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Revision History

<i>Version</i>	<i>Date</i>	<i>Prepared by</i>	<i>Reviewed by</i>	<i>Approved by</i>	<i>Change(s)</i>
Rev.000	Sep 30, 2025	Ahana Pardhe	Chris Blazewicz	Melisa Martinez	Policy creation

## 1.0 Policy Goal

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At Lakeside Process Controls, we are dedicated to conducting our business with the utmost standards of integrity, ethics, and responsibility. We expect our suppliers to share this commitment and adhere to the following Supplier Code of Conduct, which is aligned with Canadian laws and regulations.

Lakeside expects our suppliers to demonstrate responsibility and a firm commitment to integrity, respect, fairness, and honesty to both people and the environment. As our suppliers play a central role in our sustainability-oriented value chain, we require them to familiarize themselves with the Lakeside Supplier Code of Conduct as we expect each supplier to understand and adhere to these principles within their businesses and throughout their entire supply chain

Suppliers are expected to collaborate with Lakeside to enhance programs and initiatives related to the content outlined in this Code of Conduct. This collaboration should focus on fostering ethical practices, ensuring compliance with regulatory standards, and promoting sustainability. Suppliers are encouraged to actively participate in discussions, provide feedback, and share best practices to continuously improve the effectiveness of these programs and initiatives.

## 2.0 Scope

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This code of conduct is applicable to all Lakeside suppliers, subcontractors and other third-party intermediaries like agents, consultants, distributors and contractors.

## 3.0 Compliance with Laws and Regulations

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Suppliers must comply with all applicable laws, regulations, and standards in the jurisdictions in which they operate. This includes, but is not limited to, laws related to labour, health and safety, data privacy, environmental protection, and anti-corruption as stipulated by Canadian legislation.

### Labour Practices

#### **Child Labour**

Suppliers must not engage in or condone the use of child labour. All workers must be of legal working age as defined by applicable Canadian laws and regulations.

## **Forced Labour**

Suppliers must ensure that all work is voluntary and that workers are not subjected to forced, bonded, or indentured labour. Suppliers must not engage in human trafficking as per Canadian laws and international conventions.

## **Non-Discrimination**

Suppliers must provide a workplace free from discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, or marital status, in compliance with the Canadian Human Rights Act.

## **Working Conditions**

Suppliers must provide a safe and healthy working environment for all employees. This includes taking appropriate measures to prevent workplace hazards and ensuring access to clean drinking water, sanitary facilities, and emergency medical care, in accordance with Occupational Health and Safety regulations.

## **Wages and Benefits**

Suppliers must pay employees fair wages that meet or exceed the minimum legal requirements. Employees must be provided with all legally mandated benefits as per the Employment Standards Act.

## **Business Ethics**

### **Anti-Corruption**

Suppliers must conduct their business ethically and must not engage in bribery, corruption, or any other forms of unethical business practices. This includes offering, giving, requesting, or receiving anything of value to influence the actions of others, in line with the Corruption of Foreign Public Officials Act.

### **Conflict of Interest**

Suppliers must avoid conflicts of interest that may compromise the integrity of the business relationship. Suppliers must disclose any actual or potential conflicts of interest to Lakeside Process Controls Canada.

## **Confidentiality**

Suppliers must protect the confidentiality of all proprietary information shared by Lakeside Process Controls Canada. This includes not disclosing any confidential information to third parties without prior authorization, in compliance with privacy laws and regulations.

## **Bribery**

Suppliers must comply with all applicable anti-bribery laws. Any form of bribery, including facilitation payments, is strictly prohibited. Suppliers must report any suspected bribery incidents to Lakeside immediately. Regular training in anti-bribery policies is required for all supplier employees.

## Environmental Responsibility

### **Electronic invoices**

To increase environmental sustainability while also reducing carrier documentation delays, Lakeside requests all international suppliers to provide electronic copies of all commercial invoices to our customs brokerage of choice:

Near North Customs  
importingteam@nearnorthcustoms  
Phone: 705-739-0024  
Fax: 705-739-0268

The transmitted info (ex. PDF file) of all commercial documentations (including USMCA / certificate of origin where applicable) can be sent directly to [importingteam@nearnorthcustoms.com](mailto:importingteam@nearnorthcustoms.com) with reference to the shipment ID# (ex. Carrier tracking number) in the subject line.

