Updated ; November 2026

Supplier Code of Conduct

1 Scope and Objectives.....2

2 Rules of conduct 3

3 Compliance 4

4 Standards to uphold.....5

4.1 Conflicts of Interest.....5

4.2 Anti-corruption and Fraud 6

4.3 Supply chain 6

4.4 Fair competition.....6

4.5 Labour.....7

4.6 Health and safety 8

4.7 Environment 8

4.8 Confidentiality of information and intellectual property.....8

4.9 Data privacy.....9

4.10 Cybersecurity.....9

5 Compliance to the Code 9

6 Report a concern or situation non-compliant..... 10

7 Requests for information 10

8 Governance and follow-up 10

CDPQ infra

1

Scope and Objectives

Scope

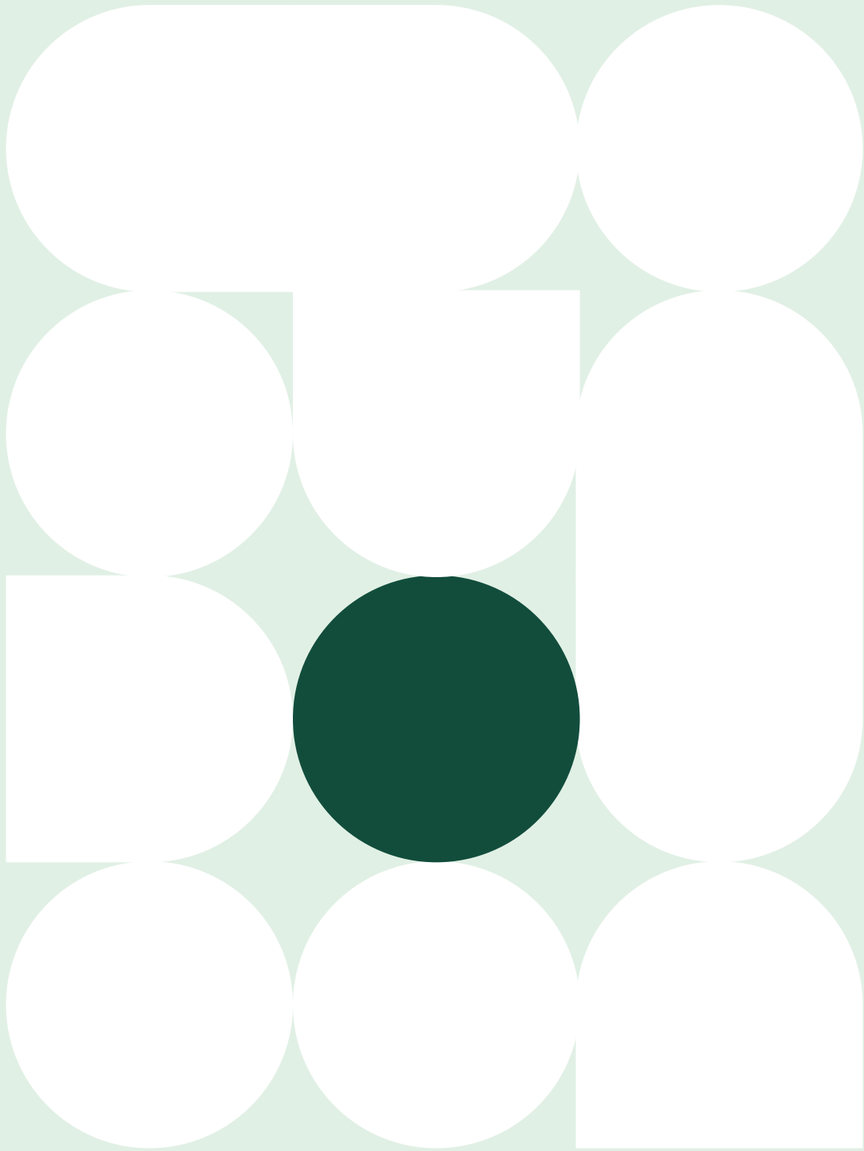
This Code applies to all Suppliers[1] during any period during which they provide goods and/or services to CDPQ Infra[2]. Certain provisions or special measures may continue to apply after the end of their business relationship with CDPQ Infra.

The Code sets out the rules, principles and standards to guide CDPQ Infra's Suppliers with regards to integrity and ethics.

Objectives

CDPQ Infra recognizes its liability to respect universally recognized human rights, as stated in the *International Bill of Human Rights* and in the *International Labour Organization's Declaration on Fundamental Principles and Rights at Work*.

