

SUPPLIER CODE OF CONDUCT

North American Pipe and Steel Ltd. (“**NAPS**” or the “**Company**”) acknowledges our corporate responsibility towards the people, communities, and environment in which we and our suppliers operate. We are dedicated to fostering ethical and equitable relationships in our operations and supply chains and expect our Suppliers to uphold similar standards.

The Supplier Code of Conduct applies to all companies and individuals who are suppliers of goods and contractors performing services for or on behalf of North American Pipe and Steel, and all their parent, subsidiary and affiliated companies and their respective employees, contractors, and agents (“**Suppliers**”). This Supplier Code of Conduct is incorporated into the terms and conditions of Suppliers’ contracts with North American Pipe and Steel, and supplements the requirements, guidelines and standards of conduct described in North American Pipe and Steel’s other internal and external policies, including any site-specific orientation or safety requirements. The Supplier Code of Conduct will be reviewed regularly and updated as required.

North American Pipe and Steel expects that Suppliers will integrate this Supplier Code of Conduct into their business practices and implement similar policies within their own supplier networks. North American Pipe and Steel expects Suppliers’ full cooperation in ensuring that the standards set in this Code of Conduct are upheld, not only within the Suppliers’ organization and operations, but in their subcontractors and extended supply chain.

North American Pipe and Steel shall have the right to conduct audits at our discretion to assess compliance with this Code of Conduct. In addition, Suppliers are expected to promptly notify an officer of North American Pipe and Steel of any actual or reasonably suspected non-compliance with the Supplier Code of Conduct. North American Pipe and Steel reserves the right to remove any individuals or organizations who fail to comply with this Supplier Code of Conduct and to require the prompt remediation of any harm caused by the failure to comply.

RESPECT FOR LAW AND STANDARDS

Suppliers must respect all applicable laws, regulations, and government requirements in their own jurisdictions and in those in which they conduct business. Suppliers must also comply with international and industry standards relating to the sourcing of goods and the performance of services. In the event there is a conflict between this Supplier Code of Conduct and applicable regulations or laws, the higher standard of conduct applies.

EMPLOYMENT PRACTICES

Suppliers are expected to maintain high standard when it comes to human rights and equal opportunity within the workplace. This includes but is not limited to the following:

Harassment and Discrimination:

Discrimination in any form, particularly based on gender, religion, age, race, caste, nationality, social, ethnic, or national origin, membership in a workers’ organization, disability, or sexual or political orientation, is prohibited.

Suppliers are expected to uphold principles of hiring non-discrimination, fair compensation, equal access to training and promotion, and avoid wrongful termination or retirement based on age, religion, disability, gender, marital status, sexual orientation, union memberships, political views, or other legally protected categories.

Forced Labour:

The use of forced labour in any facilities or properties associated with the Suppliers' operations is prohibited. "**Forced labour**" includes labour or services provided under circumstances that 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 the labour or service, or that constitute forced or compulsory labour as defined in the Forced Labour Convention, 1930. Suppliers are prohibited from withholding their employees' property, wages, or personal documents (such as passports, personal IDs, social security IDs, employment papers, or training certificates) and from charging any recruitment fees when hiring employees.

Child Labour:

The use of child labour in any facilities or properties associated with the Suppliers' operations is prohibited. "**Child labour**" includes labour or services provided by person under the age of 18 years that is contrary to applicable laws, provided under circumstances that are mentally, physically, socially, or morally dangerous to them, interfere with their schooling, or constitute the worst forms of child labour as defined in the Worst Forms of Child Labour Convention, 1999.

Suppliers must maintain official documentation verifying each worker's date of birth and comply with all applicable laws governing hiring practices, wages, working hours, overtime, and working conditions. Additionally, Suppliers must comply with local minimum working age laws and prohibit any form of exploitative labour practices.

HEALTH AND SAFETY

Suppliers are obligated to adhere to all applicable safety and health laws, regulations, policies, and procedures. It is imperative that they prioritize the health, safety, and welfare of their employees, visitors, and any individuals affected by their operations.

The workplace environment and professional activities conducted by Suppliers must not compromise the health and safety of any employee associated with North American Pipe and Steel. Employees must receive clear safety instructions, and adequate, safe protective equipment must be provided in the workplace.

Suppliers must identify workplace risks and respond appropriately to any emergency situations that may arise. This includes coordinating with safety authorities to establish effective fire safety protocols, emergency plans, and conducting regular drills, such as those for emergency medical care, evacuations, and first aid, to the best of their ability.

Additionally, Suppliers must offer their employees clean, sanitary facilities and access to an ample supply of clean drinking water. If sleeping accommodations are provided, they must meet standards of cleanliness, safety.

Every Supplier must consider the unique health concerns and requirements of individuals requiring special protection, such as pregnant women, young mothers, and people with disabilities.

SOURCING OF MATERIALS AND CONFLICT MATERIALS

We expect Suppliers to take the necessary measures to ensure that their sourcing practices do not promote or support counterfeiting, nor benefit any group that perpetrates human rights abuses, violent conflict, and bribery.

North American Pipe and Steel requires our Suppliers to assure that their products do not contain conflict minerals. At our request, Suppliers must notify North American Pipe and Steel of the specific mineral and its country of origin. We reserve the right to terminate and cancel any orders or contracts for goods containing conflict minerals.

SUSTAINABILITY

North American Pipe and Steel upholds a robust standard of social responsibility and sustainability. We are dedicated to fulfilling our role as stewards of the environment, and we extend this commitment to all our Suppliers and their business practices. We collaborate with Suppliers to explore and implement innovative approaches towards environmental protection and social sustainability.

We expect our Suppliers to operate with a proactive approach towards risk management, natural resource conservation, pollution prevention, and environmental protection. It is expected that Suppliers adopt environmental management system principles to systematically address risks, hazards, and opportunities related to the environment. This includes addressing potential risks stemming from regulatory non-compliance and reputational damage, while also capitalizing on opportunities for business growth through operational and product stewardship.

FAIR AND HONEST DEALING

At North American Pipe and Steel, we hold ourselves to the highest standards of ethical conduct and integrity in all our business dealings. Suppliers should treat fairly and be honest and transparent with North American Pipe and Steel and members of the community in which they carry on business. All consultations and negotiations should be carried out in good faith and with no intention to mislead.

Suppliers must understand and adhere to North American Pipe and Steel's policies regarding gifts and bribery. Suppliers prohibited from offering any gifts, favors, or benefits that could be perceived as attempts to influence business decisions or actions. This prohibition extends to various forms of inducements, including but not limited to:

- Tangible gifts or monetary offerings.
- Invitations to events or entertainment functions.
- Kickbacks or incentives for preferential treatment.
- Extortion or coercion tactics.
- Engagement in competitive, restrictive, or illegal trade practices.

This includes any personal, financial, or professional relationships that could compromise our commitment to impartiality and fairness in our operations.

