

KIWETINOHK ENERGY CORP. SUPPLIER CODE OF CONDUCT

1.0 Purpose and Scope

The Supplier Code of Conduct provides a framework and extension of our Code of Conduct to establish a commitment to ethical, environmentally and socially responsible practices throughout Kiwetinohk, including the sourcing of goods and services. The policy underscores Kiwetinohk's broader commitment to uphold human rights, environmental stewardship and responsible business practices and outlines the type of commitments Kiwetinohk expects its suppliers and contractors of goods and services to make.

Kiwetinohk encourages and promotes an overall culture of ethical business conduct by promoting compliance with applicable laws, rules and regulations, providing guidance to suppliers, employees and management to help them recognize and deal with ethical issues, promoting a culture of open communication, honesty and accountability and ensuring awareness of disciplinary action for violations of ethical business conduct. In the event of a conflict or inconsistency between this Supplier Code of Conduct and an agreement between Kiwetinohk and a Supplier, the agreement will govern and prevail.

Kiwetinohk employees involved in the procurement of goods and services are responsible for implementing this policy and ensuring the suppliers they are engaged with understand and agree to this policy and enforce policy compliance.

2.0 Definitions

"Kiwetinohk", the **"Corporation"**, **"we"** and **"our"** means Kiwetinohk Energy Corp. and any of its subsidiaries or affiliates.

"Prime Directive" means Kiwetinohk's primary goal to build a better enterprise by stakeholder engagement and accommodation, serving our stakeholders and working together with them as we transition to sustainable energy.

"Code" means Kiwetinohk's Code of Conduct, a statement of business practices and how we do business that reflects our commitment to a culture of honesty, integrity, and accountability.

"Employees" means employees of Kiwetinohk, including officers.

"MNPI" means material non-public information.

"Supplier" or "suppliers" means a person or organization that provides goods or services to Kiwetinohk and may include third-party suppliers, service providers, contractors, subcontractors and consultants, including their respective employees and representatives.

3.0 Principles and Rules

3.1 Foundational Principles

At Kiwetinohk, we are transitioning to become a sustainable energy company and we recognize that the fortunes of Kiwetinohk and its stakeholders are inseparable. In the long term, for any to benefit, all must be engaged and contribute. We acknowledge the following stakeholders and the duty to address their reasonable desires, including the below:

- people, everywhere, who seek to protect the environment want us to reach beyond compliance and find ways to lead the energy industry in reducing the environmental impact of our activities, restoring disturbed land and reducing greenhouse gas emissions intensity;
- governments and regulators want us to comply with all laws and regulations and to advise them of changes that would enable the industry to better serve society;
- communities most impacted by the Kiwetinohk's activities, including Indigenous communities, want to participate in planning, building and operating projects and in restoring the land when the projects are done;
- industry partners want us to honor our arrangements and reasonably accommodate change and adaptation;
- customers want us to reliably deliver our products at the specifications and in the amounts that we forecast;
- suppliers and service providers want an opportunity to compete for our business, to be paid promptly and fairly, and to contribute to the evolution of our business;
- employees want an energizing, inclusive, happy work environment where everyone is treated with dignity and respect, to be compensated fairly and a safe and healthy workplace; and
- investors want strong returns on their investment, effective communication and management of risks, including environmental, social, financial and reputational risks.

We, at Kiwetinohk, see ourselves in the business of serving our stakeholders and working together with them to transition to sustainable energy. By engaging all of our stakeholders openly and honestly and by encouraging their participation in our business, we expect to best serve each of them.

This goal of building a better enterprise by stakeholder engagement and accommodation is our Prime Directive. The pursuit of this objective is the foundation for all of Kiwetinohk's corporate conduct policies.

3.2 Minimum Requirements

This Supplier Code of Conduct sets out the minimum standards of ethical conduct which Kiwetinohk requires from Suppliers when doing business on behalf of Kiwetinohk. Kiwetinohk requires its Suppliers to adhere to this Supplier Code and expects Suppliers to implement these requirements in a manner that is appropriate and proportional to the

nature and scale of their activities, the goods that they supply and the services that they perform.

3.2.1 Comply with Law

Suppliers are required to act in accordance with all laws and regulations applicable to their business and in the jurisdictions in which they operate.

3.2.2 International Standards

Suppliers are encouraged to support the principles of the United Nations Global Compact and the International Labour Organization (ILO) Core Standards and Declaration on Fundamental Principles and Rights at Work, including:

- freedom of association and the effective recognition of the right to collective bargaining;
- not using forced or compulsory labour;
- not using child labour;
- eliminating discrimination, negative, disrespectful and bullying behavior; and
- providing a safe and healthy working environment.

3.2.3 Conflicts of Interest

Suppliers must always avoid and report situations of real or perceived conflicts of interest and should have a company-wide code of conduct or other policies or processes to manage conflicts of interest.

Suppliers must not try to gain improper advantage or preferential treatment, or improperly impact a Kiwetinohk employee's ability to make sound, impartial and objective business decisions on behalf of Kiwetinohk. Kiwetinohk employees may only accept gifts that they could reasonably reciprocate. If in doubt, Suppliers should consult with their Kiwetinohk contact about gift giving to avoid a real or perceived conflict of interest. Any situation that may reasonably create the appearance of a potential conflict of interest must immediately be disclosed by the Supplier to Kiwetinohk.

