



CENTURION SUPPLIER CODE OF CONDUCT: SHARING OUR VALUES

MESSAGE FROM: Shona Pilgrim, Director of Supply Chain Management

Operating safely and sustainably and in an ethical and responsible manner is critical to achieving our goals. Our suppliers play an important role in supporting our operations and upholding our commitments to our customers. Our Supplier Code of Conduct explains the principles and standards that apply to you when you are providing goods and services to CENTURION. As a CENTURION supplier, we expect you to share the principles described in this Code of Conduct and to apply similar standards with your own employees and across your supply chain.

By following this Code, you are upholding our mission and our core values and setting the groundwork for our joint success. We expect you, including your employees and the suppliers you yourself use, to act ethically and abide by the commitments in this Code and by other policies that may apply to you as you interact with us or act on our behalf. We value our relationship with you and appreciate your efforts to fulfill these important responsibilities.

Sincerely,

Shona Pilgrim
Director, Supply Chain Management



SUPPLIER CODE OF CONDUCT

THIS SUPPLIER CODE OF CONDUCT APPLIES TO ALL TRANSACTIONS ENTERED WITH: CENTURION CANADA INFRASTRUCTURE INC., AND ITS AFFILIATES (“CENTURION”).

1. Suppliers are required to respond to CENTURION’s solicitations in an honest, fair and comprehensive manner, accurately reflecting their capacity to satisfy the requirements stipulated in the request. Suppliers shall be obligated to alert CENTURION to any errors they discover in the solicitations.
2. Suppliers shall not, either during or after working for CENTURION, disclose confidential information to an unauthorized recipient. Suppliers shall ensure the utmost care and discretion in handling confidential information.
3. Suppliers shall not, directly or indirectly, offer or provide a bribe to any person or entity, and all requests or demands for bribes must be expressly rejected and reported. Supplier shall not offer to, nor make, facilitating payments to government officials in order to encourage them to expedite any governmental tasks. Suppliers’ business must comply with the Canadian Corruption of Foreign Public Officials Act (“FPOA”), the US Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act 2010 (“UK Bribery Act”) and other such anti-corruption laws as may be applicable.
4. Suppliers shall conduct business in alignment with competition and anti-trust laws of CAD, US and the UK and when required, competition and anti-trust laws of other jurisdictions. Suppliers must commit to upholding the democratic, professional, and ethical and people values of CENTURION as are set out in the CENTURION **Business Ethics & Conduct** and the **Anti-Corruption** policies.
5. Suppliers are expected to avoid any actual or apparent conflict between personal interests and those interests of CENTURION. Suppliers must disclose any conflict of interest.
6. Suppliers shall ensure all individuals are provided with, and contribute to a respectful workplace which creates and sustains an environment that: (i) values the diversity and human rights of others; (ii) demonstrates the dignity of the person, mutual respect, fairness and equality; (iii) fosters positive communications between persons; and (iv) does not tolerate harassment, bullying, violence or discrimination.
7. Suppliers shall keep complete and accurate information such as time charges, confirmations of payment, statutory declarations, lien waivers, change orders, project estimates, expenses, costs, payroll, travel records, expense reports and regulatory data, which shall be available in a timely manner, as required.
8. It is expected that Suppliers follow specific laws, regulations and policy which apply to gifts and entertainment. Suppliers acknowledge that CENTURION employees must not compromise, or appear to compromise its ability to make objective, impartial and fair business decisions and that transparency and exercise of good judgement are fundamental expectations of all Suppliers.
9. Suppliers shall have established a complaint mechanism available to any individual in its organization who wishes to report a concern regarding any accounting, audit, procurement, contract or other violation of business practice of conduct that appears to be illegal, unethical or improper.