



# Bruce Power's Supplier Code of Conduct

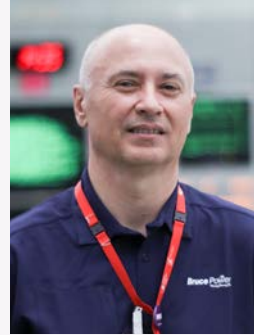
**HIGH STANDARDS & STRONG ETHICS.** Every step. every time. every day.

**BrucePower**<sup>™</sup>



# Contents

<b>General Supplier Responsibilities and Reporting Obligations</b>	<b>3</b>
1.0 <b>Safety First</b>	<b>3</b>
2.0 <b>Harassment, Discrimination and Workplace Violence</b>	<b>4</b>
3.0 <b>Human Rights and Diversity</b>	<b>4</b>
4.0 <b>Environment</b>	<b>4</b>
5.0 <b>Privacy and Confidential Information</b>	<b>4</b>
6.0 <b>Hiring Former Bruce Power employees/contractors</b>	<b>5</b>
7.0 <b>Avoiding Conflicts of Interest</b>	<b>5</b>
8.0 <b>Gifts and Hospitality</b>	<b>5</b>
9.0 <b>Anti-Corruption and Insider Trading</b>	<b>5</b>
10.0 <b>Business Reporting</b>	<b>6</b>
11.0 <b>Protecting Bruce Power Assets</b>	<b>6</b>
12.0 <b>Information Security</b>	<b>6</b>
13.0 <b>Social Media and Protection of Bruce Power's Reputation</b>	<b>6</b>
<b>Reporting Ethical Concerns</b>	<b>7</b>
<b>Bruce Power Ethics Decision Tree</b>	<b>7</b>



## A Message from our President and CEO Michael W. Rencheck

At Bruce Power we are fully committed to conducting our business safely, with professionalism and integrity, while treating each other with respect and striving to achieve performance excellence. We want to work with companies who also demonstrate strong values and are committed to working ethically, with integrity, and who have a passion for performance excellence.

Suppliers are an integral part of our team and contribute to our overall success at Bruce Power. We have high expectations for ethical leadership, behaviour and performance by our employees and representatives at Bruce Power, and we expect the same from the Suppliers we choose to work with.

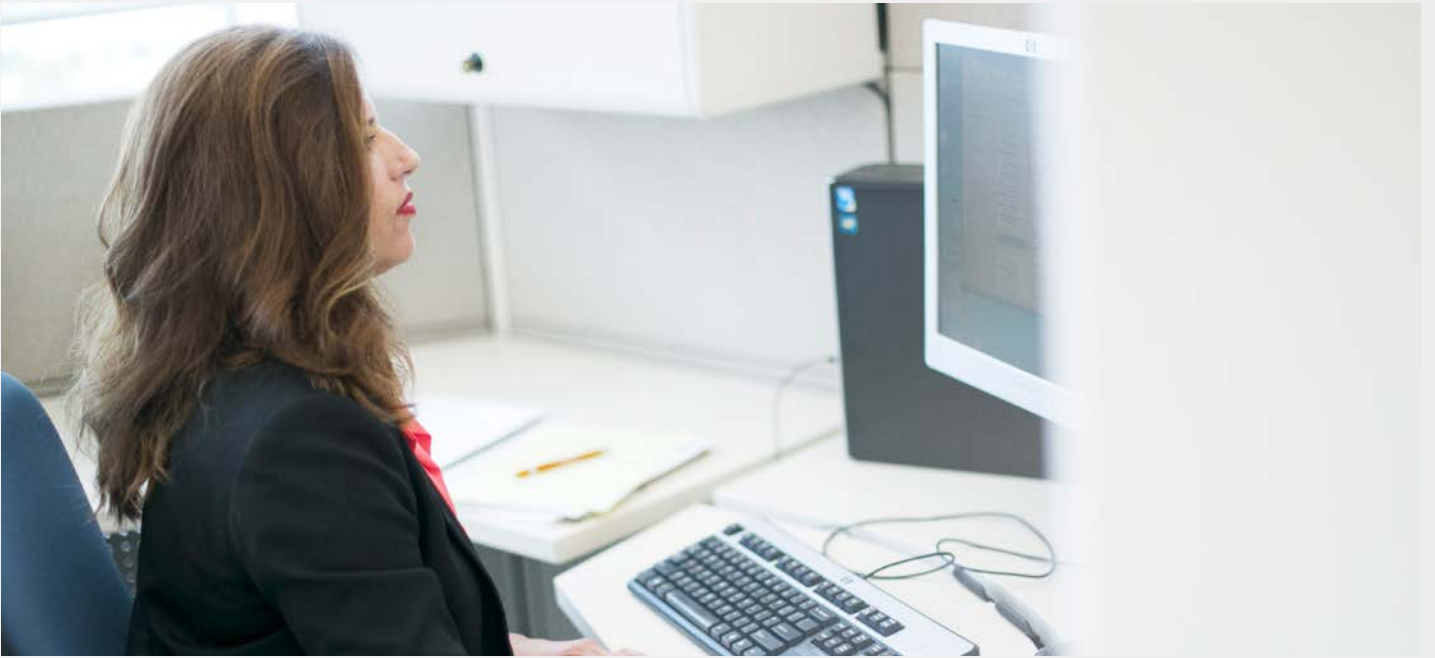
The Supplier Code of Conduct applies to Bruce Power Suppliers, including their owners, employees, agents, partners and subcontractors who provide goods and/or services to Bruce Power.

