

NORTHERN STRANDS GROUP OF COMPANIES	
Date Issued: 21-02-2025	Doc ID: <b>GOC-GOV-02-35(e)</b>
Date Revised:	Revision Nb: 00



## NSGC Supplier Code of Conduct and Ethics Policy

### Purpose

At Northern Strands Group of Companies (NSGC), we recognise the importance of maintaining strong partnerships with our suppliers and selecting those with general practices that align with NSGC's ethical principles. NSGC recognises that their Suppliers operate in different legal and cultural environments and that the standards set forth in this Supplier Code of Conduct and Ethics Policy operate as a benchmark for acceptable conduct. In instances where local laws impose less stringent obligations on a Supplier, the Supplier is expected to adhere to the standards outlined in this Supplier Code of Conduct and Ethics Policy. In jurisdictions where applicable local laws impose greater obligations on a Supplier, the Supplier must comply with such laws and regulations.

### Policy

This Supplier Code of Conduct sets standards of ethical conduct which NSGC requires from all suppliers when conducting business with or on behalf of NSGC. NSGC has the expectation that these suppliers will implement these requirements in a manner that is appropriate and proportional to the nature of their activities, the goods that are supplied and the services that are provided.

### Business Integrity (Supplier Expectations)

#### Legal Compliance

We require suppliers to conduct business in such a way that complies with all applicable, laws, rules, and regulations pertaining to the jurisdiction in which they operate. Suppliers are to comply with all Human Rights, national and international laws, regulations, codes, and standards with respect to fair labour practices.

#### Anti-Trust and Competition-Anti Money Laundering-Bribery, Fraud, and Corruption

We require suppliers to conduct themselves in a manner that does not put NSGC at risk of violating current legislation. These practices include bid rigging, exclusive dealing, putting forward false or misleading representations, or in any other way that business is conducted limiting competition or product selection.

#### Confidentiality and Non-Disclosure

We require suppliers to protect NSGC's proprietary information and only use information obtained through their relationship with us for the purpose of fulfilling their obligations to NSGC. This prohibits using or disclosing confidential information owned, possessed, or controlled by NSGC including customer and supplier information.

#### Conflicts of Interest

Suppliers, their employees and their families are to avoid any conflicts of interest. A conflict of interest may arise when a supplier attempts to gain an improper advantage or

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preferential treatment for other relationships they may have with us, or when there is a choice between personal interest (financial or otherwise) and NSGC business interests.

**Gifts and Entertainment**

We discourage the exchange of gifts or entertainment. The nature of any gifts or entertainment offered or accepted must not exceed a monetary value of \$50.00 CAD as outlined by NSGC’s governing policy. Any such gifts must not, by their quality, quantity or timing, be used by suppliers to gain unacceptable advantage or preferential treatment.

**Employment Practices**

Inclusivity, diversity, and equitable opportunities are predominating principles at NSGC and Suppliers are required to adhere to all Human Rights, labour, and employment laws in the jurisdiction of operations. Suppliers and their employees are expected to treat everyone professionally with respect and dignity. We require suppliers to take appropriate action, where necessary, to demonstrate that they do not tolerate any sort of harassment or violent behaviour. Individuals who report activities believed to be illegal, unethical, or otherwise improper, will not be reprimanded.

**Forced Labour and Child Labour**

We require that our suppliers do not engage in or benefit from, directly or indirectly, any form of involuntary labour, such as forced labour, compulsory labour, or child labour. Suppliers are expected to mitigate such occurrences and follow processes as referenced in *The United Nations Global Compact’s Ten Principles* specifically PRINCIPLES 4 and 5.

**Health and Safety**

We require suppliers to provide safe, clean, and healthy workplaces that comply with relevant occupational health and safety laws. Suppliers are expected to provide their employees with adequate information and instruction on health and safety concerns and to enable their employees to meet their responsibilities for the maintenance of a healthy and safe workplace. This includes implementing appropriate safe job procedures, preventative maintenance, and providing essential training and Personal Protective Equipment (“PPE”). Suppliers are required to abide by jurisdictional legislation in relation to occupational health and safety practices.

**Environmental**

Suppliers must conduct their operations with minimal environmental impact. Suppliers are required to abide by all environmental laws and regulations, adopt procedures, develop contingency plans, emergency response measures, and management systems, as suitable for their business. Suppliers are obligated to implement measures to prevent pollution, limit energy consumption, and reduce greenhouse gas emissions.

**Monitoring and Oversight**

**Record Keeping**

NSGC will require suppliers to maintain accurate business records pertaining to their business dealings with us and not to alter, distort, or conceal such records. We further require suppliers to retain records that may be relevant to any pending or threatened legal or regulatory proceeding of which the supplier becomes aware.

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**Compliance and Monitoring**

NSGC will consistently review and assess supplier relationships and perform due diligence to ensure our suppliers maintain compliance with this policy. We may require suppliers of certain goods and/or services to periodically confirm in writing that they meet all criteria as outlined in this policy. Suppliers must cooperate with requests from NSGC to provide information to assist NSGC’s endeavours to conduct investigation of compliance verification. NSGC will not conduct business with companies that fail to implement sound and just labour practices. Should a supplier fail to implement remedial action regarding a reported breach of the Supplier Code of Conduct and Ethics Policy within the time prescribed upon being made aware of the breach, the ongoing relationship with that supplier will be terminated.

**Reporting Contraventions**

It is encouraged that all suppliers seeking advice on, knows of, or suspects any violations of this Policy that they speak directly to a representative of the NSGC Supply Chain. Suppliers must not retaliate against any person for reporting, in good faith, contraventions of this Supplier Code of Conduct and Ethics Policy, or for filing a complaint, testifying, assisting, or participating in any manner in any investigation, proceeding, or hearing conducted by a government agency.

**Awareness**

It is NSGC’s expectation that our Suppliers communicate to their management and employees our assurance, including the requirements of the Supplier Code of Conduct and Ethics Policy, resulting in a suitable level of knowledge and understanding.

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# Declaration of Supplier’s acknowledgement and acceptance of the NSGC Supplier Code of Conduct and Ethics. V 2025-00

(Please return completed acknowledgement forms to [compliance@northernstrands.com](mailto:compliance@northernstrands.com))

Name of Supplier’s Company	
Company Address:	

On behalf of the Supplier, it is herewith confirmed that:

- the Supplier has received, read, and fully understands the NSGC Supplier Code of Conduct and Ethics.
- the Supplier denotes compliance with the NSGC Supplier Code of Conduct and Ethics and agrees that it shall form the basis of present and future business with NSGC.
- the NSGC Supplier Code of Conduct and Ethics is initiated as the benchmark of any agreement entered between the Supplier and NSGC regardless of being directly referenced in any contract or supplier agreement.
- the supplier may be required to reconfirm their compliance with the NSGC Supplier Code of Conduct and Ethics at any time throughout the duration of service.
- the supplier shall be held accountable for ensuring compliance with the NSGC Supplier Code of Conduct and Ethics on behalf of their employees, company representatives, subcontractors, or any other portion of their Supply Chain.

The signatory hereby acknowledges that they are an authorized representative of the Supplier and that they are permitted to accept compliance on behalf of the Supplier.

Date of Signature:	
Acknowledged by: (Printed)	
Acknowledged by: (Signature)	
Position within the Organization	