



Supplier Code of Conduct

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About this Supplier Code of Conduct

Altera Infrastructure is committed to legal, ethical, and responsible business. We expect our direct suppliers, contractors, and selected sub-suppliers (“Suppliers”) to share this commitment. This Supplier Code of Conduct (the “Code”) details the standards and principles to which all Suppliers must adhere when delivering goods and services to Altera Infrastructure.

Every Supplier must acknowledge and commit to adhering to the requirements set forth in the Code and must develop and implement a relevant management system, appropriate for an entity of their size and industry, to ensure compliance with legal requirements and the Code.

The requirements of “the Code” are in addition to any contractual obligations applicable to Suppliers according to agreements executed with Altera Infrastructure.

Suppliers must ensure that their own business partners, suppliers, and contractors agree to and comply with standards at least as stringent as those set forth in the Code.

In the event applicable laws, regulations, contractual requirements, or prevailing international standards address the same topics as the Code but are not in conflict, the most stringent standard shall apply. In the event the standards in the Code conflict with applicable laws or prevailing international standards, we expect our Suppliers to address such conflicts to us so we can work together to find the most appropriate course of action.

While the main objective of the Code is to drive positive business and procurement practices, in the event of severe violations we reserve the right to take responsive action in line with our legal and contractual rights.

Business ethics

We expect our Suppliers to conduct business in accordance with the highest standards of compliance and business ethics.

Compliance with law

Suppliers must comply with all applicable laws and regulations and must act in an ethical and responsible manner.

Anti-corruption

Suppliers must not engage in or knowingly benefit from corruption, extortion, bribery, or facilitation payments, and must maintain adequate procedures to ensure and document compliance with all applicable anti-corruption and anti-bribery laws and regulations.

Gifts and hospitality

Altera Infrastructure only permits the giving and receiving of gifts and hospitality that are appropriate in nature, reasonable in value, transparently exchanged and documented, and offered for a legitimate business purpose. Suppliers must not offer gifts or hospitality to Altera Infrastructure's employees, representatives, or partners that contravene these standards and must not solicit gifts or hospitality. Gifts and hospitality will never be offered or received in connection with contract bidding, negotiation, or award.

Conflicts of interest

Suppliers must maintain procedures to prevent improperly biased decision-making and shall inform Altera Infrastructure promptly of any actual or potential conflict of interest of which they become aware.

Competition

Suppliers must comply with applicable competition and anti-trust laws and regulations and must not engage in anti-competitive behaviour of any kind.

Foreign trade controls

Suppliers must comply with applicable laws and regulations restricting trade with countries, companies, and persons (sanctions) and must promptly inform Altera Infrastructure if they or any of their owners become the target of sanctions. Suppliers must comply with applicable laws and regulations restricting the transfer of goods, services, software, or technology between countries (export controls) and must inform Altera Infrastructure in writing in advance if the goods, services, software, or technology they deliver to Altera Infrastructure is regulated by export control laws or requirements.

Business ethics

Anti-money laundering

Suppliers must comply with applicable laws and regulations prohibiting money laundering and must maintain adequate procedures to prevent their financial transactions from being used by others to launder money.

Tax

Suppliers must comply with all applicable laws and regulations regarding payment of tax and must not take any action, directly or indirectly, that facilitates tax evasion.

Privacy

Suppliers must comply with all applicable laws and regulations regarding the collection, use, and retention of personal information, must maintain adequate internal technical and organisational measures to protect the security and confidentiality of personal information, and must ensure that personal data is deleted or anonymised once it is no longer needed for the purpose for which it was collected.

Confidentiality

Suppliers must comply with and maintain adequate procedures to protect the confidentiality and information security of business information received from Altera Infrastructure.

Health, safety and the environment

We expect our Suppliers to provide a safe and secure working environment and to conduct their business activities in a way that minimises negative environmental impacts.

Health and safety

Suppliers must comply with all applicable laws, regulations, and other requirements regarding workplace safety and the working environment and must implement effective health and safety management systems that support identification, monitoring, and mitigation of health and safety risks from their operations. Suppliers must further provide their workforce with personal protective equipment and health and safety training appropriate to the nature of work and must empower workers to report unsafe practices without fear of retribution.

