

Atura Power

Supplier Code of Conduct

The following describes the requirements of business conduct Atura Power expects from every supplier including their owners, employees, agents, partners and subcontractors who provide goods and/or services to Atura Power.

The supplier and/or third party declares herewith:

EXCELLENCE, PEOPLE & CITIZENSHIP

1.0 Equity, Diversity and Inclusion

- Suppliers must promote equal opportunities for and treatment of its employees irrespective of age, ancestry, colour, race, citizenship, ethnic origin, place of origin, creed, disability, family status, marital status, gender identity, gender expression, record of offense pardoned, sex and/or sexual orientation as defined by the *Ontario Human Rights Code*.
- Suppliers must treat all employees and persons with whom they do business with dignity, fairness and respect, and comply with legal obligations that prohibit discrimination or harassment.

2.0 Employment Practices

- Suppliers must comply with all applicable labour and employment laws, statutes and regulations of the jurisdictions in which they and Atura Power operate.
- Suppliers must be able to demonstrate that, in their workplaces:
 - No child labour or forced labour is used
 - Discrimination, harassment, and workplace violence are not tolerated
 - There is respect for the rights of workers to associate and bargain collectively
 - Employees are free to raise concerns without fear of reprisal
- While on Company business or when on Atura Power property or premises:
 - Employees may not possess, use, or transport a dangerous or potentially dangerous weapon, such as a firearm, club, electronic weapon or explosive device, unless authorized by law or policy
 - The use of illicit drugs and/or alcohol and the misuse of medications and other substances is prohibited

INTEGRITY

3.0 Compliance with Laws

- Suppliers must comply with all applicable laws, statutes and regulations of the jurisdictions in which they and Atura Power operate.

4.0 Conflict of Interest

- Suppliers must not try to gain improper advantage or improperly impact an Atura Power employee's ability to make sound, impartial and objective decisions on behalf of Atura Power.
- Suppliers must disclose in writing to the Atura Power contract owner any conflict or potential conflict. This includes situations where an Atura Power employee has a personal interest or relationship to the supplier's business.

5.0 Gifts and Entertainment

- Suppliers must never offer, ask for, give or receive any gift, gratuity, entertainment, hospitality or benefit that may compromise or appear to compromise an Atura Power employee's ability to make business decisions in the best interest of Atura Power.

6.0 Anti-Bribery and Corruption

- Suppliers must not engage in any form of corruption, extortion and/or embezzlement.
- Suppliers must never offer, ask for, give or receive any form of bribe, kickback, any other type of improper payment, or attempt to gain influence or competitive advantage through improper means.
- Suppliers must also never offer or give facilitation payments, i.e. payments to foreign public officials to expedite or secure the performance of any act of a routine nature that is part of that official's duties or functions.
- Suppliers must ensure that the requirements of all applicable anti-corruption laws are met, including, but not limited to, Canada's Corruption of Foreign Public Officials Act.
- No payments, gifts or other benefits may be given, directly or indirectly, to public officials, political parties or political candidates for the purpose of influencing government decisions in Atura Power or the supplier's favour or securing any other improper advantage.

7.0 Proper Use of Atura Power Assets

- Suppliers must protect Atura Power's assets, use them properly and use them only for authorized Atura Power business, never for personal use. Protect Atura Power's assets from fraud, theft and destruction (e.g., by vandalism or neglect).

8.0 Privacy, Information Security, Confidential Information and Intellectual Property

- Suppliers must protect Atura Power sensitive information against theft, loss, destruction, unauthorized access/release or misuse. Sensitive information includes information that is proprietary, technical, business, financial, and personal or requires confidentiality. Except as required by law, suppliers must not disclose Atura Power sensitive information to anyone outside Atura Power, without prior written approval from Atura Power, even after the supplier's contract is complete.
- Suppliers must protect Atura Power's intellectual property such as copyrighted information, trademarks and logos, patents, and trade secrets against loss or infringement, and use them only for Atura Power business.

9.0 Insider Trading

- Suppliers must comply with applicable insider-trading laws and regulations that govern use of sensitive information.

10.0 Communications

- Suppliers must have permission from Atura Power before releasing for publication any information in respect of business relations with Atura Power or speaking as an Atura Power supplier in any public forum, presentations and/or media/social media forum.
- Suppliers must not use their association with Atura Power for any improper purposes.

11.0 Procurement, Outsourcing and Subcontracting

- Supplier must avoid using any raw materials that have been illegally mined, obtained, transported or traded in a manner that directly or indirectly finances or benefits non-state armed groups or private security forces.
- Ensure that procurement practices, including outsourcing or subcontractor arrangements, comply with this Code of Conduct.

12.0 Hiring Former Atura Power Employees

- Suppliers must not take any action that could jeopardize the ability of former employees to meet their legal or contractual obligations to Atura Power following the end of their employment.

ENVIRONMENT, HEALTH AND SAFETY

13.0 Occupational Health and Safety

- Suppliers must comply with all applicable health and safety laws, statutes and regulations of the jurisdiction in which they operate. Foster a safety culture where continuous learning is embraced, and health and safety is incorporated into day-to-day decision making.

14.0 Environmental Protection

- Suppliers must comply with all applicable environmental laws, statutes and regulations of the jurisdiction in which they operate, and meet all legal requirements and strive to prevent or mitigate adverse effects on the environment with a long-term objective of continual improvement.

COMPLIANCE

15.0 Code Compliance

- Suppliers must maintain accurate records to demonstrate compliance with applicable laws and this Code of Conduct. Suppliers must not destroy any records that may be relevant to any legal or regulatory proceeding.
- Atura Power reserves the right to conduct an audit of suppliers to ensure Supplier Code compliance. Suppliers must cooperate with any audits or investigations into violations or suspected violations of the Supplier Code.
- Suppliers who violate the Supplier Code, or who are aware of conduct by others that violates or appears to violate this Code of Conduct must report it to Atura Power by calling 1-866-921-6714.
- Retaliation against any person for good faith reporting of breaches of the Supplier Code is prohibited.
- Concerns or questions related to the Supplier Code can be anonymously reported by calling 1-866-921-6714.

16.0 Consequences

- A failure to comply with this Code of Conduct may result in suspension or termination, in whole or in part, of the supplier's agreement(s) with Atura Power and may include removal of the supplier from Atura Power's vendor list.
- This Code of Conduct is in addition to the supplier's obligations as set out in any agreements between Atura Power and the supplier. In the event of a conflict between the Code of Conduct and an applicable agreement, the agreement will govern.