

AECL Supplier Code of Conduct

Purpose and Scope

At Atomic Energy of Canada Limited (“AECL”), as a Crown corporation we uphold the highest standards of integrity, transparency, and social and environmental responsibility. Our AECL Code of Conduct underscores our commitment to behaving and conducting business in a fair, legal, and ethical manner. Similarly, we expect our suppliers to always operate with integrity, in compliance with applicable laws, adhering to recognized industry standards and best practices, while respecting human rights and safeguarding the environment in all their activities.

This Supplier Code of Conduct (“Code”) outlines the minimum standards and expectations for all organizations and individuals providing goods or services to AECL, including suppliers, service providers and independent contractors, and their respective employees, representatives, agents and subcontractors (each, a “Supplier”). The Code outlines our principles and expectations for our Suppliers, including those related to business conduct and integrity, respect for individuals, Code monitoring and compliance, and reporting of Code violations.

We expect our Suppliers to adhere to these standards and expectations, and to conduct their activities consistent with the Code. It is Supplier’s responsibility to ensure compliance with this Code by its employees, representatives, agents and subcontractors.

Business Conduct and Integrity

Compliance with Laws and Regulations

Suppliers must comply with all applicable federal, provincial, and municipal laws and regulations of the jurisdictions in which they operate, including but not limited to employment and labour laws, health, safety and environmental laws and regulations, and anti-corruption laws. Suppliers must also comply with sanctions that are effective under Canadian law and applicable to their operations and/or industry.

To do business with AECL, Suppliers must ensure that they, as well as their own suppliers and contractors, remain eligible to do business with the Government of Canada throughout the duration of their supply of goods or services to AECL. As part of this obligation, Suppliers are required to regularly check the list of ineligible or suspended suppliers as determined by the Public Services and Procurement Canada’s Registrar of Ineligibility and Suspension. This list is available at www.canada.ca/en/public-services-procurement/services/standards-oversight/supplier-integrity-compliance/ineligible-suspended-suppliers.html or by emailing the Registrar of Ineligibility and Suspension at pwgsc.o.integrity-tpsgc.o.integrite@pwgsc-tpsgc.gc.ca. If Supplier is aware that it or its own suppliers or contractors may be or have been declared ineligible or suspended by the Registrar, Supplier must report this promptly to AECL in the manner prescribed in the Reporting Violations section below.

Anti-Corruption, Anti-Bribery

Suppliers must not engage in corruption, bribery, or other unethical practices. Suppliers must never accept or offer any form of kickback, bribe, facilitation or unlawful payment or benefit in their operations or dealings. They must comply with applicable anti-corruption and anti-bribery laws and must ensure their activities do not put AECL’s compliance with laws at risk.

Conflicts of Interest

Suppliers must avoid any actual, potential or perceived conflict of interest in their dealings with AECL, including situations where such a conflict could provide preferential treatment or an improper advantage. A conflict of interest may also arise where Supplier has a personal relationship with an AECL employee during a procurement or while goods or services are being supplied to AECL.

Gifts, hospitality, entertainment or other benefits must not be offered to or accepted from any member of AECL's workforce with the intent or possibility of influencing either party's objectivity in performing their work duties or influencing a business decision. AECL employees are restricted from accepting or giving gifts of substance, cash or cash equivalents with Suppliers. No gifts of any value or kind are permitted if the gifting could influence or appear to influence performance of duties or serve as a reward for a decision. No gifts or benefits of any kind may be offered or accepted during a tendering or procurement process, or during contract negotiations.

Supplier must immediately advise AECL in the event it suspects any actual, potential or perceived conflicts of interest, and must take action to remediate any such conflicts in its operations to AECL's satisfaction.

Confidentiality and Privacy

Suppliers must safeguard AECL confidential information, personal information, proprietary information, security information and competitive information (collectively, "Information") from unauthorised or illegal disclosure and access. Suppliers may not use or disclose this Information for any purpose other than in accordance with AECL contractual obligations, best practices and applicable law. Suppliers must maintain and exercise industry standard policies and procedures for the appropriate and lawful handling of the Information.

Supplier may only use AECL personal information collected during the provision of that Supplier's goods or services for the authorized use for which it was collected, and must ensure the personal information is collected, held, used, disclosed, stored, retained and disposed of in accordance with AECL's obligations under the *Privacy Act* (Canada).

Supplier must notify AECL immediately in the event of a suspected or actual breach of handling of the Information or a security breach and must provide assistance to AECL in mitigating any consequences of such events.

Environmental Responsibility

Suppliers must comply with all applicable environmental laws, regulations, permits and licenses. Suppliers must exercise appropriate environmental management practices and procedures. They are expected to strive to minimize their environmental impact through sustainable practices and continuous improvement.

AECL expects Suppliers to operate in alignment with our environmental, social and governance ("ESG") principles, which include responsible sourcing, waste reduction, sustainable resource use, and ethical business practices. These principles reflect our commitment to environmental stewardship, social responsibility, and effective governance across all operations.

