



Intersect
Power

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Supplier Code of Conduct

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CONTENTS



Contents..... 2

1. Purpose..... 3

2. Scope..... 3

3. Requirements and Expectations..... 4

 3.1 Business Integrity..... 4

 3.2 Labor..... 5

 3.3 Health and Safety..... 6

 3.4 Environment..... 7

 3.5 Responsible Sourcing and Supply..... 7

4. Speaking Up..... 8

I. PURPOSE



At Intersect Power, our mission is to preserve the planet for future generations through innovative, scalable, and American-made low-carbon solutions. We are committed to ethical business practices, including responsible sourcing, and we collaborate with all contractors, consultants and agents (collectively referred to as “Suppliers”) that share the same commitment.

Our Supplier Code of Conduct sets out our standards and expectations for any individual or entity that provides materials, products, or services directly to Intersect (collectively, “Suppliers”) on a range of topics, including labor and human rights, health and safety, and responsible sourcing. We expect our Suppliers to read this Code carefully and comply with it. If local law sets higher standards than this Code, we expect Suppliers to follow the higher standard.

2. SCOPE

Intersect Power (“Intersect”) seeks to collaborate with Suppliers that share our commitment to ethical and sustainable business practices. As stated in our Code of Conduct, we are committed to working with our Suppliers in accordance with our Core Values: People Come First, Long-Run Value, Equity, Humility, and Authenticity.

This Supplier Code of Conduct (the “Supplier Code”) sets out a code of values and expectations for our Suppliers to adhere to. It also reflects our commitment to sustainability, responsible corporate citizenship, and continuous improvement against our standards.

In developing this Supplier Code, Intersect has referred to internationally recognized standards, including:

- United Nations Guiding Principles on Business and Human Rights
- International Bill of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work Organisation for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct

- Responsible Business Alliance Code of Conduct
- OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

Our Suppliers must act in a manner consistent with the Supplier Code, and must require their own subcontractors and supply chains to comply with the Supplier Code.

The ESG Department is responsible for ensuring that the Supplier Code is maintained and will review the Supplier Code annually modifying it as necessary, including for purposes of incorporating reference to any additional guidance, processes or procedures that inform the use of this Supplier Code (which shall not be considered material changes). For any material changes to the Supplier Code, approval from the Chief Commercial Officer is required.

3. REQUIREMENTS AND EXPECTATIONS

3.1 Business Integrity

At Intersect, we conduct business ethically, fairly, and with integrity.

Our Suppliers must adhere to the following requirements:

- **Applicable Laws:** Comply with all applicable laws, rules, and regulations.
- **Anti-Bribery and Corruption:** Prohibit all forms of bribery, extortion, and embezzlement. In particular, act in a manner consistent with Intersect's Anti-Corruption, Anti-Money Laundering and Sanctions Policy, the U.S. Foreign Corrupt Practices Act, and all other applicable anti-corruption and anti-money laundering laws.
- **Conflicts of Interest:** Avoid any interaction with Intersect personnel that may conflict, or appear to conflict, with the personnel's duty to act in the best interest of Intersect. In particular, disclose to Intersect in writing any circumstances that could be perceived as a conflict of interest, such as any familial or other close relationships with Intersect personnel.
- **Fair business:** Comply with all laws and regulations regarding insider trading, competition, and intellectual property.

3.2 Labor

Intersect is committed to fostering a safe and respectful workplace.

We expect our Suppliers to:

- treat their workers and other stakeholders with dignity and respect, consistent with the United Nations Guiding Principles on Business and Human Rights;
- respect workers' lawful rights of freedom of association and collective bargaining, including their right to join or not to join a labor union;
- ensure all work is voluntary (including overtime work) and workers are free to terminate their employment at any time without penalty, upon giving reasonable notice;
- prevent any unreasonable restrictions on workers' freedom of movement;
- provide workers with safe, secure, and clean working conditions and (if relevant) living conditions;
- comply with all local laws and regulations related to maximum working hours and rest days;
- comply with all applicable wage and benefits laws and pay workers in a timely fashion; and
- provide workers and supply chain partners with an effective grievance reporting procedure that includes an anonymous and confidential method for raising concerns to Supplier's senior level management without fear of retaliation.

We expect our Suppliers **not** to:

- tolerate any form of child labor, forced labor, or other forms of modern slavery, as defined by the International Labour Organization, including prison labor, indentured labor, bonded labor, or slave labor, in their operations and supply chains;
- engage in or tolerate harsh or inhumane treatment of workers, including, without limitation, violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse, or threats of such treatment;

- engage in or tolerate harassment or discrimination on the basis of race, color, sex, sexual orientation, gender identity and/or expression, genetic information, creed, religion, age, marital status, national origin, ancestry, pregnancy, medical condition, veteran status, citizenship, political views or participation, physical or mental disability, or any other basis protected by applicable law;
- confiscate, destroy, withhold, or otherwise deny workers access to their identity or immigration documents, including work permits and travel documentation (e.g., passports, visas); or
- charge workers any fees or costs related to workers' recruitment, directly or indirectly, including, but not limited to, costs associated with travel, and processing work visas or other official job-related documents – if any such fees are found to have been paid by workers, Suppliers shall repay such fees to the affected workers.

