

Supplier Code of Conduct

MISSION STATEMENT

To use our excellence in heat exchange, energy transfer and thermal science to understand and satisfy our stakeholder needs.

COMPANY VISION

To be recognized as a trusted solution partner providing excellence and creativity to reduce primary energy consumption and CO2 emissions. To sustainably grow our business by diversifying our markets, applications and technology.

VALUES

Excellence – Integrity - Sustainability – Accountability – Teamwork

Solex strives to be an employer who fosters an environment of health, safety and wellbeing so that employees are empowered to share and use their knowledge while also being challenged to excel.

SOLEX CODE OF BUSINESS CONDUCT AND ETHICS

In support of our mission and in accordance with our values, Solex is committed to meeting the highest standards of ethics and integrity in our business affairs. Our relationships with our business partners are built on mutual respect and trust that we will openly communicate and work together to always do what's right when conducting business. We always seek to maintain the trust of our employees, customers, shareholders, business partners, and communities in which we operate.

As part of building a corporate culture of transparency and integrity, Solex has developed and implemented our Code of Business Conduct and Ethics which serves as a guideline for our employees at all levels when carrying out their business activities. Solex's Code of Business Conduct and Ethics:

- Promotes integrity and honest and ethical conduct, including the ethical handling of actual or perceived conflicts of interest.
- Promotes full, fair, accurate, timely and understandable disclosure of reports, documents, and other public communications made by Solex.
- Promotes compliance with applicable governmental laws, rules and regulations.
- Promotes the protection of Solex' assets, including corporate opportunities and confidential information.
- Promotes fair dealing practices.
- Deters wrongdoing.

- Ensures accountability for adherence to the standards and principles in Solex's Code of Business Conduct and Ethics.

In all our business activities, we observe and practice Solex's commitment to the standards and principles of conduct in our Code of Business Conduct and Ethics. This is supported by our sharing of this Supplier Code of Conduct ("Supplier Code") with our business partners. Our expectation is that each Solex Business Partner will strive to fulfill their responsibility as a good corporate citizen in accordance with the principles of the Supplier Code.

The Supplier Code applies to all suppliers, vendors, agents, contractors, or others supplying services or products to Solex, its subsidiaries or affiliates, and their respective directors, officers, employees, agents, or representatives (collectively, "Business Partners"). Without limiting Business Partners' obligations under this Supplier Code, each Business Partner is accountable for compliance with this Supplier Code, including all its suppliers, vendors, agents and subcontractors.

As further described in this Supplier Code, Solex expects its Business Partners to:

- Comply with all applicable laws, rules, and regulations and the requirements of this Supplier Code, both in letter and in spirit.
- Implement systems, controls and policies to promote compliance with applicable laws and this Supplier Code, including training, monitoring and auditing mechanisms.
- Uphold and respect internationally accepted corporate sustainability principles related to human rights, labour rights, safety, and the environment.
- Strictly prohibit all forms of conflicts of interest, corruption, or bribery.
- Conduct business in accordance with applicable trade compliance laws and regulations.
- Respect our and third parties' assets, resources, intellectual property and confidential information to which they have access.
- Compete fairly and ethically, and within the applicable provisions of competition and antitrust laws.

Where laws and regulations differ from this Supplier Code, the stricter rule shall apply. Diligent and consistent compliance with the provisions of the Supplier Code is considered for the selection, retention and evaluation of Solex's Business Partners.

SUSTAINABILITY. As a signatory to the United Nations Global Compact, Solex has established its Corporate Sustainability Policy in accordance with the 10 principles of the United Nations Global Compact, which are internationally accepted universal principles in

the areas of human rights, labour, environment and anti-corruption. These 10 principles are:

1. Businesses should support and respect the protection of internationally proclaimed human rights.
2. Businesses should make sure that they are not complicit in human rights abuses.
3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. Business should uphold the elimination of all forms of forced and compulsory labour.
5. Business should support the effective abolition of child labour.
6. Business should uphold the elimination of discrimination in respect of employment and occupation.
7. Businesses should support a precautionary approach to environmental challenges.
8. Businesses should undertake initiatives to promote greater environmental responsibility.
9. Business should encourage the development and diffusion of environmentally friendly technologies.
10. Businesses should work against corruption in all its forms, including extortion and bribery.

