Harnois Énergies

Code of Ethics

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Introduction and fundamental principles

Objective of the code

The purpose of Harnois Énergies' code of ethics is to provide a clear and structured framework that guides the conduct, decisions, and interactions of all members of the company, in line with its core values.

This code is a reference tool for all employees and partners to ensure that individual and collective actions are aligned with Harnois Énergies' mission and commitments.

Scope

Our Code of Business Conduct and Ethics (the "Code") sets out the fundamental principles that guide how Harnois Énergies conducts its business. It reflects our cultural values and guides our decisions by integrating high professional ethical standards into our daily work. The Code details the expected conduct, our legal and ethical responsibilities, and supports us in performing our work with integrity. It reflects our ongoing commitment to act with honesty and respect toward our colleagues, shareholders, business partners, and the market as a whole.

The Code applies to all employees, executives, and members of the board of directors of Harnois Énergies. The terms «HÉ» or «Company» refer to Harnois Énergies and each of its wholly owned subsidiaries. The words «we» and «our» refer to all employees, executives, and directors.

Furthermore, Harnois Énergies expects its business partners, including contractors, subcontractors, consultants, agents, distributors, suppliers, representatives, or any other entities or individuals acting on behalf of the company, to follow standards equivalent to those set out in our Code.

The Code is supported by HÉ's internal policies and procedures. We must ensure that our daily activities always comply with these principles, as well as with all applicable laws and regulations. An annual refresher procedure on the provisions of the Code will be implemented for all employees.

Message from the President and CEO

> *Our code of ethics embodies these convictions, deeply held by the company's founder.*

At Harnois Énergies, we are building a company based on essential principles: camaraderie, passion, ingenuity, and the pleasure of working together, while honouring our commitments. These values define us, inspire us, and guide every decision we make.

Our code of ethics embodies these convictions, deeply held by the company's founder. It reminds us that transparency, accountability, and integrity are the foundations on which we build our future. Adhering to these principles strengthens the trust of our employees, customers, and partners, while preserving a corporate culture based on excellence and innovation.

A spirit of camaraderie allows us to collaborate with authenticity and kindness. Our commitment drives us to always seek the best solution, push our limits, and take on every challenge with determination. Ingenuity encourages us to innovate, develop new approaches, and turn obstacles into opportunities. And finally, the pleasure we find in our work gives meaning to our actions, reinforcing our motivation and commitment on a daily basis. Fulfilling our commitments reflects our professionalism and reliability, and assures our partners and customers that we keep our promises.

I invite you to embrace these principles with pride and conviction. Let us continue to move forward with ambition, innovate with passion, and build, day after day, an organization that inspires trust and respect.

Serge Harnois
President and CEO, Harnois Énergies

Mission, vision and values

Our mission

Provide energy sources, speciality products, quality services and a warm customer experience.

Our vision

To be a leading provider in Canada in all our activity sectors.

Our values

Harnois Énergies is built on the following values:

1. **To dare to be ingenious with passion means to show initiative, resourcefulness, inventiveness, and agility.**

   Every day, we propose new ways to improve, we are open to new ideas, and we act quickly to solve problems for all our partners.

2. **To act with authenticity means that we are genuine, natural, and of good character, that we don't play around.**

   Every day, we act with honesty and sincerity, while aligning ourselves with the company's values and taking calculated risks in the best interests of the company. Collaboration and communication are at the heart of our authenticity.

3. **To honour our commitments means that we place great importance on the commitments made to each of the people with whom we interact in the course of our work, whether they are our colleagues, our customers, or our partners.**

   Every day, we treat all our partners with respect, striving to deliver high-quality work and ensure customer satisfaction.

4. **To succeed through cooperation and enjoyment means achieving our goals while maintaining a high level of collaboration, harmony, solidarity, and courtesy, in an atmosphere marked by lightheartedness and enjoyment.**

   Every day, we work together with our colleagues, contributing our energy, perseverance, and good humour to create a positive atmosphere within the company.

Legal compliance and governance

1.1 Compliance with laws and regulations

We must comply with all laws, rules, regulations, and ordinances, whether federal, state/provincial, municipal, or international (collectively, the «Law»). In the event of any discrepancy between local practices and the requirements of the Code or the Law, the Law and the Code shall always prevail. If in doubt, do not hesitate to consult the Legal Affairs Department for information.

