

SUPPLIER CODE OF BUSINESS CONDUCT

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SVP COMPLIANCE & SUSTAINABILITY

As CEO of PROENERGY, one of my most important responsibilities is to set the tone and culture for how we conduct business. This commitment extends beyond our employees to the vendors, suppliers, and business partners who work with us. Those who have partnered with PROENERGY know that nothing is more important to us than doing the right thing.

We expect our vendors and business partners to conduct their activities in a manner consistent with our values and ethical standards. PROENERGY's Supplier Code of Business Conduct serves as a guide to help identify the appropriate course of action when difficult situations arise. It reflects the principles and expectations we apply to ourselves and to those who represent or support our business. We expect full compliance with applicable laws, adherence to ethical business practices, respect for human rights, and a commitment to safety, integrity, and transparency.

We ask that you take the time to review and understand the expectations outlined in our Supplier Code of Business Conduct and apply them to all work conducted on behalf or in support of PROENERGY. If questions or concerns arise, we encourage you to seek guidance through your PROENERGY contact or the resources identified in the Code. By working together in alignment with these standards, you help reinforce PROENERGY's vision, values, and reputation—above all else, by doing the right thing.

Jeff Canon, President & CEO



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PROENERGY CORE VALUES

Teamwork	Challenge and support one another
Focus	Deliver excellence to our customers
Integrity	Be responsible and accountable
Education	Pursue growth through learning
Change	Embrace it!
Faith	Believe that anything is possible



WHO MUST FOLLOW THE CODE?

- PROENERGY suppliers, vendors, service providers, contractors, subcontractors, and consultants, all referred to here as “Supplier(s).”
- Suppliers’ subcontractors who work with or in connection with goods or services supplied to PROENERGY.

EXPECTATIONS OF SUPPLIER

Suppliers can contribute to the PROENERGY culture of compliance by understanding the company's core values and policies and embracing its commitment to integrity.

Suppliers are required to:

UNDERSTAND THIS CODE AND RELEVANT POLICIES

- Gain a basic understanding of this Code.
- Apply the requirements of this Code that are relevant to your PROENERGY's scope.
- Reinforce the importance of ethics and compliance with your employees.
- Create an environment where people feel comfortable raising concerns without fear of retaliation.
- Always act to stop violations of this Code or the law.

RAISE CONCERNS

- Promptly raise any concern about potential violations concerning PROENERGY products and services.
- Understand the different channels for raising integrity concerns through your management and PROENERGY.
- PROENERGY will take reasonable precautions to keep reported concerns confidential.
- The longer you wait to report a concern, the worse it may become.
- If the concern you raise is not resolved, raise it again through another channel.
- Cooperate in investigations related to integrity concerns.

RETALIATION VIOLATES PROENERGY POLICY

PROENERGY prohibits retaliation against anyone who raises an integrity concern. Retaliation is grounds for discipline up to and including dismissal.

HOW TO RAISE A CONCERN WITH PROENERGY

PROENERGY offers several channels for raising concerns. Use the channel that is most comfortable for you.

- Your PROENERGY Point of Contact.
- PROENERGY Compliance or Legal Department.
- You can also use the Ethics Helpline at <https://PROENERGY.ethix360.com> or make a toll-free call in the US to 1-844-463-2368 or Argentina to 0800-999-1457.
 - Helpline reports can be made anonymously.
 - Helpline is available 24 hours a day, seven days a week.
 - Translators are available.
 - Helpline reports will be forwarded to the Compliance office for review and follow-up.

CODE ADMINISTRATION

This Code ensures consistency in how PROENERGY manages suppliers' conduct. No set of rules can cover all circumstances, and these guidelines may vary to conform to local law, contract, or other circumstances.

RESPONSIBILITY

The Chief Compliance Officer administers this Code, which is overseen by the Ethics Committee, the Chief Executive Officer, and the Board of Directors.

INVESTIGATION OF POTENTIAL CODE VIOLATIONS

PROENERGY takes all reports of potential Code violations seriously and is committed to confidentially assessing and investigating all credible allegations.

DISCIPLINARY ACTIONS

The Company strives to impose discipline that fits the nature and circumstances of each Code violation. Serious violations may result in the suspension of the business relationship.

PEOPLE, QUALITY, AND SAFETY

PROENERGY aims to protect people and the environment. You should treat others fairly and with respect. PROENERGY is an inclusive company. Discrimination and harassment are violations of this Code.

Environmental, Health, and Safety Expectations

PROENERGY is committed to safeguarding people's health, safety, and the environment.

