



TRUSTED SOLUTIONS. SUPERIOR CLIENT EXPERIENCES.

# SUPPLIER CODE OF ETHICS

## Canada

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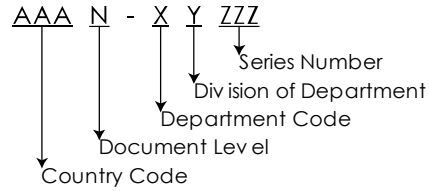
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## 1. PURPOSE

Our Company is committed to conducting business with the highest standards of ethics and corporate integrity. We believe that honesty, fairness, and transparency are the foundation of a successful and sustainable business and should guide all our decisions on a daily and ongoing basis.

This Supplier Code of Ethics outlines the basic ethical standards required of our Company's Suppliers. The Supplier Code of Ethics is a requirement in addition to the Supplier's other obligations as set out in any Master Service Agreement or other form of contract. It is the Supplier's obligation to ensure any of their subcontractors hired to complete work for or on behalf of our Company are also operating in accordance with this Supplier Code of Ethics.

## 2. DEFINITIONS

**Child Labour:** The employment of individuals under the age of 15 (or 14 for manufacturers in developing countries, per International Labour Organization (ILO) Convention No. 138). Particularly, work that deprives children of childhood experiences and affects their education, potential or dignity, and that could be considered harmful to a child's physical, social or mental development.

**Company:** Magna IV Engineering, Inc.

**Employee:** Any person working directly for, or on behalf of, the Supplier. This includes, but is not limited to, workers on contract or hired through third-party agencies, volunteers, subcontractors and external consultants performing work for the Supplier.

**Supplier:** The company with which our Company has entered into an agreement with for the provision of goods or services to our Company.

**Supply Chain:** A network of individuals and companies who are involved in creating a product and delivering it to the consumer. The Supply Chain begins with the producers of the raw materials required to create a product and ends with the company that delivers the finished product to the end user.



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### 3. RESPONSIBILITIES

#### 3.1. Social

##### 3.1.1. Forced & Child Labour

The Supplier's Employees must be performing the work by choice; any type of involuntary labour arrangements and the use of Child Labour are strictly prohibited. Validated workplace apprenticeship programs complying with applicable laws and regulations are permitted (depending on the nature and complexity of the work).

##### 3.1.2. Employment Standards

The Supplier shall ensure its Employees are aware of the employment standards for their region and will abide by these standards as an employer. This includes compliance with maximum working hours, permitted breaks, days of rest, payment of wages (including ensuring minimum wage requirements are being met), overtime pay requirements, holiday pay, and vacation time.

##### 3.1.3. Equal Opportunities

The Supplier shall offer equal opportunities to all its Employees and shall take accountability for acts of discrimination based on race, nationality, age, religion, political convictions, social background, skin colour, gender identity or expression, physical or mental abilities or sexual orientation. These factors shall not be considered in hiring practices or when determining the availability of any benefits related to employment, including training and recognition.

##### 3.1.4. Treatment of Employees

The Supplier shall ensure all its Employees are treated with respect and dignity, including the respect of privacy and the prohibition of any form of mental, physical or verbal abuse. This encompasses many behaviours including, but not limited to, sexual harassment, discrimination, coercion, or exploitation. A clearly defined disciplinary policy and/or procedure should be followed and communicated to employees via standard corporate training practices.



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### 3.2. Environmental

#### 3.2.1. Environmental Management System

The Supplier shall have (or follow) a formalized environmental management system which, at a minimum: minimizes environmental pollution in the performance of work; ensures proper disposal of hazardous materials; maximizes waste reduction to the most reasonable extent; minimizes the use of natural resources; and aids in continuously improving measures in environmental protection as it relates to the completion of work.

#### 3.2.2. Legal Compliance - Environmental

The Supplier shall comply with all domestic and international laws, approvals or permits relating to the environment in its region(s), as well as any additional environmental regulations or standards that may be applicable to its industry.