Our Supplier Code of Conduct provides guidelines that pertain to our working relationship with you. We expect our Suppliers to have a system in place to ensure compliance with Bruce Power applicable policies and procedures.

We value our relationship with you and look forward to continuing to work together for many years to come.

A handwritten signature in black ink that reads "Michael W. Rencheck". The signature is written in a cursive, flowing style.

**MICHAEL W. RENCHECK**  
President and Chief Executive Officer  
Bruce Power



## General Supplier Responsibilities and Reporting Obligations

At Bruce Power, we strive to be a responsible, ethical and values-driven organization. We expect the same of our Suppliers. Bruce Power Suppliers are expected to act with integrity and conduct business in a manner that safeguards the interests of Bruce Power, our local communities, our colleagues and the environment. In so doing, Suppliers are to observe Bruce Power policies, procedures and rules while at any Bruce Power facility and/or performing any Bruce Power work. These have been established to provide for the security and safety of our Suppliers, our colleagues, the site, the community and the environment, and to ensure the efficient operation of Bruce Power's business.

At a minimum, it is expected that all applicable laws, statutes and regulations of the jurisdictions in which the Supplier and Bruce Power operate are complied with. Suppliers must ensure their outsourcing or sub-contractor arrangements, if applicable, comply with the Supplier Code of Conduct. The Supplier Code of Conduct is not to be followed in lieu of but in addition to the Supplier's obligations as set out in any agreements between Bruce Power and the Supplier. In the event of a conflict between the Supplier Code of Conduct and an applicable agreement, the agreement will govern.

### Reporting

Our reputation and our Suppliers' reputations depend on ethical decision-making. Accordingly, everyone has a duty to report any actual violation or suspected violation of the Supplier Code of Conduct that is believed in good faith to have occurred or may occur to the Bruce Power Code of Conduct Office.

Bruce Power will not tolerate anyone who engages in retaliation or reprisal against someone who has made a good faith report.

All allegations received in relation to workplace harassment, while at any Bruce Power facility must immediately be reported to the Bruce Power Code of Conduct Office, and any allegations of workplace violence, including threats, must be immediately reported to Bruce Power Security.

Further information on reporting concerns can be found on pages 4 and 7.

