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# Code of Conduct for Suppliers of Goods and Services

# Code of Conduct for Suppliers of Goods and Services

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## Contents

1.	Our commitment.....	3
2.	Scope.....	3
3.	Applicable laws and regulations.....	3
4.	Management and compliance.....	3
5.	Climate and environment.....	4
5.1	Climate.....	4
5.2	Environment and resource efficiency.....	4
5.3	Materials and minerals.....	4
6.	Human and labour rights.....	5
6.1	Human rights due diligence.....	5
6.2	Forced labour and modern slavery.....	5
6.3	Child labour.....	5
6.4	Wages, working hours and employment terms.....	6
6.5	Freedom of association and collective bargaining.....	6
6.6	Non-discrimination and respectful workplace.....	6
6.7	Grievance mechanisms and non-retaliation.....	6
6.8	Remedy and cooperation.....	6
7.	Health and Safety.....	6
8.	Business ethics and compliance.....	7
8.1	Anti-corruption and bribery.....	7
8.2	Sanctions, export control and trade compliance.....	7
8.3	Fair competition and antitrust.....	7
8.4	Conflicts of interest.....	8
8.5	Financial integrity and accurate records.....	8
8.6	Confidentiality and data protection.....	8
9.	Raising concern and whistleblowing.....	8
10.	Consequences of non-compliance.....	8
11.	Acceptance by Supplier.....	10

# Code of Conduct for Suppliers of Goods and Services

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## 1. Our commitment

Corvus Energy is committed to acting in a responsible, ethical and sustainable manner and to complying with all applicable legal requirements wherever we operate. We align our business conduct with internationally recognized standards and principles, including:

- the UN Guiding Principles on Business and Human Rights
- the OECD Guidelines for Multinational Enterprises
- the ILO Declaration on Fundamental Principles and Rights at Work

We expect this commitment to be reflected in our supply chain.

The principles and requirements set out in this Supplier Code of Conduct represent expectations that suppliers must comply with. The Code shall be read together with the contractual terms agreed between Corvus Energy and the supplier, which may contain additional or more specific requirements.

## 2. Scope

The requirements set out in this Code constitute standards and apply to all suppliers and their employees, temporary workers, subcontractors and others acting on behalf of the supplier in connection with deliveries to Corvus Energy.

Suppliers are required to comply with these requirements within their own operations and to take appropriate measures to ensure that the principles of this Code are respected in their supply chains. The nature and extent of such measures shall be determined using a risk-based and proportionate approach, taking into account the supplier's role and risk exposure.

## 3. Applicable laws and regulations

Suppliers shall comply with all applicable laws and regulations in their country of incorporation, the countries where they operate, and the countries where goods or services are delivered.

In addition, suppliers are expected to respect internationally recognized standards and principles for responsible business conduct, including:

- the UN Guiding Principles on Business and Human Rights
- the ILO Core Conventions
- the OECD Guidelines for Multinational Enterprises

Where differences exist between applicable laws, this Supplier Code of Conduct and/or contractual requirements, suppliers shall follow the strictest applicable requirement that applies to the goods or services supplied to Corvus Energy under the business relationship, to the extent permitted by law.

## 4. Management and compliance

Suppliers shall have and enforce appropriate policies, procedures, and management systems, including risk assessments, controls, training and resources to meet this Code. Suppliers shall monitor compliance and drive continuous improvement.

Where a supplier does not yet fully meet one or more of the requirements set out in this Code, the supplier shall inform Corvus Energy and provide a plan describing the actions to be taken and the expected timeline for achieving compliance.

Corvus Energy reserves the right to conduct audits, including on-site inspections, either directly or through third parties, to assess whether and how suppliers meet the requirements of this Code.

# Code of Conduct for Suppliers of Goods and Services

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## 5. Climate and environment

Suppliers shall conduct their operations in a manner that minimizes negative environmental impacts and contributes to the transition towards a low-emission and resource-efficient economy.

Suppliers shall comply with applicable environmental laws and permits and apply a precautionary approach to environmental challenges, including through systematic risk assessment and risk management related to their operations, products and services.

### 5.1 Climate

Suppliers shall establish and maintain processes to collect, calculate, track and document climate-related data across their operations and value chain.

