



Hannon Armstrong Human Rights and Human Capital Management Policies

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This Human Rights and Human Capital Management Policy is overseen by the Chief Executive Officer and Chief Human Resources Officer. Our senior management team reviews progress towards this policy on a quarterly basis, including assessing progress towards targets and suggests adjustments to programs.

The Nominating, Governance and Corporate Responsibility Committee of the Board of Directors reviews this policy on an annual basis and reports out to the full Board of Directors any recommendations for modifications.

Human Rights

Respect for human rights is a fundamental value of Hannon Armstrong. We strive to respect and promote human rights in accordance with the United Nations Guiding Principles on Business and Human Rights and the United Nations Global Compact in our relationships with our employees, suppliers and the communities where we operate. This policy is also guided by international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

We expect our employees and business partners to uphold these ideals in accordance with our Code of Business Conduct and Ethics ("Code of Conduct") and Business Partner Code of Conduct ("Partner Code"), which are available for viewing on our website at www.hannonarmstrong.com. These documents cover a wide range of business practices and procedures, applies to our officers, directors, and employees, as well as to vendors, contractors, joint venture partners, co-investors, and project sponsors. The Code of Conduct and Partner Code set forth our policies and expectations regarding compliance with laws, rules and regulations, anticorruption and bribery prohibitions, insider trading, and conflicts of interest, among others.

Our culture and policies establish standards whereby we do not tolerate violations of basic human rights of life, liberty, and security. We do not condone any inhumane treatment, particularly, sexual harassment, sexual abuse, verbal abuse, mental or physical coercion, corporal punishment, forced labor, child labor, human trafficking, and slavery.

This policy applies to Hannon Armstrong, the entities that we own, the entities in which we hold a majority interest and the facilities that we manage. We also expect suppliers to uphold these principles and urge them to adopt similar policies within their own businesses.

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking. We also prohibit child labor, including the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

We expect all suppliers and business partners to comply with this policy, or have their own policy in effect that is substantially similar.



Social Responsibility and Community and Stakeholder Engagement

We recognize that we are part of the communities in which we operate. We are strongly committed to giving back to those communities, whether that takes the form of dollar donations, personal time commitments, or both.

Non-Discrimination Policy

Hannon Armstrong maintains a policy of non-discrimination in employment and complies with and supports all federal, state, and local laws regarding discrimination in employment. Specifically, Hannon Armstrong does not discriminate in employment opportunities or practices against any employee, intern, or applicant on the basis of race, color, gender, sex, sexual orientation, gender identity, religion, ancestry, national origin, age, marital status, pregnancy (including childbirth, lactation, or related medical conditions), mental or physical disability, veteran status, uniformed servicemember status, genetic information (including testing and characteristics), or any other characteristic to the extent prohibited by federal, state, or local law.

Diversity and Inclusion

At Hannon Armstrong, we take a values-driven, broad view of diversity and inclusion. We believe that fostering an internal climate that is supportive and allows people of all backgrounds to flourish lends itself to the highest levels of team and company performance and facilitates the attraction and retention of best-in-class talent. We also believe it is inherently the right way to conduct business. We support an innovative, creative culture where people can bring their best and most authentic selves to work. Employees who hold divergent opinions are encouraged to voice their views.

Decisions regarding staffing, selection, and promotions are made on the basis of individual qualifications related to the requirements of the position. We endeavor to select qualified individuals from a diverse pool of candidates derived from broad outreach efforts when we are recruiting. We also continue to seek highly-qualified women, people of color and under-represented groups for management and Board-level positions.

Equal Pay

Our policy is “equal pay for equal work” in compliance with applicable state law. Compensation for our employees is based upon experience, seniority, educational-attainment and individual contribution and company performance against goals. “Compensation” refers to basic salary, bonuses, long-term equity incentives and other contractual benefits. “Employee” refers to any full- or part-time employee.

To ensure compliance with this policy, we will undertake annual equal compensation reviews or audits for all employees and use the results to address any instances of discrimination in compensation, monitor starting salaries for new staff, and provide training and guidance for those involved in determining compensation levels.



The Chief Human Resources Officer is responsible for the implementation and monitoring of this policy. Any concerns or questions regarding this policy or implementation of this policy should be directed to the Chief Human Resources Officer. The Compensation Committee of the Board of Directors also reviews this policy and performance against this policy on an annual basis.