Each employee, executive, and director is personally responsible for familiarizing themselves with and understanding the Law applicable to the performance of their duties. We must avoid acts or omissions that could result in a violation of the Law, and commit to acting in the spirit of the Law, with transparency, fairness, and integrity. Through our ethical and compliant conduct, we help maintain HÉ's reputation and preserve its employer brand as a responsible, trustworthy company committed to conducting its business in accordance with laws and ethical standards.

1.2 Bookkeeping and record keeping

It is our responsibility to record our transactions accurately, honestly, and completely. All documents relating to our activities, such as registers, accounting books, reports, invoices, pay slips, or expense statements, must accurately reflect the transactions carried out.

It is prohibited to falsify documents, omit important information, or produce inaccurate reports. Transparency, rigour, and integrity in the maintenance of our documents are essential to ensure the reliability of our internal processes and meet our legal obligations.

We must also cooperate fully with internal and external audit procedures and ensure that the documents and information we provide are complete, accurate, truthful, and transparent, regardless of the medium used.

1.3 Appointment to a board

Prior to accepting a position as a director on the board of another company or entity (non-profit organization), we must obtain approval from our immediate manager. This precaution ensures that there is no current or potential conflict of interest with HÉ's activities.

1.4 Code governance

All questions or requests for information regarding the application or interpretation of this Code should be directed to our immediate manager, the Human Resources Department, or Legal Affairs.

If we witness conduct that violates the Code, an internal policy, or the law, or if we have serious doubts about such conduct, we must report it in good faith through one of the channels provided for this purpose.

All complaints, concerns, or statements will be handled promptly and confidentially. HÉ strictly prohibits any form of retaliation against a person who has reported a questionable situation in good faith or who has cooperated in an investigation.

Sanctions
Failure to comply with this Code or HÉ's policies, procedures, and guidelines will result in disciplinary action, up to and including termination of employment. In addition, certain violations could result in legal action.

Recognition and commitment
Upon hiring, and at any time upon request by HÉ, all employees must declare in writing that they have read, understood, and accepted this Code. This Code may be amended from time to time, in which case a notice will be posted on the intranet.

1.5 Dispute resolution procedure

We firmly believe that resolving disputes (interpersonal conflicts, misinterpreted decisions, insufficient knowledge of certain policies/practices, etc.) requires open discussion and a willingness to listen. As soon as a dispute arises, it is your responsibility to discuss it with the person concerned and/or your manager as quickly as possible. Collaboration is essential in order to ensure a healthy and enjoyable working environment.

If the dispute cannot be satisfactorily resolved, the employee may refer the matter to the human resources department. The person responsible for human resources will take the time to meet with the employee, gather the facts, and meet with all parties involved as necessary.

Professional relationships

2.1 Customer satisfaction: our priority!

Every person who joins HÉ is important. HÉ stands out thanks to the efforts of each and every one of us and the excellence of our customer service!

The company's smooth operation depends on everyone's willingness to carry out their work professionally and to adhere to a code of ethics in their interpersonal relationships. To achieve this, everyone shares the responsibility of fostering team spirit and providing exceptional service. In order to achieve these objectives, employees must:

- Be welcoming, courteous, respectful, and empathetic toward customers;
- Build trust with the customer from the very first contact;
- Respond to customer needs and/or dissatisfaction;
- Promote a positive work environment through attitude and conduct;
- Demonstrate openness to criticism and remain calm in difficult situations;
- Help one another with various tasks and responsibilities;
- Be involved in the process of onboarding and integrating new employees;
- Be loyal to the company.

2.2 Employee relations

Harnois Énergies promotes a healthy, respectful, and safe work environment, free from violence, harassment, and discrimination, for all employees, managers, customers, suppliers, and visitors. Good manners, courtesy, and cooperation in all professional settings, including when working remotely and during social activities, are of the utmost importance.

The company regularly assesses workplace risks and implements mechanisms for preventing, reporting, and handling complaints. Employees are encouraged to address problematic conduct directly or report incidents to their manager or the human resources department, with the option of using a confidential email address: denonciation@harnoisenergies.com. All complaints are handled confidentially and impartially.

Disciplinary measures, up to and including termination, are in place for misconduct, while malicious complaints may also result in sanctions. Harnois Énergies is committed to protecting complainants from any form of retaliation and to keeping complaint files confidential for at least two years.

