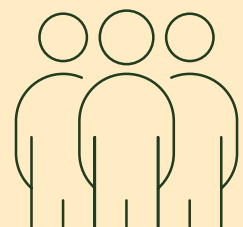


OnPath Supplier Code of Conduct

Supplier code of conduct

OnPath Energy Limited and its controlled subsidiaries (collectively OnPath Energy) are committed to conducting business activities with honesty and integrity and in compliance with applicable legal and regulatory requirements.



I. Introduction

OnPath Energy Limited and its controlled subsidiaries (collectively **OnPath Energy**) are committed to conducting business activities with honesty and integrity and in compliance with applicable legal and regulatory requirements.

We expect that anyone that provides goods or services directly or indirectly to OnPath Energy (**Suppliers**) adheres, as a minimum, to the same commitments to ethical business practice as set out in this Supplier Code of Conduct (**Code**), and to have the necessary policies and procedures in place to support such commitments within their supply chain.

If you have any questions regarding this Code, please contact OnPath Energy via email: procurement@onpathenergy.com.

II. Legal and Regulatory Compliance

OnPath Energy is part of wider Brookfield Renewable group which is subject to the supervision of numerous regulators and reporting requirements.

OnPath Energy expects all Suppliers to:

- a. understand and comply with applicable laws and regulations;
- b. maintain all appropriate licenses, permits and other regulatory authorisations and requirements necessary to conduct the activities for which they have been hired by OnPath Energy; and

- c. upon reasonable request, promptly provide such information, access and cooperation as is reasonably necessary to support OnPath Energy's compliance with those reporting requirements.

III. Sustainability

Sustainability principles and values are embedded in all our operations. As such, we encourage our Suppliers to:

- a. familiarise themselves with OnPath Energy's OnPath Together policy and its requirements;
- b. have their own policies and programmes in place to maintain good relationships with local communities and stakeholders;
- c. have strategies in place to reduce their environmental impact, including measuring, reducing, and, as may be requested by OnPath Energy or required by law, reporting greenhouse gas emissions. OnPath Energy may actively engage with individual Suppliers to encourage these practices, set robust emission reduction targets, and track progress against environmental commitments;
- d. assess the availability of, and where feasible use, equipment and components of high durability and recyclability and that are easy to dismantle and refurbish, incorporating recycled components into the manufacturing process when viable;
- e. use resources responsibly and conduct operations with the aim to protect and preserve the environment. As appropriate, Suppliers facilities must have suitable plans for notifying local authorities in the case of accidental discharge or release of hazardous materials or any other environmental emergency;

- f. where adverse impact(s) directly linked to the Supplier's operation, products or services could not be mitigated or were unforeseen, collaborate with relevant stakeholders to remedy impacts.

IV. Integrity, Ethics and Anti-Corruption

OnPath Energy has a zero-tolerance approach towards illegal activities, including bribery and corruption, money laundering, tax evasion and sanctions and export control violations. We view the prevention of OnPath Energy being involved in, or facilitating, any illegal activities as integral to our business.

OnPath Energy has in place an Anti-Bribery and Anti-Corruption Policy and ABC programme designed to prevent employees and Suppliers from paying or receiving bribes or engaging in corrupt activities. We expect our Suppliers to share these principles and uphold our standards and therefore have and maintain policies and procedures to ensure that their representatives understand and adhere to the same standards.

OnPath Energy expects all Suppliers to:

- a. comply with all applicable anti-bribery, anti-corruption, and anti-money laundering laws;
- b. comply with all applicable competition and antitrust laws;
- c. refrain from offering or making any payments of money or anything of value to any public officials, political parties, candidates for public office, charities or other business-related parties that could be considered to improperly influence any act or decision of such official or person for the purpose of promoting the business interests of OnPath Energy in any respect, or otherwise in violation of applicable law. This includes a prohibition on "facilitation" payments of any kind;
- d. refrain from entering into business relationships or transactions with OnPath Energy personnel in an individual capacity or in any way that could create the appearance of a conflict of interest or impropriety;
- e. where applicable, disclose to OnPath and appropriately manage any actual or potential conflicts of interest arising due to either personal or business relationships;
- f. deal fairly and honestly in their activities, behave in an ethical manner and not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts, or any other unfair practice;
- g. comply with all applicable tax laws and refrain from knowingly facilitating a person committing fraudulent evasion of tax;
- h. confirm that neither they nor any related company (including parent companies) have been: (i) named or listed as the target of any economic, trade, or transactional sanctions imposed by any governmental agency; or (ii) otherwise banned or blocked pursuant to any laws that are enforced or administered by any governmental agency and promptly inform OnPath Energy if this changes;
- i. comply with all applicable trade restrictions and sanctions laws, and not knowingly employ or do business with anyone suspected of being connected with criminal or terrorist activities or who is the subject of applicable trade sanctions; and
- j. adopt and implement appropriate policies and exercise due diligence to ensure that minerals used in their supply chains originating from conflict-affected and high-risk areas have not directly or indirectly financed or benefited armed groups or other activities which may

