERII believes in doing business only with Vendors who demonstrate the highest standards of ethical business conduct. We are committed to operating our business in an ethical manner that ensures compliance with all applicable laws and regulations, and in which working conditions are safe, workers are treated with respect, and our commitment to the environment is met. We expect that our Vendors will uphold and abide by these same standards.

We conduct business in various countries around the world. Many laws, local customs and social standards differ from one place to the next. Like ERII, Vendors must abide by the laws of the countries in which they operate, as well as conduct business according to the Code. If local customs or practices differ from the standards contained in the Code, Vendors must follow the Code. If there is a conflict between the standards of this Code and local expectations, Vendors are expected to consult with ERII's Legal Department to determine the proper way to conduct business in that location. The Code is in addition to and does not reduce or supersede any contractual obligations that may be set forth in a written agreement between ERII and the Vendor.

We expect Vendors to read, understand and follow the Code and to always conduct business with ethics. Vendors are expected to abide by the Code when on Company property or when doing work for or on behalf of the Company. Vendors must also ensure that this Vendor Code is communicated to and adhered to by all their employees, agents, subcontractors, and representatives doing business with or on behalf of ERII. Vendors who encounter a situation believed to violate this Code must immediately report the situation to ERII's Legal Department.

Compliance with this Vendor Code and completing training on this Code, as may be offered by ERII, is required in addition to any other obligations in any agreement a Vendor may have with ERII. Vendors may be required to provide annual certification to ERII regarding their compliance

Copyright 2023 Energy Recovery, Inc. All rights reserved. October 2023 version

with this Vendor Code and all applicable laws and regulations, including extraterritorial laws of all countries that govern the conduct of ERII, such as the United States Foreign Corrupt Practices Act ("FCPA") and the U.K. Bribery Act. Vendors must comply with data/reporting requests from ERII. ERII vendors are expected to self-monitor and demonstrate their compliance with this Vendor Code. ERII assumes no duty or obligation to inspect, audit or review a Vendor's compliance with this Vendor Code. ERII assumes no liability or responsibility for the actions or omissions of its Vendors. ERII may require the immediate removal of any Vendor agent, representative or employee who acts unlawfully or contrary to this Vendor Code or any ERII policy.

This Vendor Code is subject to change within ERII's sole discretion and does not convey any contractual or other rights to anyone. If you have questions regarding this Vendor Code, please contact ERII's Legal Department via email at LegalDepartment@energyrecovery.com.

II. AUTHORITY TO ACT ON BEHALF OF ERII

Vendors must know and adhere to the limitations on their authority to act on behalf of ERII, and cannot enter into transactions or other commitments for ERII without proper authorization. Vendors must not sign any document on behalf of ERII or in any other way represent or exercise authority on behalf of ERII unless specifically authorized to do so in writing by an authorized ERII employee and in full compliance with this Vendor Code.

III. CONDUCT BUSINESS FOR ERII IN COMPLIANCE WITH THIS CODE AND ALL APPLICABLE LAWS

While conducting business with and/or on behalf of ERII, Vendors must conduct all business activities with integrity and in full compliance with this Code and all applicable laws and regulations, including regarding the following:

A. Anti-Bribery and Corruption

When acting on behalf of ERII, Vendors must comply with all applicable anti-bribery laws, including without limitation, the FCPA, the UK Bribery Act, and all anti-bribery laws of the countries where they operate. Vendors must never directly or indirectly offer or pay bribes or facilitation payments to anyone. Vendors must not, directly or indirectly, offer or pay anything of value (including without limitation, cash, charitable donations, gifts, entertainment, or travel expenses) to any person, or any government official or employee or agent of any government, government agency, political party, public international organization, or any candidate for

Copyright 2023 Energy Recovery, Inc. All rights reserved. October 2023 version

political office (collectively "Government Agent") to: (i.) improperly influence any act or decision of the Government Agent or anyone for the purpose of promoting ERII's business interests; or (ii.) in an attempt to influence any decision by anyone that would assist ERII in obtaining or retaining business or securing any improper business advantage for ERII; or (iii.) induce any improper performance of responsibilities by any person or Government Agent for ERII's benefit; or (iv.) otherwise improperly promote the business interests of ERII in any manner. In addition, Vendors will not solicit or accept money or any other thing of value directly or indirectly in connection with the performance of any service or other activity on behalf of ERII, other than the Vendors' lawfully negotiated fees for its services, and/or the reimbursement of reasonable business expenses directly related to its performance.

