



Supplier Code of Conduct

Introduction

Geomega Resources Inc., with its wholly owned subsidiaries, (“Geomega”, the “Company”, “we” or “us”) is deeply committed to fostering a sustainable future in alignment with the United Nations' 17 Sustainable Development Goals. This Supplier Code of Conduct (the “Code”) serves as a cornerstone in realizing this commitment, embodying our core integrity values.

Conforming to legal compliance and moral responsibility, our suppliers must strive to ensure alignment with the principles outlined in this code, adhering to all regulations governing labor practices and human rights, both domestically and internationally. Through this code, we aim to cultivate a supply chain characterized by fairness, safety, and dignity for all individuals involved, ensuring that our collective efforts contribute positively to society and the environment.

General Legal and Regulatory Acknowledgement

Suppliers must comply with all applicable laws and regulations of their local jurisdiction. It is imperative that suppliers adhere to legal requirements governing their operations to ensure ethical conduct and promote a fair and transparent business environment. By upholding local laws and regulations, suppliers demonstrate their commitment to responsible business practices and contribute to building trust and integrity within the supply chain. Compliance with legal standards is non-negotiable and forms the foundation of our partnership with suppliers.

Health and Safety

Suppliers must have a high regard for the health and safety of their employees, promoting a hygienic and healthy work environment, free from occupational hazards. Appropriate measures must be implemented to prevent and control risks of occupational injury and occupational illness, driven by physical, chemical, or biological agents, or physically demanding tasks. Employees must receive training and personal protective equipment accordingly. Emergency response plans must be in place to address potential emergency situations. Employees must be provided with a sanitary work access to toilet facilities, potable water and eating facilities, along with adequate heat, ventilation, and reasonable personal space.

Environment

Suppliers must demonstrate engagement with sustainability principles, pursuing the minimization of environmental impacts in their operations and in their supply chains. This includes the adoption of practices to minimize and responsibly manage the generation of solid wastes, effluents, atmospheric emissions, and pollutants in general. Suppliers should comply with environmental regulations and strive for continuous improvement in their environmental performance.

Forced Labor and Child Labor

Suppliers must adhere to a strict zero-tolerance policy towards all forms of forced labor and modern slavery, including bonded labor, involuntary servitude, and human trafficking. They should uphold the principles of freedom and dignity for all workers, ensuring that employment is voluntary and conducted under fair and equitable conditions.

Moreover, suppliers must unequivocally reject the use of child labor in any forms. Suppliers are expected to take proactive measures to verify the age of workers and ensure that no children are employed in any capacity that compromises their well-being, education, or development.

Suppliers are expected to comply with all labor legislations applicable in their local jurisdictions. Geomega also recommends its suppliers to engage on the identification, prevention and mitigations of forced labor, child labor and human trafficking within their respective supply chains, in accordance with internationally recognized standards, such as the OECD Due Diligence Guidance for Responsible Supply Chains.

Equity, Inclusion, and Diversity

Suppliers must promote equity, inclusion, and diversity in their workforce, treating all individuals with respect and dignity regardless of gender, religion, ethnic background, age, sexual orientation, disability, or any other characteristic protected by law. Hiring, compensation, dismissal, and performance evaluation, and other processes to manage workforce are expected to be conducted through fair and equitable principles. Suppliers must prevent discrimination and harassment in the work environment.

Personal Information Protection

Suppliers must protect the privacy and confidentiality of personal information entrusted to them by customers, employees, and other stakeholders. They should implement appropriate security measures to safeguard data against unauthorized access, use, or disclosure.

Business Integrity

Suppliers must conduct their business with honesty, integrity, fairness, and transparency, in all aspects of their operations. This entails adhering to established codes of conduct and ethical guidelines, ensuring that their actions are aligned with legal requirements and industry best practices. Suppliers should adhere to high ethical standards in all interactions and transactions, avoiding conflicts of interest and maintaining the trust and confidence of their stakeholders.

Anti-Corruption and Anti-Bribery

Corruption undermines fair competition, distorts markets, and derogates companies' credibility. Suppliers must demonstrate a firm commitment to combating corruption and bribery in all their business dealings, complying with applicable anti-corruption laws, prohibiting unethical influence, extortion, or illicit payments. Geomega advises its suppliers to establish robust internal controls and due diligence processes to prevent corrupt practices, and support initiatives promoting transparency and accountability, such as the UN Global Compact's Principle 10 on anti-corruption.

Financial and Trade Regulations

Suppliers must refrain from engaging, directly, or indirectly, in any activities associated with accepting, concealing, converting, or transferring funds obtained from criminal activities, including but not limited to money laundering, embezzlement, terrorist financing, facilitation of tax evasion, fraud, or falsification.

Additionally, suppliers must adhere to international trade laws that prohibit or restrict trade with certain countries, individuals, or organizations subject to embargoes or sanctions, such as those with ties to actual or suspected terrorists or drug traffickers.

Complying with applicable anti-trust legislations, suppliers are also expected to conduct fair competition, refraining from engaging in any anti-competitive practices, collusion, or abuse of market dominance.

Suppliers are encouraged to proactively perform due diligence to identify and assess potential risks associated with third-party relationships regarding these issues. Robust risk management processes and internal controls are crucial to prevent the involvement in illicit activities through third-party connections. Any indication of non-compliance or unethical behavior is expected to be addressed accordingly.

Freedom of Association and Grievance Management

According to local legislation, suppliers should respect the worker's rights to form or participate in organizations of their choice (such as unions, councils, or worker committees), seek representation and bargain collectively, without facing any form of interference, discrimination, retaliation, or harassment.

Suppliers must establish and maintain effective grievance mechanisms to address complaints or concerns raised by stakeholders, including but not limited to employees, customers, local communities, and other relevant parties. These mechanisms should be easily accessible, transparent, and impartial, allowing for the timely resolution of grievances in a fair and respectful manner. Suppliers must ensure that all grievances are handled confidentially and without fear of retaliation. Additionally, suppliers should periodically review and evaluate their grievance management processes to identify opportunities for improvement, to perpetuate stakeholder engagement and satisfaction.

Compliance Monitoring

Overall, our suppliers are expected to fully adhere to the guidelines outlined in this Code, and to maintain records to confirm their compliance. Geomega reserves the right to request evidence of compliance, including conducting site visits and inspections by our internal personnel or designated agents. Any violations to this Code should be promptly notified to Geomega and rectified by the Supplier through corrective actions. Non-compliance to this Code may be deemed by Geomega as a breach of contract.

This Code and all our operational and business guidelines are established through Geomega's Code of Ethics. Should there be any questions or further clarification pursued about any aspect of this Code, please contact one of our representatives or email the inquiries to compliance@geomega.ca.

We take any suspected violations of this Code seriously. Prompt reporting of any concerns is strongly encouraged. If you become aware of any potential misconduct, please report them immediately at +1 (450) 641-5119 or compliance@geomega.ca. According to our Whistleblower Policy, all reports are handled in strict confidence and mediated through an independent member to ensure impartiality and fairness in the investigation process.