### **Sustainable Practices**

Suppliers must adopt environmentally responsible practices in their operations. This includes minimizing waste, reducing energy consumption, and promoting the use of sustainable resources, in alignment with Canadian environmental laws.

### **Compliance with Environmental Laws**

Suppliers must comply with all applicable environmental laws and regulations. This includes obtaining and maintaining all necessary permits and licenses related to environmental protection, as required by Canadian legislation.

## **Pollution Prevention**

Suppliers must take measures to prevent pollution and to protect the environment. This includes managing hazardous materials responsibly and adopting practices that reduce environmental impact, in accordance with the Canadian Environmental Protection Act.

## Social Responsibility

### **Community Engagement**

Suppliers are encouraged to engage with and contribute to the communities in which they operate. This includes supporting local initiatives and promoting social welfare. Lakeside is committed to fostering sustainable and positive relationships with Indigenous communities and takes proactive steps to ensure the success of the Indigenous Relations Program. Suppliers are encouraged to share details of their involvement with supporting indigenous welfare.

### **Human Rights**

Suppliers must respect and promote human rights in their operations. This includes treating all employees with dignity and respect and ensuring that their rights are upheld, in compliance with international human rights standards.

## 4.0 Monitoring and Compliance

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Lakeside Process Controls reserves the right to monitor and audit supplier compliance with this Supplier Code of Conduct. Suppliers must provide access to relevant documentation and premises as requested.

### Conflict Minerals

The Seller hereby warrants that all items supplied as part of this purchase order do not contain conflict minerals as defined by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. These items include but are not limited to tin, tantalum, tungsten, and Gold sourced from conflict areas including, but not limited to, the Democratic Republic of Congo, Angola, Burundi, and Rwanda. The Seller hereby agrees that the Buyer has the right to terminate this contract without penalty, should the Seller violate this section of the Purchase Order Terms and Conditions.

### PFAS Chemicals

All materials and services supplied should be provided in accordance with applicable laws and regulations. If the Seller is supplying goods containing PFAS chemicals, they must disclose any use of PFAS

in their products or services to the Buyer. The Seller hereby agrees that the Buyer has the right to terminate this contract without penalty, should the Seller violate this section of the Purchase Order Terms and Conditions. The Seller will bear all costs associated with corrective actions, including but not limited to product recalls, disposal, and environmental remediation. Additionally, the Seller shall indemnify and hold harmless the Buyer for any legal, financial, or reputational damage resulting from non-compliance with PFAS restrictions.

## **Corrective Actions**

In the event of non-compliance, Lakeside Process Controls may require suppliers to implement corrective actions to address the issues. Continued non-compliance may result in the termination of the business relationship.

## **Reporting Concerns**

Suppliers must have mechanisms in place for employees to report concerns or violations of this Code of Conduct. Reports must be taken seriously and addressed promptly and appropriately.

## 5.0 Other

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### Management Systems

Suppliers must establish and maintain effective management systems to ensure compliance with this Supplier Code of Conduct and all applicable laws and regulations. These systems must be designed to identify, monitor, and mitigate risks related to their operations and supply chain. Suppliers must maintain accurate and complete documentation and records related to their compliance with this Supplier Code of Conduct. This includes records of audits, inspections, training, and any corrective actions taken. Suppliers must make these records available to the company upon request. Suppliers must commit to continuous improvement in their management systems and practices. This includes regularly reviewing and updating policies, procedures, and controls to ensure they remain effective and aligned with best practices and regulatory requirements. Suppliers must provide regular training and awareness programs to their employees on the requirements of this Supplier Code of Conduct and relevant laws and regulations. These programs must cover topics such as ethical business. Suppliers must designate an individual or individuals responsible for ensuring compliance with this Management Systems Clause and the overall Supplier Code of Conduct. These individuals must have the authority and resources necessary to implement and maintain effective management systems. Suppliers must conduct regular monitoring and auditing of their operations and supply chain to ensure compliance with this Supplier Code of Conduct. This includes internal audits, third-party audits, and inspections. Suppliers must promptly address any identified non-compliance issues and implement corrective actions.