Harnois Énergies promotes a harmonious work environment for a good quality of life at work. Once hired, all employees deserve to work in a healthy environment that is free of violence, discrimination, and harassment. These principles are at the heart of our corporate culture.

2.3 Forced labour and child labour

Harnois Énergies is committed to preventing all forms of forced labour and child labour within its operations and supply chain. The Company requires its suppliers to prohibit such practices and to demonstrate, upon request, the controls and due diligence measures they have implemented to identify, prevent, and mitigate related risks. Harnois Énergies will provide training to its employees and update its contractual templates to clearly reflect the Company's expectations and commitments regarding the protection of human rights.

In addition, in accordance with Québec's Act respecting the regulation of child labour, the Company has implemented a Student Employment Policy to promote a healthy balance between education and work. Under this policy, young workers may not be assigned tasks that exceed their capabilities or that could compromise their health, safety, development, or academic success. They are prohibited from working during school hours or on overnight shifts, and work schedules must be adapted to accommodate examination periods and educational commitments.

In compliance with applicable legislation, parental consent is obtained for employment involving workers between the ages of 14 and 16.

Harnois Énergies values education and actively supports academic perseverance and student success. To date, no remediation measures have been required in relation to forced labour or child labour concerns

2.4 Business partners and agents

We expect our business partners, suppliers, agents, and anyone else acting on our behalf to behave in a manner consistent with our values and the principles set out in this Code.

When interacting with HÉ or acting on our behalf, these partners must, in particular:

- Ensure compliance with the law in force;
- Not pay bribes or engage in acts of corruption;
- Ensure compliance with antitrust laws and promote fair competition;
- Adhere to our principles regarding workers' and human rights;
- Help promote occupational health and safety.

All agreements entered into with such partners must comply with standard market practices, the principles set out in this Code, and HÉ's policies, procedures, and guidelines. In addition, HÉ complies with international trade sanctions that may be imposed by the competent authorities, and expects the same level of rigour from its business partners.

2.5 Conflict of interest

Employees of Harnois Énergies are expected to exercise sound judgment and maintain the highest standards of integrity when offered gifts, benefits, hospitality, or invitations to business-related events. Such items may only be accepted when they are reasonable in the circumstances, of modest value, and unlikely to influence—or be perceived as influencing—the employee's objectivity, independence, or business judgment.

The acceptance of gifts or benefits with a value exceeding $300 is strictly prohibited. Invitations to business events must be evaluated on a case-by-case basis, taking into account the nature and purpose of the event, its value, the employee's role and responsibilities, and any potential perception of undue influence or preferential treatment.

Any gift, benefit, hospitality, or invitation must receive prior approval from the employee's manager before being accepted.

Employees involved in procurement activities, supplier selection, contract negotiations, or the awarding of contracts are subject to heightened standards of conduct. They must not accept any gift, benefit, hospitality, or other advantage from a current or prospective supplier, contractor, or business partner when a related business decision is pending, anticipated, or under consideration, including during tendering processes, negotiations, evaluations,

or supplier selection activities.

Employees are required to promptly disclose any personal, familial, or other relationships that could give rise to an actual, potential, or perceived conflict of interest. Appropriate measures will be implemented, where necessary, to safeguard the integrity and objectivity of business decisions.

Employees are also prohibited from engaging in employment, business activities, or financial interests that compete with, conflict with, or otherwise interfere with the interests of Harnois Énergies.

Protection of information

3.1 Data confidentiality

At Harnois Énergies, employee and customer privacy is a priority. The company collects only the information necessary for human resources management or improving the customer experience, in compliance with the law and with the consent of the individuals concerned.

This data is handled discreetly and transparently, and anyone can view, correct, or ask questions about their information at any time. Respect for privacy is at the heart of all Harnois Énergies' interactions and commitments.

3.2 Use of sensitive or confidential information

As part of our work, we may have access to sensitive or confidential information related to HÉ activities. Unless it has already been made public through authorized channels, this information may not be used for personal purposes or disclosed to third parties, including our relatives. Examples of sensitive or confidential information include:

- Strategic, operational, or financial information;
- Upcoming projects involving restructuring or reorganization, or business decisions;
- Negotiations or intentions to acquire or form partnerships;
- Significant strategic changes currently being developed;
- Personal information concerning employees or customers;
- Trade secrets, processes, or technologies;
- Information entrusted by third parties in the context of a professional relationship;
- Any other information obtained in the course of duties that could have an impact if made public.

