



Business Partner Code of Conduct

At Twin Eagle, we take pride in our reputation and our commitment to conducting business in an ethical and compliant manner. Our conduct is based on our Core Values of Safety, Performance, Learning, Integrity and Teamwork.

Objective

Consistent with our Core Values, Twin Eagle expects its Business Partners to conduct business responsibly and with integrity. The Business Partner Code of Conduct (“Code”) complements and sets the minimum standards governing our relationship but not does amend the more detailed requirements in the terms and conditions (“Terms and Conditions”) of a contract, agreement, or order between a Business Partner and Twin Eagle.

Expectations of conduct for all Business Partners are outlined in the principles below in the areas of Ethics & Compliance, Health & Safety, Human Rights and Environmental Management.

Business Conduct Principles

Ethics & Compliance

At Twin Eagle, we take pride in our reputation and our commitment to conducting business in an ethical and compliant manner.

Business Partners shall:

- Conduct business in an ethical and compliant manner with integrity.
- Comply with all applicable laws and regulations.
- Comply with the U.S. Foreign Corrupt Practices Act and all other applicable laws related to bribery of government officials, including but not limited to the Canadian Corruption of Foreign Public Officials Act, and Mexico's Mexico Federal Law Against Corruption in Public Procurement.
- Avoid conflict of interest situations – business, financial, and personal – that would conflict with the interests of Twin Eagle and its shareholders.
- Comply with applicable antitrust laws and not participate in any activity that could be considered a violation of antitrust laws.
- Exercise good judgement with regard to facilitating payments. Facilitating payments are small payments given to government officials whose duties are essentially ministerial or clerical in nature, the purpose of which is to expedite or secure the performance of routine government action that the official has a duty to perform.
- Exercise good judgement with regard to business gifts and entertainment (Non-Government Entities). If not managed properly, the giving or receiving of business gifts and entertainment could give rise to an incorrect perception of our integrity and values.
- Provide confidential grievance mechanisms for employees to report violations of conduct, accounting issues, or illegal activity. These violations should be investigated, and corrective action taken, if necessary.



Health & Safety

At Twin Eagle, Safety is a top priority as it protects our most valuable resource – our employees.

Business Partners shall:

- Provide a safe and healthy working environment.
- Ensure appropriate controls are in place including policies, procedures, training, and equipment.
- Comply with all applicable laws, regulations, standards, and business practices.

Human Rights

At Twin Eagle, we are committed to respecting internationally recognized human rights – such as those noted in the United Nations Sustainable Development Goals.

Business Partners shall:

- Uphold and respect the human rights of all workers, treating them with dignity and respect at all times.
- Comply with all applicable laws, regulations, standards, and business practices.
- Commit to fostering, cultivating, and preserving a culture of diversity and inclusion.
- Not discriminate based on age, color, gender, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make employees unique.
- Prohibit harassment by cultivating an environment free of unnecessary distractions, bias, prejudice, and offensive behavior.
- Not tolerate trafficking or involuntary servitude.
- Respect the rights of employees to associate freely.

Environmental Management

At Twin Eagle, we are committed to environmental stewardship by minimizing the impacts of our operations.

Business Partners shall:

- Be responsible and respectful environmental stewards through awareness of risks, mitigation of impacts, and efficient use of resources.
- Comply with all applicable laws, regulations, standards, and business practices.

Grievances

Business Partners may contact Twin Eagle's Compliance & Ethics Helpline 24/7 at 844-754-3347 to request guidance or report violations of our Business Partner Code of Conduct, accounting issues, or illegal activity.