



SUPPLIER CODE OF CONDUCT

(January 18, 2024)

Introduction

Alberta Tubular Products Ltd. ("**ATP**") is committed to a high standard of ethical conduct and expect our business partners to share those same high standards and to conduct business in a manner that aligns with our values. ATP has developed this Supplier Code of Conduct ("**Code**") to clarify ATP's requirements of its Suppliers in this regard.

This Code is applicable to those that provide goods and services whether directly or indirectly ("**Suppliers**").

Health and Safety

ATP is committed to ensuring the safety and well-being of our employees, Suppliers and the communities we serve. ATP expects our Suppliers to share this commitment and to:

- Provide their employees with a safe and healthy work environment,
- Take proactive measures to minimize potential risk of incidents and hazard exposure, and
- Meet or exceed all regulatory safety and health requirements applicable where the Supplier operates. In cases where ATP exceeds these regulatory requirements, when performing work on our behalf or at our sites, suppliers are expected to align to our minimum standards.

Discrimination, Harassment and Workplace Violence

ATP is committed to providing a workplace that is healthy, comfortable, and free from intimidation, hostility, violence or other offenses which might interfere with work performance and expects our Suppliers to do the same.

Suppliers must prohibit discrimination based on legally protected status, including but not limited to race, religious beliefs, colour, place of origin, gender, gender expression, sexual orientation, mental or physical disability, ancestry, marital status, family status or any other classification protected under applicable laws.

Discrimination, harassment or workplace violence of any kind will not be tolerated.

What is Discrimination? Discrimination is any unjust practice or unfair behaviour, whether intentional or not, based on the race, religious beliefs, colour, place of origin, gender, gender expression, sexual orientation, mental or physical disability, ancestry, marital status, family status or source of income or an individual or group, which has a negative effect on that individual or group. Discrimination is prohibited by ATP.

What is Harassment? Harassment is any single incident or repeated incidents of objectionable or unwelcome verbal, written, or physical conduct by a person that the person knows, or ought reasonably to know, will or would cause offence or humiliation to another. Harassment can take many forms and generally has the overall effect of creating an intimidating, hostile, or offensive work environment; interfering with an individual's work performance; adversely affecting an individual's work relationship; and/or denying an individual dignity and respect. Harassment may result from one incident or a series of incidents and may include, but is not limited to: words, actions, signs, jokes, pranks, intimidation, physical contact, or violence. Harassment also includes:

- Sexual harassment, i.e. unwelcome sexual advances, requests for sexual favors, or any other unwelcome verbal, written, or physical contact of a sexual nature that prevents an individual from effectively performing the duties of their position or creates an intimidating, hostile, humiliating or offensive working environment, or when such conduct is made a condition of employment or compensation, either implicitly or explicitly.
- Bullying, i.e. repeated, persistent, continuous behavior that is usually associated with a power imbalance, where the victim is made to feel inferior. Workplace bullying includes, but is not limited to, silent treatment, isolation, starting or encouraging rumours, excessive or unjustified criticism, withholding job related information or job responsibility or deliberate interference with the performance of job responsibilities.

Harassment in all forms—including sexual harassment and bullying—is prohibited by ATP.

Human Rights and Equity, Diversity and Inclusion

ATP is committed to treating all employees and Suppliers fairly and without regard to race, colour, ancestry, place of origin, religious beliefs, gender, gender identity, gender expression, age, physical or mental disability, marital status, family status, source of income, sexual orientation or any other ground prohibited by federal or provincial law and expects all Suppliers to do the same.

Suppliers must support legislative efforts to protect and enforce human rights.

Forced or Child Labour

ATP is opposed to the use of forced labour or child labour and expect Suppliers to commit to the same standard of conduct. Suppliers are expected to be able to demonstrate that they do not use forced labour or child labour in the production of goods for ATP or anywhere in their supply chain. Suppliers are encouraged to have proper policies and take adequate measures, including exercising reasonable due diligence as required, to prevent the use of forced labour or child labour in their operations and supply chains. As part of ATP's commitment to ethical business practices, all forms of forced labour and child labour are prohibited.

Suppliers must operate in compliance with all applicable Federal and Provincial laws and regulations, including the *Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Compensation, Benefits and Working Hours

Suppliers must ensure that all applicable labour and employment laws are followed, and ensure that all working conditions, including but not limited to, wages and hours of work are respected and adhered to at all times.

Freedom of Association

In accordance with local laws, Suppliers shall recognize their employees' right to freedom of association, and the rights to collective bargaining and to form and join trade unions.

Anti-Trust and Fair Competition

ATP is committed to the principles of fair competition everywhere ATP operates. Suppliers must comply with all applicable antitrust and competition laws. These laws are designed to protect and promote fair competition. Suppliers shall not make, and are prohibited from making, formal or informal agreements – whether successful or not – with competing companies that attempt to unlawfully restrict trade.

Customs and Trade

Suppliers must comply with all applicable laws regulating trade, as well as local import and export laws and regulations.

Suppliers must also ensure the appropriate classification of supplied materials and communicate it accurately to government officials and ATP.

Conflicts of Interest

Suppliers must disclose any relationships and/or interests (financial or otherwise) that might represent an actual conflict of interest or even the appearance of a conflict of interest with ATP.

Anti-Corruption and Anti-Bribery

Suppliers must ensure that all interactions with and requests to government officials and business partners are based on legitimate grounds and do not include attempts to improperly influence the other person's decision. This includes compliance with all applicable anti-corruption and anti-bribery laws in any jurisdiction in which Suppliers do business, noting that this sometimes includes foreign and local laws.

Anti-corruption laws prohibit bribing anyone, including government officials and business partners, by offering anything of value, either directly or indirectly through a third party, in an attempt to improperly obtain or retain business or a business advantage.

Generally speaking, a bribe is giving, offering or authorizing something of value to an individual with the intent of obtaining an improper benefit. A bribe can take many forms, including cash and cash equivalents, gifts, entertainment, meals, travel, below-market loans, preferential hiring, favours and political and charitable donations.

No payment, gift or favour shall be made to any person in a position of trust or public responsibility, such as government officials or personnel, with intent to induce them to violate their duties or to obtain favourable treatment for the Supplier or ATP in the negotiation or the award of contracts or otherwise. Payments to government officials and personnel (including officials and personnel of government owned and controlled entities and enterprises), except as specifically authorized by law, or gifts of substantial value or lavish entertainment, regardless of motive, are viewed by ATP as improper and not permitted.

Confidential Information or Proprietary Information

Suppliers shall not disclose any confidential information or proprietary information to any third party, without the approval of their ATP business contact who shall consult with a member of ATP's Legal Department.

Confidential and proprietary information includes, but is not limited to, all non-public information, ATP's and its customers' intellectual property, trade and business secrets, strategy, reports, customer and supplier lists, employee data market plans, contracts, bids, quotes and pricing information.

No Retaliation

Suppliers shall not permit retaliation of any kind by or on behalf of themselves or their employees against:

- Good faith reports of potential violations of this Code or violation of the law; or
- Cooperation in an investigation by a governmental authority, itself, or by ATP.