We must handle information with rigour, discretion, and in compliance with applicable law and HÉ's internal policies.

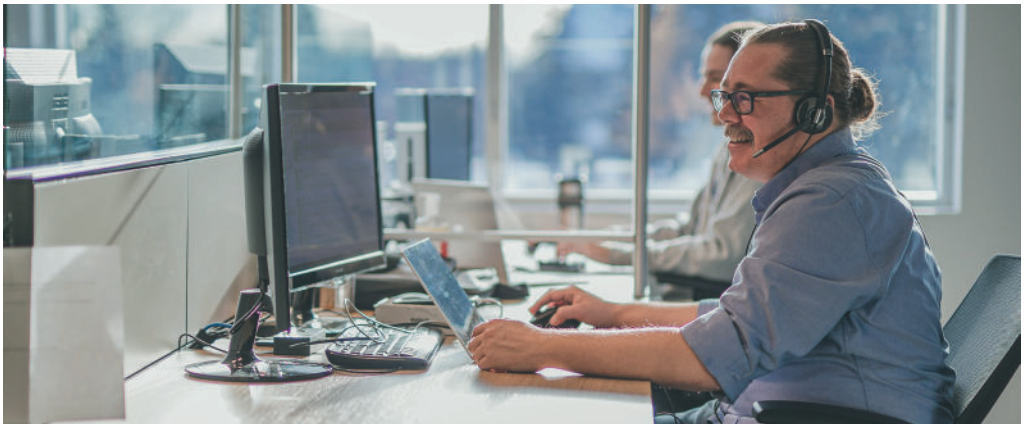
3.3 Intellectual property

Any invention, discovery, improvement, or intellectual creation made by an employee of Harnois Énergies, alone or in collaboration with others, in the course of their duties or related to the company's activities, remains the exclusive property of Harnois Énergies. These contributions are considered confidential information. Upon request, the employee agrees to sign any document necessary to protect this intellectual property.

3.4 Use of company property

All office supplies and equipment must be used solely for work purposes.

Personal use of company property requires prior written approval from the manager. Even if certain material or equipment appears to be destined for disposal, it is mandatory to obtain specific authorization before taking possession of it for personal use.



3.5 Use of personal mobile devices and computer networks

Harnois Énergies' policy on the use of computer equipment and mobile devices strictly regulates the use of technological equipment made available to employees, including computers, phones, software, and networks. These tools must be used primarily for professional purposes, although limited personal use is tolerated under certain conditions. The company emphasizes data security, privacy protection, respect for intellectual property rights, and the prohibition of illegal activities or activities that could damage its reputation. Employees must lock their workstations, avoid any abusive or unauthorized conduct, and report any violations. Installing software, accessing inappropriate content, hacking, identity theft, and using external services without authorization are strictly prohibited. Finally, each employee is responsible for the confidentiality of their login details and the security of the equipment entrusted to them.

Safety and quality

4.1 Occupational health and safety

Harnois Énergies places paramount importance on the health and safety of its employees and is committed to providing a healthy and safe working environment that complies with legal standards. Employees must conduct themselves in a safe manner, follow established instructions and procedures, use the required protective equipment, and report any hazardous situations. In the event of an accident, a specific procedure must be followed, including reporting to a manager, keeping a record, and submitting medical documents. Internal committees are responsible for analyzing incidents, preventing risks, and promoting safe practices throughout the company.

4.2 Food safety and quality

Harnois Énergies is committed to maintaining the highest standards in food safety and quality. To this end, the company applies the *Guide des bonnes pratiques d'hygiène et de salubrité alimentaires (Guide to Good Food Hygiene and Safety Practices)*, thereby ensuring compliance with current standards and consumer protection.

Social and environmental responsibility

5.1 Donations and sponsorships (Our commitments)

Harnois Énergies is actively involved in its community by making donations and sponsorships to organizations and projects that target youth and promote healthy lifestyles, sports, health and wellness, and education. This involvement reflects the company's desire to contribute positively to the social development and vitality of the communities it serves.