Business Partners are not expected to be signatories to the United Nations Global Compact; however, Solex's commitment to these principles requires the cooperation of its Business Partners in meeting their spirit and intent as further set out in this Supplier Code and a Business Partner's own applicable policies and procedures.

HEALTH, SAFETY, AND ENVIRONMENT (HSE). Solex is dedicated to making a positive impact, starting at our own doorstep. We believe that providing a healthy, safe, and sustainable workplace is essential to the well-being of our stakeholders while also ensuring that we can provide a high level of service to our customers. The cooperation of our Business Partners in this respect is crucial to our ability to do business in a manner that prioritizes employee health and safety, conserves natural resources and protects the environment. Business Partners are expected to:

- Operate in compliance with all applicable environmental and safety laws and regulations, including, but not limited to, laws and international treaties relating to climate change, waste disposal, emissions, discharges and the handling of hazardous and toxic materials or chemicals.
- Implement an appropriate environmental policy and required elements of an environmental management system covering environmental impacts and risks related to their operations and products from the full life cycle perspective.

- Identify and look for opportunities to reduce any negative environmental impacts of their manufacturing operations and products during their lifecycle.
- Comply with applicable laws and regulations on product safety, including communication of the hazards and information about the safe use of chemicals, if applicable.
- Comply with Solex's HSE policy and applicable procedures, as amended from time to time, when working at or visiting Solex premises, or those of Solex's customers, including required safety training.
- Adopt and promote sustainability principles and to comply with applicable environmental, social and governance laws and regulations and to foresee any known or expected future changes in the requirements and take all reasonable actions to ensure compliance.

LABOUR AND HUMAN RIGHTS. The principles and standards in this Supplier Code reflects Solex's commitment to the respect of human and labour rights as well as support for the elimination of all forms of illegal or forced labour, including, but not limited to, slavery. As set out in the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organization (ILO), Solex expects that its Business Partners will:

- Respect fundamental human rights and maintain workplaces that are free from discrimination, harassment, intimidation, oppression, rejecting any form of unfair treatment.
- Provide safe and healthy working conditions at all operational locations.
- Never use or tolerate the use of human trafficking, forced labor, or child labor as defined by the ILO.
- Respect, and will not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.
- Meet or exceed all legal requirements for compensation, benefits, and working conditions.
- Respect the privacy of the personal information to which they have access, and process personal information only for legitimate business purposes and in compliance with applicable laws.
- Corporate integrity, responsible sourcing, and the safety and well-being of workers across its supply chain are of paramount importance to Solex when selecting and evaluating Business Partners. In this context, compliance with modern anti-slavery laws and regulations is an important part of Solex's sustainability program, as set out in our Code of Business Conduct and Ethics, and evidences our commitment, and that of our Business Partners, to essential human rights and freedoms.

CONFLICTS OF INTEREST. Business Partners should avoid any interaction with Solex's directors, officers, employees, agents, representatives, or any third parties that may conflict, or appear to conflict, with the best interests of Solex. For example, a Business Partner should not employ or otherwise make payments to a Solex employee during the course of any transaction with Solex. Business decisions should be impartial and based on accurate business information, sound business reasoning that is reflected in business records, and that does not compromise, or appear to compromise, Solex's judgment or independence. Any potential conflict of interest related to any business with Solex must be disclosed in writing to Solex's compliance email (as set out below) as soon as it is identified.

