			Document Number: CORP-WW-Policy-0010	
			Revision No.:	2
			Initial Issue Date:	March 26, 2024
SUPPLIER CODE OF CONDUCT			Last Revision Date:	July 3, 2024
			Next Review Date:	March 2027
Prepared by: Legal	Reviewed by: CEO & CFO	Approved by: Board of Directors	Page:	1 of 6




1.0 Introduction

- 1.1 ACT Energy Technologies Ltd. and its global affiliates and subsidiaries (together or individually, as the context requires, the **Company**) are committed to applying high standards of ethics and business conduct in every country in which we operate and within every business relationship we have worldwide – this includes our business relationship with our vendors and suppliers (collectively, **Supplier(s)**).
- 1.2 We expect our Suppliers to conduct business activities, including activities performed through subcontractors, within the guidelines of this Supplier Code of Conduct (the **Supplier Code**). This Supplier Code is in no way intended to conflict with the terms and conditions of any existing contract with the Company. In the event of a conflict, Suppliers must first adhere to Applicable Laws (defined below), then the contract terms, followed by this Supplier Code.

2.0 Supplier Code Expectations and Reporting Non-Compliance

- 2.1 Suppliers shall take active steps, including audits and inspections, to ensure compliance with this Supplier Code and Applicable Law.
- 2.2 Grievance Procedures: An effective, confidential grievance process called the *Business Ethics Hotline* has been established by the Company to ensure that grievances can be submitted confidentially, without suffering any prejudice or retaliation of any kind. Suppliers and their personnel are expected to promptly report any breaches of this Supplier Code to the Company's *Business Ethics Hotline*, as follows:
 - Toll free at: 1-866-921-6714 (Canada & USA)
 - Email: actenergy@integritycounts.ca
 - Web: <https://www.integritycounts.ca/org/actenergytechnologies>
 - By mail: ACT Energy Technologies Ltd.
6030 – 3rd St. S.E.
Calgary, Alberta T2H 1K2
Attention: Chair of the Audit Committee OR Legal Department
- 2.3 The Company or its representatives may engage in monitoring activities to confirm Supplier's


			Document Number: CORP-WW-Policy-0010	
			Revision No.:	2
			Initial Issue Date:	March 26, 2024
SUPPLIER CODE OF CONDUCT			Last Revision Date:	July 3, 2024
Prepared by: Legal	Reviewed by: CFO & CEO	Approved by: Board of Directors	Next Review Date:	March 2027
			Page:	2 of 6

compliance to this Supplier Code, including on-site inspections of facilities, use of questionnaires, surveys or report cards, review of publicly available information, or other measures necessary to assess Supplier's performance.

- 2.4 Consequences for Violating Supplier Code: In the event of a violation of any of the above expectations, the Company may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, the Company may be required to report those violations to proper authorities. The Company reserves the right to terminate our relationship with any Supplier under the terms of the existing procurement/purchasing contract.
- 2.5 Ethics Policies and Whistleblower Protection: Commensurate with the size and nature of their business, we expect our Suppliers to have management systems in place to support compliance with Applicable Laws and this Supplier Code. We expect our Suppliers to implement their own written code of conduct and to flow down the principles in this Supplier Code to the entities that furnish them with goods and services. Suppliers must provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation, and Supplier must have a process to investigate and resolve such issues and concerns.

3.0 Compliance


- 3.1 Applicable Law: We expect our Suppliers to comply with all laws and regulations applicable to their business, in each jurisdiction in which they operate (collectively, **Applicable Law**). All requirements in this Supplier Code are to be interpreted as obligations in addition to the foregoing requirement to comply with Applicable Law.
- 3.2 Compliance Requests: We expect our Suppliers to fully cooperate with our compliance requests. The Company reserves all rights, to cease any business relationship due to non-compliance with this Supplier Code and to conduct any investigation and/or audit to verify compliance with this Supplier Code.
- 3.3 Maintain Accurate Records: Suppliers must create and maintain reasonable, complete and accurate books and records, including producing timely, accurate, and complete business records for all transactions with our Company. This includes preparing accurate invoices and other financial records that are in accordance with professional accounting standards, applicable legal requirements and contractual terms and obligations. We reserve the right from time to time to monitor Supplier records as they pertain to work being performed for the Company.

