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## TransCanada Turbines Supplier Code of Conduct

TransCanada Turbines Ltd. and its subsidiaries (“TCT”) are committed to conducting business with the highest ethical standards and in compliance with all applicable global laws. TCT, in turn, requires all companies it interacts with to maintain the ethical business practices set out in this Supplier Code of Conduct (“SCC”).

All TCT contractors, suppliers and vendors must adhere to TCT’s SCC and Business Ethics Policy or provide satisfactory evidence that their own business ethics meet or exceed those set forth by TCT. These policies are available on TCT’s website here: [Governance | TransCanada Turbines \(tcturbines.com\)](http://www.tcturbines.com/Governance). TCT is committed to ongoing evaluation and continuous improvement of all business relationships and mandates that its suppliers commit to cooperating and adhering to the requirements set out herein.

### 1. Creating a Safe Workplace

TCT is committed to the protection of its employees, assets, resources and the environment from accidental loss. TCT will ensure that all corporate decisions affecting employee physical, physiological and social well-being and the environment are made with full consideration of current and potential health, safety and environmental effects.

Likewise, in fulfilling this promise, TCT expects all suppliers to maintain a safe and healthy work environment in their business jurisdictions and meet or exceed all applicable regulatory and other health, safety and environmental requirements. TCT expects suppliers to commit to eliminating and/or reducing all foreseeable hazards and risks by integrating health and safety into the daily operation and maintenance of their facilities. TCT believes all accidents, illnesses and personal injuries can be prevented and will continue to work to that goal.

### 2. Diversity, Inclusion and Equity

TCT believes diversity improves performance and contributes to a better business. Experience has shown that when different people’s ideas, opinions, backgrounds and skills are brought to the table, embracing our differences, we create a more creative, innovative and high-performance culture.

Our company and employees respect the personal dignity, privacy and rights of each individual and this belief in diversity enriches the workplace. TCT conducts business without regard to ethnic origin, culture, religion, age, disability, skin color, gender, sexual identity and orientation, or worldview.

When *everyone* feels safe and empowered to bring their very best, it sparks innovation. All TCT employees work to foster an inclusive workplace where all members of our team are respected and feel they can contribute to their, and TCT’s full potential.

### 3. Protection of Human Rights

TCT is dedicated to the protection and advancement of all human rights. This commitment is based on TCT’s core values that every individual has the right to work in a harassment and violence-free workplace and to be treated with dignity and respect.

This protection is guaranteed against harassment on the basis of any person’s race, color, creed, religion, sex (including pregnancy, childbirth, or related medical conditions), age, national origin, ancestry, citizenship, marital status, veteran or military status, medical condition, sensory, physical, or mental

disability, genetic information, sexual orientation (including gender expression or identity), whistleblower actions, or any other factor protected by local, provincial/state, federal or global legislation.

#### Preventing Modern Slavery

TCT requires its suppliers to take effective measures ensuring no one conducts work for TCT's benefit that he or she has not voluntarily accepted based on mutually agreed, true and transparent conditions. This includes protection against any form of direct or indirect mental, physical or financial coercion, threat of any penalty or sanctions, or which in any other way exploits the vulnerability of the worker. No supplier employees should have to pay any form of recruitment or employment eligibility fees without proper compensation. No companies conducting business with TCT should retain identity papers or work permits of personnel as a condition of employment.

#### Preventing Child Labour and Protecting Young Workers

TCT requires no persons below the age of 17 years be employed, or the legally prescribed minimum age. Persons under the age of 18 are not allowed to perform hazardous work (i.e. work that is mentally, physically, socially or morally dangerous or harmful) or work that interferes with mandatory schooling.

Suppliers are expected to apply equally stringent standards regarding the employment of children and young workers, and to prohibit any other forms of child labour (such as trafficking, sexual exploitation, debt bondage, forced labour and the recruitment or use of underage children for security or military purpose).

### **4. Ethics, Integrity and Compliance**

All individuals who represent TCT, as well as those with whom we conduct business must uphold the highest ethical, legal and business standards. TCT understands the challenges operating in a global marketplace are not always straightforward, with different clients, business partners and operations throughout the world. Our company ensures our commitment to ethics, integrity and compliance is paramount in meeting and succeeding in these new situations.

As new business partner relationships are established, new markets are entered and new global laws are introduced, impacting how business is conducted, there may be business challenges driven by a passion to succeed, however TCT commits to never compromising its integrity. TCT and its suppliers must always choose the ethical path in the face of such challenges.

### **5. Bribery and Corruption**

The giving, making, offering or authorising of inappropriate payments or bribes, directly or indirectly, to any government official or business representatives contrary to law, is never acceptable in any situation and exposes both TCT and its personnel to possible criminal prosecution, legal action and large criminal or civil fines or penalties and imprisonment for individuals.

Additionally, creating false records or misrepresenting facts in connection with corrupt payments is contrary to law and acts or even allegations of bribery may do serious damage to TCT's reputation.

## 6. Privacy, Confidentiality and Information Security

Confidential information can be broadly defined as technical information concerning products and services, manufacturing and development process information, engineering designs, drawings and layouts, software code, know-how, pending patent applications or invention disclosure statements.

Suppliers must protect confidential information, proprietary information and trade secrets in their possession from unauthorized use or disclosure, including any confidential information relating to customers, suppliers, contractors, employees and other third parties.

## 7. Reporting Breaches of the Code

All instances of breaches or suspected or potential breaches of any applicable law or any section of the SCC must be immediately reported on a confidential or, if preferred, anonymous basis via the TCT Business Ethics Hotline at any time. All such communications will be held in confidence to the extent consistent with carrying out any appropriate investigation and applicable laws.

### **TCT Business Ethics Hotline**

Phone –Canada/ US -1(844) 875-9755

All Other Countries use 3rd party web intake Online –<https://tcturbines.ethicspoint.com/>