SUPPLIER DUTY - SAFETY

- Take responsibility for your employees' and subcontractors' health and safety and foster a culture that promotes open communication and learning.
- Create safe work environments that ensure the application of appropriate industrial hygiene and sanitation standards.
- Comply with all applicable safety laws and establish safe work procedures and emergency response plans to control risk and reduce workplace injuries.
- Implement a zero-tolerance Drug & Alcohol Policy to ensure that employees do not enter PROENERGY facilities and projects while in possession of or impaired by alcohol, drugs, or controlled substances.
- Report all safety incidents that occur at PROENERGY facilities or projects.

SUPPLIER DUTY- ENVIRONMENT

- Comply with applicable laws, regulations, and standards of environmental protection, including requirements for hazardous and non-hazardous waste management minimization, disposal, recycling, storage, treatment, air emissions controls, environmental permits, and environmental reporting.
- Implement an environmental management system that includes steps to minimize environmental impacts, such as reducing raw materials, substituting hazardous chemicals, and reducing water consumption and discharges.
- Report all environmental incidents that occur at PROENERGY facilities or projects.

Quality Expectations

The long-term business success of PROENERGY relies on our suppliers' commitment to continuously improving the quality of the materials and services they provide. Quality from our suppliers means consistently delivering products and services that meet our requirements the first time, every time. We ask our suppliers to demonstrate their dedication to quality by fulfilling or surpassing our expectations and by proactively preventing nonconformities in all their operations.

SUPPLIER DUTY

- Meet all applicable regulatory and PROENERGY requirements, specifications, and standards.
- Follow established process.
- Strive to exceed PROENERGY' expectations.
- Ensure traceability of materials, products, and services.
- Respond to PROENERGY requests in a timely and appropriate manner.
- Pursue every opportunity for continuous improvement.

Equal Opportunity Statement

PROENERGY is committed to ensuring that all suppliers and their representatives are afforded equal opportunity in accordance with all applicable laws and regulations. This commitment extends to all qualified individuals, regardless of race, color, sex, religion, national origin, citizenship status, age, genetic information, physical or mental disability, veteran status, or any other legally protected status. PROENERGY does not tolerate any form of discrimination in its business relationships with suppliers. The Company expects its suppliers to administer their policies, programs, and practices in a nondiscriminatory manner in all aspects of their engagement with PROENERGY, including vendor selection, contracting, assignment of work, performance evaluation, and participation in training or development opportunities.

SUPPLIER DUTY

- Respect everyone.
- Never unlawfully discriminate.
- Base hiring, evaluation, promotion, development, discipline, compensation, and termination decisions on qualifications, merit, performance, and business considerations only.
- Ensure that working hours and overtime do not exceed applicable legal limits.
- Be aware of local legislation and cultural factors that may impact decisions.

Harassment Policy

PROENERGY requires that all suppliers refrain from any actions, conduct, or behavior that is humiliating, intimidating, or hostile. This policy is designed to ensure a collaborative environment where mutual respect is maintained and working relationships are free from harassment. The Company prohibits harassment involving suppliers, employees, contractors, or customers. Suppliers should be especially mindful that certain actions or behaviors may be acceptable in one culture but not in another.

SUPPLIER DUTY

- Treat others with decency and respect and avoid situations that may be perceived as inappropriate.
- Challenge observed behavior that is hostile, intimidating, or humiliating.
- Do not physically or verbally intimidate, harass, or humiliate others.
- Never make inappropriate jokes or comments.
- Never distribute or display offensive or derogatory material, including pictures.
- Do not be afraid to speak up and tell a person if you are upset by his or her actions or behavior.

Modern Slavery and Human Rights

Modern slavery—including slavery, forced and compulsory labor, child labor, and human trafficking—is a violation of fundamental human rights. It involves the deprivation of one person’s liberty by another to exploit them for personal or commercial gain. As a supplier to PROENERGY, you must ensure that your operations and supply chains are free from any form of modern slavery. Engaging in or facilitating these activities exposes both your organization and PROENERGY to possible criminal prosecution, substantial fines, and penalties. PROENERGY maintains a zero-tolerance policy for any form of modern slavery and expects all suppliers to actively prevent and address any such practices. You are required to take steps to ensure that neither modern slavery nor human trafficking occurs within your business or supply chain, in alignment with PROENERGY’s standards.

Respecting human rights is a core value at PROENERGY and should be reflected in your business practices as a supplier. Human rights encompass the fundamental rights, freedoms, and treatment standards to which every individual is entitled. PROENERGY expects all suppliers to uphold and respect human rights, consistent with the United Nations (UN) Universal Declaration of Human Rights, the UN Global Compact, and the UN Guiding Principles on Business and Human Rights. Suppliers are also encouraged to foster a culture of respect for human rights throughout their operations and supply chains.

SUPPLIER DUTY

- Support and respect the personal dignity, privacy, and rights of everyone.
- Recognize the right of free association of employees.
- Abide by the UK Modern Slavery Act and human rights laws and take responsible steps to eliminate modern slavery from your supply chain.
- Reject all forms of forced and compulsory labor.
- Reject child labor and human trafficking.

