

Title: CODE OF BUSINESS CONDUCT POLICY

Policy Statements: Ontario Power Generation (OPG) is committed to being an ethical company. It shall conduct its relationships with its employees, suppliers, customers, subsidiaries, stakeholders and the public in accordance with the values of integrity, safety, excellence, inclusion and innovation as outlined in the OPG Code of Business Conduct ("Code") and Supplier Code of Conduct ("Supplier Code").

Requirements: OPG shall establish a Code and a Supplier Code that foster ethical behavior in its business activities and, at a minimum, meet all external legal and regulatory requirements relating to employee and supplier conduct.

OPG shall not tolerate:

- Discrimination or harassment related to grounds protected by applicable human rights legislation
- Personal harassment including behaviour that demeans, threatens or humiliates a person or group of people
- Comments or conduct that demean, threaten, ridicule or disparage a person or group of employees or people, even if they are not directed at a particular individual
- Comments or conduct that is sexual in nature
- Abusive, threatening, intimidating or violent acts directed at anyone employees come in contact with in carrying out their responsibilities
- Retaliation or reprisal, including threats against an employee for good faith reporting or participation in a complaint process

OPG shall communicate to its employees, agents, representatives, consultants, business partners, contractors and suppliers about their obligations under the Code and Supplier Code.

OPG shall monitor and enforce compliance with the Code and Supplier Code. OPG shall establish mechanisms where employees and suppliers can raise concerns and ensure that known and suspected violations of the Code and Supplier Code are appropriately investigated and addressed.

Accountabilities: **The Chief Ethics Officer is accountable, on behalf of the President & Chief Executive Officer for:**

- Ensuring this policy is effectively implemented within OPG
- Reporting on the overall effectiveness of this policy and specific violations of the Code and Supplier Code, as required, to the President & Chief Executive Officer, and Board of Directors
- Reviewing the Code and Supplier Code on a regular basis to ensure they continue to meet all relevant OPG and external business standards

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- Ensuring that appropriate management action is taken to investigate and address known or suspected violations

Each Executive Leadership Team (ELT) member is accountable for:

- Monitoring Code and Supplier Code compliance within their organizations
- Submitting an annual due diligence report to the Chief Ethics Officer that confirms that their employees have completed all required Code training, Bands A to H staff have completed the annual electronic confirmation sign-off, and all known violations have been reported to the Chief Ethics Officer

The Vice President Risk & Audit, Chief Audit Executive is accountable for:

- Providing periodic independent assurance to the Board that the controls related to the Code and Supplier Code are operating effectively

Managers at all levels in the organization are accountable for:

- Providing their employees with the necessary tools to understand and comply with their responsibilities under the Code
- Ensuring their employees complete any required training on the Code
- Ensuring their Bands A to H staff complete the required confirmation sign-off on an annual basis
- Reporting known and suspected violations of the Code and Supplier Code to their HR contact or the Ethics Office as soon as they are known
- Taking appropriate management action to address known or suspected violations of the Code in partnership with their HR contact
- Ensuring their employees complete a written declaration of any actual, perceived or potential conflict of interest and addressing declarations from employees and suppliers in consultation with their manager, HR contact and the Ethics Office
- Being concerned, knowledgeable and reliable counsellors to whom employees can comfortably go for advice
- Maintaining confidentiality in complaint processes to the extent permitted by law and the organizations' ability to address the concern
- Creating a work environment based on respect that encourages ethical behaviour

Employees at all levels in the organization are accountable for:

- Understanding Code responsibilities and complying with the Code
- Completing any required training on the Code
- Carrying out their responsibilities ethically and with integrity, and treating those with whom they do business with respect and dignity
- Seeking advice from their manager, HR contact or the Ethics Office if uncertain about the right ethical decision

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- Declaring all actual, perceived or potential conflicts of interest in writing to their manager as soon as they are known
- Reporting conduct that violates or appears to violate the Code or Supplier Code to their manager, HR contact or the Ethics Office
- Maintaining confidentiality when engaged in a Code violation process, procedure or investigation

Attachments: Code of Business Conduct
Supplier Code of Conduct

Sponsoring Unit: Chief Administrative Office

Approval: Board of Directors

Effective Date: October 2, 2024

Document requires CNSC Notification ☐