

Supplier Code of Conduct

Purpose and Scope

SECURE Waste Infrastructure Corp. (together with its subsidiaries, “SECURE”) is committed to conducting all aspects of its business in a safe, responsible, ethical, and sustainable manner. This Supplier Code of Conduct (“SCOC”) sets out the standards and expectations that apply to all suppliers, vendors, contractors, subcontractors, consultants, business partners and others within their respective supply chains (“Suppliers”) who conduct business with, or on behalf of, SECURE. These expectations reflect SECURE’s core values and are designed to ensure that our supply chain operates with integrity, comply with applicable laws and regulations, and contributes positively to the communities and environments in which we operate.

SECURE’s commitment to our values: Working Safely, Helping the Customer, Being Accountable, Performing our Best, and Embracing an Entrepreneurial Spirit – SHAPE our culture, fulfill our purpose, and guide our business strategy.

The SCOC is intended to:

- Prevent bribery, corruption, fraud, and conflicts of interest in all business dealings.
- Ensure compliance with all applicable laws, regulations, and industry standards in every jurisdiction which apply to the work being done for SECURE.
- Safeguard confidential information, intellectual property, and data entrusted by SECURE and its affiliated third parties.
- Support supply chain transparency by ensuring that Suppliers adhere to these standards.
- Ensure concerns, violations, or unethical conduct are promptly reported through SECURE’s designated reporting procedures without fear of retaliation.
- Uphold the principles outlined in SECURE’s Code of Business Conduct (“COBC”).
- Ensure compliance with any policies and procedures published by SECURE’s customers, about which the Supplier has been made aware, and to which SECURE has agreed to be bound.

1. Legal and Ethical Business Conduct

1.1 SECURE upholds the highest standards of legal compliance and business ethics. SECURE expects its Suppliers to:

- (a) Conduct business ethically, transparently, and in compliance with all applicable local, state/provincial, and federal laws and regulations;
- (b) Prohibit bribery, corruption, extortion, embezzlement, and any other form of unethical behavior;
- (c) Avoid conflicts of interest in dealings with SECURE;
- (d) Protect the privacy of personal and confidential information in relation to SECURE and its affiliated third parties; and
- (e) Promptly report any suspected or actual non-compliance with the SCOC or COBC using the SECURE Whistleblower line.

2. Human Rights and Labour Practices

2.1 SECURE strives to have an inclusive, fair and respectful work environment which includes its supply chain. Every person working with SECURE on a SECURE project, including those affiliated with our Suppliers, is to be respected and to be treated fairly without discrimination by reason of race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status or physical disability.

2.2 Suppliers must abide by applicable employment standards, labor, non-discrimination and human rights legislation. This includes but is not limited to, the following:

- (a) Treat all individuals with respect and without discrimination based on race, ethnicity, religion, gender, age, disability, sexual orientation, or other protected characteristics.
- (b) Abide by all applicable human rights and labor laws, including:
 - (i) Employment standards;
 - (ii) Non-discrimination laws; and
 - (iii) Occupational health and safety regulations.
- (c) Uphold the following practices:
 - (i) Employ only workers who meet the legal minimum age requirements in the jurisdiction where the Supplier is located;
 - (ii) Prohibit all forms of forced, bonded, trafficked, or undocumented labor, including undocumented migrants;
 - (iii) Respect workers' rights to freedom of association and collective bargaining, where permitted by law;
 - (iv) Provide fair wages, working hours, and humane treatment;
 - (v) Maintain workplaces free from harassment, abuse and discrimination, complying with SECURE'S Workplace Non-Discrimination, Violence, Harassment and Bullying Policy;
 - (vi) Comply with [International Labor Organization \(ILO\) Standards](#);
 - (vii) Comply with SECURE's Human Rights Policy; and
 - (viii) Comply with SECURE's Diversity and Inclusion Policy.

3. Forced Labour, Child Labour and Supply Chain Transparency

- 3.1 SECURE is committed to complying with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and amendments to the *Customs Tariff Act* ("Bill S-211").
- 3.2 Suppliers engaged in the production, extraction, processing or manufacturing of goods must:
 - (a) Comply with the requirements of Bill S-211;
 - (b) Provide documentation for SECURE's internal due diligence and reporting processes, if requested by SECURE;
 - (c) Cooperate with SECURE's supply chain mapping and risk-based assessments; and
 - (d) Respond promptly to requests for information related to human rights, sourcing, or supply chain integrity.

4. Health, Safety and Wellbeing

- 4.1 SECURE is guided by its Health and Safety Policy, Life Saving Rules and Alcohol and Drug Policy. Suppliers must comply with SECURE's Health and Safety Policy, Alcohol and Drug Policy and follow SECURE's Life Saving Rules. Additionally, all products delivered to SECURE shall meet quality standards and laws and be safe for their intended use.
- 4.2 All Suppliers are expected to:
 - (a) Comply with applicable workplace health and safety laws;
 - (b) Identify and mitigate workplace hazards;
 - (c) Provide a safe and healthy working environment;

- (d) Ensure workers are properly trained and equipped with appropriate personal protective equipment (PPE); and
- (e) Ensure all goods and materials meet applicable safety, quality and regulatory requirements.

5. Environmental Responsibility

5.1 SECURE is committed to reducing its environmental footprint.

5.2 Suppliers are expected to:

- (a) Comply with all applicable environmental laws and regulations;
- (b) Work to minimize negative environmental impacts through efficient use of resources, waste reductions, pollution prevention, and responsible handling of hazardous materials;
- (c) Support SECURE's goals around emission reduction, Circular economy principles, and biodiversity protection;
- (d) Disclose environmental risks and performance upon request;
- (e) Allow SECURE to conduct environmental audits as required; and
- (f) Meet environmental conditions outlined in contracts and other relevant documentation.

