

Code of Ethics for Surrette Battery Company Limited

Purpose

This Code of Ethics reflects our commitment to ethical business practices, sustainability, employee well-being, the environment and social responsibility. It ensures that our internal operations align with the high expectations we hold for our suppliers, fostering trust with employees, customers, partners, and the broader community. It ensures Surrette Battery Company LTD. operates responsibly and transparently.

1. Health & Safety Commitment

- Employee Well-being: We prioritize the health and safety of all employees and provide a secure working environment. Safety protocols are integral to our operations, aligned with our OHS-Management-System.
- Compliance: We adhere to all applicable occupational health and safety laws and ensure protocols for handling hazardous materials, including lead, are strictly followed.
- Training: Employees receive training on handling hazardous materials and safety standards.
- Accident Prevention: Safety measures are regularly reviewed to minimize risks, and employees are empowered to report hazards without fear of retaliation.
- Incident Response: Swift action plans are in place to respond to spills, fires, or emergencies to protect people and the environment.
- Surrette Battery has an elaborate OH&S Management System that incorporates Safety Commitment, OH&S Policy Statement, and a comprehensive list of Policies that ensure all Environmental, Health, Social and Governance Best Practices are communicated, adhered to and evaluated.

2. Environmental Responsibility

- Compliance: We follow all local, provincial, and federal environmental laws and standards.
- Sustainable Operations: Our manufacturing processes strive to minimize waste, emissions, and energy consumption.
- Life-Cycle Impact: We consider the full life cycle of our products, focusing on responsible recycling and disposal of lead-acid batteries.
- Biodiversity Protection: We respect protected areas and Indigenous lands, ensuring no harmful impact on these environments.

3. Governance and Ethical Conduct, Business Practices

- Anti-Corruption: Bribery, money laundering, conflicts of interest, and unethical gift-giving are prohibited.
- Transparency: We conduct business with honesty and integrity, maintaining clear communication with stakeholders.
- Accountability: We maintain transparency with stakeholders, ensuring compliance with laws and ethical standards.
- Supplier Alignment: Our suppliers are expected to follow our ethical standards, as outlined in the Supplier Code of Conduct.
- Reporting: Violations or risks can be reported anonymously, with corrective action taken promptly.

4. Respect and Dignity in the Workplace

- Inclusion and Diversity: We foster a respectful workplace free from harassment, discrimination, or abuse.
- Fair Employment Practices: All employees are hired and retained under fair labor conditions, with competitive wages and appropriate benefits.
- Stakeholder Engagement: We actively listen to, and address concerns raised by employees, customers, or community members.

5. Product Quality and Responsibility

- Quality Assurance: Our products meet or exceed all relevant safety and quality standards in Canada and Nova Scotia.
- Continuous Improvement: We perform regular internal audits and seek third-party assessments to maintain high product standards.
- Customer Safety: We provide clear guidelines for product use and recycling to ensure safety throughout the product life cycle.

6. Human Rights and Fair Labor Practices

- No Forced or Child Labor: We prohibit any form of forced labor and do not employ children below the legal working age.
- Respectful Working Conditions: Employees have the right to fair wages, overtime pay, and safe working conditions.
- Anti-Slavery Policy Compliance: We adhere to the QA 176 Anti-Slavery and Human Trafficking Policy and expect the same from our suppliers.

7. Accountability and Reporting

- Open Reporting Culture: Employees and stakeholders are encouraged to report unethical behavior, safety issues, or violations of this Code.
- Confidentiality: All reports are treated confidentially, with appropriate follow-up to ensure resolution.
- No Retaliation: We protect anyone reporting issues from retaliation.

8. Supply Chain Ethics and Monitoring

- Supplier Standards: We collaborate with suppliers who meet our ethical, environmental, and quality standards.
- Audits and Evaluations: Regular supplier assessments ensure compliance with the QA 166 Conflict Minerals Policy and other standards.
- Termination Clause: Suppliers found in violation of our Supplier Code of Conduct may face termination of their contracts.

9. Community Engagement and Social Responsibility

- Positive Community Impact: We strive to be a positive force in our community by creating jobs, supporting education, and engaging in charitable initiatives.
- Environmental Advocacy: We support environmental awareness and conservation efforts in Nova Scotia and beyond. We engage with stakeholders to address environmental and social concerns transparently.

10. Review, Monitoring and Continuous Improvement

- This Code of Ethics will be reviewed annually to ensure alignment with regulatory changes, business objectives, and stakeholder expectations.
- Emergency Preparedness: Our Contingency Plan ensures readiness for hazards that could impact health or the environment. It is also reviewed annually.

Contact for Questions or Reporting:

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