## Supply Chain Management

Lakeside requires our suppliers to use their best efforts to extend the principles embodied in this Supplier Code of Conduct to their suppliers and agents that are engaged in the production, supply and support of products or services for Lakeside. Lakeside emphasizes that all suppliers annually fill out the surveys that Lakeside sends periodically.

## Counterfeit, Fraudulent and Suspect Items (CFSI)

To mitigate CFSI risk, Lakeside requires our suppliers to introduce into their QA program a documented process to prevent, detect and disposition suspect CFSI's

Lakeside, its customers and applicable authorities having jurisdiction, reserve the right to review the supplier's documentation required for fulfillment of purchase orders issued per the applicable QA program requirements, standard or code, and to have access to the supplier facilities or working areas to facilitate audits, surveys, and verify the supplier's conformance with the specified requirements

## Data Privacy

Suppliers must comply with all applicable Canadian privacy laws and regulations, including but not limited to the Personal Information Protection and Electronic Documents Act (PIPEDA) and any provincial privacy legislation. Suppliers are required to implement appropriate measures to protect the personal information of individuals and ensure its confidentiality, integrity, and availability. Suppliers must collect, use, and disclose personal information only for purposes that are reasonable and necessary for the fulfillment of their contractual obligations. Personal information must be collected by lawful and fair means, and with the knowledge and consent of the individual concerned, except where otherwise permitted by law. Suppliers must implement appropriate physical, organizational, and technological safeguards to protect personal information against loss, theft, unauthorized access, disclosure, copying, use, or modification. These safeguards must be appropriate to the sensitivity of the information. Suppliers must provide individuals with access to their personal information upon request and allow them to correct any inaccuracies. Suppliers must respond to access and correction requests within a reasonable time frame and in accordance with applicable laws. In the event of a data breach involving personal information, suppliers must promptly notify the affected individuals and relevant authorities as required by law. Suppliers must also take immediate steps to mitigate the impact of the breach and prevent future occurrences. Suppliers must designate an individual or individuals responsible for ensuring compliance with this Code of Conduct and applicable privacy laws. Suppliers must also provide training to their employees on privacy protection and the importance of safeguarding personal information.

## Cybersecurity

Lakeside suppliers must ensure:

- Where applicable, any goods or services are secure (and any security is up to date in line with best practices) and do not expose Lakeside or our customers' data and/or systems to security breaches or unauthorized access.
- Any data or information Lakeside shares with a supplier is kept confidential and handled appropriately, given the nature of the data or information.
- They do not take any action that could create the perception that Lakeside is acting inconsistent with its policies.
- Where required, any specific security or industry standards or requirements are met.
- They immediately notify Lakeside upon becoming aware of any data or network breach of their systems, or any ongoing security issue with their supplied goods or services.
- Any information provided by Lakeside (or its customers) is protected from misuse, unauthorized access, interference, loss, modification or disclosure, and must only be used or disclosed for the purposes for which Lakeside provided it to the supplier.

## 6.0 ACKNOWLEDGEMENT

The attached Supplier Code of Conduct sets forth the principles required by Lakeside Process Controls, Ltd., of all Suppliers who supply goods and services to Lakeside when conducting business with us.

By signing this Acknowledgement, the undersigned Vendor agrees to abide by the Vendor Code of Conduct and agrees to ensure its employees, officers, agents, representatives, and subcontractors are also made aware of and comply with it.

I, \_\_\_\_\_ an authorized representative of, hereby acknowledge and agree to abide by the attached Vendor Code of Conduct, and will ensure that the employees, officers, agents, representatives and subcontractors of are aware of and abide by such policies and principles in the process of preparing and submitting bids and proposals for Regional work, provisions of goods and services to the Region, and during the performance of all agreements entered into with the Region for such purposes.