

Supplier Code of Conduct

Effective Date: March 5, 2025

Introduction and Scope

Major Drilling Group International Inc. (“**Major Drilling**”) expects its suppliers to uphold the highest standards of ethical behavior and corporate responsibility. In accordance with our [Human rights Policy](#), [Anti-Corruption Policy](#), and, to the extent applicable, [Code of Ethics and Business conduct](#), this Supplier Code of Conduct (“Code”) further outlines the principles and expectations we have for all our suppliers.

This Supplier Code of Conduct applies to all activities and operations related to our suppliers’ business relationships with Major Drilling and its subsidiaries and affiliates. Suppliers are expected to adhere to these standards when conducting business with Major Drilling. Moreover, Major Drilling seeks to engage with suppliers who consistently uphold this Code in *all* their business interactions.

Compliance with Laws and Regulations

All suppliers must comply with local, national, and international laws and regulations applicable to their operations and activities. This includes, but is not limited to, labor laws, environmental regulations, and trade compliance. Moreover, all suppliers must support Major Drilling in its compliance with applicable laws.

Ethical Business Practices

- **Integrity:** Suppliers must conduct their business affairs honestly, ethically and in full accordance with the law.
- **Anti-Corruption:** Suppliers shall not engage in any form of bribery, corruption, extortion, or embezzlement.
- **Fair Competition:** Suppliers must compete fairly and comply with applicable antitrust and competition laws.

Human Rights and Labor Practices

- **Non-Discrimination:** Suppliers shall provide a workplace free of harassment and discrimination based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic

characteristics, disability and conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered.

- **Corporal Punishment and Disciplinary Practices:** Suppliers shall not engage in or permit any form of corporal punishment, abuse, or harassment. Disciplinary practices must be fair and humane, emphasizing respect and dignity for all individuals.
- **Labor Practices:** Suppliers must abide by all applicable labour, child labour, modern slavery and employment laws. These include prohibitions on child labour, forced labour, discriminatory behaviour, human trafficking and all forms of modern slavery, as well as recognition of the rights of freedom of association and collective bargaining. For greater certainty, Suppliers must not utilize forced labour or child labour as those terms are defined in the *Fighting Against Forced Labour or Child Labour in Supply Chains Act* (Canada) and should engage in appropriate diligence to ensure the direct and indirect suppliers in their supply chain do not utilize forced labour or child labour as well.
- **Minimum Statutory Wages:** Suppliers are required to ensure that all workers receive wages that meet or exceed the minimum statutory wage standards for their specific region.
- **Maximum Working Hours:** Suppliers must comply with all applicable laws and regulations regarding working hours.
- **Health and Safety:** Suppliers must provide a safe and healthy working environment for all employees.
- **Acceptable Working Conditions:** Suppliers shall provide workers with safe and healthy working conditions. This includes access to clean water, sanitary facilities, adequate lighting and ventilation, and a safe and secure environment.
- **Acceptable Living Conditions (if applicable):** Suppliers that provide company living facilities must ensure that these accommodations meet high standards of health and safety. Each facility should provide adequate space, ventilation, and lighting, as well as access to clean water and sanitation. Individuals must have a secure environment that is free from hazards. Additionally, suppliers should ensure that living conditions comply with all relevant local and international regulations and support the well-being and dignity of all residents.

Environmental Responsibility

Suppliers must adhere to all environmental laws and regulations. They should strive to minimize their environmental impact through sustainable practices, including waste reduction, energy efficiency, and resource conservation.

Confidentiality

Suppliers must protect any confidential information shared by Major Drilling.

Reporting and Accountability

Suppliers and third parties are encouraged to report any unethical behavior or violations of this Code by our Suppliers through our [3rd party Whistleblower program](#). Reports can be made anonymously and without fear of retaliation.

The Role of Our Suppliers

By adhering to this Supplier Code of Conduct, suppliers demonstrate their commitment to ethical and responsible business practices, ensuring a mutually beneficial relationship with Major Drilling.

Thank you for your cooperation and dedication to upholding these standards.