



# Supplier Code of Conduct

EPCOR Utilities Inc.

2024

## 1.0 Introduction

This Supplier Code of Conduct (“Supplier Code”) has been developed to share EPCOR’s expectations and requirements (i.e., Standards of Business Conduct) for its Suppliers. Suppliers refers to any vendor, supplier, contractor, consultant, business partner or agent, and any sub-contractor who provide goods, services or construction to or on behalf of EPCOR Utilities Inc. or any of its affiliates (as such term is defined in Alberta’s *Business Corporations Act*) (collectively “EPCOR”). EPCOR’s Supplier Code supports its [Mission, Vision and Values](#).

## 2.0 Compliance Requirements

EPCOR’s Suppliers must comply with all provisions of this Supplier Code and with all applicable laws<sup>1</sup> in the jurisdiction(s) where the supplier operates with respect to the manufacturing of goods, development and protection of intellectual property rights, delivery of services and construction, and ethical business practices. This includes but is not limited to those laws relating to working conditions, human rights, health and safety and the environment.

## 3.0 Consequences of Code Violation

If any non-compliance with this Supplier Code is discovered, Suppliers are expected to take reasonable steps to address, remedy, and prevent reoccurrence of the non-compliant conduct. Failure to comply with this Supplier Code, in addition to any other remedy available to EPCOR, may result in immediate termination of the Supplier’s contract with EPCOR and/or exclusion from future business opportunities.

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<sup>1</sup> “Laws” include all statutes, laws, bylaws, regulations, codes, ordinances, orders and requirements of governmental or other public authorities having jurisdiction, and all amendments and successors thereto.

## **4.0 Standard of Business Conduct**

### **4.1 Health and Safety**

EPCOR puts safety first and expects the same from its Suppliers. Suppliers must:

- Follow Occupational Health, Safety and Environment (HSE) legislation, regulations, codes, standards and mandates
- Meet EPCOR Contractor Health, Safety and Environment Requirements
- Follow EPCOR's policies
- Have their own HSE programs with strict requirements
- Meet standards that are specific to the type of work being done

Prior to commencing any work, Suppliers must confirm with their EPCOR Representative that all Health and Safety requirements are met.

### **4.2 Environmental Stewardship**

At EPCOR, our focus is to minimize the impact of our operations on the environment as we strive to be environmental leaders. Suppliers must comply with all applicable environmental laws, statutes and regulations of the jurisdiction in which they operate and adhere to applicable EPCOR environmental procedures and standards.

### **4.3 Business Ethics**

EPCOR expects its Suppliers to conduct all business affairs with the same ethical standards that EPCOR maintains.

#### **4.3.1 Honesty and Integrity**

Suppliers must demonstrate integrity in their business relations with EPCOR and not deceive, lie to, misinform or allow EPCOR to be misinformed through any act or omission of the Supplier for the purpose of personal gain or to cause a loss to EPCOR.

#### **4.3.2 Personal Gifts, Benefits and Kickbacks**

Suppliers must not (directly or indirectly) in the course of their dealings with or on behalf of EPCOR offer, give, request or accept any bribe or kickback or other transaction which could compromise the integrity or harm the reputation of EPCOR or its representatives or any gift, entertainment or similar type of benefit that contravenes

applicable law, that creates a conflict of interest for EPCOR or its representatives, or that does not serve a legitimate business purpose.

#### **4.3.3 *Fraudulent Activity***

Suppliers must take proactive steps to deter and detect instances of fraud by Supplier representatives, EPCOR representatives, other business partners or customers and to minimize/mitigate the risk of it.

#### **4.3.4 *Anti-Bribery or Corruption***

Suppliers must never offer, ask for, give or receive any form of bribe, kickback, any other type of improper payment, or attempt to gain influence or competitive advantage through improper means. Suppliers must also never offer or give facilitation payments.

Suppliers must ensure that the requirements of all applicable anti-corruption laws are met, including, but not limited to, Canada's Corruption of Foreign Public Officials Act. No payments, gifts or other benefits may be given, directly or indirectly, to public officials, political parties or political candidates for the purpose of influencing government decisions in EPCOR or the Supplier's favour or securing any other improper advantage. Suppliers must not engage in any form of corruption, extortion and/or embezzlement.

#### **4.3.5 *Proper Use of EPCOR Assets***

Suppliers must protect EPCOR's assets from fraud, theft, damage and destruction (e.g. by vandalism or neglect) and must not use them for anything other than authorized EPCOR business.