			Document Number: CORP-WW-Policy-0010	
			Revision No.:	2
			Initial Issue Date:	March 26, 2024
SUPPLIER CODE OF CONDUCT			Last Revision Date:	July 3, 2024
Prepared by: Legal	Reviewed by: CFO & CEO	Approved by: Board of Directors	Next Review Date:	March 2027
			Page:	3 of 6

4.0 Ethical Sourcing

Our Suppliers must comply with the non-exhaustive ethical sourcing items below:

- 4.1 **Child Labor:** Our Suppliers must ensure that child labor is not used in the performance of their work. Workers must be: (i) at least 15 years old; (ii) the age of completion of compulsory education; or (iii) the minimum legal age for employment under Applicable Law, whichever is greater. For any worker under the age of 18, such worker must not perform hazardous work that is likely to jeopardize their health or safety, or compromise their education (e.g. night shifts, overtime).
- 4.2 **Slavery, Human Trafficking, and Forced Labor:** The employment relationship must be voluntary, and the terms of employment must comply with applicable laws and regulations. We are opposed to slavery, human trafficking, and forced (e.g. prison, indentured, bonded) labor and are committed to complying with Applicable Law prohibiting this exploitation. Workers must not be subject to traffic or exploitation by means of threat, force, coercion, abduction, or fraud. Workers must be free to leave work and terminate employment with reasonable notice. Workers must not be required to pay recruitment, hiring, agent, or brokers' fees in exchange for work. All fees and expenses charged to workers must be expressly disclosed to the Company and communicated to workers in a language they can understand, in advance of work. Suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working. Suppliers may only temporarily hold such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing.
- 4.3 **Responsible Sourcing:**
 - 4.3.1 We require our Suppliers to ensure that materials used in the products they supply do not contain conflict resources such as metals derived from minerals that originated from a conflict region that directly or indirectly benefits armed groups. As applicable, Suppliers must adhere to Applicable Law requiring reporting companies to make specialized disclosure and conduct due diligence concerning their use of conflict minerals.
 - 4.3.2 Responsible sourcing also includes managing supply chains to ensure products supplied to the Company and the materials and parts used to manufacture such products are not sourced using child or forced labor, that sub-contractors will not put the Company at risk of bribery and corruption, that third parties used by Suppliers are not subject to sanctions, and that they will not put the Company at risk of cyber-attacks or privacy breaches.


			Document Number: CORP-WW-Policy-0010	
			Revision No.:	2
			Initial Issue Date:	March 26, 2024
SUPPLIER CODE OF CONDUCT			Last Revision Date:	July 3, 2024
Prepared by: Legal	Reviewed by: CFO & CEO	Approved by: Board of Directors	Next Review Date:	March 2027
			Page:	4 of 6

5.0 Employment Practices

- 5.1 **Fair Treatment**: All workers must be treated with respect and dignity. Suppliers must ensure that their employees are afforded an employment environment that is free from violence, corporal punishment, physical, psychological, sexual, and verbal harassment, unreasonable restrictions on entering or exiting work facilities, or other abusive conduct.
- 5.2 **Non-discrimination**: Suppliers must not discriminate, on the basis of to race, national origin, religion, age, gender, marital status, sexual orientation, mental or physical disability, veteran status or any other characteristic protected under human or civil rights law, in hiring, processing job applications, promotions, job assignments, training, benefits, and termination. Suppliers are required to make reasonable accommodations for workers of different religious backgrounds, and promote gender equality in employment practices.
- 5.3 **Working Hours**: Supplier must regularly monitor working hours to ensure the safety, health, and welfare of workers. In all circumstances, working hours must not exceed the maximum amount permitted by Applicable Law.
- 5.4 **Wages and Benefits**: Suppliers are required to pay their workers in a timely manner and provide compensation (including overtime pay and benefits) that, at a minimum, satisfy Applicable Laws. Suppliers are required to provide to their workers the basis on which workers are being paid in a timely manner via pay stub or similar documentation.
- 5.5 **Freedom of Association**: The Company expects that Suppliers respect the rights of workers to establish and join an organization of their own selection. Workers must not be penalized or subjected to harassment or intimidation for the non-violent exercise of their right to join or refrain from joining such legal organizations.