COMBATING CORRUPT PRACTICES

PROENERGY does not tolerate bribery, corruption, insider dealing, market abuse, fraud, or money laundering. You must also avoid any real or potential conflict of interest (or the appearance of a conflict) and never offer or accept inappropriate gifts or hospitality. Remember, even unsubstantiated claims of corruption can damage reputations.

Bribery and Corruption

Bribery occurs when a supplier offers, pays, seeks, or accepts a payment, gift, or favor to improperly influence a business outcome. Whether the activity involves government officials or commercial organizations, bribery and corruption may be conducted directly or indirectly through third parties, such as subcontractors, agents, or joint venture partners. Suppliers must not ignore, overlook, or fail to report any suspicions of bribery or corruption, as this can lead to liability for both PROENERGY and the supplier’s organization or representatives. For additional information, please refer to the PROENERGY Anti-Bribery and Anti-Corruption Policy available on the Company Website.

SUPPLIER DUTY

- Comply with the anti-bribery and anti-corruption laws and policies, including the US Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act (UK Bribery Act), and other applicable anti-bribery legislations.
- Take no actions that might cause PROENERGY to violate the anti-bribery and anti-corruption laws.
- Never offer, pay, make, seek, or accept a payment, gift, or favor in return for favorable treatment, to influence a business outcome, or to gain any business advantage in connection with PROENERGY.
- Ensure people you work with understand that bribery and corruption are violations of law and this Code.

Commercial and Processing Intermediaries

In certain countries, business practices or local conditions may require the use of commercial intermediaries for PROENERGY projects and services. Any commercial intermediaries engaged by suppliers in connection with PROENERGY's products or services must be thoroughly vetted through a diligent review process before selection, and their engagement must be formally reported to PROENERGY in writing.

Fraud

PROENERGY expects all suppliers to maintain a zero-tolerance approach to fraud and to implement procedures that prevent, detect, report, and investigate any suspected fraudulent activity. Fraud may include forms of deceit, theft, false statements, or breaches of trust used to gain money or other advantages. Engaging in fraudulent acts can result in grave consequences for suppliers, such as monetary loss, legal action, and harm to both their own and PROENERGY's reputation.

All suppliers must institute controls to prevent, detect, report, and investigate fraudulent activities.

Fraud includes, but is not limited to:

- Dishonesty, embezzlement, or fraudulent acts.
- Misappropriation of PROENERGY, supplier, or contractor assets.
- Unauthorized handling or reporting of business transactions.
- Falsification of business documents, records, or financial statements.
- Misrepresentations of products or services.
- Failure to disclose information when there is a legal duty to do so.

If you suspect that fraudulent activity may have occurred in connection with a PROENERGY product or service, you must immediately report your suspicion to PROENERGY's management, point of contact, or to the PROENERGY Ethics Helpline.

Money Laundering

PROENERGY expects its suppliers to neither condone, facilitate, nor support money laundering. Suppliers are required to comply with all relevant national and international laws and regulations intended to deter and prevent money laundering and terrorist financing. PROENERGY will only engage with suppliers that demonstrate integrity and uphold these standards.

Money laundering refers to the process by which individuals or companies attempt to move illicit or illegal funds—including proceeds from criminal activities such as terrorism, drug dealing, or fraud—through legitimate businesses to conceal the funds' criminal origin. Anti-money laundering laws are designed to assist and protect legitimate businesses and suppliers from being misused for such purposes.

Many countries where PROENERGY and its suppliers operate have anti-money laundering legislation. This legislation may impose criminal corporate liability on suppliers and criminal personal liability on supplier personnel involved in money laundering.

If a supplier suspects that money laundering activity may have occurred, they must promptly report their concerns to PROENERGY management, point of contact, or the PROENERGY Ethics Helpline.

Conflicts of Interest

A conflict of interest may occur for suppliers when their relationships, involvement in external activities, or interests in other ventures conflict with the interests of PROENERGY or its customers, and such conflict could influence or be perceived to influence their actions or decisions. Conflicts may arise if suppliers have personal, social, financial, political, or other interests that could interfere with their responsibilities in providing goods or services to PROENERGY.

SUPPLIER DUTY

- Avoid conflicts of interest between your private activities or personal interests and your responsibilities and duties as a PROENERGY Supplier.
- Disclose potential or actual conflicts of interest so that PROENERGY can manage and resolve the situations appropriately.
- Withdraw from decision-making that creates, or could be perceived to create, a conflict of interest.
- Be impartial, professional, and competitive in dealing with contractors and suppliers.