6. Monitoring and Auditing

6.1 SECURE reserves the right monitor compliance with the SCOC by requesting information from Suppliers to screen a Supplier's business practices and processes, as such SECURE may:

- (a) Request documentation and information for review of Supplier practices;
- (b) Conduct audits, inspections, or assessments (either directly or through third parties);
- (c) Require corrective actions to remedy non-compliance; or
- (d) Terminate contracts or business relationships with Suppliers who refuse to comply with the SCOC or fail to meet expectations.

7. Third Party Engagement

7.1 SECURE is committed to meaningful engagement with local communities, including Indigenous communities, and to promoting an inclusive and diverse supplier base.

- (a) SECURE encourages its Suppliers to partner with and hire qualified local businesses and underrepresented groups.
- (b) SECURE's Indigenous Relations Policy outlines SECURE's approach to respectful engagement and shared prosperity.
- (c) Suppliers are encouraged to align with this commitment to inclusivity and community development.

8. Trade Compliance and Sanctions

8.1 SECURE requires all Suppliers to comply with applicable trade laws, customs regulations, and international sanctions regimes. Suppliers are expected to ensure that their operations and supply chains do not expose SECURE to legal, regulatory, or reputational risks.

8.2 Suppliers are expected to:

- (a) Comply with all applicable import, export control, customs, and trade sanctions laws in all jurisdictions where they operate; and

- (b) Maintain accurate trade compliance records and promptly report any actual or suspected violation related to trade or sanctions obligations.

9. Anti-Bribery and Anti-Corruption

- 9.1 SECURE prohibits all forms of bribery and corruption in its business dealings. Suppliers are expected to uphold the highest standards of integrity and to conduct business in a fair, transparent, and ethical manner.
- 9.2 Suppliers are expected to:
 - (a) Refrain from offering any gifts, bribes or other inappropriate consideration to any government officials, as defined by all applicable legislation, relating to the products or services being supplied to SECURE; and
 - (b) Prohibit and refrain from offering, promising, giving, or accepting any bribe, kickback, facilitation payment, or other improper advantage, directly or indirectly, in dealings with SECURE or third parties; and
 - (c) Ensure that any gifts, hospitality, entertainment, or charitable contributions are lawful, modest in value, infrequent in nature, and never intended to improperly influence a business decision; and
 - (d) Implement and enforce policies, controls, and training programs to prevent bribery, corruption, fraud, or unethical conduct within their organization and supply chain; and
 - (e) Promptly report any suspected or actual violation of anti-bribery or anti-corruption requirements through SECURE's designated reporting channels.

10. Subcontractor Management

- 10.1 Suppliers must ensure that its Suppliers engaged in providing goods or services to SECURE or SECURE's customers operate in compliance with this SCOC, SECURE's customers' policies, and all applicable laws.
- 10.2 Suppliers are expected to:
 - (a) Ensure that its Suppliers are contractually bound by obligations equivalent to those in this SCOC, as well as any additional requirements from SECURE or SECURE's customers;
 - (b) Perform thorough and ongoing monitoring of its Suppliers to verify compliance with legal, ethical, environmental, and safety standards;
 - (c) Adhere to, and ensure that its Suppliers adhere to, any code of conduct, contract term, rule, regulation, or guideline of SECURE's customer when providing goods or services on SECURE's behalf; and
 - (d) Report any actual or suspected violation by its Suppliers to SECURE without delay.
- 10.3 Any violation of this Section 10 will result in SECURE taking effective remedial action commensurate with the severity of the violation, up to and including termination of contracts or business relationships.

11. Digital Ethics, Cybersecurity and Data Protection

- 11.1 Suppliers are expected to:
 - (a) Protect SECURE and its affiliated third parties' confidential information, intellectual property, and data against unauthorized access, loss, misuse, or disclosure;
 - (b) Implement appropriate cybersecurity controls, including firewalls, encryption, access restrictions, and regular system monitoring, consistent with industry standards;
 - (c) Comply with all applicable data protection and privacy laws (e.g., PIPEDA, GDPR, or equivalent local legislation); and
 - (d) Notify SECURE promptly of any actual or suspected data breach, cyber incident, or unauthorized disclosure that could affect SECURE or its affiliated third parties.

12. Policy Compliance

- 12.1 Suppliers must report any actual or suspected violation of this SCOC, the COBC or applicable law. Reports may be made confidentially and without fear of retaliation through the reporting procedures set out in SECURE's Whistleblower Policy.
- 12.2 Suppliers must also adhere to the COBC. Any Violation of the SCOC or the COBC will result in SECURE taking effective remedial action commensurate with the severity of the violation, up to and including termination of contracts or business relationships.

13. Policy Review

SECURE will review this SCOC periodically to ensure it aligns with SECURE's strategy and supports industry practices, laws and regulations.

14. Policy Owner

- 14.1 This SCOC is owned by Supply Chain Management, any questions regarding this SCOC should be directed to sessupplychain@secure.ca.

15. References

- 15.1 This SCOC references the following SECURE Policies:

- (a) Alcohol and Drug Policy;
- (b) Code of Business Conduct;
- (c) Diversity and Inclusion Policy;
- (d) Health and Safety Policy;
- (e) Human Rights Policy;
- (f) Indigenous Relations Policy;
- (g) Whistleblower Policy; and
- (h) Workplace Non-Discrimination, Violence, Harassment and Bullying Policy.