



Vendor Code of Conduct

PURPOSE

Hammerstone Infrastructure Materials Ltd. (“Hammerstone” or “Company”) is committed to conducting business activities with honesty and integrity and in compliance with applicable legal and regulatory requirements. We expect anyone that provides goods or services to Hammerstone (“Vendors”) adhere, at a minimum, to the same commitments to ethics and compliance as this Vendor 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 your Hammerstone representative.

SCOPE

This Code applies to all Hammerstone Vendors.

LEGAL AND REGULATORY COMPLIANCE

Hammerstone’s business activities are subject to the supervision of numerous regulators in Alberta. Hammerstone expects all Vendors to:

- Understand and comply with applicable laws and regulations.
- Maintain all appropriate licenses, permits and other regulatory authorizations and requirements necessary to conduct the activities for which they have been hired by Hammerstone.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE

Hammerstone’s Environmental, Social and Governance (“ESG”) principles are embedded throughout its operations to ensure that its business model will be sustainable. As such, we encourage our Vendors to:

- Have appropriate policies and programs to maintain good relationships with local communities and other stakeholders.
- Have strategies in place to reduce their environmental impact over time.
- Use resources responsibly and conduct operations with the aim to protect and preserve the environment. As appropriate, Vendor 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.

INTEGRITY, ETHICS AND ANT-CORRUPTION

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

Hammerstone has in place an Anti-Bribery and Anti-Corruption Policy and Program designed to prevent employees and vendors from paying or receiving bribes or undertaking corrupt activities. We expect our Vendors to share these principles and uphold our standards and to develop and maintain policies and programs as appropriate to ensure that their representatives understand and adhere to these standards. Hammerstone expects all Vendors to:

- Comply with all applicable anti-bribery, anti-corruption, and anti-money laundering laws.
- Comply with all applicable competition and antitrust laws.



- 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 Hammerstone in any respect, or otherwise in violation of applicable law. This includes a prohibition on “facilitation” payments of any kind.
- Refrain from entering into business relationships or transactions with Hammerstone personnel in an individual capacity or in any way that could create the appearance of a conflict of interest or impropriety.
- Disclose to Hammerstone and avoid or appropriately manage any actual or potential conflicts of interest arising due to either personal or business relationships.
- Not knowingly facilitate a person committing to the fraudulent evasion of tax.
- Promptly apprise Hammerstone in the event either they or 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.
- 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.

RESPONSIBLE LABOR PRACTICES

Hammerstone respects and supports human rights and requires that workers are treated with dignity, respect and in accordance with applicable laws. Hammerstone expects our Vendors to respect human rights and maintain processes to identify and prevent adverse human rights impacts that could arise from their or their suppliers’ operations. Hammerstone expects Vendors to:

- Provide a safe and secure workplace for employees, contractors, and representatives that complies with all applicable health and safety laws, regulations, and practices.
- Provide fair compensation, fair benefits, overtime pay, time off, breaks, leave, and holidays in the context of local market factors that, at a minimum, comply with applicable laws and regulations, including those pertaining to withholding taxes, minimum wage, labor relations, insurance, and health and occupational safety. Wage deductions will not be used as a disciplinary measure.
- Provide training as necessary to ensure personnel have the required skills and certifications to perform the assigned work.
- Adhere to age-related standards set by the International Labor Organization and not use child labor or any form of forced or involuntary labor.
- 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.
- Respect the right for freedom of association unless restricted under local law, without fear of discrimination or reprisal.

WORKPLACE HEALTH & SAFETY

Hammerstone expects its Vendors to provide a workplace that seeks to prevent injury and ill-health and at a minimum:

- Provide and maintain a clean, safe, and healthy working environment that complies with applicable laws, directives, and regulations, and minimizes occupational hazards. Working conditions should at a minimum include reasonable access to sanitary facilities, fire exits, potable water, and adequate lighting and ventilation, and any Vendor-provided residential spaces must be sanitary and safe.



- Implement procedures designed to prevent injury to workers, including providing adequate work training and personal protective equipment as appropriate and safeguards against infectious disease.
- Maintain reporting systems for workers to document health and safety hazards and incidents.
- Promptly inform Hammerstone of any material health and safety incidents that occur while performing services for, or delivering goods to, Hammerstone or its clients.

CONFIDENTIALITY

Vendors will protect personal, proprietary, and confidential information (“Confidential Information”), including information that they access, receive or process on behalf of Hammerstone. Vendors must adopt and maintain processes to provide reasonable protections for such information and a degree of care that would apply to Vendor’s own confidential information, but in any event, a reasonable degree of care.

DATA PROTECTION AND INFORMATION SECURITY

The safeguarding of Hammerstone Confidential Information and privacy is of paramount importance to Hammerstone. Hammerstone expects Vendors to:

- Comply with applicable laws and regulations, including those relating to data protection, privacy, security or the processing of personal data and information (“Global Data Protection Laws”) and not take any action that would prevent Hammerstone from complying with its obligations thereunder.
- Provide services, where Vendors have access to Hammerstone Confidential Information, in accordance with an industry recognized information security framework and information security policy. Upon request, Vendors will provide a copy of their information security policy. Maintain appropriate administrative, technical, organization and physical safeguards to preserve and protect Hammerstone Confidential Information.
- Vendors must notify Hammerstone immediately of any privacy breaches, security breaches or loss of Hammerstone Confidential Information.

BUSINESS CONTINUITY AND DISASTER RECOVERY

We expect our Vendors 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 Hammerstone, Vendors will disclose in reasonable detail and discuss the elements of their business continuity plans.

INSURANCE

Vendors will maintain all required insurance coverage needed to provide services to Hammerstone. Vendors will provide documents to Hammerstone as proof of insurance coverage upon request.

NO PUBLICITY

Vendor will not use any of Hammerstone’s or its affiliates’ name, marks or other proprietary trademarks in any public or promotional materials without the prior written consent of Hammerstone.

COMPLIANCE WITH THIS VENDOR CODE OF CONDUCT

Vendors will ensure that their personnel, contractors, agents, and other representatives understand and comply with this Code. We expect our Vendors 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. Hammerstone reserves the right to monitor, assess and audit all Vendors according to this Code. Where incorporated into any contract, this Code will survive the contractual term. Hammerstone expects that Vendors will:

- Promptly notify Hammerstone as soon as it becomes aware of any actual or suspected breach of this Code. The contents of this Code are additional to and do not in any way affect or prejudice any of Hammerstone's rights and remedies under the relevant agreements with each Vendor, if any. In the event of any non-compliance to the requirements of this Code or breach of agreement, Hammerstone 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 Hammerstone to insist upon strict performance and compliance with any of the provisions of this Code at any time shall in no way constitute a waiver of its rights.
- Cooperate with Hammerstone to ensure its compliance with applicable laws and regulations. This includes responding to Hammerstone's reasonable requests for information, maintaining adequate documentation of compliance programs 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 Vendor, the provisions of that agreement will prevail.

This Code is subject to modification from time to time.

REPORTING HOTLINE

Hammerstone maintains a Reporting Hotline for its employees, Vendors, 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. The Hammerstone Ethics Hotline may be accessed by telephone (toll free) 1-844-202-0071 or by submitting an anonymous report online at

<http://www.hammerstone.ethicspoint.com>

Hammerstone will investigate all reports in compliance with applicable laws or as it otherwise deems necessary.