### Applicability

The Supplier Code of Conduct applies to Bruce Power Suppliers, **including their owners, employees, agents, partners and subcontractors who provide goods and/ or services to Bruce Power.**

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## 1.0 Safety First

Bruce Power provides a safe workplace for all workers, and we expect that the occupational health and safety of workers is a priority for Suppliers throughout all significant aspects of our activities.

We expect everyone to work safely and follow Bruce Power safety rules while working at any Bruce Power facility and/or performing any Bruce Power work. Suppliers must have appropriate health and safety policies and procedures, as well as comply with all applicable health and safety laws, statutes and regulations of the jurisdiction in which they operate and where Bruce Power operates.

Nuclear security regulations require that thorough searches be conducted for contraband items. Accordingly, all vehicles entering or exiting the site are subject to random searches.

No unauthorized material may be brought onto any Bruce Power premises. This includes, but is not limited to, weapons, firearms or explosives. If found, any such items will be confiscated.

Furthermore, possessing, consuming, selling or purchasing alcohol, cannabis / cannabinoid products, or illicit drugs while on any Bruce Power premises is strictly prohibited.

Individuals who possess a valid Bruce Power site clearance must report all criminal charges, convictions and serious Highway Traffic Act infractions (such as loss of driving privileges) to [sectionmanagersecurityclearance@brucepower.com](mailto:sectionmanagersecurityclearance@brucepower.com) within five business days in accordance with BP-PROC-00180, Security Clearances. Failure to disclose any charge may result in the revocation of a security clearance, which could lead to the termination of contract for services and/or the suspension or termination of site access privileges.

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## 2.0 Harassment, Discrimination and Workplace Violence

Bruce Power has zero tolerance for workplace harassment and discrimination. Individuals working for or on behalf of Bruce Power must not engage in any workplace harassment or discrimination. Engaging in this behaviour could lead to the termination of site access privileges.

We require our Suppliers prohibit all types of workplace harassment including, but not limited to physical, verbal, psychological and sexual harassment.

Suppliers must commit to providing a workplace free from harassment and discrimination, while at any Bruce Power facility and/or performing any Bruce Power work and must provide adequate instruction and training to their workers and supervisors.

All allegations of workplace harassment and discrimination, while at any Bruce Power facility, must be immediately reported to the Bruce Power Code of Conduct Office. Further information can be found in BP-PROC-00409, Workplace Human Rights and Harassment.

Bruce Power has zero tolerance for workplace violence. Individuals working for or on behalf of Bruce Power must not engage in or threaten any violence in the workplace. Engaging in this behaviour could lead to the termination of site access privileges.

Anyone who witnesses workplace violence, including a potential threat of workplace violence, or believes that there is an immediate threat of violence at any Bruce Power facility must contact Security immediately at ext. 15000 or 519-361-5000. In the case of workers

at offsite Bruce Power facilities, the local police force should be contacted directly (911) and the incident must also be reported to Bruce Power Security as soon as possible.

Anyone who witnesses warning signs of violence but does not believe that there is an immediate threat of violence, must promptly contact Security at ext.15281.

For clarity, there is also an obligation to report violent conduct or warnings signs of violence including behaviour that occurs outside the workplace that may impact the workplace, including content found online or on social media accounts.

Further information can be found in BP-PROC-00385, Violence in the Workplace.

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## 3.0 Human Rights and Diversity

Bruce Power expects our Suppliers to conduct their business in a responsible, non-discriminatory manner, respecting the rights of their employees. This includes following appropriate hiring practices, adhering to applicable labour laws and ensuring that all employees are treated with dignity, respect and fairness, and ensuring that no child labour or forced labour is condoned, facilitated or used in their workplaces. Suppliers must promote a culture of inclusion and demonstrate respect and acceptance of others.

We expect our Suppliers to support and respect human rights, diversity and equal opportunity within the workplace. Suppliers shall ensure all labour practices, wage payments and benefits comply with applicable laws and regulations.