Employee Engagement and Performance Conversations

It is imperative that our employees are engaged in our mission of sustainability. We also want them to be engaged to drive our business forward, to tell their friends that Hannon Armstrong is a great place to work, and to want to work with us for the long term. We continuously measure our employees' level of engagement by walking the floors and asking open-ended questions. We care about our employees' employment experience and care about them as individuals who are all motivated in different ways. We intend to measure our employees' engagement via a formal survey or other such tools on a periodic basis.

Managers hold performance conversations with their employees on a periodic basis, targeting twice a year, to ensure staff are receiving the feedback they deserve, and managers can key into how to best support their ongoing development. We also provide continuous dialogue in between these formal touchpoints. Additionally, we set goals so that expectations are clear and aligned with the overarching company objectives.

Total Rewards

In addition to competitive base salaries, cash bonuses, and equity participation for the majority of employees, we are committed to continuously evaluating and ensuring the competitiveness of our benefits offerings so that we meet the various needs of each of our employees and their families. In a rising cost of healthcare environment, we continue to pay the vast majority of the cost of our employees' healthcare insurance.

Our total rewards include:

- Medical/Prescription Drug
- Dental
- Vision
- Group Life/AD&D Insurance
- Long-Term Disability (LTD)
- 401k Retirement Plan with match and immediate vesting of one's own contributions (Investment options include ESG-themed funds)
- Vacations
- Tuition reimbursement
- Reimbursement for gym memberships, gym equipment, etc.
- Employee assistance program – encompasses wellness, legal, financial tools and resources
- Flu shots



Our leave policies include 11 paid holidays, maternity and paternity plans, and paid time off including sick leave. Further information on our benefits is available to employees, including from Human Resources.

Professional Development

We adhere to a blended learning approach with the understanding that our people learn from experiences (on the job and in life), from other people (mentors or supportive managers), and formal learning and training programs. We acknowledge that learning is highly individualized and needs to be offered in a way that is most conducive to a specific learner's needs. We run a frequent education series which includes both internal and external speakers presenting topics of interest and relevance to our employees. We provide a host of learning solutions which cover areas such as leadership skills, financial, technology training, and presentation skills. We also support the pursuit of advanced certifications and degrees and employ formal and informal coaching arrangements.

Business Ethics

Hannon Armstrong is committed to upholding the highest ethical standards in all business activities and transactions. This includes issues of anti-corruption, money-laundering and compliance with all applicable laws and regulations pertaining to the US Patriot Act and other national security related issues. We provide annual training for all employees and Board members to address these issues. The Code of Conduct is available for viewing on our website at www.hannonarmstrong.com.

Our Nominating, Governance and Corporate Responsibility Committee of the Board of Directors oversees all ethics-related matters, programs and policies. We conduct annual compliance meetings with all directors and staff to reinforce our collective understanding of our ethical obligations and to ensure familiarity with new policies and important trends emerging from the Environmental, Social and Governance (ESG) environment.

Health and Safety

Hannon Armstrong is committed to fostering a safe and healthy working environment for all employees. In addition to our open, spacious and naturally sun-lit office environment, we have implemented special measures to secure our Annapolis office against armed attacks and have engaged local law enforcement personnel to educate our staff and neighboring office staff on appropriate readiness and response plans.

As a substantial portion of our energy efficiency investments are conducted on federal, state and local government buildings and facilities and installations, our business partners are strictly regulated by such government entities and required to provide a safe work environment, comply with all applicable safety standards, and identify and respond to any public health impacts of their operations and use of products and services. Our private sector investments likewise mandate compliance with all applicable health and safety laws and regulations by requiring all project sponsors, construction contractors and subcontractors to report any material changes in their status of compliance.



Freedom of Association and Labor Rights

Hannon Armstrong also demonstrates its dedication to its employees through its labor policies. We are committed to protecting employees' freedom of association and right to collective bargaining and are guided by International Labor Organization (ILO) conventions 87 and 98. We also expect our business partners to establish and comply with such freedom of association and collective bargaining requirements. For more information, please refer to our Business Partner Code of Conduct, a copy of which is available for viewing on our website at www.hannonarmstrong.com.

Cybersecurity

Hannon Armstrong is committed to the protection of our computer systems, software, networks and other assets and devotes significant resources to maintain a high level of security against cybersecurity threats. In order to address cybersecurity risks associated with our increasing reliance on technology, we have implemented a wide range of processes, procedures, and internal controls to help mitigate cybersecurity risks and cyber intrusions which are periodically reviewed by our Finance and Risk Committee of the Board of Directors.

Adopted: October 30, 2018