
Title: 4Refuel's Supplier Code of Conduct**Effective Date: November 5, 2024**

At 4Refuel, we value our suppliers and their contribution to our success. Our Supplier Code of Conduct applies to all suppliers and to their employees, contractors, sub suppliers and subcontractors. 4Refuel's Supplier Code of Conduct does not comprise all of 4Refuel's guidelines and rules and cannot cover every situation. Our Supplier Code of Conduct is intended to serve as a tool to guide our suppliers' actions. It does not replace applicable legislation in the countries where we or our suppliers operate, which may be revised from time to time. We require our suppliers to respect and comply with this Code of Conduct by conducting regular self-assessments and to conduct business lawfully and with integrity. Suppliers must cooperate with any request by 4Refuel to audit or otherwise assess compliance with our Supplier Code of Conduct.

Failure to comply with this policy, or any portion thereof, could result in suspension or termination, in whole or in part, of the supplier's agreement(s) with 4Refuel and may include removal from 4Refuel's approved supplier list.

1. Health & Safety

At 4Refuel, safety is a core value that influences everything we do. We expect our suppliers to prioritize employee occupational health and safety throughout all aspects of their activities, and to have appropriate policies, standards, procedures, contingency measures and management systems to support the same. At a minimum, suppliers must comply with all applicable health and safety laws, regulations, and standards in the regions where they operate. When operating on 4Refuel property, 4Refuel's safety standards/rules must be met or exceeded. When operating on a customer or other third-party location either 4Refuel's or the customer's safety standards/rules must be met, whichever is more stringent. In all cases suppliers are responsible to ensure they are familiar and comply with the relevant site specific and general requirements.

2. Ethics and Governance**a. Adherence to Laws/Regulations**

Suppliers are expected to comply with all local laws and regulations in countries where they operate as well as applicable international trade laws and regulations. When there are inconsistent or different laws and regulations, the supplier is required to comply with the highest standard.

b. Financial Integrity

It is expected that suppliers operate with integrity in financial matters and do not allow or condone any of their employees, contractors, or subcontractors to engage in the below behaviors:

(i) Tax Evasion: The illegal and fraudulent nonpayment of tax. We never engage in tax evasion or assist anyone else to do so.

(ii) Money Laundering: Any act that tends to hide or conceal the illicit origin of certain goods or services that come directly or indirectly from criminal acts

(iii) Terrorist Financing: Any direct or indirect act of request, collection or delivery of funds or

assets, whose purpose is the commission of terrorist crime.

c. Anti-Bribery

All forms of bribery (including facilitation payments), corruption, extortion and embezzlement are forbidden. Suppliers must act with integrity and follow all international anti-bribery and anti-corruption laws. Care must be taken to avoid even the appearance of bribery, including avoiding placing our employees, contactors, and subcontractors in inappropriate situations. Any gifts or offers of hospitality offered to our employees, including invitations to social functions, meals and entertainment, should generally be low value or a customary token of appreciation.
Specific 4Refuel Policy: Global Anti-Bribery and Anti-Corruption Policy

d. Conflict of Interest

Any supplier that is aware of any actual or potential financial or personal conflict of interest must declare it to 4Refuel in writing. Examples include if a supplier or a supplier's personnel has any family/personal relationship with 4Refuel employees, or if a 4Refuel employee has direct or indirect (including through a family member) financial interest in a supplier.

e. Fair Competition

4Refuel supports fair competition among existing and potential suppliers. Suppliers are expected to adhere to anti-trust and competition laws in the countries where they operate.

f. Confidentiality, and Data Privacy and Protection

At 4Refuel, we have rigorous processes and policies related to the commercially sensitive data we collect, use and disclose as part of our day-to-day interactions with customers, suppliers and others with whom we do business. We expect the same of our suppliers with respect to safeguarding and protecting our information (including but not limited to financial information, personal information, trade information, and technological information), and intellectual property. This includes but is not limited to: ensuring supplier consent practices are in-line with the applicable data protection legislation locally and globally, evaluating and updating supplier practices and tools to exceed industry standards, having robust policies in place to ensure quick and efficient recovery from data breaches, and ensuring that 4Refuel's information that is inactive or outdated is securely deleted. Suppliers are expected to keep all information that 4Refuel provides to them strictly confidential and use any such information only for the purposes of performing their duties for 4Refuel.
Specific 4Refuel Policy: Data Governance Statement

g. Publicity

4Refuel branding, including our name, Trademarks and Logos, are property of 4Refuel and are only to be used with our prior express written permission. 4Refuel branding may not be used in any way that suggests an affiliation or endorsement.

3. Human Rights and Labour Practices

4Refuel is committed to promoting and safeguarding human rights throughout our operations, as noted in our Code of Conduct. This respect of human rights is informed by the United Nations Declaration of Human Rights (UNDHR), the International Labor Organization's (ILO) 1998 Declaration on Fundamental Principles and Rights at Work, employment laws in any region where we operate, and applicable legislation protecting human rights. We do not condone and we strive to eliminate all forms of forced labour and child labour in the workplace.