ANTI-BRIBERY AND CORRUPTION. Like all businesses, Solex is subject to and complies with various laws, both Canadian and international, that prohibit bribery and corruption in virtually every kind of commercial setting. Solex will not tolerate fraud or bribery of any nature, whether for personal benefit or with the misguided view that it is for the benefit of Solex or that of the Business Partner. As such, Solex prohibits, and expects that its Business Partners prohibit, the making, offering, authorizing, or using of bribes, or any other form of illegal or improper payment, gift, promise, or benefit, directly or indirectly, to anyone (including Public Officials¹), anytime, for any reason in relation to Solex. This prohibition includes, but is not limited to, facilitation payments, improper gifts, meals, entertainment, gratuities, favors, donations or any other improper transfer of value which may influence, or appear to influence, any business decision in relation to the Business Partner. Further, Business Partners must keep, and provide to Solex on request, current and accurate written records of any payments made on behalf of Solex or with funds provided by Solex.

Solex does recognize that from time to time, certain gifts, entertainment or other business courtesies may be part of building a business relationship with a Business Partner. Business Partners must exercise caution when providing or accepting gifts or invitations, meals, entertainment or other business courtesies. Such business courtesies must:

- not include cash or cash equivalents;
- be consistent with customary business practices, this Supplier Code and a Business Partner's policies related to this topic; and
- be in compliance with all applicable anti-bribery and corruption laws at all times.

¹ Individuals who are considered "Public Officials" should be interpreted broadly and includes, but is not limited to: (a) employees or representatives of governments, legislative, administrative, or judicial bodies, and their respective agencies or offices; (b) employees or representatives of government-controlled, government-operated, or government-owned entities; (c) officers of a political party or candidates for a public function; (d) any person acting for or on behalf or representing any government, public international organization or political parties; (e) any royal or ruling family member; and (f) any person with a personal, business, or other relationship or association with, or close family member of, those persons listed in subcategories (a) through (e).

All business courtesies should only be offered and accepted infrequently and in “token” amounts only. It is critical for Business Partners to be mindful of avoiding even the suggestion of impropriety or improper influence aimed at providing or obtaining undue advantages.

Further, Business Partners must deal fairly and act honestly with Solex and its affiliates’ directors, officers, employees, customers, suppliers and anyone else with whom they have contact when working with Solex. All statements, communications, and representations of any kind must be accurate and truthful. A Business Partner must not take unfair advantage of anyone through manipulation, concealment, abuse or privileged information, misrepresentation of facts or any other unfair dealing practice.

BOOKS AND RECORDS. Accurate and reliable information, books and records are required to fairly reflect Solex’s transactions and to ensure compliance with accepted accounting and other applicable standards. Proper records are critical for Solex to meet its financial, legal and management obligations. As such, Business Partners are expected to keep accurate and reliable records of all matters related to their business with Solex in compliance with such standards. Any misrepresentation, concealment, falsification, circumvention or other deliberate acts resulting in inaccurate books and records will be considered a serious infringement of this Supplier Code.

TRADE COMPLIANCE. Solex’s Business Partners must be in strict compliance at all times with all trade restrictions, export control, embargoes, and other economic sanctions laws and regulations, including but not limited to those of the United Nations, United States, United Kingdom, and the European Union or any of its member states, applicable to their work with Solex. Solex will not, and expects that its Business Partners will not, involve or include, directly or indirectly, any prohibited, sanctioned, or designated party or country under the sanctions regimes of the United Nations, United States, United Kingdom, or European Union or any of its member states. Further, a Business Partner will not, directly or indirectly, sell, provide, export, re-export, transfer, loan, or otherwise release or dispose of any services, products, equipment, software or technology received by it in relation to a transaction with Solex to, or via any individual, entity, or destination, for any use or other purpose prohibited by applicable law and regulations unless prior written authorization is granted by the competent government authorities as required by all such law and regulations.

PROTECTION AND PROPER USE OF SOLEX ASSETS AND RESOURCES. When the supply of services or products, or the performance of a Business Partner’s obligations to Solex requires the use of Solex’s property, supplies, equipment, technological resources or systems, and other assets, Business Partners must do so responsibly and in compliance with applicable law. Business Partners will ensure that any such assets or resources are used by authorized persons for their intended purposes only and not for any purpose other than those authorized by Solex or which are directly related to the fulfillment of the

purposes of the relevant agreement. Further, use of all Solex assets and resources must always be compliant with licensing agreements, user restrictions, or other limitations or obligations so as not to subject Solex to liability with any third party.

