

COMPANY NOTICE

SUPPLIER CODE OF CONDUCT

Policy Statement & Purpose

E.S. Fox Limited is determined to carry out all of their activities lawfully, ethically and with integrity by establishing the necessary practices, guidelines, polices, and expectations. E.S. Fox Limited's Supply Chain is essential to their success and is expected to maintain the highest standard and practices by conducting business in a manner consistent to or exceeding this guideline.

Applicability

This Supplier Code of Conduct applies to, but is not limited to, Suppliers, Partners, and all personnel to whom E.S. Fox Limited has a business relationship with.

Principles

This Supplier Code of Conduct is based on the Company's corporate policy, sound business standards, ethics, laws, and codes. E.S. Fox's core expectations are outlined at a high level in below points:

- Suppliers shall always act ethically and with integrity in any business dealings.
- Suppliers **shall not** offer/give gifts or other types of benefits to E.S. Fox Limited employees, representatives, associates, or others that would compromise or appear to compromise the best interest of E.S. Fox Limited.
- Exchange of gifts, meals, or prizes are permitted, provided they are not deemed to be out of line of what would be considered customary and are modest, low in cumulative monetary value (\$100 or less), and infrequent. Reference E.S. Fox Limited 'Conflict of Interest (Supply Chain)' Policy for additional conditions.
- Suppliers shall act in a respectful and constructive manner to all workers and personnel regardless of Company or Organization.
- Suppliers **shall** not disclose sensitive or confidential information about E.S. Fox Limited, our Clients, Projects and Jobs, or Performance to Third Parties unless accepted in advance by E.S. Fox Limited and warranted or applicable for purposes of agreed to scope execution only. When in doubt, consult with your E.S. Fox Limited authorized representative for directive.
- Supplier **shall not** subject former E.S. Fox Limited employees, and associates to any pressures, requests, or action that would comprise contractual obligations to E.S. Fox following their employment or business dealings with our Company.
- Suppliers shall ensure applicable Occupational Health and Safety standards are met (at minimum) or exceeded.
- Suppliers **shall** act in an environmentally friendly and sustainable manner.
- Suppliers **shall** promote diversity initiatives within their organization and their Supply Chain.
- Suppliers shall maintain the necessary controls to combat child labor, forced labor, and/or human trafficking.
- Suppliers **shall** enforce applicable elements of this Code of Conduct upon their employees, sub suppliers, and any other associated providers of goods or services.
- Suppliers are encouraged and expected to implement (if not already) policies, standards, controls to account or exceed this Supplier Code of Conduct.

Reporting

Questions, clarification, suspect, or otherwise behaviour pertaining to this policy may be submitted to the E.S. Fox Limited Human Resources Manager.

Brandon Layge Purchasing Manager

Date (dd/mmm/yy)