

Anaergia Supplier Code of Conduct

1. Purpose and Scope

Anaergia Inc. and its subsidiaries (“Anaergia”) are committed to the highest standards of social and environmental responsibility and ethical conduct. Anaergia’s suppliers are required to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible practices wherever they make products or perform services for Anaergia. This Supplier Code of Conduct (“Code”) sets forth the expectations for supplier conduct regarding labor and human rights, health and safety, environmental protection, ethics, and management practices expected of all suppliers, vendors, contractors, consultants, and subcontractors (“Suppliers”) engaged in business with Anaergia and its subsidiaries worldwide.

Anaergia expects Suppliers to act in accordance with the Code, and at a minimum requires that all Suppliers comply with applicable laws and regulations within the geographies where they operate and be open and cooperative with the regulators enforcing such laws. When differences arise between standards and legal requirements, the stricter standard shall apply, in compliance with applicable law.

This Code aligns with the United Nations Global Compact, the Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, and regional and national laws, including but not limited to those in the United States, Canada, European Union, United Kingdom, Australia, Gulf Cooperation Council countries, Asia-Pacific, and Latin America.

This Code complies with Anaergia’s governance documents - e.g., Diversity Policy, Code of Conduct, Whistleblower Policy - located at:

<https://investors.anaergia.com/governance/governance-documents/default.aspx>.

2. Ethical Business Conduct

a. Anti-Bribery and Anti-Corruption

Suppliers shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. Suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate, including the Foreign Corrupt Practices Act and applicable international anti-corruption conventions.

b. Fair Competition

Suppliers will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

c. Money Laundering and Sanctions

Suppliers must not engage in money laundering or business with parties subject to sanctions issued by the Office of Foreign Assets Control, EU, United Nations Convention against Corruption, Global Affairs Canada, or other applicable law or regulation.

d. International Trade Controls

Suppliers must comply with export control regulations applicable to their business and provide accurate and truthful information about it to customs and other authorities when required.

3. Labor and Human Rights

Anaergia believes all workers in our supply chain deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and Suppliers shall uphold the highest standards of human rights.

a. Freely Chosen Employment, Involuntary Labor, and Human Trafficking

Suppliers shall ensure that all work is voluntary. Suppliers shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

Suppliers shall not withhold workers' original government-issued identification and travel documents. Suppliers shall ensure that workers' contracts clearly convey the conditions of employment in a language understood by the workers. Suppliers shall not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities.

b. Child Labor

Suppliers must not employ workers under the minimum legal working age as defined by local law or under 15 years of age, whichever is higher.

c. Non-Discrimination and Equal Opportunity

Suppliers shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by country law, in hiring and other employment practices.

d. Working Hours and Compensation

Working hours must comply with applicable laws. Wages, including overtime, must meet or exceed legal requirements.

e. Anti-Harassment and Abuse

Suppliers shall commit to a workplace free of harassment and abuse. Suppliers shall not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment.

f. Freedom of Association

Suppliers shall freely allow workers to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment. In the absence of formal representation, Suppliers shall ensure that workers have a mechanism to report grievances and that facilitates open communication between management and workers.

4. Health and Safety

Suppliers must provide a safe and healthy workplace and construction environment, and implement a health and safety policy that complies with the below laws or regulations based on the work location:

- **U.S.:** OSHA 29 CFR 1926 for Construction
- **Canada:** Canada Occupational Health and Safety Regulations
- **EU:** Directive 89/391/EEC on Safety and Health at Work
- **Other:** Applicable local laws or regulations

a. Risk Management

Suppliers shall conduct routine hazard assessments and provide controls for working at heights, excavation, confined spaces, electrical work, and heavy equipment.

b. Safety Training and PPE

Suppliers shall ensure that their workers receive training in their language and are provided with appropriate personal protective equipment (PPE).

c. Incident Reporting and Investigation

Accidents and near misses must be reported, recorded, and investigated. Suppliers must maintain injury logs and conduct root cause analysis.

5. Environmental Stewardship

Suppliers must operate in compliance with environmental laws and strive to adopt practices that promote environmental sustainability.

a. Emissions and Pollution Control

Manage air, water, and soil emissions through appropriate controls.

b. Waste Management

Reduce, reuse, and recycle materials. Dispose of hazardous and non-hazardous waste safely and legally.

c. Sustainable Materials

Where applicable, use certified sustainable materials (e.g., FSC-certified wood, low-VOC products) and avoid harmful substances (e.g., asbestos, PFAS).

d. Climate Change

Monitor and reduce greenhouse gas (GHG) emissions. Suppliers are encouraged to align with science-based targets and disclose climate data.

6. Supply Chain Transparency and Due Diligence

a. Subcontractor Oversight

Suppliers must ensure their subcontractors and suppliers comply with this Code.

b. Conflict Minerals

Suppliers must not source tin, tungsten, tantalum, or gold (3TG) from conflict-affected areas, unless through certified, conflict-free sources.

c. Modern Slavery

Suppliers operating in or selling into the UK, EU, or Canada must conduct and disclose due diligence on forced labor in supply chains.

7. Data Privacy and Cybersecurity

Suppliers must protect confidential information and personal data in compliance with:

- **EU:** General Data Protection Regulation (GDPR)
- **Canada:** Personal Information Protection and Electronic Documents Act
- **U.S.:** California Consumer Privacy Act, and federal standards
- **Other:** Local equivalents in Asia-Pacific and Africa, e.g., Personal Data Protection Act of Singapore, etc.

Suppliers must maintain security controls against data breaches, including encryption, access restrictions, and breach notification protocols.

8. Whistleblower Protection and Grievance Mechanisms

Suppliers must provide mechanisms for employees to report misconduct or concerns confidentially and without fear of retaliation.

Suppliers may report violations of this Code through Anaergia’s anonymous platform as detailed below or directly via email to Anaergia:

- **Email:** Legal@Anaergia.com
- **Anonymous Hotline:** www.lighthouse-services.com/anaergia

9. Acknowledgment and Continuous Improvement

Anaergia encourages Suppliers to go beyond legal compliance and pursue industry leadership in ethical business practices, sustainability, and worker well-being.

Suppliers are expected to continually assess and improve their practices in line with evolving global standards and stakeholder expectations.

Suppliers shall:

- Acknowledge this Code in writing
- Integrate its principles into internal policies
- Actively work to improve performance in each area over time

Company Name: _____

Address: _____

Signature: _____

Name: _____

Title: _____

Date: _____

Country: _____

E-mail: _____

For Questions or Clarifications:

For the Americans and Asia:

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