With a view to sustainability and long-term impact, Harnois Énergies has also established the Fondation Harnois Énergies. This foundation aims to support promising initiatives to improve the quality of life of young people. It acts as a catalyst for innovative projects in partnership with committed stakeholders.

Through these actions, Harnois Énergies demonstrates its commitment to being much more than just an energy supplier: it is a socially responsible player that listens to the needs of its community and is resolutely focused on the future.

5.2 Sustainable development and ESG

At Harnois Énergies, we understand our role in the transition toward a more sustainable future For several years, we have been implementing various initiatives in the areas of the environment, social responsibility, and governance (ESG). However, to maximize our impact and structure our efforts, it is essential to have a clear and consistent vision.

It is with this in mind that we have developed an ESG roadmap. It aims to centralize all ongoing initiatives, guide our future actions, and define a concrete action plan for structured progress. Aligning our commitments with a strategic approach gives us the means to achieve our goals in a measurable and effective way.

This roadmap represents a key milestone in our approach, enabling us to act ambitiously while ensuring the sustainability of our business and meeting the expectations of our stakeholders.

In this way, Harnois Énergies continues its commitment to innovating and evolving toward increasingly sustainable practices in line with our mission and values.

Communication and public image

6.1 Media relations

All interview requests from print or electronic media representatives must be sent to the Harnois Énergies Communications Department: communications@harnoisenergies.com. The Communications Department must also approve all articles, press releases, or other public communications concerning Harnois Énergies. .

Social media
The aim of the social media policy is to raise awareness and equip employees to use social media appropriately, especially when it comes to the company. This document also provides a framework for protecting the confidentiality of company information while explaining best practices, employee responsibilities, and related penalties to employees.

If an employee has questions about what is appropriate or not, they should feel free to talk to their immediate manager or a member of the communications department.

6.2 Reputation of Harnois Énergies

Harnois Énergies' reputation is based on the excellence of its products and services. To maintain this reputation, everyone must behave respectfully and avoid making any comments or sharing any content that could harm the company, its executives, or its employees.

It is important to comply with Harnois Énergies' graphic standards guide when using or referring to the Harnois Énergies name and/or brand image, including our logo.

6.3 Political activities and lobbying

HÉ does not make political contributions and does not support any party or candidate in its name.

We are free to participate in political activities or make personal donations to political parties, provided we do so in our own name, on our own time, and without using company resources. It is important to ensure that none of these actions give the impression that we are acting on behalf of HÉ or have its support.

Ethics and integrity

7.1 Integrity

Harnois Énergies employees may engage in personal activities outside of work, provided that they are legal and unrelated to their duties within the company. They must avoid any conflict of interest, refrain from misusing resources or their position at HÉ, and act with honesty in the handling of data and recommendations. They are also required to respect the company's commitments to its stakeholders, guarantee the quality and safety of products and services, treat customers fairly, and contribute to Harnois Énergies' environmental and social responsibility efforts.

7.2 Competitive environment

Harnois Énergies may gather information about its industry and competitors from legitimate sources such as market research, publications, or professional exchanges. This information must be gathered in an ethical and legal manner, without resorting to inappropriate methods or using confidential information from former employers. Any information obtained must respect the rights of third parties and never compromise the integrity of the company.

In accordance with the Competition Act, Harnois Énergies employees are strictly prohibited from discussing or exchanging price information with competitors or retailers, except those on consignment, or from entering into agreements in this regard. Any attempt at non-compliant discussion must be immediately stopped and reported to the vice president of the retail network. Failure to comply with this policy may result in disciplinary action, including termination.

7.3 Fight against corruption

Harnois Énergies has a zero-tolerance policy toward corruption. We must never offer, give, or accept a bribe, undue advantage, or any illegal payment, either directly or through a third party, for the purpose of obtaining or retaining a contract or business advantage.

This rule also applies to consultants, agents, suppliers, distributors, or any other person acting on our behalf. It applies even when local practices or certain industry customs might appear to condone this type of behaviour.

Anti-corruption laws prohibit, among other things, any attempt to unduly influence a business decision or official action, whether in the private sector or with government officials. This also includes facilitation payments, i.e., amounts paid to expedite a service that is normally provided.

We must also avoid any action or situation that could be perceived as corruption or cause confusion. We believe in honest, fair, and responsible business practices, and we all have a role to play in maintaining this reputation.

Harnois
Énergies