Antitrust Law

Antitrust law protects free enterprise and prohibits behaviors that limit trade or restrict fair competition, and these requirements extend to all suppliers of PROENERGY. Suppliers must not engage in illegal practices such as price-fixing, market-sharing, or bid-rigging conspiracies, nor should they participate in actions that aim to achieve or maintain monopoly power. Any anti-competitive conduct by suppliers can harm PROENERGY's business and its reputation for fairness and honesty. PROENERGY requires all suppliers to fully comply with antitrust laws and does not tolerate any violations.

SUPPLIER DUTY

- Do not rig bids or tenders and you must not agree with others to boycott any customer or supplier except in connection with internationally imposed sanctions.
- Do not agree with competitors to fix prices or any price elements such as discounts, rebates, or surcharges.
- Do not discuss with competitors:
 - PROENERGY's other suppliers, customers, or contractors
 - PROENERGY's terms of commercial transactions

Trade Controls and Sanctions

As a supplier to PROENERGY, you may provide products and services in many countries worldwide. Many of these countries have customs laws and trade controls that govern the import, temporary import, export, or re-export of products, services, technology, and software. Suppliers must comply strictly with all trade control laws and regulations that apply, wherever business is conducted on behalf of PROENERGY or in connection with PROENERGY's products and services.

SUPPLIER DUTY

- Comply with all applicable import and export regulations.
- Think carefully about the potential impact of trade control laws and sanctions before transferring goods, technology, software, or services across national borders.
- Remember that controls and sanctions (or embargoes) can be imposed against countries, entities, individuals, and goods; you must know which controls or sanctions may result in restrictions or prohibitions on conducting business.
- Obtain proper authorization before exporting or importing goods, technology, software, or services across national borders.
- Know your customers and suppliers and how they will use your goods, technology, software, or services.
- Seek legal and compliance advice before doing business with a country or individual if sanctions apply.

SAFEGUARDING INFORMATION AND ASSETS

Suppliers are expected to recognize the value of intellectual, physical, and financial assets belonging to PROENERGY and its clients, and must ensure these assets are preserved, protected, and managed appropriately. Suppliers are required to safeguard personal data and intellectual property (IP) entrusted to

them. Information technology (IT) and communication resources provided or accessed in connection with PROENERGY's products and services must be used responsibly. Any fraud, theft, abuse, or misuse of PROENERGY assets by suppliers is strictly prohibited.

Protection of Assets

PROENERGY assets can be financial, physical, or intangible, including buildings, equipment, funds, software, know-how, data, patents, and other IP.

SUPPLIER DUTY

- Protect PROENERGY assets against waste, loss, damage, misuse, theft, misappropriation, or infringement.
- Use PROENERGY assets appropriately and responsibly.
- Respect the physical and intangible assets of others.

Intellectual Property

Intellectual property (IP) such as patents, trademarks, know-how, and trade secrets is vital to PROENERGY's success. Suppliers should treat IP as a strategic asset and must manage it securely.

YOUR DUTY

- Safeguard PROENERGY technology and intellectual property provided in connection with your work.
- Do not disclose PROENERGY IP to any third party unless expressly authorized in writing and a non-disclosure agreement has been executed.
- Acknowledge that any IP developed or created for PROENERGY as part of your engagement belongs exclusively to PROENERGY.
- Adhere to all restrictions regarding the installation and use of third-party software in connection with PROENERGY projects.
- Do not make or use unauthorized copies of software, publications, copyrighted materials, or trademarks provided by or belong to PROENERGY.

Confidential Information

Suppliers are expected to safeguard all PROENERGY confidential data, trade secrets,

SUPPLIER DUTY

- Protect confidential PROENERGY data.
- Refrain from disclosing such information without express authorization.
- Take steps to manage protection and maintenance of such confidential information, which includes restricting access and disclosure.

Data Privacy and Protection

Data privacy laws safeguard information about individuals. This information includes name and contact details, employment and financial information, age, and nationality. Information on race or ethnic origin, religion or philosophical beliefs, health or sexual orientation, criminal behavior, or trade union membership is sensitive personal data and subject to stricter controls. PROENERGY respects the basic right of individuals to privacy and expects all its suppliers to apply this standard.

SUPPLIER DUTY

- Follow all applicable data privacy and information security laws and regulations.
- Collect and use personal information only for lawful business purposes.
- Respect a person's right to privacy and follow applicable laws.

- If applicable, notify PROENERGY immediately when you become aware of a personal data breach under the General Data Protection Regulation.
- Protect from misusing personal information.
- Observe legal restrictions on the transfer of personal data.

Records Management

Suppliers must maintain honest and accurate business records. Meeting this standard requires suppliers to make responsible business decisions, fulfill legal, financial, regulatory, and management obligations, and ensure that lessons learned from prior experiences are effectively utilized.

SUPPLIER DUTY

- Never hide, alter, falsify, or disguise the true nature of any business transaction.
- Business records and communications often become public, so avoid exaggeration, derogatory remarks, speculation, or inappropriate characterization of people and companies.