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## 4.0 Environment

We recognize our responsibility to the environment and seek to operate sustainably. Suppliers are expected to apply a continuous improvement approach to enhance their environmental performance and reduce their environmental footprint. Suppliers must follow all internal Bruce Power procedures as well as all applicable laws and regulations regarding environmental practices, while at any Bruce Power facility and/or performing any Bruce Power work.

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## 5.0 Privacy and Confidential Information

Bruce Power is committed to respecting applicable privacy laws and to protecting personal information we collect about employees, agents, contractors and the public. Bruce Power expects our Suppliers to protect the confidentiality and privacy of business records,

allowing for their use only by authorized personnel and for authorized business purposes.

Suppliers may have access to information which is confidential and proprietary in nature, including personal and business information about colleagues, partners, competitors, other Suppliers and third parties, and customers. Everyone must protect confidential information belonging to Bruce Power (and mark it accordingly), and has a responsibility to prevent misuse, theft, fraud and improper disclosure. It is expected that appropriate care must be taken in the handling, discussion or transmission of sensitive or confidential information that could affect Bruce Power employees, the business community or the general public.

If anyone believes they have been given access to confidential information in error, they must notify Bruce Power and refrain from any further use or distribution of the information for either personal or professional purposes.

The obligation to protect confidential and proprietary personal and business information continues even after the relationship with Bruce Power ends. All information and property belonging to Bruce Power must be returned when the services or contract ends.

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## 6.0 Hiring Former Bruce Power employees/contractors

Suppliers must not interfere with the ability of former employees or contractors of Bruce Power to meet their legal or contractual obligations to Bruce Power following the end of their employment or contract for services, particularly as it relates to confidentiality or non-disclosure requirements.

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## 7.0 Avoiding Conflicts of Interest

A conflict of interest is any situation where an individual or enterprise has a private or personal interest in the outcome of a decision or action which may create, or may be perceived as creating, a conflict with the interests of Bruce Power.

Suppliers must not try to gain improper advantage or improperly impact a Bruce Power employee's ability to make sound, impartial and objective decisions on behalf of Bruce Power.

It is mandatory to declare any actual or potential conflict of interest, and discuss it with Bruce Power's Contract Manager and Supply Chain.

## 8.0 Gifts and Hospitality

Gifts and hospitality (e.g., meals, beverages, invitations to social or recreational outings) can help build strong business relationships, but they must never influence decisions. If offers of gifts and hospitality are frequent, or of substantial value, they may create the appearance of, or an actual, conflict of interest.

### Suppliers may offer gifts and hospitality provided they:

- Are consistent with customary business practices as they are relatively infrequent, not lavish or excessive in value
- Are not given or received by an active member of the Bruce Power evaluation team during a competitive procurement process
- Are not requested
- Comply with applicable laws

### How to Know?

#### Gifts and Hospitality which are acceptable:

- Modest occasional meals with someone with whom we do business
- Occasional attendance at ordinary sports, theatre and other events
- Gifts of nominal value, such as pens, calendars, or small promotional items
- Attendance at social functions at conference or trade events that are widely attended

#### Gifts and Hospitality which are always unacceptable:

- Any gift of cash or cash equivalent (such as gift certificates, gift cards or loans)
- Any gift or hospitality that is a 'quid pro quo' (offered for something in return)
- Any gift or hospitality that would be considered offensive or in poor taste, or that could damage Bruce Power's reputation
- Any gift or hospitality that would be illegal (anything offered to a government official in breach of local or international bribery laws)

These requirements do not change during traditional gift-giving seasons.

If a Supplier is unsure whether a gift or hospitality offer complies with the Supplier Code of Conduct, the Supplier should consult with the Contract Manager or Bruce Power's Supply Chain organization.

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## 9.0 Anti-Corruption and Insider Trading

Bruce Power promotes integrity and ethics in all aspects of its activities. Bruce Power expects Suppliers to comply with all applicable laws and regulations on corruption, bribery, prohibited business practices and

extortion. Furthermore, Suppliers must never make, offer, receive or approve any form of bribe, kickback or other type of improper payment under any circumstances.

