



Scope and Purpose

Atlas Salt recognizes that the core values that we strive to uphold can only be fully achieved when our business partners have or make the same commitments.

Policy

This Supplier Code of Conduct sets expectations for how Atlas Salt's Suppliers conduct business. Suppliers must follow these expectations within the bounds of applicable local laws. Atlas Salt may elect not to work with, or cease to work with, suppliers who do not meet our expectations.

Working together, all of us can help set industry standards to ensure business is done the right way.

Procedures

The Code reflects Atlas Salt's values and sets forth what is expected of its Suppliers with respect to the following topics:

1. Health and Safety
2. Governance and Legal Compliance
3. Labour and Human Rights
4. Environmental Performance
5. Data privacy and security
6. Inclusion and diversity



7. Insider Trading
8. Demonstration of Compliance

Health and Safety

Atlas Salt is committed to preventing and reducing the risk of both injury and occupational illness to our employees. In fulfilling this commitment, we will provide and maintain a safe and healthy work environment, in accordance with industry standards and in compliance with the Occupational Health and Safety Act (OHSA). We will strive to eliminate any foreseeable hazards that may result in personal injury, illness, property damage or loss of production.

Atlas Salt strives to work with suppliers that share in this commitment by:

- Providing a safe and healthy working environment for employees and subcontractors including provision of appropriate personal protective equipment.
- Taking all practical and reasonable measures to eliminate workplace fatalities, injuries and disease.
- Ensuring any worker housing, if provided, is safe, healthy and sanitary, while respecting workers' dignity and right to privacy.

Governance and Legal Compliance

We compete ethically and lawfully in all activities. We work with partners and suppliers who commit to:

- Comply with all applicable laws and regulations;
- Ensure personal activities and interests, and those of employees and subcontractors, do not conflict with their responsibilities to Atlas Salt;
- not provide any personal gifts, favours or other compensation to an Atlas Salt employee that are intended to influence, or appear to influence, a business decision;



- prohibit bribery or corruption of any form, including facilitation payments, by any of their employees, agents and representatives;
- Maintain policies and practices to ensure violations, misconduct, or grievances are reported by workers and addressed without fear of retaliation;
- inform Atlas Salt if any of the Supplier's directors, officers, shareholders or senior managers are "government officials" for purposes of anti-corruption laws;
- comply with all applicable competition/antitrust laws and other laws intended to
- promote free and fair competition and not engage in any collusive bidding, price fixing or other unfair trade practices.

Labour & Human Rights

Atlas Salt is committed to respecting internationally recognized human rights, including those set out in the Universal Declaration of Human Rights, federal, provincial and territorial laws.

Atlas Salt is committed to respecting and promoting human rights in all its operations. As part of this commitment we expect all our suppliers to respect internationally recognized human rights.

Atlas Salt suppliers will:

- Comply with all applicable laws and regulations of the jurisdictions where they do business with, or on behalf of, Atlas Salt.
- Eliminate all forms of discrimination and encourage staff diversity.
- Provide fair remuneration and work conditions for all workers.
- Respect labour rights, including freedom of association and the right to collective bargaining.
- Not use forced or compulsory labour or any other form of modern slavery. *



- Not use child labour, and use reasonable means of verifying workers are of local legal age.
- Prohibit inhumane treatment of employees, including any form of physical, moral, sexual or verbal abuse, bullying or any other forms of intimidation.
- Ensure that accommodation, when provided, is clean and safe and meets the basic needs of employees.
- Respect the privacy of employees and customers, and comply with all laws in the collection, use and protection of personal information
- Establish, maintain and implement policies, standards, procedures and management controls to ensure compliance with the above requirements.

** Forced labour, as set out in the ILO Forced Labour Convention, 1930 (No.29),¹ refers to "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily."*

Suppliers must take measures to assess, prevent and reduce the risk that "forced labour" or "child labour" is used by them or by a third party in their supply chains and must inform Atlas Salt of these measures annually, or upon request by Atlas Salt.

Environmental Performance

We are committed to protecting the environmental values of the regions where we operate and maintaining good stewardship for the long term. We work with suppliers who share our commitment as demonstrated by:

- Promoting a culture that values the environment and acts to protect the environment in which they operate.
- Continuously improving environmental and resource management – reducing, recycling and making steps towards a circular economy.
- Measuring, managing, and reporting environmental data in accordance with applicable laws and regulations.



- Ensuring products manufactured or contracted to manufacture do not contain conflict minerals.

Data Protection and Security

Atlas Salt requires its Suppliers to protect the privacy of individuals and the security of confidential assets and information. Suppliers must design and maintain processes to provide appropriate protections for this information.

Atlas Salt requires Suppliers to protect personal information in compliance with all applicable local laws. Personal information provided by or on behalf of Atlas Salt should only be used, accessed, and disclosed as permitted by the Supplier agreement.

Inclusion and Diversity

Atlas Salt fosters an inclusive culture and believes diversity should be celebrated and discrimination of any form should not be tolerated.

Non-discrimination and workplace diversity

Suppliers must comply with all applicable laws relating to discrimination in hiring, employment practices, and harassment and retaliation.

Atlas Salt expects Suppliers to operate workplaces free from discrimination, harassment, victimization, and any other abuse on any grounds including but not limited to age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation, or veteran status, or any other grounds identified in applicable human rights legislation.



Supplier Diversity

As one component of Atlas Salt's commitment to advancing diversity and inclusion, we actively promote relationships with diverse and underrepresented businesses in our strategic sourcing and procurement process.

Atlas Salt looks for Suppliers that similarly value diversity within their own supply chain and support Atlas Salt's goals with respect to supplier diversity.

Atlas Salt expects Suppliers to:

- utilize search and assessment processes that are both unbiased and transparent,
- ensure that Suppliers' procurement teams proactively provide diverse businesses with fair access to bids, and
- where practicable, actively seek out and provide opportunities for diverse suppliers to participate in business opportunities.

Insider Trading

Suppliers must comply with all insider trading laws and not trade in the securities of Atlas Salt during any period when they have become aware of confidential or material information of Atlas Salt until the confidential or material information has been fully disclosed and a reasonable period of time has passed for such information to be widely disseminated.

Demonstration of Compliance

Suppliers must be able to demonstrate compliance with this Code at the request and to the satisfaction of Atlas Salt and provide reasonable assistance to Atlas Salt during the course of any investigation into the Supplier's compliance with this Code. Atlas Salt may require from



POLICY: Supplier Code of Conduct

SECTION: Corporate

POLICY # 2.7.01.v1

time to time that Suppliers reconfirm in writing their understanding of, and compliance with, this Code.

Signature: Richard LaBelle
Richard LaBelle (Oct 17, 2024 08:35 EDT)

Date: 10/17/2024

Rick LaBelle
CEO & Director

Signature: Alasdair Federico

Date: 10/11/2024

Alasdair Federico
VP Corporate Affairs

Initiated By:
Corporate

Date Issued:
Sep 12, 2024

Approved By:
Corporate

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