We expect our suppliers' labour practices to be conducted ethically and without contravention of human rights legislation or conventions. Additionally, we encourage our suppliers to take appropriate steps to ensure their operations and supply chains are free of any form of modern slavery, such as forced labour and child labour, including by: (i) complying with the expectations and requirements set out in our Supplier Code of Conduct; (ii) offering their employees training to help them recognize situations that may involve a risk of modern slavery; and (iii) conducting due diligence screenings of new suppliers, with enhanced attention to possible human rights concerns.

a. Voluntary Employment

We expect that all work performed on a supplier's behalf is undertaken voluntarily and is not forced. Workers should have the freedom to leave their employment at any time or terminate it, subject to legal notice period requirements. Forced labour means labour or service provided or offered to be provided by a person under circumstances that: (i) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or (ii) constitutes exacting work or service from someone under the menace of any penalty when that person has not offered themselves voluntarily.

b. No Child Labour

We expect our suppliers to, at minimum, abide by local child labour laws and align their practices with the fundamental labour standards outlined by the International Labour Organization (ILO) in Convention No. 138 on Minimum Age and Convention No. 182 on the Worst Forms of Child Labour. Children must be protected from harm, must have access to education, and should be free to attend school before they enter the workforce. ILO 138 establishes a minimum working age, commonly fifteen 15 years of age, but subject to variations based on a country's development status and the type of work at issue. Additionally, ILO 182 states that no one under the age of 18 should be allowed to engage in hazardous, nighttime, extended hour, or morally compromising work.

c. Compensation

We expect our suppliers to compensate their workers in accordance with relevant employment laws, including those pertaining to minimum wages, working conditions, overtime hours, and legally mandated benefits. In cases where no specific employment laws exist, workers should be remunerated fairly and at least at the minimum industry standard in the local area. Suppliers should regularly review worker compensation to evaluate whether workers earn enough to meet their basic needs and the needs of their family to disincentivize the need for such workers to resort to child labour or forced labour to supplement family income.

If we become aware of any actions or conditions in our supply chain that do not align with our expectations of our suppliers as they relate to human rights and labour practices, we retain the right to demand corrective actions from the applicable supplier. Non-compliance by a supplier may result in further actions, including the termination of our business relationship.

4. People and Communities

a. Diversity, Inclusion and Equal Opportunity

Diversity brings together different thoughts, life experiences, perspectives and learnings to create a positive impact for all. We are committed to building a safe, talented, and inclusive team. Suppliers should employ the most suitable individuals for posted positions, regardless of race, religion, national origin, colour, gender, gender identity, sexual orientation, age and/or physical or mental disability. Suppliers must support and obey local laws that prohibit discrimination everywhere they

do business. We make efforts to engage and support diverse suppliers, such as minority-owned, indigenous-owned and women-owned business, and expect the same of our suppliers.

b. Harassment

There is no place for discrimination, harassment or violence in the workplace. We all have a responsibility to ensure that harassment does not happen. Suppliers shall be committed to provide and promote a harassment free workplace, for not only their own employees, but any dealings with our employees, subcontractors and customers as well.

5. Corporate Social Responsibility

a. Environmental Responsibility

We support the UN Sustainable Development Goals (SDGs). We encourage our suppliers to maintain the highest environmental standards to reduce or minimize environmental risks and impact. Suppliers must comply with all applicable environmental laws, including sourcing, disposal of materials, and discharge of substances into the environment. Emphasis should be placed on products that incorporate sustainability practices into the product life cycle, reducing waste and encouraging recycling within the product, its packaging and disposal. Suppliers are also expected to comply with our customers' policies and practices related to environmental responsibility and sustainability, where applicable.

b. Community Involvement

Community extends much broader than where individuals and companies reside. It is where people and environments are directly or indirectly impacted by our existence. Suppliers must demonstrate an ongoing commitment to corporate social responsibility through tangible and measurable efforts. When operating on or near Indigenous communities, Suppliers must acknowledge and respect Indigenous peoples' rights, cultures, and interests.

c. Business Continuity

Longevity, rooted in sustainability, requires innovation. We look to suppliers not only to supply required goods and/or services but to provide unique solutions that increase efficiencies, create value, and ensure continued success of all parties involved. Succession and business and emergency contingency plans to mitigate unseen circumstances are expected to be developed.

d. Whistleblowing

Suppliers shall have a program or policy to ensure the protection of whistleblower confidentiality and prohibit retaliation against workers. Suppliers shall provide an anonymous complaint mechanism for workers to report grievances in accordance with local laws and regulations.

If you have any questions or concerns with this policy or to report a violation; please reach out to us by emailing: lharkness@4refuel.com