



   **EMPOWER. DELIVER. SHARE.**

Supplier Code of Conduct and Ethics



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1 Introduction

Corporate integrity, responsible product sourcing, and the safety and well-being of workers across the global supply chain are of paramount importance to Pason Systems Inc. and its subsidiaries and affiliates (collectively "Pason"). These principles apply to all aspects of Pason's business, and encompasses any manufacturer, distributor, vendor, agent and other supplier that sells goods or services to or does business with Pason (each a "Supplier" and collectively "Suppliers").

Pason is committed to transparent, safe and ethical procurement practices and intends to align itself with partners sharing the same values.

This Supplier Code of Conduct ("Policy") is aligned with Pason's corporate values and expected behaviours, as further described in Pason's Code of Conduct and Ethics. This Policy establishes the minimum standards that must be met by any Supplier regarding:

- the Supplier's treatment of workers;
- workplace safety;
- the impact of the Supplier's activities on the environment; and
- the Supplier's ethical business practices.

Pason may choose not to work with, or cease to work with, Suppliers that do not meet these minimum expectations.

This Policy applies to all of Pason's Suppliers. Suppliers are responsible to ensure the compliance by:

- their own operations and supply chain; and
- all of their suppliers, vendors, agents, and subcontractors ("Partner(s)")

with the standards set out in this Policy.

2 Forced and Child Labour

Use of forced, bonded, compulsory labour or any form of modern slavery by the Supplier is strictly prohibited. All work shall be voluntary, and workers must be free to terminate their employment within legal notice period requirements. Suppliers are prohibited from engaging in or benefitting from any form of human trafficking. Workers must not be required, as a condition of employment, to make a deposit of, or surrender any government-issued identification, passports, work permits or any other documents necessary for free movement and termination of employment.

Suppliers are strictly prohibited from employing children below the minimum age permitted by local law, which in no case can be less than 15 years pursuant to the International Labour Organization (ILO) Minimum Age Convention No. 138. Workers under the age of 18 shall be employed according to the protective restrictions prescribed by local laws. Where local laws do not exist or where they set lower standards than the ILO, the ILO standards shall prevail.

Suppliers and their Partners are expected to respect their workers' workplace rights, and to take appropriate steps to prevent the use of any form of modern slavery, including child labor or forced labour, in their operations and supply chains.

3 No Discrimination, Abuse or Harassment

We uphold the human rights of all individuals and require that everyone be treated with respect and dignity in accordance with the UN Guiding Principles on Business and Human Rights.

We expect our Suppliers to:

- comply with all applicable legislation and regulations relating to employment practices, remuneration, bullying, harassment, workplace and human rights;
- foster and sustain an equitable, diverse, and inclusive workforce that rejects any form of discrimination in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on protected characteristics such as race, colour, national or ethnic origin, gender, gender identity, sexual orientation, military status, political convictions, religion, age, family status, mental or physical disability, or any other characteristic other than the worker's ability to perform the job;
- treat workers with respect and dignity;
- ensure just compensation and favorable working conditions while prioritizing the well-being of all employees;
- not (i) subject workers to corporal punishment, or physical, verbal, sexual, or psychological abuse or harassment or (ii) condone or tolerate such behaviour by any of its Partners;
- uphold individuals' privacy rights and comply with laws governing the collection, use, and protection of personal information; and
- provide sufficient training to employees and contractors to comply with the principles outlined in this Policy.

4 Ensuring a Safe and Healthy Work Environment

Pason is committed to the health and safety of its employees and others whose safety and health may be affected by the conduct of our business, both on and off the jobsite. A safe and healthy work environment increases engagement and positively contributes to operational performance.

At Pason we expect our Suppliers to:

- comply with all applicable health and safety legislation, regulations and standards;
- comply with Pason's site and product-specific safety rules and requirements;
- take all reasonable measures to eliminate the risk of workplace harm, including the provision of a safe working environment, an adequate emergency response plan (to safeguard employees, operations and security of supply, where possible), appropriate safety training, and personal protective equipment; and
- adopt and follow a formal health and safety policy (which should include requirements for recording, managing and reporting all safety incidents and accidents).

5 Environmental Responsibility

Pason strives to operate in an environmentally responsible manner. Pason's product development, supply chain, and operational initiatives aim to minimize emissions and to maximize durability, reuse and recycling.

At Pason, we expect our Suppliers to:

- adhere to applicable environmental laws and regulations;
- implement reasonable measures to alleviate and address any potential impact on the environment and local communities, incorporating practices such as reduction, reuse, and recycling whenever feasible;
- ensure that contracted products adhere to specifications and contain no extraneous substances; and
- handle and store chemicals, products, and equipment in compliance with industry standards and manufacturer instructions.

6 Engaging in Transparent and Ethical Business Practices

Pason's Board of Directors and shareholders expect the highest standards of ethical conduct in every aspect of Pason's and its Suppliers' businesses, including employee relations, operations and sourcing.

At Pason, we expect our Suppliers to:

- strictly prohibit bribery and corruption (including any form of facilitation payment or improper interaction with government officials, Pason employees, any subcontractors and other Suppliers);
- promptly disclose any actual or potential conflicts of interest between the Supplier and any of Pason's employees;
- maintain policies and practices to empower the Supplier's employees to identify and report any potentially illegal or unethical behaviour, without fear of retaliation; and
- act fairly and reasonably in competition and comply with anti-trust or competition laws.

In addition, Pason expects its Suppliers to:

- maintain accurate and complete financial and business records, including invoicing, in compliance with all applicable regulatory requirements and accounting standards;
- provide sufficient reporting on operational, economic, social and environmental performance to enable Pason to meet its regulatory and contractual requirements; and
- protect and respect the intellectual property rights of Pason and other parties (patents, trademarks, copyright, and confidential information).

7 Reporting

Pason's Suppliers shall self-report any violations of this Policy. Suppliers can also submit questions and comments regarding this Policy to Pason's liaison set out below:

Legal Department

6130 3rd Street SE, Calgary AB T2H 1K4

(403) 301-3400

legal@pason.com

Pason's Suppliers shall not retaliate or take disciplinary action against any worker who has, in good faith, reported violations or questionable behaviour, or who has sought advice regarding this Policy.

8 Compliance

Pason's Suppliers must comply with all applicable federal, provincial, territorial and local laws and regulations. Where this Policy requires a Supplier to meet a higher standard than set out by law or regulation, the Supplier shall meet such higher standards. Additionally, where a Supplier has implemented and maintains its own policy that is substantially similar in principle to this Policy, the Supplier shall comply with the more stringent or higher standard of this Policy and the applicable Supplier policy.

Pason may, in its discretion, conduct inspections of Supplier facilities to confirm Supplier's compliance with this Policy. Pason has no obligation to conduct such inspections.

9 Approval and Adoption

This Policy was last approved by the Board of Directors on May 2, 2024.

Pason Systems Inc.

A handwritten signature in blue ink, appearing to read "N. Fenez", is written over a horizontal line.

Natalie Fenez,
Corporate Secretary

10 Document Revision Record

The following table describes all revisions made to this document.

Version	Date MM.DD.YY	Changed By	Description of Change / Reason for Change
1.0	05.02.24	Natalie Fenez	Initial policy document