

	Purchasing	Approved by	President
	<b>SUPPLIER CODE OF CONDUCT</b>	Review Date	February 2026

Maksteel Holdings ULC (“Maksteel”), is committed to conducting business in a lawful, professional and ethical manner.

The *Supplier Code of Conduct* (“Code”) reflects the core values, beliefs and business practices of Maksteel. The *Code* forms part of all agreements between Maksteel and its Suppliers, their employees, their contractors, and subcontractors. Suppliers must meet the expectations in this Code themselves, and share them with their own suppliers so they are communicated through the supply chain.

Maksteel encourages suppliers to work together with Maksteel and other supply chain partners to identify challenges and develop improvements.

### **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. In jurisdictions where legal requirements are less stringent than this Code, suppliers must meet the minimum expectations in this Code as a requirement of responsible sourcing.

### **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 must comply with all applicable competition/antitrust laws and other laws intended to promote free and fair competition.

### **Confidentiality**

Product and business information, trade secrets, technology, and other confidential and proprietary information of Maksteel must be protected. Suppliers should have a system to restrict access to its facilities and should implement controls to protect documents and information in all forms.

### **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.

### **Environment**

Suppliers should implement controls and initiatives to minimize the environmental impact of their operations, and shall comply with application environmental laws, codes, and regulations.

### **Health and Safety**

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 health and safety laws, regulations, policies, and procedures.

### **Harassment**

Suppliers must provide a work environment that is free from any form of harassment, including unwelcome conduct and vexatious behaviour. Workers must be treated with respect and dignity.

**Human Rights**

Suppliers must not discriminate based on the protected grounds of age, ancestry, colour, race, citizenship, ethnic origin, place of origin, creed, disability, family status, marital status, gender identity, gender expression, record of offences, sex, and sexual orientation.

**Forced Labour and Child Labour**

Suppliers must have policies and procedures for identifying and prohibiting the use of forced labour and child labour in their own activities and throughout supply chains.

Forced labour in any form is prohibited, including slave, prison, trafficked, indentured or bonded labour. Suppliers must ensure that all employees are of legal working age and are not subject to any form of exploitation.

Wages, benefits, and working hours shall meet minimum, legal, and industry standards, and comply with applicable collective agreements. 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.

**Grievance Mechanism**

Suppliers must provide and maintain grievance mechanisms for workers to raise issues without fear of retaliation. These should allow for anonymous submissions.

Suppliers will not solicit business from Maksteel's customers or engage in business with our competitors using confidential information gained during the business relationship.

**Demonstration of Compliance**

The principles set forth above are part of all agreements between Maksteel and its Suppliers.

Maksteel reserves the right to terminate an agreement with any Supplier that cannot demonstrate compliance with this Code to the satisfaction of Maksteel.