Vendors must immediately report within 24 hours to ERII's Legal Department any suspected or potential violation of applicable anti-bribery laws or these provisions of the Vendor Code.

B. Anti-Money Laundering Laws

Vendors are required to comply with all applicable anti-money laundering laws of the countries in which they transact any business on behalf of ERII. Vendors must also comply with all applicable laws governing lobbying and political campaign contribution laws, and other related regulations.

C. Anti-Trust and Fair Competition

Vendors must conduct business in full compliance with all applicable antitrust and fair competition laws where they transact business on behalf of ERII. Vendors must not participate in international boycotts that are not sanctioned by the United States government. Vendors must also comply with all applicable trade controls, as well as all applicable export, re-export, and import laws and regulations.

D. Business Records

Vendors must honestly and accurately record and report all business transactions and business information, and comply with all applicable laws regarding completion and accuracy of business

Copyright 2023 Energy Recovery, Inc. All rights reserved. October 2023 version

records. Vendors must also create, retain, and only dispose of business records in accordance with all applicable laws and regulatory requirements.

E. Conflicts of Interest

Vendors must not enter into transactions with ERII employees, agents or representatives that create a conflict of interest or the appearance of a conflict of interest. A conflict of interest exists when personal interests interfere or appear to interfere with ERII's business interests.

F. Conflict Minerals

ERII is committed to ensuring that its products and product components are responsibly manufactured. Vendors are expected to ensure that products supplied to ERII do not contain metals derived from "conflict minerals" – tin, tantalum, tungsten and gold, or their derivatives – that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (or any adjoining country). To promote compliance with this standard, Vendors are expected to:

- Establish appropriate policies, data exchange methods, due diligence frameworks, risk mitigation strategies and systems designed to accomplish the goal of supply chain transparency. These steps should be consistent with an internationally recognized due diligence framework, such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its applicable supplements (see http://www.oecd.org/daf/inv/mne/mining.htm).
- Communicate their own policies and expectations down to their sub-suppliers, reflecting a commitment to responsible sourcing of minerals.
- Establish appropriate objectives and targets, regularly measure and assess sub-supplier performance, and practice continual improvement in pursuit of "conflict free" supply chains.
- Work with sub-suppliers to attain traceability of conflict minerals to the smelter level by, for example, using the EICC-GeSI Conflict Minerals Reporting Template and Dashboard (see materials located at www.conflictfreesmelter.org).
- Promptly provide accurate and appropriate reporting to ERII when requested regarding the smelters and facilities within Vendor's minerals supply chain, and the steps taken to

Copyright 2023 Energy Recovery, Inc. All rights reserved. October 2023 version

investigate the source and chain-of-custody of such minerals, and to address "red flags" indicating potential exploitation by armed groups.

For additional information, please refer to ERII's Conflicts Minerals Statement found on ERII's internet site under Governance Documents.

G. Gifts

Vendors should avoid offering or providing gifts to ERII employees because even a well-intentioned gift might constitute a bribe under certain circumstances, or create a conflict of interest. Therefore, do not offer ERII employees any gifts. Vendors may offer and provide to ERII employees a business meal, or entertainment where ERII business is discussed, as long as such business meal or entertainment is reasonable in value, complies with ERII's policies and applicable law, and does not violate the Vendor's policies on the matter.

H. Employment Practices

ERII expects Vendors to comply with all applicable employment laws and regulations. At a minimum, ERII expects its Vendors to comply with the following standards:

- Child Labor: Use of child labor is absolutely prohibited. No person shall be employed at an age younger than the legal minimum age for working in any specific country or in absence of law, 15 years of age.
- Compensation & Benefits: Vendors must provide wages, overtime compensation and benefits at not less than the minimum levels required by applicable laws and regulations or which are consistent with the prevailing local industry levels, whichever is higher.
- Forced Labor: ERII prohibits Vendors to use forced or involuntary labor. Vendors shall maintain employment on a voluntary basis. Vendors will not work with anyone who directly or indirectly use in any manner forced labor, indentured labor, bonded labor or prison labor.
- Freedom of Association: Vendors should respect the rights of their employees to choose to associate with or not associate with or to establish any lawful organization including labor organizations.
- Health & Safety: Vendors must provide their employees with a safe work environment, and where provided, a safe and healthy living environment. Vendors must comply with all