### **4.4 *Modern Slavery***

Suppliers must not engage in any forms of modern slavery or use goods or services from suppliers in their supply chain that may constitute modern slavery. Suppliers must comply with all relevant laws and regulations relating to modern slavery, including all applicable provisions of the Bill S-211 – *Fighting Against Forced Labour and Child Labour in Supply Chain Act* (Canada).

**Forced Labour:** Suppliers must employ workers who choose to be employed by the supplier. All work must be voluntary, and workers must be free to leave upon reasonable notice.

**Child Labour:** Suppliers must comply with applicable labour and employment laws regarding any form of child labour and prohibit any exploitation of children in the manufacturing and delivery of products or services.

#### **4.5 *Discrimination and Harassment***

Suppliers must provide inclusive, respectful, healthy and safe workplaces that are free from harassment, discrimination, workplace violence, retaliation and other disrespectful and inappropriate behavior.

Suppliers must treat all employees, subcontractors, EPCOR customers and EPCOR staff with dignity and respect, and comply with legal obligations that prohibit discrimination or harassment.

Suppliers must not engage in discrimination based on race, religious beliefs, colour, gender, gender identity, gender expressions, physical or mental disability, ancestry, marital status, family status, source of income, age, place of origin, and sexual orientation in hiring and employment practices such as promotions, rewards, and access to training.

#### **4.6 *Alcohol and Drugs***

Suppliers are strictly prohibited to work, or permit others to work, while under the influence or suffering the after effects of alcohol or drugs (e.g. cannabis, illicit drugs, prescription and over-the-counter medications), or bring, or permit anyone else to bring, alcohol or any illicit drugs into any EPCOR site or workplace.

#### **4.7 *Freedom of Association and Collective Bargaining***

Suppliers must work directly with employees to find solutions to any outstanding legal and employment issues while at all times respecting worker rights to obtain representation, join labour unions, and bargain collectively. Workers must be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.

#### **4.8 *Working Hours, Wages and Benefits***

Suppliers must comply with all applicable laws in the jurisdiction(s) of production and provision of services with respect to hours of work, wages

and benefits. Workers must receive at minimum the national or international standards wage whichever is higher, for wages and benefits within the country of production.

#### **4.9 *Indigenous Relations***

EPCOR operates in areas near or within Treaty territories and established or asserted traditional lands of Indigenous Peoples in Canada and the United States. Suppliers are expected to share in EPCOR's commitment to develop mutually beneficial business relationships with Indigenous Nations, communities, and businesses where it operates and to provide Indigenous businesses with equitable opportunities to work with them.

#### **4.10 *Confidential Information***

Suppliers must protect EPCOR sensitive information against theft, loss, destruction, unauthorized access/release or misuse. Except as required by law, Suppliers must not disclose EPCOR sensitive information to anyone outside EPCOR, without prior written approval from EPCOR. Suppliers must not use EPCOR sensitive information for any improper purpose. This applies even after the Supplier's contract is complete.

Suppliers must protect EPCOR's intellectual property such as copyrighted information, trademarks and logos, patents, and trade secrets against loss or infringement, and use them only with prior approval from EPCOR.

Suppliers must promptly report any confidential or sensitive information that they believe has been disclosed and any device that is lost or stolen so that appropriate steps can be taken by EPCOR.

#### **4.11 *Communication***

Suppliers must have permission from EPCOR Communications & Public Engagement before releasing for publication any information in respect of business relations with EPCOR or speaking as an EPCOR Supplier in any public forum. This includes presentations to industry, community or business groups and/or media/social media forum or with a media representative.

## 5.0 Reporting Related to this Supplier Code

Suppliers are expected to report any violation, including potential or suspected violations, of this Supplier Code of Conduct to EPCOR promptly, truthfully and in good faith. If a Supplier fails to report a violation it knows to have occurred, then the Supplier will have violated this Supplier Code of Conduct.

## 6.0 Questions

The Supplier Code of Conduct is not a complete guide to every legal or ethical issue that a Supplier or Supplier's Representatives may encounter. It is also not a summary of all the applicable laws or EPCOR policies or procedures that may apply in a given situation. If questions arise about the interpretation of this Supplier Code of Conduct, Suppliers should contact:

- Your Supply Chain contact
- EPCOR Supply Chain general mailbox: [scmprocurement@epcor.com](mailto:scmprocurement@epcor.com)

For Ethics related matters:

EPCOR Ethics Officer:

Ethics Hotline: 1-888-EPRITE1 (1-888-377-4831)

Email: [eprite1@epcor.com](mailto:eprite1@epcor.com)

Jason Harley

Ethics Officer, Canada and US

Phone: 587-489-6015

2000-10423 101 Street NW

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Fax: 780-412-3192