Business Partners must also protect and use Solex property and other tangible and intangible assets in a responsible manner and in compliance with applicable law. Business Partners must not use or disclose to any third party any of Solex's intellectual property unless expressly permitted in writing by Solex personnel.

Finally, Business Partners may not make any public disclosures or speak on behalf of Solex in any manner unless approved in writing in advance by authorized Solex personnel.

DATA SECURITY, PRIVACY AND CONFIDENTIALITY. As Solex conducts its operations in various countries around the world, it is subject to personal data protection laws that vary from country to country. We believe that our privacy policy reflects our efforts to balance the rights of individuals in relation to their personal information and the ability of Solex to use data to conduct its business. Business Partners must comply with applicable data privacy and information security laws as well as best practices whenever sensitive information is collected, stored, processed, transmitted or shared.

Solex's Business Partners are expected to safeguard and maintain the confidentiality of all Solex's proprietary and confidential information, which includes all personal information or data, to which they have access in the performance of their obligations in relation to the supply of services and products to Solex. In all cases, Business Partners will use all such information they have access to in a legitimate way, in compliance with applicable law, and only for the purposes such information was disclosed, received or accessed. Solex will not tolerate misuse, dishonest, unauthorized, illegal or improper use of any information.

Business Partners must take due care to ensure safe custody of, and implement all necessary measures to protect and safeguard, Solex's confidential and proprietary information, which includes all personal information or data, from misuse, theft, loss, fraud, or improper disclosure. Without limiting this obligation, these measures also apply to a Business Partner's handling, discussing, and transmitting of any such information of Solex's. A Business Partner's obligation to hold confidential, and protect, such information will continue even after the working relationship with Solex ceases.

COMPETITION. Solex is committed to fair, honest and transparent competition. Its Business Partners are expected to comply with the principle of competitive markets, all applicable competition laws, and rules of conduct in this Supplier Code and its own policies and procedures to help anticipate and prevent competition violations before they occur and detect and report such violations if they do occur. Examples of competition violations may include, but are not limited to, bid rigging, price fixing, and market or

customer allocation. Daily responsibility for compliance with competition laws rest with every director, officer and employee of a Business Partner.

COMPLIANCE, MONITORING, AND IMPROVEMENT. Solex strives to continuously improve its social and environmental impact in cooperation and active engagement with its Business Partners. Therefore, we reserve the right to monitor our Business Partners' compliance with this Supplier Code and may ask a Business Partner, at any time, to verify compliance through a self-assessment questionnaire, certification, or Solex or third-party assessments, inspections or audits, during which sufficient evidence of full compliance with this Supplier Code is expected.

Notwithstanding any provision in any agreement between a Business Partner and Solex, if a Business Partner is not compliant with the requirements set out in this Supplier Code, we will actively discuss with the Business Partner how to improve their performance. Further, in the event a Business Partner has breached this Supplier Code or does not take corrective actions within the agreed timeframe, Solex reserves the right to terminate such agreement(s) and defer any outstanding business and transactions with the Business Partner without any liability or obligation.

REPORTING VIOLATIONS. The relationship between Solex and its Business Partners is built on a foundation of trust. As such, a Business Partner's relationship with Solex is only made stronger by an honest report of misconduct to Solex in a timely manner.

A Business Partner who believes that a person acting on behalf of Solex or any of the Business Partner's employees or representatives, or any of a Business Partner's suppliers, vendors, agents or subcontractors related to the supply of services or products to Solex, has engaged in illegal, improper conduct or any potential violation or breach of this Supplier Code must report such matter to Solex immediately.

Reports, or a Business Partner's questions or comments regarding this Supplier Code, may be submitted anonymously to compliance@solexthermal.com. All reports shall be treated confidentially to the greatest extent possible in the situation, but always subject to Solex's legal obligations and applicable law.

Business Partners shall not retaliate or take disciplinary action against any person who has, in good faith, reported misconduct or potential violation or breaches, or who has sought advice regarding this Supplier Code.