At a minimum, such data shall include:

- energy consumption, and
- greenhouse gas emissions

Suppliers shall have the capability to provide climate-related data to Corvus Energy upon request. Corvus Energy may specify the scope, level of detail, methodology and format of data requested, taking into account the supplier's size, role and risk exposure.

Where requested by Corvus Energy suppliers shall be able to provide product- or system-level climate and environmental information, including Environmental Product Declarations (EPDs), life-cycle assessments (LCAs) or equivalent documentation prepared in accordance with recognized standards.

Such information may be requested to support Corvus Energy's climate reporting, customer requirements, product or system footprint calculations, environmental assessments, or other climate-related analyses.

Where required to comply with applicable carbon border adjustment or similar climate-related regulations, suppliers shall cooperate with Corvus Energy by providing relevant emissions data and documentation upon request. This includes, where applicable, data necessary to support reporting obligations under the EU Carbon Border Adjustment Mechanism (CBAM) or equivalent regulatory frameworks.

### 5.2 Environment and resource efficiency

Suppliers shall establish and maintain processes to identify, manage and monitor environmental impacts associated with their operations and shall comply with applicable environmental laws and permits.

Suppliers shall implement appropriate measures to prevent pollution and minimize negative environmental impacts related to emissions to air, water and soil.

At a minimum, suppliers shall have processes in place to manage and document:

- waste generation, handling, treatment and disposal,
- material use, material efficiency and recycling, and
- safe handling, storage and disposal of chemicals and hazardous substances.

Suppliers shall have the capability to provide environmental data or documentation to Corvus Energy upon request. Corvus Energy may specify the scope, level of detail and format of information requested, taking into account the supplier's size, role and risk exposure.

### 5.3 Materials and minerals

Suppliers shall conduct appropriate due diligence on the sourcing of materials and minerals, in line with recognized international standards and expectations for responsible supply chains.

At a minimum, suppliers shall have processes in place to:

# Code of Conduct for Suppliers of Goods and Services

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- identify materials and minerals used in products or components supplied to Corvus Energy,
- assess risks and adverse impacts associated with the sourcing and use of such materials and minerals,
- trace, document and maintain information on the origin and chain of custody and traceability systems for relevant materials and minerals, and
- maintain an up-to-date mapping of the relevant suppliers and manufacturers involved in the production of products or components supplied to Corvus Energy.

Suppliers shall support compliance with applicable battery and product-related regulations, including the EU Battery Regulation, by providing relevant product, sustainability, supply chain and traceability information upon request by Corvus Energy.

Upon request, suppliers shall provide data, documentation or standardized disclosures to Corvus Energy. Corvus Energy may specify the scope, level of detail, methodology and format of information requested.

This may include information on critical raw materials, hazardous substances and recycled content. Requests may include completion of recognized responsible-sourcing templates, such as the Conflict Minerals Reporting Template (CMRT), the Extended Minerals Reporting Template (EMRT), or equivalent templates, as well as documentation demonstrating compliance with applicable product-related substance regulations, such as, but not limited to, REACH and RoHS, including declarations, substance information and disclosures required under such regulations.

## 6. Human and labour rights

Suppliers shall respect internationally recognized human rights and labour rights and conduct their operations in a manner that respects the dignity, rights and safety of all individuals affected by their activities.

Suppliers shall avoid causing or contributing to adverse human rights and labour rights impacts and shall seek to prevent or mitigate adverse impacts that are directly linked to their operations, products or services through their business relationships.

### 6.1 Human rights due diligence

Suppliers shall carry out human rights due diligence in line with the OECD Guidelines for Multinational Enterprises, consistent with the UN Guiding Principles on Business and Human Rights.

This includes identifying, assessing, preventing, mitigating and addressing risks and adverse impacts related to human rights and labour conditions in their own operations and supply chains.

Suppliers shall maintain appropriate policies, processes and documentation to demonstrate how human rights and labour related risks and adverse impacts are identified and addressed.

Suppliers shall have the capability to provide relevant information or documentation to Corvus Energy upon request to support Corvus Energy's own due diligence and reporting obligations. This applies to both general information regarding the supplier's human rights due diligence approach and outcomes, and information relating to a specific product or service offered to Corvus Energy, including, where relevant, identification of suppliers and manufacturers involved in the production of such products or components.

### 6.2 Forced labour and modern slavery

Suppliers shall not use any form of forced, bonded or compulsory labour, nor engage in human trafficking.

