



The Redpath Group's Partners' Code of Conduct



1. **About the Redpath Group:** Headquartered in North Bay, Ontario, Canada and operating since 1962, with approximately 9,000 employees across the globe, Redpath Mining Inc. encompasses all entities it owns or in which it holds a controlling interest. Collectively known as the Redpath Group, it stands out as one of the world's leading mining construction companies, with operations in 15 countries across six continents. The Redpath Group provides a comprehensive range of mining services to some of the world's most prominent corporations and organizations.

The Redpath Group is fully committed to complying with all applicable laws, regulations and internal policies in every jurisdiction where it operates. The Redpath Group will conduct its business activities with integrity, ensuring that all operations align with legal and regulatory requirements. The Redpath Group will diligently obtain, store, and when required by authorities, and in consultation with the CCO provide the necessary information relating to all transactions, in full compliance with relevant legal and regulatory obligations. The Redpath Group's commitment to transparency and cooperation with authorities ensures it maintains the trust and integrity of its operations worldwide. This obligation extends beyond internal operations to include all external relationships with all suppliers, service providers, contractors, and business parties the Redpath Group is or may become affiliated with ("Partners"). Unethical or unlawful business conduct, by any individual or entity, will not be tolerated under any circumstances.

2. Partners' Conduct:

- 2.1. **Redpath Supplier Ethical Covenant ("RSEC"):** All Partners must sign (via an authorized representative) and adhere to the RSEC, which mandates that Partners comply with ethical and legal business practices. By signing this ethical covenant, the Partners acknowledge the Redpath Group's pledge to ensuring that all business activities are conducted in accordance with applicable legal, regulatory, and ethical standards that guide the Redpath Group.

Partner must disclose beneficial ownership, undergo sanctions & PEP screening, and ensure no circumvention through related entities.

- 2.2. **Contents of the RSEC:** The following sections set out the RSEC's key commitments and standards that all Partners must uphold as a condition of engaging with the Redpath Group:

- **Compliance:** Conduct business in full compliance with applicable laws, regulations as well as industry and ethical standards. Examples of applicable laws include, but are not limited to, applicable antitrust and competition laws, anti-bribery laws, anti-money laundering laws, as well as labour and employment laws including sanctions and export control laws applicable to Redpath operations.
- **Anti-Bribery and Anti-Corruption:** Prohibit all forms of corruption, bribery, fraud, and unethical conduct to improperly influence business decisions or secure an unfair advantage. Partners must not use intermediaries to commit any act prohibited under this RSEC.
- **Government Official(s):** Ensure all interactions with Government Official(s) are conducted in an ethical and lawful manner. Partner must disclose if any Government Official has ownership, control, employment, or close family connection to the Partner.
- **Gifts, Entertainment, and Expenses:** Ensure that all Gifts, Entertainment, and Expenses received, provided, and incurred are done so in an ethical and lawful manner.
- **Fair Employment Practices and Respectful Workplace:** Comply with all applicable labor, employment, and human rights laws. All employees must be compensated fairly, in accordance with the legal minimum wage and benefit standards. Employees must have the right to freely associate, form, and join trade unions and bargain collectively without fear of retaliation or interference. Partners must ensure that working hours comply with applicable laws, including overtime laws, and that employees are allowed at least one uninterrupted day off every seven days, except as otherwise permitted by law. Furthermore, Partners must maintain a workplace free of discrimination, harassment (including sexual harassment), violence, threats, exploitation, and abuse. All employees must be compensated fairly, treated with respect and dignity, regardless of gender, race, nationality, age, disability, religion, sexual orientation, or any other characteristic protected by law.
- **Health, Safety, and Environmental Standards:** Provide a safe, healthy, and environmentally sustainable workplace. In particular, the Partner must:
 - Formally appoint a competent individual to manage health and safety standards, as well as environmental sustainability programs.
 - Establish and maintain organizational structures and procedures to mitigate health, safety, and environmental risks.
 - Ensure that all employees are sufficiently trained and aware of the aforementioned risks.

- Report HSE incidents that involve Redpath projects to Redpath immediately.
- **Conflicts of Interest:** Avoid conflicts of interest with the Redpath Group and promptly disclose any potential or actual conflicts of interest that may arise.
- **Fair Competition:** Engage in fair competition and conduct business openly and honestly. Partners must avoid practices that could be deemed anti-competitive, including but not limited to collusion and price-fixing.
- **Confidential Information and Intellectual Property:** Safeguard any confidential information, personal information, and intellectual property received from the Redpath Group and ensure compliance with applicable privacy laws, particularly the European Union's General Data Protection Regulation, including notification of data breaches to Redpath without undue delay.
- **Audits and Inspections:** Cooperate fully in the event of an audit or inspection conducted by the Redpath Group or by an external auditor appointed by the Redpath Group, with the Redpath Group covering the costs associated with either scenario.
- **Subcontractors of Affiliates:** Ensure the Redpath Group's written consent is obtained prior to engaging with any subcontractors or affiliates of the Partner and require that all subcontractors or affiliates of the Partner comply with the RSEC as well as any applicable laws and regulations.
- **Recordkeeping:** Maintain accurate and complete records of the Partner's compliance with the RSEC as well as applicable laws and regulations. Such records must be kept for the legally required period and provided to the Redpath Group upon request.
- **Reporting Misconduct:** Notify the Redpath Group if any suspected or actual breach of the RSEC, laws, or regulations that impact the Redpath Group's interests occur. Such reports must be made as soon as reasonably possible through the requisite reporting channels to ensure prompt investigation and corrective action.

