



Supplier Code of Conduct  
Last Revised: April 29, 2025

Reviewed by:  
Director of Purchasing  
  
Approved by:  
President

Maksteel Holdings ULC (“Maksteel”), is committed to conducting business in an ethical, legal, and socially responsible manner. The strength of Maksteel’s business and reputation is based not solely upon its conduct, but also on the behavior of those with whom Maksteel conducts its business.

Maksteel’s supply chain is a critical part of the company and plays an important role in its ongoing success. Maksteel aspires to work with suppliers who share its core beliefs and values and who demonstrate a commitment to protecting its confidential information and trade secrets.

The *Supplier Code of Conduct* (“Code”) reflects the core values, beliefs and business practices of Maksteel and has been prepared to convey to its suppliers, contractors, consultants, agents and other suppliers of goods and services (collectively, “Suppliers”) Maksteel’s expectations when conducting business with, for and on behalf of Maksteel.

The *Code* forms part of all agreements between Maksteel and its Suppliers. Suppliers are required to comply with this *Code* and to ensure that its employees and representatives understand and comply with this *Code*. Failure to adhere to this Code may negate the terms of the supplier relationship and any related agreements.

### **Maksteel’s Core Values and Business Practices Compliance with Laws**

Suppliers must operate their businesses in full compliance with all applicable laws, codes, rules and regulations of the countries, provinces, territories, states, regions, and municipalities in which they operate.

### **Ethical Business Conduct**

Suppliers are expected to conduct all business transactions with integrity and fairness. Giving or receiving any kickbacks, bribes or other similar payments is prohibited.

### **Antitrust/Competition Law**

Suppliers must not engage in any collusive bidding, price fixing or other unfair trade practices and will comply with all applicable competition/antitrust laws and other laws intended to promote free and fair competition.

**Labour Practices**

- Suppliers must have in-place or develop policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains.
- Suppliers are prohibited from using any form of child labour. Only workers over the age of 16 or over the legal minimum age, if higher, may be employed.
- Forced labor in any form is prohibited, including slave, prison, indentured or bonded labour.
- Wages and benefits shall meet, at a minimum, legal and industry standards.
- Working hours and compensation for overtime must be in accordance with appropriate legislation and collective agreements, if applicable.
- Suppliers must recognize and respect the right of workers to associate freely, conduct collective bargaining or organize, as permitted by applicable laws, and to raise employment issues with their employer without fear of retribution.

**Discrimination**

Suppliers must not discriminate based on the prohibited grounds of race, color, religion, nationality, gender, ethnicity, age, marital status, creed, sexual orientation, political beliefs, pregnancy, disability, or other basis prohibited by law.

**Harassment**

Suppliers must provide a work environment that is free from any form of harassment, including verbal, physical or sexual. Workers must be treated with respect and dignity.

**Environment**

Suppliers will meet or exceed all environmental standards required by applicable laws, codes, and regulations. Suppliers will maintain and provide a safe and healthy work environment for all employees, keep the work environment free from recognized hazards and ensure compliance with all applicable laws regarding working conditions, health, safety, and sanitation.

**Confidentiality**

Product and business information, know-how, trade secrets, technology, and other confidential and proprietary information (collectively, “Confidential Information”) are vital assets of Maksteel that must be protected by Suppliers. Suppliers are required to sign Maksteel’s standard non-disclosure agreement.



Suppliers are required to maintain and comply with the following controls and procedures intended to protect Maksteel's Confidential Information:

#### Security

- Suppliers must have a system to restrict access to its facilities to employees only and a formal site visitor process.
- Suppliers must control the use of cameras and other electronic recording devices in production areas.

#### Document Management

- Intellectual Property sensitive Maksteel documents, including specifications, algorithms, drawings, and blueprints (collectively, "Documents"), must be restricted to employees on a need-to-know basis.
- All Maksteel identifying markers (i.e., Maksteel logo, part numbers, project numbers or names, or other specific identification etc.) in any Document must be only made visible or available to employees who have a need to know for the function of their job. Otherwise, such markers must be removed or covered.
- Documents must be filed or stored in locked areas with restricted access.
- Documents must be shredded or otherwise destroyed after use.
- Documents may not be disposed of in garbage bins accessible by the public.
- Suppliers must control access to, copying (i.e. to memory sticks, external hard drives, etc.) and printing of electronic copies of Documents.
- Suppliers must control the emailing of Documents internally and externally.
- Suppliers must have a formal process for destroying electronic copies of Documents.

#### Conflict of Interest

- Suppliers will not solicit for hire any Maksteel employees while in a business relationship with Maksteel and for a period of one year after the end of the business relationship.
- Suppliers will not solicit business from Maksteel's customers or engage in business with our competitors using Confidential Information gained during our business relationship.



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### Demonstration of Compliance

- The principles set forth above are part of all agreements between Maksteel and its Suppliers.
- Suppliers must be able to demonstrate compliance with this *Code* at the request and to the satisfaction of Maksteel.
- Maksteel routinely assesses Suppliers' compliance with the *Code*, including on-site visits, meetings, and discussions with Supplier's employees upon reasonable notice.
- Suppliers are required to provide reasonable cooperation to Maksteel during on-site visits.
- If a Supplier fails to comply with any aspect of this *Code*, the Supplier is expected to implement corrective actions. Maksteel reserves the right to terminate an agreement with any Supplier that cannot demonstrate compliance with this *Code*.

### Acceptance

We agree to the terms of this *Code* and have the authority to ensure \_\_\_\_\_  
(print company name)  
and its affiliates adhere to the *Code*.

Name & Title (print): \_\_\_\_\_  
(CEO or Designate)

Signature: \_\_\_\_\_

Date: \_\_\_\_\_