

## Suppliers Code of Conduct

The following describes the standards of business conduct Laurentis Energy Partners (LEP) expects from every LEP supplier including their owners, employees, agents, partners, and subcontractors who provide goods and/or services to LEP.

### **EXCELLENCE, PEOPLE & CITIZENSHIP**

#### **1.0 Equity, Diversity, and Inclusion**

Suppliers must promote inclusive, respectful, healthy, and safe workplaces that are free from harassment, discrimination, workplace violence, retaliation, and other disrespectful and inappropriate behaviour. Suppliers must treat all employees and persons with whom they do business with dignity and respect and comply with legal obligations that prohibit discrimination or harassment.

#### **2.0 Employment Practices and Labour Relations**

Suppliers must comply with all applicable labour and employment laws, statutes, and regulations of the jurisdictions in which they and LEP 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

#### **3.0 Environment**

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.

### **INTEGRITY**

#### **4.0 Compliance with Laws**

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

#### **5.0 OPG Code of Business Conduct**

The Code establishes LEP values and sets the standard for LEP's business behaviour. All LEP employees must understand and adhere to the Code. Suppliers must not engage in any conduct that would cause LEP or any of its employees to be in breach of any of the obligations set out in the Code.

#### **6.0 Conflict of Interest**

Suppliers must not try to gain improper advantage or improperly impact an LEP employee's ability to make sound, impartial and objective decisions on behalf of

LEP. Suppliers must disclose in writing to the LEP contract owner and Human Resources any situation that conflicts, appears to conflict or could potentially conflict, in any way, with the interests of LEP. This includes situations where an LEP employee has a personal interest or relationship to the supplier's business. Suppliers can use the Suppliers' Declaration of Conflict of Interest or Potential/Perceived Conflict of Interest Form ("Supplier COI Declaration Form") to make a declaration. The Supplier COI Declaration Form is available on the LEP Supply Chain Intranet site and external site.

## **7.0 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 LEP employee's ability to make business decisions in the best interest of LEP. If a supplier is unsure whether a gift or entertainment offer complies with the Code or Supplier Code, the supplier should consult with the intended recipient's manager. LEP expects suppliers to maintain appropriate records of the provision or offers of gifts or entertainment to LEP employees.

## **8.0 Anti-Bribery and Corruption**

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 LEP or the supplier's favour or securing any other improper advantage. Suppliers are expected to ensure that payments made to agents or other third parties are not used, in whole or in part, to influence government decisions or secure any other improper advantage. Suppliers must not engage in any form of corruption, extortion and/or embezzlement.

## **9.0 Proper Use of LEP Assets**

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

## **10.0 Privacy, Information Security, Confidential Information, and Intellectual Property**

Suppliers must protect LEP 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 LEP sensitive information to anyone outside LEP, without prior written approval from LEP. Suppliers must not use LEP sensitive information for any improper purpose. This applies even after the supplier's contract is complete.



Suppliers must protect LEP's intellectual property such as copyrighted information, trademarks and logos, patents, and trade secrets against loss or infringement, and use them only for LEP business.

### **11.0 Insider Trading**

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

### **12.0 Communications**

Suppliers must have permission from LEP Communications before releasing for publication any information in respect of business relations with LEP or speaking as an LEP supplier in any public forum, including presentations to industry, community, or business groups and/or media/social media forum or with a media representative. Suppliers must not use their association with LEP for any improper purposes.

### **13.0 Procurement, Outsourcing and Subcontracting**

In providing materials or services to LEP, suppliers must not use any minerals (or metals derived from such minerals) that have been illegally mined, transported, or traded in a manner that directly or indirectly finances or benefits non-state armed groups or private security forces. LEP expects that suppliers will exercise reasonable due diligence in their supply chains to ensure this requirement is met. Ensure that procurement practices, including outsourcing or subcontractor arrangements, comply with the Supplier Code.

### **14.0 Hiring Former OPG Employees**

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

## **SAFETY**

### **15.0 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.

## **IMPLEMENTATION**

### **16.0 Record Keeping and Audit**

Suppliers must maintain accurate records to demonstrate compliance with applicable laws and the Supplier Code. Suppliers must not destroy any records that may be relevant to any legal or regulatory proceeding.

LEP reserves the right to conduct an appropriate audit of suppliers to ensure Supplier Code compliance. Suppliers must cooperate with any audits or investigations into violations or suspected violations of the Code and/or Supplier Code.

### **17.0 Code Compliance, Monitoring and Reporting**



Suppliers who violate the Code or Supplier Code, or who are aware of conduct by others that violates or appears to violate the Code or Supplier Code must report it to LEP Human Resources ([human.resources@laurentisenergy.com](mailto:human.resources@laurentisenergy.com)). All reports are taken seriously.

Retaliation against any person for good faith reporting of breaches of the Code or Supplier Code is prohibited. There will be no reprisal against suppliers for good faith reporting of a breach or suspected breach of the Code or Supplier Code.

### **18.0 When the Supplier Code does not have the Answer**

There may be occasions when the Supplier Code does not have the answer to the ethical question suppliers are facing, or there may be a difficult judgment call to make with respect to the application of the Supplier Code. In these cases, suppliers should consult with LEP Human Resources ([human.resources@laurentisenergy.com](mailto:human.resources@laurentisenergy.com)).

Breaches of the Supplier Code are taken seriously by LEP. A failure to comply with the Supplier Code may result in suspension or termination, in whole or in part, of the supplier's agreement(s) with LEP and may include removal of the supplier from LEP's vendor list. The Supplier Code is not to be read in lieu of but in addition to the supplier's obligations as set out in any agreements between LEP and the supplier. In the event of a conflict between the Supplier Code and an applicable agreement, the agreement will govern.