contribute to human rights abuses or other violence. Any minerals (including but not limited to tantalum, tin, tungsten, and gold) originating in a conflict-affected and high-risk area shall be responsibly sourced in accordance with these requirements. Suppliers are encouraged to align their policies and due diligence with the OECD Due Diligence Guidance for Responsible Business Conduct, OECD Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas, and/or IFC Performance Standards, where high risk is present or where relevant.

V. Responsible Labour Practices

OnPath Energy requires that all workers are treated with dignity, respect and in accordance with applicable laws and in a manner that respects human rights.

We recognise our responsibility to ensure that our activities, and activities performed by our Suppliers, positively contribute to the communities in which we operate and align with internationally recognised human rights standards.

We therefore expect our Suppliers to respect human rights and maintain processes to identify and prevent adverse human rights impacts including modern slavery that could arise from their or their suppliers' operations.

OnPath Energy expects Suppliers to:

- a. familiarise themselves and comply with OnPath Energy's Human Rights policy and its requirements;
- b. provide a safe and secure workplace for employees, contractors, and representatives that complies with all applicable health and safety laws, regulations, and practices;
- c. provide fair compensation, fair benefits, overtime pay, time off, breaks, leave, and holidays in the context of local market factors that allows workers to cover their essential needs, at a minimum, comply with applicable laws and regulations, including those pertaining to withholding taxes, minimum wage, labour relations, insurance, health and occupational safety, and timely compensation. Wage deductions must never be used as a disciplinary measure;
- d. provide training as necessary to ensure personnel have the required skills and certifications to perform the assigned work;
- e. adhere to age-related standards set by the International Labour Organisation and not use child labour or any form of forced or involuntary labour, human trafficking, slavery, or servitude;
- f. provide workers with clear, documented employment terms and not withhold workers' documentation including identity or immigration documents;
- g. respect freedom of movement allowing workers to voluntarily leave work at any time or terminate their employment upon reasonable notice without penalty;
- h. provide a workplace free from discrimination and harassment, whether on the basis of gender, age, disability, ethnicity or cultural affiliation, sexual orientation, belief, educational background, or any other basis prohibited by applicable law;
- i. respect the right for freedom of association and/or collective bargaining unless restricted under local law, without fear of discrimination or reprisal; and
- j. provide fair and appropriate pay, benefits and working conditions.

VI. Workplace Health & Safety

OnPath Energy requires its Suppliers to assess potential hazards to its workers and provide a workplace that seeks to prevent injury and ill-health and, at a minimum:

- a. provide and maintain a clean, safe, and healthy working environment that complies with applicable laws, directives, and regulations, and minimises occupational hazards. Working conditions must include reasonable access to sanitary facilities, fire exits, potable water and sanitary food preparation, storage and eating facilities, and adequate lighting and ventilation;
- b. ensure that any Supplier-provided residential spaces are sanitary and safe, and equipped with adequate emergency egress, lighting, heat and ventilation, hot water for bathing, and reasonable personal space and entry/exit privileges;
- c. obtain, maintain and comply with all required health and safety permits;
- d. eliminate or control potential hazards through design, engineering, administrative controls, preventative maintenance and/or safe work procedures. When this is not possible, protect worker health through appropriate personal protective equipment;
- e. implement procedures and related measures designed to prevent injury to workers, including providing adequate work training and personal protective equipment as appropriate and safeguards against infectious disease;
- f. provide workers with appropriate workplace health and safety training in their language (or a language the worker can understand) for all identified workplace hazards that may be encountered in the course of their work;
- g. post required health and safety information in the work facility or a location identifiable and accessible by all workers;
- h. maintain reporting systems for workers to document, track and report health and safety hazards, incidents, and occupational injuries, and encourage workers to raise safety concerns without fear of retaliation or reprisal for so doing;
- i. enforce workplace health and safety rules, and promptly and suitably address workplace health and safety-related deficiencies, hazards, or risks; and
- j. promptly inform OnPath Energy of any material health and safety incidents that occur while performing services for, or delivering goods to, OnPath Energy or its projects.

