

	<b>SIRIUS INSTRUMENTATION AND CONTROLS INC.</b>	<b>SUPPLIER CODE OF CONDUCT</b>
	Date Issued: July 28, 2025	Approved by: T. Sekhon

**1. PURPOSE**

Sirius Instrumentation and Controls Inc. (Sirius Controls) is committed to maintaining the highest standards of integrity, trust, and responsible business practices across its supply chain. This Supplier Code of Conduct outlines the principles and expectations that apply to all third parties providing goods or services to Sirius Controls including manufacturers, distributors, vendors, service providers, contractors, and their representatives (collectively referred to as “Suppliers”).

The purpose of this Supplier Code of Conduct is to promote ethical conduct, respect for human rights, and the safety and well-being of workers involved in the supply of products and services to Sirius Controls and it applies to all Suppliers, governing their business interactions with the company.

**2. COMPLIANCE WITH LAWS**

Suppliers must conduct business in accordance with all applicable laws, rules and regulations relevant to the goods and services they provide in the regions where they operate.

**3. CONFLICTS OF INTEREST**

Suppliers are expected to exercise sound judgment, care, and diligence to avoid situations where a conflict of interest in their interactions with Sirius Controls.

Suppliers and their employees must not seek to gain improper advantage or preferential treatment through personal relationships with Sirius Controls. A conflict may also arise if a Supplier is partially or fully owned, controlled, or influenced by a Sirius Controls employee or their immediate family. Any actual or potential conflicts of interest known to the Supplier must be promptly disclosed to the appropriate Sirius Controls contact.

**4. ANTI-BRIBERY AND ANTI-CORRUPTION**

Suppliers must maintain the highest standards of integrity and must not, under any circumstances, engage in bribery or corrupt practices. Any form of bribery, corruption, kickbacks, extortion are strictly prohibited. Suppliers must comply with all applicable anti-bribery and anti-corruption laws in the jurisdictions where they operate.

**5. SANCTIONS COMPLIANCE**

Suppliers must comply with all applicable economic sanctions and trade restrictions imposed by relevant national and international authorities. Distributors and vendors are prohibited from selling Sirius Controls products to sanctioned markets or engaging in any transactions that could cause Sirius Controls to violate applicable trade laws and regulations. Distributors must ensure that Sirius Controls’ products are not sold to sanctioned individuals, organizations, or countries. Vendors are likewise expected to avoid any transactions with restricted markets. Both distributors and vendors are expected to implement appropriate controls to ensure ongoing compliance with these obligations.

	<b>SIRIUS INSTRUMENTATION AND CONTROLS INC.</b>	<b>SUPPLIER CODE OF CONDUCT</b>
	Date Issued: July 28, 2025	Approved by: T. Sekhon

**6. HUMAN RIGHTS, INCLUSION AND LABOUR STANDARDS**

Sirius Controls is committed to upholding the highest standards of human rights, fair labor practices, and inclusion throughout its supply chain. The company expects all suppliers to respect these principles and integrate them into their daily operations.

Suppliers must comply with all applicable local, national, and international laws related to labor, employment, human rights, and non-discrimination. This includes ensuring that all workers are treated fairly, paid legally, and employed in safe and healthy working environments. Forced labor, child labor, and any form of modern slavery are strictly prohibited. Sirius Controls has a separate Modern Slavery Policy, and suppliers must understand and abide.

An inclusive and equitable workplace is essential. Suppliers are expected to foster a culture of equal opportunity and to prevent any form of discrimination based on gender, race, ethnicity, religion, age, disability, sexual orientation, or any other protected characteristic. Harassment in any form is not tolerated.

To support accountability, Sirius Controls encourages suppliers and their workers to report any concerns or suspected violations of these standards to the appropriate Sirius Controls contact, which allows for confidential and anonymous reporting without fear of retaliation. Suppliers are encouraged to report concerns or questions about this Code of Conduct to [purchasing@siriuscontrols.com](mailto:purchasing@siriuscontrols.com).

**7. MONITORING AND COMPLIANCE**

Suppliers are expected to follow and uphold the standards outlined in this Code of Conduct. Appropriate systems must be in place to demonstrate compliance with this Code of Conduct.

Suppliers may be required to provide confirmation that they are complying with the obligations of this Code of Conduct.

If anyone has reason to believe that a Supplier is violating the obligations or principles of this Code, they are encouraged to report their concerns confidentially to the appropriate Sirius Controls contact.

If a supplier is found to be non-compliant, they are expected to take timely corrective action. Failure to meet the expectations of this Code may result in suspension, termination, or legal action, depending on the severity of the breach.

**8. OWNERSHIP AND REVIEW**

The Quality Manager or his/her representative is responsible for overseeing this Supplier Code of Conduct. The Supplier Code of Conduct will be reviewed annually during the Management Review Meeting to maintain its relevance and accuracy.