

Supplier Code of Conduct

Updated May 2023



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Our Company

Capstone Infrastructure Corporation (Capstone or the “Company”) is generating our low-carbon future, driving the energy transition forward through creative thinking, strong partnerships, and a commitment to quality and integrity in how we do business. A developer, owner, and operator of clean and renewable energy projects across North America, Capstone’s portfolio includes wind, solar, hydro, biomass, and natural gas cogeneration power plants.

Capstone’s Values

Capstone is committed to safety, quality, and integrity in all aspects of our business. We believe that by investing in our people and delivering on our promises, we can deliver on our mission to drive the energy transition forward and build a clean energy future. These values help to define who we are, what we stand for, and guide our decisions and actions on a day-to-day basis. Every one of Capstone’s, suppliers, contractors, consultants, and vendors (collectively, “Suppliers”) occupy a position of trust and play an integral role in helping us to deliver on our mission. This Supplier Code of Conduct (the “Code”) provides the foundation on which we build these relationships and affirms Capstone’s commitment to uphold the highest ethical standards.

Whatever the area of activity and whatever the degree of responsibility, Capstone expects our Suppliers, inclusive of their respective supply chain, to comply with applicable laws, to uphold the highest standards of health and safety, environmental management, human rights and labour rights, and to act with transparency, integrity, and respect when working with us.

People

Human and labour rights

Capstone recognizes and respects the rights and dignity of all employees, consultants, and stakeholders. As the company grows and interacts with an increasingly diverse supply chain, workforce, and stakeholders, Capstone remains committed to acting with integrity and respecting human rights and we expect every business and individual we work with to do the same.

We expect our Suppliers to:

- Respect internationally recognized human rights and labour standards;
- Prohibit, directly and indirectly, the use of slavery, forced labour, and child labour in accordance with local regulations and international standards.
- Not tolerate discrimination, abuse, or harassment towards any person at any working location.
- Provide employees with fair wages at/or above the statutory minimum wage and adhere to acceptable working hours.

Health and Safety

Capstone upholds the highest standards for safety and prioritizes the health and well-being of our people, the public, and the environment. Working safely is our number one objective. If something can't be done safely, we won't do it.

We expect our Suppliers to:

- Comply with, or exceed, all applicable health and safety laws and regulatory requirements.
- Identify and manage operational hazards, and plan and perform work to minimize risk.
- Communicate openly, consult, and cooperate with Capstone on all health and safety matters.
- Be prepared for health, safety, and environmental emergencies.

Equity, Diversity, & Inclusion

Equity, diversity, and inclusion are values integral to Capstone, and we are committed to ensuring work environments free of discrimination and harassment where employees are assured equality of employment opportunity based on merit and ability.

We do not discriminate based on race, ancestry, place of origin, colour, national or ethnic origin, citizenship, creed, sex, sexual orientation, religion, marital status, family status, same-sex partnership status, age or disability.

In addition, we are committed to ensuring a work atmosphere free of harassing, abusive, disrespectful, disorderly, disruptive, or any other non-professional conduct.

Capstone expects its Suppliers to be equally committed to promoting diversity and equal opportunities for their employees.

Protection of the Environment

Capstone is committed to decarbonization and the successful transition to a clean energy future while protecting the environment from harm. We take responsibility for the impact of our actions and business operations on the environment, customers, employees, communities, and other stakeholders.

We expect our Suppliers to demonstrate a proactive approach to contribute to our environmental commitments, by actions such as (but not limited to):

- Minimizing any potential environmental impacts and protecting and conserving biodiversity.
- Minimizing the use of hazardous materials and ensuring appropriate management process.
- Ensuring compliance with all permitting obligations, applicable laws, and best environmental management practices.

Business Integrity and Anti-Corruption

Capstone requires that all employees and Suppliers do not tolerate or engage in any form of bribery or corruption practices, whether direct or indirect, in the course of doing business. To

ensure the highest ethical standards are met, appropriate procedures are in place to prevent and report conduct that contravenes applicable anti-corruption laws, rules, and regulations.

We require our Suppliers to:

- Perform all duties in a fair and ethical manner, including in compliance with competition and antitrust laws, anti-corruption laws, and crime and anti-money laundering laws.
- Not offer or make corrupt payments to any person, or solicit such payment from any person, including public officials or private individuals, to obtain or retain business or to obtain a business advantage for Capstone.
- Report to Capstone any actual or suspected bribery and corruption conduct that is in violation of this Code.
- Comply with all applicable securities laws and regulations to ensure that material, non-public information (“insider information”) is only disclosed in accordance with the law. Suppliers are not to use insider information for personal profit or take advantage of insider information by providing information to external parties.

Sustainable Supply Chain

Capstone expects our Suppliers to take reasonable steps to ensure procurement of materials and services from ethical sources. This includes not benefiting, directly or indirectly, from child or forced labour or any other discriminatory work practices.