Bruce Power prohibits the payment of bribes or kickbacks (the offering or acceptance) of any kind, whether in dealings with public officials or individuals in the private sector.

Bruce Power respects our relationship with government employees. Suppliers are expected to be aware of and comply with relevant laws and regulations that govern relationships between government, customers and Suppliers.

Suppliers are expected to ensure that payments made to agents or other third parties are not used, in whole or part, to influence government decisions or secure any other improper advantage.

We expect our Suppliers to conduct their business fairly and in respect of competition laws, sometimes referred to as “antitrust” laws. Suppliers shall not engage in collusive bidding, price discrimination, anti-competitive, antitrust or other unfair trade practices.

Suppliers must comply with any applicable insider trading laws and regulations that govern use of sensitive information.

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## 10.0 Business Reporting

Bruce Power expects everyone to honestly, accurately and timely record and report all business information including, without limitation, financial records, to ensure that such information is maintained in a manner consistent with applicable laws and regulations and that effective internal controls are in place to protect and comply with these same requirements.

No one will make any deliberate, false, artificial or misleading entry in any Bruce Power book, invoice, log, record or document. This includes, but is in no way limited to, room and board/per diem claims, timesheets / electronic time entry, training records, expense forms, project time entry, project status reporting, overtime meals or other allowances.

Individuals must immediately disclose any clerical or accounting errors as they become known and when there may have been an inadvertent disclosure of confidential or private information.

Bruce Power reserves the right to conduct an appropriate audit of Suppliers to ensure compliance with the Supplier Code of Conduct.

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## 11.0 Protecting Bruce Power Assets

As a Supplier of Bruce Power, you have a responsibility to protect Bruce Power assets and information. Bruce Power property must only be used for business and other approved purposes.

Everyone has a responsibility to immediately report the theft, loss or misuse of Bruce Power property, including graffiti. Bruce Power assets must not be used for personal use.

Bruce Power computers, email systems and equipment must never be used for outside business purposes or for any illegal or unethical purposes.

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## 12.0 Information Security

All computers, wireless communication devices or other Bruce Power Information Technology (IT) equipment, including the information stored and transmitted on them, is the property of Bruce Power.

Inappropriate use of Bruce Power systems, including usage that interferes with business processes or puts a strain on business resources is unacceptable. Use of Bruce Power systems to download or distribute content that may conflict with Bruce Power values, or that may be regarded as offensive on the basis of any prohibited ground of discrimination under the Canadian Human Rights Act, is prohibited.

There must not be any attempt to circumvent or tamper with Bruce Power IT and information security measures. In an effort to protect our resources, Bruce Power monitors and logs IT equipment usage including all computer and wireless communication device activity. Accordingly, there should be no expectation of privacy regarding the use of IT equipment. Individuals are responsible for all use of their IT account.

IT equipment and information security is the responsibility of all users. All suspicious activity must be reported to BNPD-IT-Security@brucepower.com, the IT Service Desk or the Code of Conduct Office.

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## 13.0 Social Media and Protection of Bruce Power’s Reputation

Everyone is expected to avoid any conduct or comments that may negatively impact Bruce Power, including on social media. Suppliers should adopt processes to ensure that the use of social media by their workforce or representing agents does not negatively affect Bruce Power’s reputation, and that representatives do not make any false, misleading or otherwise inappropriate comments about Bruce Power.

Suppliers may not produce social media content on behalf of Bruce Power. Posting photographs or video taken on Bruce Power property without written Bruce Power approval is prohibited.

Should you have a photo or video you would like to share on social media, contact the Communications and Media Relations Manager at [commsapproval@brucepower.com](mailto:commsapproval@brucepower.com) for approval.

## Speak Up! Reporting Ethical Concerns is our Obligation

If you believe the Supplier Code of Conduct may have been violated, we encourage you to discuss it with your Bruce Power contract manager or another member of Bruce Power’s management team.

