



BUSINESS CONDUCT AND ETHICS EXPECTATIONS FOR SUPPLIERS AND SUBCONTRACTORS

The purpose of this Business Conduct and Ethics Expectations for Suppliers and Subcontractors document is to outline the ethical and business standards that Archmill House Inc. and its subsidiaries and affiliates ("Archmill") encourages its suppliers and subcontractors to uphold. These standards promote a culture of integrity, responsibility, fairness and respect for all stakeholders involved in our projects. We are committed to working with suppliers and subcontractors who share our values and uphold the highest standards of business conduct and ethics.

1 Health, Safety and Environmental

We expect our suppliers and subcontractors to demonstrate their full commitment to health, safety and the environment. The health and safety of our employees and all personnel associated with our project is our highest priority. Our suppliers and subcontractors are expected to:

- provide a safe and healthy work environment that supports accident prevention, minimizes exposure to health risks, is in compliance with applicable workers health and safety laws and policies, and minimizes harmful impacts to the surrounding community.
- Apply safe work practices (including regulatory and contract-specific requirements) to all their activities and instill safety in every aspect of their work processes and in the attitude and behaviour of all their workers.
- Conduct their operations in an environmentally responsible manner and in accordance with applicable environmental laws.

2. Human Rights and Employment Practices

The welfare of the workers of our suppliers and subcontractors is critical to us successfully completing our project. Our suppliers and subcontractors are expected to:

- Support and respect human rights and avoid complicity in human rights abuses.
- Perform work without the use of forced, compulsory, bonded, or indentured labour, including without limitation the use of any persons by way of child labour and forced labour, as defined under section 2 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* in Canada.
- Never use misleading or fraudulent practices during the recruitment of employees or offering of employment.
- Treat all their workers with dignity, respect, and fairness,
- Conduct all their operations in a socially responsible, non-discriminatory manner and in accordance with applicable laws including those associated with equal opportunity, child labour, forced or compulsory labour, working hours, wages and benefits, freedom of association, data privacy, and harassment-free environment.

3. Subcontractor Oversight

Suppliers and subcontractors are responsible for ensuring that any sub-subcontractors they engage meet the same ethical, safety, and legal standards outlined in this policy. The following expectations apply:

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- Suppliers and subcontractors must perform appropriate due diligence on any sub-subcontractors they hire, ensuring they adhere to the same ethical standards and practices.
- Suppliers and subcontractors must ensure that all sub-subcontractors comply with these standards, including all health, safety, and labour standards.

4. **Confidentiality and Data Protection**

Suppliers and subcontractors must respect and maintain the confidentiality of any proprietary or confidential information received from Archmill, its clients, or other partners. This includes:

- Safeguard sensitive information and comply with applicable privacy laws, including the *Personal Information Protection and Electronic Documents Act* (PIPEDA) in Canada.
- Suppliers and subcontractors may be required to sign agreements as part of their engagement with Archmill.

5. **Financial and Operation Controls**

Our suppliers and subcontractors are expected to:

- Keep accurate, complete, fair, timely, transparent, and understandable financial and operational books, records, and accounts, and a system of effective internal controls.
- Create, retain, and dispose of business records in accordance with applicable legal and contractual requirements.
- Keep accurate and complete records prepared for the company, including records of work time and expenses.

6. **Conflicts of Interest, Gift, Entertainment, and Business Courtesies**

Our suppliers and subcontractors, their employees, and their family members must not receive improper benefits through their relationship with our company, our clients or our projects or allow other activities to conflict with acting in the best interests of our company, our clients or our projects. Our suppliers and subcontractors are expected to:

- Limit promotional items or entertainment involving our employees, to common business courtesies, within accepted business practices and never with the intent to improperly influence a business decision or create a potential conflict of interest or the appearance of impropriety.
- Disclose any potential conflict of interest to the company for review prior to entering into any business transactions.

7. **Improper Payments**

We maintain a zero tolerance for bribery and expect our suppliers and subcontractors to do the same. Bribery is directly or indirectly giving or promising to give anything of value to improperly influence actions of a third party. Bribes may include money, gifts, travel expenses, hospitality, vacations, expenses, below-market loans or products, reciprocal favours, political or charitable contributions, or any direct or indirect benefit or consideration.

8. **Trade Controls**

Our suppliers and subcontractors are expected to:

- Know and comply with the export controls, economic sanctions, and anti-boycott laws applicable to their work with and for the company.
- Never participate in boycotts or other restrictive trade practices prohibited or penalized under Canadian or applicable local laws.

9. **Money Laundering Prevention**

Our suppliers and subcontractors are expected to follow applicable laws that prohibit money laundering and require the reporting of cash and other suspicious transactions.

10. **Competing Fairly**

We believe in the free market system where merit, quality, price, and other objective factors determine who succeeds and who fails. Our suppliers and subcontractors are expected to:

- Compete honestly and fairly.
- Comply with applicable antitrust and competition laws.
- Never participate in anti-competitive practices such as price fixing or bid rigging.

11. **Commitment to Positive Engagement**

We are committed to maintaining a positive and professional relationship with our suppliers and subcontractors, both during and after our collaboration. We strive to always speak respectfully and constructively about one another, ensuring that our actions and words reflect the integrity of our working relationship. Both parties agree to avoid making any negative or misleading statements that could harm each other's reputation or business. This shared respect is fundamental to a successful and enduring relationship.

12. **Reporting concerns and whistleblower policy**

Our suppliers, subcontractors, and their employees should promptly report any business conduct or ethics concerns which may involve or affect our company, our clients or our project, whether or not the concern involves the supplier or subcontractor (collectively, a "Concern"), by contacting their Archmill representative.

Should that not be possible or, if they do not feel comfortable doing so, they may contact Archmill's legal department via email at: legal@archmillhouse.com.

13. **Enforcement and Next Steps**

We encourage open communication and transparency regarding any concerns regarding the contents of this document. In cases where a supplier or subcontractor does not meet the standards outlined in this document, Archmill will work collaboratively with them to address the issue. Depending on the situation, actions may include discussions, corrective measures, or, if necessary, a re-evaluation of the business relationship to ensure alignment with Archmill's values and expectations.

14. **Conclusion**

Archmill is committed to upholding the highest standards of business conduct, ethics, and sustainability. By establishing clear expectations for our suppliers and subcontractors, we ensure that all parties work together to build strong, ethical, and successful relationships that benefit everyone involved in our projects.