Kindly refer to the following link for more information:

www.redpathmining.com/en/profile/compliance

- **Consequences of Breach:** The Partner understands that failure to comply with the RSEC and any laws and regulations that impact the Redpath Group's interests may result in immediate termination of the business relationship, suspension of transactions, or any other corrective action deemed necessary

by the Redpath Group. The Partner must promptly comply with all corrective action imposed by the Redpath Group.

2.3. Additional Obligations: In addition to a Partner signing (via an authorized representative) and adhering to the RSEC, it must ensure also abides by the following principles in relation to its engagement with the Redpath Group:

- **Human Rights:**

- Prohibiting forced labour and any form of modern slavery or human trafficking.
- Ensuring child labour is not used in any part of operations.
- Providing fair wages, reasonable working hours, and ensuring the right to freedom of association and collective bargaining.
- Creating a workplace free from harassment, discrimination, abuse, and violence.
- Obligation to remediate violations.
- Obligation to cascade human rights standards to sub-suppliers.

- **Diversity, Equity, and Inclusion:**

- Prohibit discrimination based on race, gender, sexual orientation, age, religion, or other protected characteristics.
- Promote equal opportunity and fair treatment for all workers.
- Creating an inclusive workplace where every individual is respected and valued.

- **Health, Safety, and Environmental Management:**

- Complying with applicable occupational health and safety regulations.
- Maintaining clean, safe, and accessible facilities.
- Minimizing adverse environmental impact.
- Taking appropriate measures to prevent accidents, injuries, and illnesses.

- **Business Ethics:**

- Prohibiting all forms of improper payments, bribery, and corruption.
- Accurately recording and reporting business and financial records.
- Avoiding conflicts of interest and disclosing any potential or actual conflicts to the Redpath Group.

- Respecting intellectual property rights and maintaining the confidentiality of confidential information and personal information.
- **Secure Business Practices:**
 - Protecting confidential information and personal information from unauthorized access and disclosure.
 - Following industry best practices for cybersecurity, data protection, and secure technology use.
 - Reporting any known or suspected data breaches or security incidents promptly to the Redpath Group.
- **Procurement and Responsible Sourcing:**
 - Conducting thorough due diligence to ensure that products and services are sourced ethically and legally.
 - Avoiding business relationships that support conflict, exploitation, or illegal practices.
 - Prioritizing sustainable and socially responsible suppliers in their own supply chains.
 - Any subcontractor work must receive the prior written consent of the Redpath Group.
- **Inspections and Corrective Actions:**
 - To ensure compliance, the Redpath Group reserves the right to:
 - Conduct audits, assessments, or site inspections of the Partner's facilities, with or without notice.
 - Require documentation and cooperating during the review process.
 - Expect prompt corrective action if non-compliance is found.

2.4. Failure to comply with the RSEC constitutes a breach of the relevant service contract and as a consequence, the Redpath Group may take disciplinary action. Kindly refer to the Redpath Group's "Sanctions" group directive for more information.

2.5. Reporting: Employees must, in good faith, report any suspected or actual breach of this document, applicable laws, regulations, or any other concern that impacts the Redpath Group's interests, to their manager, human resources, local compliance officer, regional compliance officer or the CCO. Alternatively,



employees may report their concerns anonymously through the Redpath Group's ethics hotline. All reports will be handled with confidentiality to the fullest extent possible.

Kindly refer to the following link for more information on how to report concerns:
www.redpathmining.com/en/profile/compliance

2.6. Protection Against Retaliation: The Redpath Group strictly prohibits retaliation against any employee who, in good faith, raises a concern, reports a violation, participates in an investigation, or refuses to engage in unethical or unlawful conduct that impacts the Redpath Group's interests. Retaliation will result in disciplinary action, up to and including termination of employment. Kindly refer to the Redpath Group's "Non-Retaliation" group directive for more information.

2.7. Partner Acknowledgement and Sign-Off: All of the contents outlined in this document collectively constitute the Redpath Group's Partners' Code of Conduct and are binding upon the Partner in its relationship with the Redpath Group.

By signing below, the Partner acknowledges, understands, and agrees to comply with the Redpath Group's Partners' Code of Conduct in its entirety. The Partner further agrees to continuously and satisfactorily implement these standards within its operations and to monitor and promote compliance within its supply chain.

Partner Name: _____

Partner's Authorized Representative: _____

Title: _____

Signature: _____

Date: _____