Environmental impact

Suppliers must comply with all applicable environmental laws, regulations, and international standards and must maintain effective environmental management systems that support identification, monitoring, and mitigation of environmental risks from their operations. Suppliers must develop and deploy strategies to prevent accidental discharges to air and water, to reduce consumption of natural resources and waste production, and to prioritise recycling of waste that is produced. Suppliers must obtain and comply with all necessary environmental and discharge permits, approvals, and registrations.

Climate impact

Suppliers must commit to applying a precautionary principle approach regarding climate impact in their own operations. Suppliers must develop and deploy strategies and technology to improve energy efficiency, reduce fuel and power consumption, and reduce greenhouse gas emissions resulting from or related to their activities, including the accurate tracking and reporting of greenhouse gas emissions.

Working conditions and employment practices

We expect our Suppliers to provide a working environment where individuals are treated with dignity and respect.

Fundamental human rights

Suppliers must respect and adhere to internationally recognised labour and human rights standards, including as described in the United Nations Guiding Principles on Business and Human Rights (available at www.ohchr.org). Suppliers must undertake appropriate due diligence to ensure that such standards are respected in their business activities and across their full supply chain.

Prevention of forced labour and human trafficking

Suppliers must not use or benefit from any form of forced or involuntary labour in its workforce or supply chain. No worker should pay any form of recruitment or employment eligibility fees without proper compensation. Suppliers must not retain identity papers or work permits as a condition of employment and must prohibit any practice that would prevent or impede a worker from freely terminating their employment. Suppliers must prohibit any form of human trafficking or sexual services in connection with their operations.

Minority rights

Suppliers must pay special attention to the rights, requirements, values, and integrity of indigenous peoples and other minority groups affected by their operations and must take steps to mitigate negative impacts from their operations on such groups.

Security services

Suppliers must ensure that security guards operating at their premises act in accordance with internationally recognised human rights, including guidelines on the use of force.

Minimum age of labour

Suppliers must not use or benefit from any form of child labour in its workforce or supply chain. Suppliers must not engage workers below the age of 15 or the locally applicable minimum legal age, whichever is more stringent, and must ensure that workers under the age of 18 do not undertake night-shift work, overtime work, or work that is hazardous or harmful to their physical or mental development.

Equality and fair treatment

Suppliers must ensure fair and equal treatment for workers, including contract and migrant workers. Suppliers shall not engage in or permit any form of discrimination, including on grounds that are prohibited by applicable law. Suppliers must prohibit and take active steps to prevent harassment and abuse, including sexual harassment and abuse.

Working conditions and employment practices

Employment practices

Suppliers must comply with requirements regarding employment terms, minimum wages, overtime wages, legally mandated benefits, working hours, overtime, breaks, rest periods, paid sick leave, paid annual leave, and paid pregnancy and parental leave as established by applicable laws and regulations, international and industry standards, and relevant collective bargaining agreements. Suppliers must ensure that workers are engaged on the basis of a written contract in a language they understand and that is aligned to requirements of the Code as a minimum. Suppliers must establish fair and transparent disciplinary, grievance, and termination procedures.

Freedom of association

Suppliers must respect and shall not discourage or impede workers' rights to associate freely, join or not join trade unions and/or workers' councils, and engage in collective bargaining in accordance with applicable laws and international conventions.

Reporting concerns

We expect our Suppliers to receive and respond to workers' concerns in an open and honest manner.

Reporting of concerns and non-retaliation

Suppliers must provide workers with a reliable and confidential channel to report concerns about the Supplier's business practices and must prohibit any form of retaliation against those who report concerns in good faith. Suppliers must ensure that reported concerns are handled and investigated fairly, professionally, and thoroughly and that corrective action is taken where appropriate. Suppliers must notify and keep Altera Infrastructure informed of reported concerns and investigations related to activities under contract with Altera Infrastructure and the outcome of such investigations.



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Version: November 2022