Copyright 2023 Energy Recovery, Inc. All rights reserved. October 2023 version

applicable worker safety laws and regulations. Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. Vendors shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training must be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

- Human Trafficking: Vendors must maintain a work environment that is free from human trafficking. ERII strictly prohibits employment practices that include the recruitment, transportation, transfer, harboring or receipt of persons or through the use of force or the threat of force or through other forms of coercion, abduction, fraud, deception, abuse of power or by giving or receiving payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.
- Non-discrimination & Harassment: ERII recognizes that cultural differences exist and different practices apply in various jurisdictions. However, the terms and conditions of employment should be based on an individual's ability to do the job, not on the basis of race, color, religion, sex, age, physical ability, national origin, or any other protected characteristic, and free of harassment based upon any protected status recognized by law.
- Working Hours: Vendors must maintain employee work hours in compliance with the local standards and applicable laws of the jurisdictions in which the Vendor does business. If such laws do not apply where Vendor does business, Vendor will ensure that employees only work hours that are reasonable under the circumstances and are not excessive, and will provide their employees adequate time off and rest periods.

I. Environmental Regulations and Protection

ERII recognizes its social responsibility to protect the environment and expects its Vendors to share its commitment. As a part of this commitment, all ERII Vendors must, without limitation:

Copyright 2023 Energy Recovery, Inc. All rights reserved. October 2023 version

- Comply with all applicable environmental laws and regulations, including without limitation, laws and regulations regarding air emissions, hazardous materials, waste, and wastewater discharges, including the manufacture, transportation, storage, disposal, and release to the environment of such materials.
- Endeavor to reduce or eliminate waste of all types, including energy and water, by implementing appropriate conservation measures in Vendor's facilities, through their maintenance and production processes, and by recycling, re-using, or substituting materials.
- Obtain, maintain, and keep current all required environmental records, permits and registrations and follow the operational and reporting requirements of such permits.
- If applicable, identify the chemicals or other materials being released that pose a threat to the environment and manage them appropriately to ensure their safe handling, movement, storage, use, recycling, or reuse and disposal.
- Adhere to all applicable laws, regulations, and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.
- Explore methods to improve energy efficiency and to minimize energy consumption and greenhouse gas emissions.

J. Protection of Assets and Intellectual Property

All ERII Vendors must, without limitation:

- Use the physical and intellectual assets of ERII, including intellectual property, tangible property, supplies, consumables, and equipment, only as authorized by ERII.
- Use and protect the intellectual property rights of all parties by only using information technology and software that has been legitimately acquired and licensed, only in accordance with their licenses or terms of use.

K. Management Systems

ERII expects all vendors to have a management system with a scope that is related to the content of this Code. The management system should contain the following elements:

Copyright 2023 Energy Recovery, Inc. All rights reserved. October 2023 version

- Legal and Customer Requirements: A process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.
- Risk Assessment and Risk Management: A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with Vendor operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.
- Training: Programs for training managers and workers to implement Vendor policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.
- Audits and Assessments: Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.
- Documentation and Records: Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.
- Business Continuity Plan: Vendor shall have procedures in place to prevent or minimize any disruption of its business operations.

IV. ASKING QUESTIONS & REPORTING CONCERNS

If you have a question regarding compliance with this Vendor Code or wish to report questionable behavior or a possible violation of the Vendor Code, please promptly contact ERII's Legal Department through any of the following methods:

Email: Operations@energyrecovery.com
Mail: Send a letter to the Legal Department at ERII 1717 Doolittle Drive, San Leandro, CA 94577

ERII will maintain the confidentiality of your communication to the extent permitted by law and as appropriate under the circumstances. ERII will not tolerate retaliation taken against any individual who has, in good faith, sought advice or reported a possible violation of this Vendor Code.

Copyright 2023 Energy Recovery, Inc. All rights reserved. October 2023 version