### Alternatively, you may wish to contact the Code of Conduct office by:



#### Internal

519-361-4630, or ext. 14630

[BNPDCoCodeOfConduct@brucepower.com](mailto:BNPDCoCodeOfConduct@brucepower.com)

#### External 24/7 Code of Conduct Help Line

1-888-371-4692 or [www.ethicspoint.com](http://www.ethicspoint.com)

The Code of Conduct Help Line is administered by an independent external service provider, which is available 24/7 by phone or online. You may submit a report anonymously if you choose. Caller ID is not used. Once the call is complete, a report is forwarded to the Code of Conduct Office for assessment and appropriate follow-up. All callers are issued a report number and a confidential PIN number that allows them to follow-up on their report, even if they have chosen to remain anonymous. During a follow-up, a caller can access responses from the Code of Conduct Office, including requests for additional information that may be required before an effective investigation can occur.

Anyone reporting a concern is responsible for giving all relevant details. All reports are treated confidentially to the extent possible, consistent with the law and the need to conduct an adequate investigation. Anyone involved in an investigation is expected to co-operate and participate, and treat the matter confidentially. Failure to respect the confidentiality of an investigation, including a Code of Conduct, Human Resources or Security investigation may result in consequences, up to and including possible termination of contract for services, with or without notice, and/or the suspension or removal of site access privileges.

Anyone making a malicious or knowingly false allegation will be subject to consequences, up to and including possible termination of contract for services, with or without notice, and/or the suspension or removal of site access privileges.

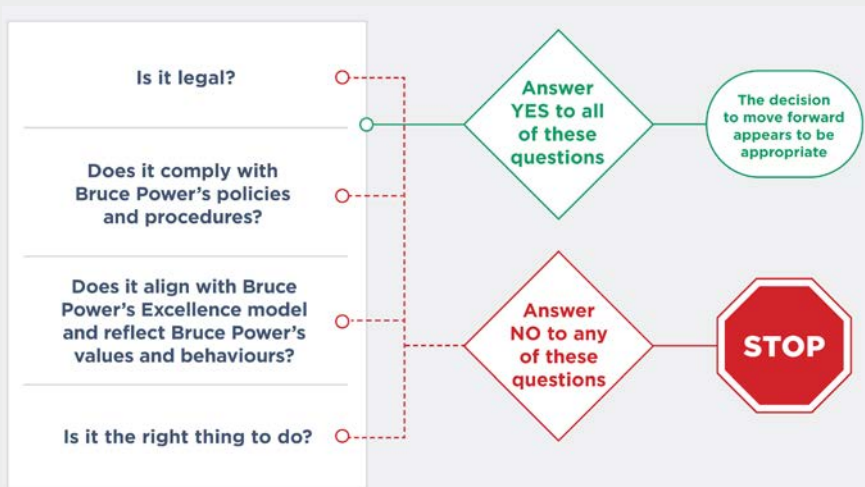
Regardless of how the report is raised, all reports are taken seriously, and must be investigated and addressed as appropriate. in accordance with Bruce Power policies, procedures and all applicable laws and regulations.

Suppliers are responsible for immediately reporting all allegations received in relation to workplace harassment, while at any Bruce Power facility, to the Bruce Power Code of Conduct Office and any allegations of workplace violence to Bruce Power Security.

### Consequences

A failure to comply with any part of the Supplier Code of Conduct may result in the suspension or termination, in whole or in part, of the Supplier’s agreement(s) with Bruce Power and may include removal of the Supplier from Bruce Power’s vendor list. Bruce Power also reserves the right to suspend or terminate site access privileges of any worker who violates the Supplier Code of Conduct.

## Bruce Power Ethics Decision Tree



If you are unsure how to answer any of these questions, are unsure how to proceed or the Supplier Code does not cover the ethical question you are faced with, contact your Bruce Power Contract Manager, any member of the Bruce Power Management Team or the Bruce Power Code of Conduct office.



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