3.2.4 Anti-bribery and Anti-corruption

Suppliers must not engage directly or indirectly in any activities that would put themselves or Kiwetinohk at risk of violating anti-bribery and anti-corruption laws. This includes bribes, kickbacks or other inappropriate payments to gain an unfair advantage in any of the jurisdictions in which a Supplier may operate.

Maintaining internal controls and keeping accurate and complete transaction records are required. Our standard language for procurement contracts includes a requirement to comply with all laws, keep accurate books and records, and where appropriate, contains specific anti-bribery and anti-corruption commitments.

3.2.5 Anti-Trust and Fair Competition

Suppliers must engage in fair competitive business practices in compliance with applicable anti-trust and competition laws. In particular, but without limitation, Suppliers shall not engage in any of the following practices:

- price-fixing or price control;
- behavior in restraint of trade or competition; or
- market or customer segmentation in collusion with anyone.

3.2.6 Inclusion, Equity, Diversity and Belonging

Kiwetinohk is committed to supporting workplaces that ensure all members of its organization are treated with dignity and respect. People have the right to work in an atmosphere free of discrimination, harassment, bullying and workplace violence.

Inclusivity, diversity and belonging are important principles at Kiwetinohk, and we do not tolerate any form of discrimination. Suppliers should promote an inclusive work environment that always allows everyone to contribute their skills and talents fully. Discrimination in employment means any distinction or exclusion made on the basis of the personal characteristics of an individual, such as age, race, colour, religion, gender, national or ethnic origin, sexual orientation, gender identity or disability, or any other characteristic protected by law with no bearing on an employee's professional duties.

3.2.7 Supporting Indigenous Peoples and Local Communities

Kiwetinohk strives to support the communities in which we operate by building positive and sustainable relationships. Kiwetinohk seeks to have a diverse supplier base including businesses that are Indigenous-owned and employ Indigenous Peoples. Suppliers are encouraged to identify, adopt, and integrate diverse suppliers into their supply chain so their own supplier base reflects the diversity of society.

Kiwetinohk's vision is to develop mutually beneficial relationships with Indigenous Peoples on whose traditional territories we live and work, and to advance the goals of the Truth and Reconciliation Commission's Call to Action 92.

Kiwetinohk believes its Suppliers should, where applicable, have a similar approach and engage respectfully with Indigenous Peoples and local communities, promote local employment opportunities, increase their employee and stakeholder engagement practices, and identify and foster business opportunities that support Indigenous-owned businesses and their communities.

3.2.8 Employment Practices & Human Rights

Suppliers must abide by applicable employment standards, labor, non-discrimination and human rights legislation. Where laws do not prohibit discrimination, or where they allow

for differential treatment, we expect Suppliers to be committed to non-discrimination principles and not to operate in a way that unfairly differentiates between individuals.

Suppliers must be able to demonstrate that, in their workplaces:

- child, forced, and compulsory labour is not used;
- discrimination and harassment are prohibited, including in the context of recruitment, hiring, promotion, compensation and employee development decisions;
- retaliation for speaking up is prohibited and employees are free to raise concerns and speak up without fear of reprisal;
- all wage and hour laws are complied with, including those relating to minimum wages, overtime, maximum hours, mandated benefits and other elements of compensation;
- employees are allowed the freedom of association;
- they do not engage in modern slavery and actively monitor and prevent modern slavery in their own supply chains; and
- clear and uniformly applied employment standards are used that meet or exceed legal and regulatory requirements.

3.2.9 Confidentiality and Data Protection

In the course of business with Kiwetinohk, Suppliers may have access to information that is the property of Kiwetinohk, or the property of its clients or other third parties. This information may constitute valuable information, know-how or trade secrets and may be non-public, confidential, privileged, or of value to Kiwetinohk's competitors, or may be damaging to Kiwetinohk if improperly disclosed.

We expect Suppliers to have in place policies and procedures for the proper safeguarding, handling and use of that information. These policies and procedures must meet applicable legal and regulatory requirements to prevent inappropriate access, use or disclosure of non-public information.

Suppliers must process and store information as agreed with Kiwetinohk and have appropriate privacy / data protection and information security policies and procedures in place to protect personal and confidential information. Suppliers must notify Kiwetinohk immediately if there are any actual or suspected privacy breaches, security breaches, or losses of our information. Further, Suppliers must assist Kiwetinohk in managing any consequences arising from those events.

You may, by virtue of your dealings with Kiwetinohk, come into contact with MNPI concerning Kiwetinohk. You must comply with legal and other restrictions with respect to trading in the securities of Kiwetinohk and disclosing any MNPI to any third party. You and your personnel may not purchase or sell, whether yourselves or whether on behalf of another party, securities issued by Kiwetinohk while in the possession of MNPI concerning Kiwetinohk and at no times should Suppliers use MNPI for trading with

Kiwetinohk common shares or securities of any other company for financial gain. You must have appropriate policies and procedures in place to comply with applicable laws and regulatory requirements regarding the management of MNPI and must prevent inappropriate access or disclosure of MNPI. All Suppliers must read and comply with Kiwetinohk's Securities Trading and Reporting Policy.