6.0 Health, Safety & Environment


- 6.1 **Health & Safety**: We believe that safety is one of our greatest responsibilities. We expect our Suppliers to operate in alignment with our commitment to safety and to do their part to help us achieve and maintain safe workplaces. We must all take responsibility for understanding the health, safety and environmental rules and regulations that apply to the tasks we perform and for taking appropriate precautions to prevent accidents, injury and unsafe conditions.

			Document Number: CORP-WW-Policy-0010	
			Revision No.:	2
			Initial Issue Date:	March 26, 2024
SUPPLIER CODE OF CONDUCT			Last Revision Date:	July 3, 2024
Prepared by: Legal	Reviewed by: CFO & CEO	Approved by: Board of Directors	Next Review Date:	March 2027
			Page:	5 of 6

- 6.2 **Environment:** We are committed to sound stewardship and protection of the environment, and require that our Suppliers comply with all applicable laws and regulations, as well as industry standards.

7.0 Ethical Business Dealings

- 7.1 **Anti-Corruption Laws:** Suppliers must comply with the anti-corruption laws, directives and/or regulations that govern operations in the countries in which they do business. Regardless of Applicable Law, Suppliers must not offer or make any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action, even in locations where such activity may not violate Applicable Law. We expect our Suppliers to exert due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of consultants.
- 7.2 **Illegal Payments:** Suppliers must not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives, inspectors, auditors, or others. The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such activity may not violate Applicable Law.
- 7.3 **Gifts/Business Courtesies:** We expect our Suppliers to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, our Suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by Applicable Law, these exchanges do not violate the rules and standards of the recipient's organization, are consistent with reasonable marketplace customs and practices, and will not adversely impact the reputation of the Company.
- 7.4 **Fair Competition:** We expect Suppliers to compete honestly and fairly, comply with applicable antitrust and competition laws and never participate in anti-competitive practices. Suppliers must not fix prices or rig bids with their competitors. They must not exchange current, recent, or future pricing information with competitors.
- 7.5 **Conflicts of Interest:** We expect our Suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest, in their dealings with the Company. Our Suppliers must provide notification to all affected parties in the event that an actual or potential conflict of interest arises.

			Document Number: CORP-WW-Policy-0010	
			Revision No.:	2
			Initial Issue Date:	March 26, 2024
SUPPLIER CODE OF CONDUCT			Last Revision Date:	July 3, 2024
Prepared by: Legal	Reviewed by: CFO & CEO	Approved by: Board of Directors	Next Review Date:	March 2027
			Page:	6 of 6

8.0 Information Protection

- 8.1 Confidential / Proprietary Information: We expect our Suppliers to properly handle sensitive information, including confidential, proprietary, and personal information. Information must not be used for any purpose (e.g., advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information.
- 8.2 Intellectual Property: Our Suppliers must comply with all Applicable Law governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.
- 8.3 Information Security: Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures. Suppliers must comply with all Applicable Law respecting data privacy. Suppliers shall ensure extension of this requirement to all sub-tier sources they employ.
- 8.4 Public Disclosure of Business Relationship or Dealings with the Company: Suppliers wishing to inform third parties or to make it publicly known that they do business with the Company must request and receive written or e-mail consent from an employee of the Company employed as a Vice President or above, or the designee of such an individual.

9.0 Communication

- 9.1 This Supplier Code will be available to our Suppliers, and will be reviewed by the Company periodically and revised as determined appropriate.