VII. Confidentiality

Suppliers will protect personal, proprietary, and confidential information (**Confidential Information**), including information that they access, receive or process on behalf of OnPath Energy.

Suppliers must adopt and maintain processes to provide reasonable protections for such information and a degree of care that would apply to their own confidential information, but in any event, a reasonable degree of care.

VIII. Data Protection and Information Security

The safeguarding of confidential information is of paramount importance to OnPath Energy. OnPath Energy expects Suppliers to:

- a. comply with applicable laws and regulations, including those relating to the data protection, privacy, security or the processing of personal data and information (“Global Data Protection Laws”) and not take any action that would prevent OnPath Energy from complying with its obligations thereunder;
- b. provide services in accordance with an industry recognised information security framework and information security policy. Maintain appropriate administrative, IT, organisation and physical safeguards to preserve and protect OnPath Energy’s confidential information; and
- c. Suppliers must notify OnPath Energy immediately if any privacy or security breach affecting them has resulted or might result in loss of OnPath Energy’s confidential information.

IX. Business Continuity and Disaster Recovery

We expect our Suppliers to have adequate business continuity and disaster recovery plans in place designed in accordance with industry standards to maintain continuity of services to a reasonable degree after the occurrence of an event that results in an interruption or suspension of services. Upon request by OnPath Energy, Suppliers will disclose in reasonable detail and discuss the elements of their business continuity plans.

X. Insurance

Suppliers will maintain all required insurance coverage needed to provide services to OnPath Energy. Suppliers will upon request promptly provide documentation to OnPath Energy that demonstrates such insurance coverage is in place.

XI. No Publicity

Suppliers will not use OnPath Energy’s, or any of its projects’, names, logos or other proprietary trademarks in any public or promotional materials without the prior written consent of OnPath Energy.

Ethics Reporting Hotline

OnPath Energy maintains an Ethics Reporting Hotline for its employees, Suppliers, partners, and various other interested parties to anonymously report any concerns or raise any issues free of discrimination, retaliation or harassment pertaining to (i) accounting, auditing, or other financial reporting irregularities; (ii) unethical business conduct (including safety, environment, conflicts of interest, theft, and fraud); or (iii) violations of applicable law.

OnPath Energy’s Ethics Hotline may be accessed by telephone on 0808 189 0041 or by submitting an anonymous report online at <https://report.syntro.com/onpathenergy>. OnPath Energy will investigate all reports in compliance with applicable laws or as it otherwise deems necessary.

XII. Compliance with this Supplier Code of Conduct

Suppliers will ensure that their personnel, contractors, agents, and other representatives understand and comply with this Supplier Code of Conduct. We expect our Suppliers to share our commitment to the minimum standards and principles in this Code and to have their own internal policies and procedures in place to support and monitor their compliance with such commitment.

OnPath Energy reserves the right to monitor, assess and audit all Suppliers according to this Code. Where incorporated into any contract, this Code will survive the contractual term.

OnPath Energy expects that Suppliers will:

- a. promptly notify OnPath Energy as soon as it becomes aware of any actual or suspected breach of this Code;
- b. acknowledge that the contents of this Code are additional to and do not in any way affect or prejudice any of OnPath Energy's rights and/or remedies under any applicable agreement with Suppliers. In the event of any non-compliance with the requirements of this Code or breach of any applicable agreement, OnPath Energy reserves its rights and retains the sole discretion to exercise any rights under this Code, any relevant agreement and/or local laws and regulations. The failure or omission by OnPath Energy to insist upon strict performance and compliance with any provision of this Code shall in no way constitute a waiver of its right to do so; and

- c. cooperate with OnPath Energy to ensure its compliance with applicable laws and regulations. This includes responding to our reasonable requests for information, maintaining adequate documentation of compliance programmes and obtaining compliance certifications as reasonably requested.

In the event of any conflict or ambiguity between any provision of this Code and the provisions of any relevant agreement with any Supplier, the provisions of that agreement will prevail.

This Code is subject to modification from time to time. The latest version of this Code is available on OnPath Energy's website: [Our policies - OnPath Energy](#)