Workers shall be free to leave their employment upon reasonable notice. Suppliers shall not retain identity documents or require deposits as a condition of employment. Workers shall not be charged recruitment fees or related costs.

### 6.3 Child labour

Suppliers shall not employ child labour. No person under the age of 15, or a higher minimum age required by applicable law, shall be employed.

# Code of Conduct for Suppliers of Goods and Services

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Under no circumstances shall persons under the age of 18 perform hazardous work. Where child labour is identified, suppliers shall implement remediation measures that are in the best interests of the child.

## 6.4 Wages, working hours and employment terms

Suppliers shall provide wages and benefits that comply with applicable laws and regulations and shall ensure that wages are paid regularly, on time and in full.

Working hours, including overtime, shall not be excessive and shall comply with applicable legal requirements.

Workers shall be provided with written employment terms in a language they understand.

## 6.5 Freedom of association and collective bargaining

Suppliers shall respect workers' rights to freedom of association and collective bargaining, in accordance with applicable laws.

Where these rights are restricted by law, suppliers shall allow workers to freely elect their own representatives and engage in dialogue with management without fear of retaliation.

## 6.6 Non-discrimination and respectful workplace

Suppliers shall not tolerate discrimination, harassment, intimidation, degrading treatment or gender-based violence.

Employment decisions shall be based on qualifications, performance and experience, and not on personal characteristics protected by law.

## 6.7 Grievance mechanisms and non-retaliation

Suppliers shall have effective and accessible mechanisms in place for workers and affected stakeholders, including external and potentially affected stakeholders where relevant, to raise concerns or grievances related to human rights and labour conditions.

Retaliation against individuals who raise concerns in good faith shall not be tolerated.

## 6.8 Remedy and cooperation

Where adverse human rights or labour rights impacts are identified, suppliers shall enable or cooperate in remediation consistently with the UN Guiding Principles on Business and Human Rights.

## 7. Health and Safety

Suppliers shall ensure that all workers, including permanent employees, temporary workers, contractors and others who may be affected by their activities, have a safe and healthy working environment that meets all applicable health and safety laws and regulations.

Suppliers shall establish, implement and maintain appropriate organizational structures, procedures and controls for the effective management of health and safety risks and impacts in their operations. This shall include processes to identify, assess, avoid or mitigate and respond to health and safety hazards and risks, the implementation of effective preventive and protective control measures, and relevant training.

Suppliers shall provide workers with suitable job-related personal protective equipment free of charge, together with instructions for proper use, and shall ensure that such equipment is used as intended, properly maintained and replaced when necessary.

Suppliers shall track and document relevant health and safety performance data and statistics to support continuous improvement, including data on accidents, incidents, near-misses, lost-time injuries and occupational illnesses.

# Code of Conduct for Suppliers of Goods and Services

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Suppliers shall maintain relevant documentation and be able to provide information to Corvus Energy upon request to demonstrate compliance with this chapter.

## 8. Business ethics and compliance

Suppliers shall conduct their business in an ethical manner and in compliance with all applicable laws and regulations. Suppliers are expected to act with integrity and transparency in all business dealings related to Corvus Energy.

Suppliers shall have the capability to provide relevant information or documentation to Corvus Energy upon request to demonstrate compliance with the requirements of this chapter.

Suppliers are expected to act transparently and proactively engage with Corvus Energy where serious compliance risks related to the business relationship are identified.

Suppliers shall cooperate with Corvus Energy in good faith in connection with compliance-related inquiries, audits or investigations related to the business relationship.

### 8.1 Anti-corruption and bribery

Suppliers shall not engage in any form of bribery or corruption, including facilitation payments, whether directly or indirectly.

This includes offering, promising, giving, requesting or accepting any improper advantage or benefit to influence business decisions, secure improper advantages or obtain preferential treatment.

Suppliers shall not offer or provide, directly or indirectly, any bribe, kickback, gift, hospitality or other undue advantages to Corvus Energy employees, representatives, agents or others acting on behalf of Corvus Energy, nor to public officials or other third parties, in connection with the business relationship.

Suppliers shall promptly and without undue delay inform Corvus Energy if the supplier becomes aware of any actual or suspected breach of the requirements set out in this section, including if the supplier, any of its employees, agents or representatives has engaged in conduct that may constitute bribery or corruption in connection with the business relationship with Corvus Energy.