#### 3.2.3. Supply Chain

The Supplier shall do its due diligence to ensure its own suppliers and subcontractors are taking the necessary precautions to ensure environmental protection in the performance of work and in the sourcing of its required materials.

### 3.3. Ethical

#### 3.3.1. Anti-Corruption & Bribery

The Supplier shall not engage in any form of corporate corruption or bribery, or any other type of unethical business practice, whether directly or indirectly. The Supplier shall action appropriate disciplinary measures if it becomes known that any of its employees are partaking in such activities.

#### 3.3.2. Conflicts of Interest

The Supplier shall make known any real or perceived conflicts of interest that may be present in its working relationship with the Company. Measures shall be taken by the Supplier to avoid any conflicts of interest in relation to the completion of work for the Company whenever possible.

#### 3.3.3. Supply Chain

The Supplier shall make all reasonable efforts to avoid the use or purchase of raw materials which directly or indirectly finance groups or corporations known to violate human rights.



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### 3.3.4. Fair Competition

The Supplier shall act in accordance with any applicable competition laws and agrees to not participate in any sort of collusion with its competitors, either directly or indirectly. This includes, but is not limited to, activities such as price-fixing, control of supply, and bid rigging. Intellectual property rights shall be respected in all circumstances. The Supplier agrees to not intentionally provide inaccurate or misleading information.

## 3.4. Health & Safety

### 3.4.1. Health & Safety Program

The Supplier shall have (or follow) a formalized health & safety management system. This should include an incident reporting system and the implementation of regularly scheduled safety audits.

### 3.4.2. Legal Compliance – Occupational Health & Safety

The Supplier shall comply with all domestic and international laws relating to occupational health and safety in its region(s). The Supplier has a responsibility to ensure the health and safety of its Employees and its work environments. The Supplier shall do its due diligence to recognize and control hazards and take all reasonable precautions to prevent workplace incidents or injuries in accordance with best practices for its industry.

### 3.4.3. Occupational Testing & Fitness for Work

The Supplier shall do its due diligence to arrange for the performance of occupational testing of its Employees, as required. The Supplier will not permit its Employees to perform work when they are under the influence of any legal or illegal substances that may impair their judgement or abilities, or under any other circumstances where an Employee is not fit to perform the work at hand.

### 3.4.4. Training

The Supplier shall ensure its Employees are properly trained and/or certified to safely and knowledgeably complete the work tasks assigned to them. The Supplier agrees to inform its Employees of its health and safety guidelines via standard corporate training practices. Additional health and safety training may be required as related to the performance of work, including but not limited to equipment training, WHMIS training, first aid training, and emergency protocols.



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### 3.5. Governance

#### 3.5.1. Laws & Regulations

The Supplier shall ensure its Employees are aware of any relevant domestic and international laws as applicable to its business, as well as any other regulations applicable to its industry. The Supplier will take responsibility for its Employees' compliance with these laws and regulations as a corporation.

#### 3.5.2. Corrective Measures

The Supplier is responsible for completing regular reviews of its business practices in all areas to identify non-compliance with any component of this Supplier Code of Ethics. If it becomes known that any of these requirements are not being met, it is the Supplier's responsibility to take any corrective actions necessary to ensure compliance as soon as is reasonable. This may include revisions to the Supplier's policies, procedures, or work processes, and, if required, the execution of disciplinary actions for any Employees who do not comply. Where the corrective action includes removal of a Supplier as an approved vendor, notification will be issued internally to all relevant parties.

#### 3.5.3. Reporting Violations

If improper conduct is observed of the Supplier or any of its Employees that may constitute violation of this policy, the details should be reported to 'compliance@maximapowergroup.com'. Reported violations will be investigated as deemed necessary. The reported information will be held in confidentiality to the extent permitted by law. Validated violations of this Policy will be resolved through application of the appropriate Company policy, law, regulation or guideline.