With that in mind, the Code incorporates the fundamental principles pertaining to human rights, work, the environment and the fight against corruption, thereby strengthening its commitment to respect these rights.



[1] Any supplier of goods and/or services, including contractors, their employees, consultants, advisors and subcontractor involved in the supply of goods or services to CDPQ Infra, whether or not they are bound by a written agreement with CDPQ Infra.

[2] CDPQ Infra inc. And its subsidiaries.

2

Rules of conduct

2.1 Act with respect, loyalty, honesty and integrity

Competence, diligence and integrity

The duties assigned to the Suppliers must be carried out diligently, to the best of their ability and with rigour and judgment. Suppliers must adhere to the highest standards of quality when information is processed on behalf of CDPQ Infra.

Suppliers may not knowingly omit any information or data affecting the accuracy of a report, falsify documents or issue false declarations.



Loyalty and restraint after the relationship ends

The Suppliers obligations continue after the end of the business relationship with CDPQ Infra. Any confidential information brought to the Supplier's attention as part of their business relationship with CDPQ Infra must remain confidential after such disclosure is complete. Suppliers may not disclose its content or give anyone advice based on such information, nor use it to their advantage, to the advantage of a third party or to the detriment of CDPQ Infra or a third party.

All of CDPQ Infra’s documents in the Supplier's possession must be returned to CDPQ Infra or destroyed at the end of the business relationship with CDPQ Infra.

3

Compliance

Suppliers must comply with the provisions of this Code. In case of doubt regarding the interpretation of these provisions, Suppliers must ask questions or validate their interpretations with CDPQ Infra.

In addition, Suppliers must comply with all applicable laws and regulations in force in each country where they operate, including those relating to fair competition, importation and exportation. The most sensitive elements are notably found in the bidding process.

It is prohibited to use facilitating payments, either to insure or to accelerate regular government procedures (such as issuing licenses, permits, visas, etc.).

4

Standards to uphold

IN SHORT

4.1 Conflicts of Interest →

4.2 Anti-corruption and fraud →

4.3 Supply chain →

4.4 Fair competition →

4.5 Labour →

4.6 Health and safety →

4.7 Environment →

4.8 Confidentiality of information and intellectual property →

4.9 Protection of personal data →

4.10 Cybersecurity →

4.1 Conflicts of Interest

Suppliers must take the proper measures to avoid any conflict of interest or any appearance of a conflict of interest, or any potential situation likely to lead to a conflict of interest, in order to remain impartial in its business relationship with CDPQ Infra.

If the Supplier is in a real, potential or apparent conflict of interest, the Supplier must immediately report it and withdraw from any discussion, decision or evaluation related to the matter at hand.

Throughout its business relationship with CDPQ Infra, the Supplier must not, under any circumstance, directly or indirectly, offer gifts or any other benefits that may compromise or appear to compromise the objectivity of CDPQ Infra's employees or that are likely to jeopardize the credibility of CDPQ Infra.

Specific prohibitions

When, as part of its business relationship with CDPQ Infra, a Supplier participates in a bidding or bidding-like process, the Supplier must not offer, under any circumstance, any gift or benefit to an employee, administrator, consultant or CDPQ Infra employee who participates in the process, for the duration of the process.

4.2 Anti-corruption and Fraud

Suppliers must conduct all their activities with integrity. It is prohibited to participate, directly or indirectly, in fraudulent transactions or in activities that are illicit or likely to be perceived as such.

Suppliers undertake to respect all anti-corruption laws and regulations in force, including provisions that prohibit corruption and bribery.

Corruption, by definition, is the act of giving, offering, receiving or soliciting, directly or indirectly, namely by using agents or other intermediaries, money or gifts in order to influence the behaviour of a third party, thereby preventing said third party from exercising its normal functions with the goal of obtaining or maintaining professional commitments or obtaining illicit benefits.

4.3 Supply chain

Suppliers must exercise reasonable diligence toward their supply chains to ensure an ethical procurement process for all the goods and services that they use.

4.4 Fair competition

All agreements with Suppliers must be based on competitive terms and conditions and market practices. Request for proposals are required for certain contracts to respect sound management and to ensure a transparent and fair process. With this in mind, Suppliers must respect CDPQ Infra's Procurement Policy at all times.

4.5 Labour

CDPQ Infra expects its Suppliers to comply with all local labour and employment laws and regulations in the countries where they do business. In addition, Suppliers must adhere to the following principles:

Diversity and inclusion

The Suppliers undertake to guarantee equal employment opportunities, regardless of age, sex, sexual orientation, disability, race, religion, citizenship, civil status, family status, country of origin or any other similar reason.