### 8.2 Sanctions, export control and trade compliance

Suppliers shall comply with all applicable sanctions, export control and trade compliance laws and regulations.

Suppliers shall not engage in business with sanctioned individuals, entities or jurisdictions, nor participate in activities that may directly or indirectly result in a breach of applicable sanctions or export control requirements.

Suppliers shall not take any action that could cause Corvus Energy to violate applicable sanctions or export control laws, including through the use of intermediaries or by circumvention of applicable restrictions.

Suppliers shall promptly inform Corvus Energy if the supplier becomes aware of any actual or suspected breach of applicable sanctions, export control or trade compliance laws that may affect or be related to the business relationship with Corvus Energy.

### 8.3 Fair competition and antitrust

Suppliers shall comply with applicable competition and antitrust laws and shall not engage in anti-competitive conduct. This includes, but is not limited to, price fixing, market sharing, bid rigging, abuse of dominant position or exchange of competitively sensitive information.

# Code of Conduct for Suppliers of Goods and Services

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## 8.4 Conflicts of interest

Suppliers shall avoid conflicts of interest that could improperly influence, or appear to influence, their relationship with Corvus Energy.

Any actual or potential conflict of interest related to Corvus Energy, including personal, financial or other interests, shall be disclosed to Corvus Energy without undue delay.

## 8.5 Financial integrity and accurate records

Suppliers shall maintain accurate, complete and reliable books, records and accounts in accordance with applicable laws and generally accepted accounting principles.

Suppliers shall not participate in money laundering, fraud or other financial crimes.

## 8.6 Confidentiality and data protection

Suppliers shall protect confidential information and personal data received from Corvus Energy and shall use such information solely for legitimate business purposes related to the contractual relationship.

Suppliers shall implement appropriate technical and organizational measures to protect information against unauthorized access, disclosure, loss or misuse.

## 9. Raising concern and whistleblowing

Suppliers shall have mechanisms in place that allow workers and other relevant stakeholders to raise concerns or report suspected misconduct, unethical behavior or breaches of this Supplier Code of Conduct without fear of retaliation or adverse consequences. Suppliers shall investigate reported concerns in good faith and take appropriate actions where breaches are identified.

In the context of the business relationship with Corvus Energy, suppliers and their employees are encouraged and expected to raise concerns relating to suspected or actual breaches of this Supplier Code of Conduct, or instances where Corvus Energy may not be acting in accordance with its own Code of Conduct, through Corvus Energy's whistleblowing channel, available at: <https://corvusenergy.com/my-voice>.

Suppliers shall cooperate with Corvus Energy in relation to concerns raised, investigations or follow-up activities connected to the business relationship and shall provide reasonable assistance in connection with any investigation related to reported concerns. Retaliation against individuals who raise concerns or report suspected or actual violations in good faith shall not be tolerated. Suppliers shall take appropriate measures to protect employees or contractors from any form of retaliation.

## 10. Consequences of non-compliance

To assess and verify compliance with this Supplier Code of Conduct, Corvus Energy may request relevant information or documentation from suppliers and, where appropriate, conduct reviews, audits or inspections, with reasonable notice and in accordance with applicable laws.

Suppliers are expected to cooperate with such activities and facilitate access to relevant information, personnel or documentation, as appropriate.

Failure to comply with this Supplier Code of Conduct may result in appropriate follow-up actions by Corvus Energy.

Depending on the nature and severity of the non-compliance, such actions may include requests for corrective actions, implementation of improvement measures, increased monitoring or audits, suspension of deliveries or termination of the business relationship in accordance with applicable contractual terms.

Where non-compliance is identified, suppliers are expected to cooperate with Corvus Energy in good faith to address the issue and, where relevant, implement corrective actions within a reasonable timeframe.

## Code of Conduct for Suppliers of Goods and Services

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In cases involving serious breaches, including but not limited to corruption, human rights violations, health and safety risks, sanctions breaches or other violations of law, Corvus Energy reserves the right to take immediate action.

# Code of Conduct for Suppliers of Goods and Services

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## 11. Acceptance by Supplier

By signing below, the Supplier acknowledges and accepts this Code and commits to continuous improvement, risk-based due diligence and cooperation with Corvus Energy in relation to evolving regulatory and customer requirements.

**Company Name:**

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**Address:**

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**Name:**

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**Signature:**

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**Title:**

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**Date:**

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