3.2.10 Environment and Climate Change

Suppliers must conduct their operations with minimal environmental impact, respect applicable environmental laws and regulations and adopt procedures, contingency plans, emergency response measures and management systems as appropriate for their business. Kiwetinohk also expects Suppliers to be aware of its Health, Safety and Environment Policy. Suppliers should provide their employees with relevant environmental training.

Suppliers should also take the necessary measures to ensure the resiliency of their business to the impacts of climate change. Suppliers should implement measures to prevent pollution and reduce greenhouse gas emissions and other pollutants, including setting climate change objectives and targets.

Suppliers must implement appropriate procedures to identify, manage, reduce and dispose of or recycle any identified hazardous substances and non-hazardous waste from their operations, in accordance with applicable laws and regulations.

Suppliers are encouraged to seek opportunities for biodiversity conservation, including the rational use of natural resources required for their operations and promotion of conserving, recycling, or reusing materials.

3.2.11 Public Communications

Kiwetinohk is committed to maintain its reputation, credibility and image among its business partners and the general public. Therefore, Suppliers shall not make, publish or otherwise communicate any disparaging or derogatory statement concerning Kiwetinohk, its directors, officers or employees. Suppliers are also prohibited from using or referring to Kiwetinohk's name and/or visual corporate identity, including its logo, in any manner whatsoever, including, without limitation, in any advertising, website, corporation document, social media or written or oral public communications, without our express prior written consent.

3.2.12 Health and Safety

Suppliers must provide a safe, clean, and healthy work environment and abide by all applicable laws with respect to occupational health and safety. Suppliers should ensure that actual and potential risks to worker health and safety are identified, assessed, and eliminated or managed to mitigate their impacts and ensure preparedness. This includes implementing appropriate safety procedures and preventative maintenance, deploying training, and providing Personal Protective Equipment, as required.

Suppliers should strive for continuous improvement in safety performance and regularly review and update their safety programs and practices in a manner that ensures ongoing compliance with law and industry standards.

All Suppliers who perform work on Kiwetinohk property must read and comply with Kiwetinohk's Health, Safety and Environment Policy.

4.0 Other Matters

4.1 Certification and Compliance

It is essential that all Suppliers understand and adhere to the Supplier Code of Conduct.

New Suppliers will be asked to certify their review of, and agreement to be bound by, the Supplier Code of Conduct as a condition of contract.

Suppliers are expected to maintain documentation to demonstrate their compliance with the Supplier Code of Conduct in accordance with applicable laws and the terms of their contract with Kiwetinohk.

4.2 Compliance Verification and Reporting Violations

Suppliers are expected to demonstrate compliance with the Supplier Code of Conduct upon Kiwetinohk's request. Kiwetinohk reserves the right to investigate and audit compliance with this Supplier Code of Conduct, including through dialogue, self-assessment questionnaires or site visits and inspections by Kiwetinohk personnel or designated agents. Kiwetinohk may require that a Supplier certify or provide information relevant to compliance with this Supplier Code of Conduct. In this regard, Suppliers shall assist with any such investigation and audit and provide access to any information reasonably requested.

If a Supplier fails to comply with the Supplier Code of Conduct, the Supplier must notify Kiwetinohk and implement corrective actions. This includes violations by any employee, agent or third-party contractor acting on behalf of either the Supplier or Kiwetinohk. In the event of non-compliance with the Supplier Code of Conduct, Kiwetinohk may consider such event a breach of contract and in extreme situations terminate the contract.

If remediation is required, a Supplier shall implement a corrective action plan and timeline to effectively and promptly resolve the non-conformity. Kiwetinohk reserves the right to temporarily suspend or terminate its relationship with a Supplier, in its sole discretion, should a Supplier fail to comply with the provisions of this Supplier Code of Conduct or any requested remedial action plan.

Suppliers are encouraged to raise any concerns or suspected violations of the Supplier Code of Conduct with their Kiwetinohk relationship contact or if not comfortable it can be reported to Kiwetinohk's Whistleblower email address at whistleblower@kiwetinohk.com.

Suppliers must not retaliate against any person for reporting, in good faith, contraventions of this Supplier Code of Conduct, or for filing a complaint, testifying, assisting, or participating in any manner in any investigation, proceeding or hearing conducted by a government enforcement agency. Prohibited retaliation includes but is not limited to termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions, or otherwise denying any employment benefit because an employee has reported alleged prohibited conduct or participated in an investigation.

5.0 Other Policies Incorporated by Reference

Prime Directive

Code of Conduct

Diversity, Equity, Inclusion and Belonging Policy

Whistleblower Policy

Health, Safety and Environment Policy

Securities Trading and Reporting Policy

6.0 Review and Modification

In addition to annual certification by all Suppliers, this policy is reviewed at least annually by the CEO. The CEO and management will review at least once per year, recommending updates and modifications as required.

Approved by the Pat Carlson, CEO, on November 6, 2023.