3.3 Health and Safety

At Intersect, we are committed to providing a healthy and safe work environment.

We expect our Suppliers to:

- operate in accordance with all applicable occupational health and safety laws and regulations;
- take reasonable steps in accordance with prevailing industry practices to identify and assess health and safety risks and hazards, including developing emergency preparedness plans, implementing appropriate controls to ensure employee safety, and taking appropriate precautions when conducting physically demanding work;
- report all incidents and near misses related to the contract to the appropriate authorities as required by applicable laws and to Intersect; and
- provide their health and safety policy statement, management arrangements, and insurances on request.

3.4 Environment

At Intersect, our mission is to work to preserve our planet for future generations through low-carbon energy and infrastructure solutions. In pursuit of this mission, we are committed to monitoring and reducing our environmental impact.

We expect our Suppliers to:

- comply with all applicable environmental laws, regulations, and customer requirements (including related to Environmental, Social and Governance (ESG) reporting and materials restrictions) and obtain all required permits, approvals, and registrations;
- identify their environmental impacts and minimize adverse effects on the community, environment, and natural resources;
- Effectively manage any hazardous substances, solid waste, and air emissions, including through appropriate documentation and monitoring;
- Implement measures to document, characterize, and monitor water sources, use, and discharge, and measures to promote water conservation and contamination controls;
- Establish and report against greenhouse gas (GHG) reduction goals, including through appropriate tracking, documentation, public reporting, and initiatives to minimize energy consumption.

3.5 Responsible Sourcing and Supply

Intersect is committed to respecting human rights and sourcing responsibly. We only source from Suppliers who commit to the same standards.

We expect our Suppliers to:

- communicate expectations for responsible sourcing to their own suppliers;
- undertake appropriate measures to prevent any materials made with forced labor or child labor from entering their supply chains, and notify Intersect in writing immediately upon becoming aware of any credible allegations or evidence of significant human rights concerns in their supply chains related to Intersect's business, including, but not limited to, forced labor or child labor;

- if involved in sourcing mined minerals or metals or providing products containing such materials to Intersect, undertake appropriate measures to prevent any conflict minerals entering their supply chains and reasonably ensure such sourcing is consistent with the Organisation for Economic Co-operation and Development Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance) or an equivalent and recognized due diligence framework;
- conduct due diligence and use appropriate contractual provisions to ensure that sub-suppliers in Intersect's supply chains comply with standards consistent with this Supplier Code;
- conduct appropriate supply chain mapping and cooperate with Intersect's due diligence supply chain mapping and ongoing monitoring processes, including by providing reasonably requested information, documentation, and responses to questionnaires; and
- if deemed reasonably necessary by Intersect, permit Intersect or its appointed representatives reasonable access to the Supplier's facilities, personnel, and corporate records for purposes of conducting audits or any other reasonable inquiries to assess compliance with this Supplier Code, and where any deficiencies are identified, collaborate with Intersect to develop and execute a corrective action plan to ensure effective remediation in a timely manner.

This Supplier Code is intended to align with the Responsible Business Alliance (RBA) Code of Conduct and in the event of a conflict, the stricter standard applies.

4. SPEAKING UP

At Intersect, we expect our Suppliers to promptly inform Intersect of inappropriate or unethical conduct or suspected violations of this Supplier Code, Intersect policy, or applicable law.

You can raise your concerns or ask questions about this Supplier Code, in any of the following ways:

- Speak with your Intersect contact or a member of Intersect's management; and/or
- Report your concern anonymously through Intersect's anonymous reporting whistleblower hotline: 1-866-921-6714, or website: www.integritycounts.ca/org/intersectpower.

Intersect takes all reports of inappropriate conduct seriously. We will make all reasonable efforts, as needed, to maintain the confidentiality of those who report concerns, and we will investigate suspected violations of this Supplier Code, Intersect policy, and applicable law. Intersect expects Suppliers to cooperate with reasonable inquiries to follow up on such issues, including by providing Intersect access to relevant information, personnel, and documentation upon reasonable request. After investigating, we will take appropriate action to address the issue, if necessary.

By reporting your concerns, you are helping to protect Intersect's Core Values. Intersect does not tolerate retaliation or discrimination against anyone who raises an honest, good-faith concern.