Child labour

CDPQ Infra does not engage in or support child labour and does not tolerate child labour on any level of its supply chain. In this respect, CDPQ Infra expects its Suppliers to strive to eliminate the use of child labour.

Forced and mandatory labour, modern slavery and human trafficking

CDPQ Infra does not practice any form of human trafficking, has remedies to any forced and mandatory labour or modern slavery, and tolerates these practices at no level in its supply chain and expects its Suppliers to follow the same standards.

Freedom of association

Suppliers must recognize and respect their employees' freedom of association, which is provided for under applicable laws.

Respect and dignity

Suppliers are committed to treating all employees with equity, ethics, respect and dignity. They must protect their employees in the workplace from harassment, intimidation and victimization, including any form of sexual, physical and psychological abuse. The Supplier undertakes to comply with CDPQ Infra's Policy on this subject when in contact with the latter.

4.6 Health and safety

CDPQ Infra requires that its Suppliers make the health and safety of their employees a priority in all aspects of their operations. Suppliers must comply with all applicable health and safety laws, regulations and standards.

Suppliers must take the necessary measures to protect the health, safety and well-being of their employees. They must systematically assess and mitigate risks to which workers and the public are exposed, monitor their health and safety performance through appropriate audits and produce reports on them. In addition, they must continuously improve their health and safety management system, communicate their undertaking to their employees and subcontractors, provide adequate training and demonstrate visible leadership.

→ **Use of substances that may affect faculties**
Suppliers must ensure that each of their employees are at all times fit for work and have no impaired faculties in the performance of their duties concerning CDPQ Infra, and comply with all local laws and regulations in force concerning drug use and alcohol consumption.

4.7 Environment

Suppliers are required to carry out their activities sustainably and environmental protection must be at the core of all their activities.

Suppliers must adopt policies, standards, procedures and contingency measures as part of a relevant environmental management system. They must also take the necessary measures to prevent pollution, reduce greenhouse gas emissions and preserve the ecosystems and the natural resources they need to operate. Their undertaking must be clearly communicated to their employees and subcontractors.

4.8 Confidentiality of information and intellectual property

Suppliers must respect the intellectual property rights of others. In addition, Suppliers must respect, protect and ensure the confidentiality of information provided or collected by them or by CDPQ Infra, including personal, financial, technical, commercial, industrial and scientific information. They may use such information only for the purposes provided in the contract and must not disclose or transmit it to third parties without CDPQ Infra's prior written consent. These obligations of confidentiality persist after the end of the business relationship, unless otherwise indicated by CDPQ Infra.

4.9 Data privacy

Suppliers must comply with all applicable laws and regulations regarding the protection of personal data. To that end, Suppliers must immediately report unauthorized access, use, disclosure, loss or theft of CDPQ Infra's personal data to the person responsible for protecting personal data at the following email address: responsablerp@cdpqinfra.com

4.10 Cybersecurity

The use of computer resources must never interfere with work, information security, the operation of the computer and telecommunications network, or the image and reputation of CDPQ Infra, nor have immoral or illegal motives.

CDPQ Infra expects all digital information provided to a Supplier to be protected from unauthorized access or leaks and remains confidential.

Suppliers must immediately inform CDPQ Infra of any cybersecurity incident involving information, data, systems or assets of CDPQ Infra by contacting the Cybersecurity team at: cybersecurité@cdpq.com

5

Compliance to the Code

CDPQ Infra reserves the right to verify that its Suppliers are complying with this Code. This verification may take the form of a self-appraisal by the Supplier or by filling out a questionnaire provided by CDPQ Infra.

Suppliers are strongly recommended to implement the policies, procedures, tools and indicators necessary to ensure the compliance of the principles mentioned above. In addition, they must manage, monitor and develop their supply chains to ensure that they meet CDPQ Infra's requirements in accordance with this Code.

6

Report a concern or situation non-compliant

Suppliers must immediately report any concerns or suspicions of a situation that does not comply with this Code to CDPQ Infra's Ethics team.

Email

- cdpqinfra_ethique@cdpqinfra.com

The Ethics Line

- At the following number:
  844 831-5567

- Online, confidentially and anonymously:
  Ethics Hotline — CDPQ Infra



7

Requests for information

Requests for information concerning the application or interpretation of the Code must be sent to CDPQ Infra's Procurement team at the following email address:
approvisionnements@cdpqinfra.com

8

Governance and follow-up

The Board of Directors of CDPQ Infra approves this Code. It must be reviewed every three years, unless it is necessary to do so earlier.