For further details on AECL's ESG principles, progress, and expectations, Suppliers should consult our annual ESG reports available on our website at www.aecl.ca/Reports-Resources.

These reports provide a comprehensive overview of our sustainability goals and the standards we uphold within our supply chain.

Indigenous Rights

Suppliers must respect the rights and freedoms of Indigenous Peoples. If engaging in activities that may infringe upon Indigenous or treaty rights, this information must be shared with AECL as early as possible. This supports transparent, respectful and authentic engagement with Indigenous Peoples and helps to safeguard constitutionally protected rights.

Business Continuity

Suppliers are expected to have and maintain business continuity plans that meet or exceed applicable regulatory obligations and industry standard practices, and in accordance with their contractual requirements with AECL.

Outsourcing and Subcontracting

Suppliers are required to ensure that any subcontractors used for the provision of goods or services to AECL will comply with this Code or a similar set of standards and expectations.

Respect for Individuals

Respect for people, integrity and ethical behaviour are core values of AECL. We treat people with dignity, fairness and respect, and we expect our Suppliers to do the same. Suppliers are required to follow all appropriate workplace standards and practices in their operations, including those related to fair treatment, employment, and health and safety.

Suppliers must respect and protect fundamental human rights and must ensure there is no tolerance for forced labour, child labour or human trafficking in the conduct of their operations.

Suppliers are expected to provide confidential and anonymous means for workers to raise concerns, without fear of retaliation.

Fair Treatment

Suppliers must treat all individuals with respect and dignity. They must respect the diversity of their workforce and others with whom they interact, including respecting differences in religion, race, disability, age, sex, gender identity, sexual orientation, marital or family status, colour, national origin and ethnic origin. Suppliers must operate professionally, be committed to non-discrimination principles and demonstrate intolerance for disrespectful and inappropriate behaviour, including discrimination, violence, harassment and intimidation.

Employment Practices and Human Rights

Suppliers must ensure they uphold employment practices and human rights standards that meet or exceed applicable legal and regulatory requirements, including those related to fair wages, employee benefits, working hours, overtime and non-discrimination. In jurisdictions where the laws do not adequately reflect the rights and protections afforded to workers under Canadian employment, labour, human rights and non-discrimination laws, Suppliers are expected to provide the highest level of protection possible to workers.

Suppliers must strictly prohibit the use of child labour and forced labour in accordance with Canadian standards and laws, in their own operations and in their supply chains. Suppliers must not employ or engage workers below the local legal minimum working age, nor may they use or import goods manufactured in whole or in part by forced, bonded, indentured, or involuntary labour. They must provide workers with clearly written and understandable terms of employment, pay their wages to them directly, and pay them at least the minimum legal wages and overtime pay requirements. If applicable, Suppliers are expected to grant their workers the right to join or form trade unions of their own choosing and to bargain collectively with their employer.

Health and Safety

Suppliers must ensure that the health and safety of their workplaces meet or exceed applicable health and safety laws and regulations. Suppliers are expected to ensure members of their workforce receive and maintain appropriate health and safety training and are equipped to raise any health and safety concerns for appropriate remediation. Suppliers are expected to take proactive measures to prevent workplace accidents and injuries.

Code Acceptance, Compliance and Monitoring

Suppliers are expected to comply with this Code. Suppliers must acknowledge agreement with the terms of this Code as a precondition to entering into a supplier agreement with AECL. Periodically, AECL may request that Suppliers confirm in writing their compliance with the Code. AECL reserves the right to monitor, request information and/or audit Suppliers' compliance with this Code and the law, including for compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada). Suppliers must maintain adequate records to demonstrate their compliance, cooperate fully with such requests for information or audits by AECL, and provide all necessary information in a timely manner, as may be reasonably requested by AECL or its authorized representatives.

AECL will periodically update the Code as needed, with which Suppliers are expected to comply. In addition, there may be other requirements provided in contracts between Supplier and AECL which exceed or conflict with the requirements of the Code; in the event of conflict between contractual requirements and the Code, the provisions of the contract will prevail and govern.

AECL reserves the right to terminate any agreement with Supplier where, in AECL's reasonable discretion, it has determined that Supplier or its subcontractor has failed to conduct its activities in accordance with the Code.

Reporting Violations

Suppliers are required to report any suspected breaches of this Code to AECL immediately by contacting the AECL Representative at procurement@aecl.ca or by phone at 1-343-303-0513. Alternatively, reports of suspected violations of this Code may be made through ClearView Connects at www.clearviewconnects.com, AECL's third party confidential reporting system. Anonymous reports may also be made through the ClearView Connects site. Reports may be submitted confidentially and without fear of retaliation.

Inquiries

General inquiries regarding this Code may be directed to procurement@aecl.ca.

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