

Responsible Supply Chain Policy

1 Introduction

Purpose: The purpose of this Responsible Supply Chain Policy is to establish Aperion Energy Group's (AEG) commitment to ethical and responsible practices within our supply chain. This policy aims to ensure that all suppliers, contractors, and business partners adhere to the highest standards of integrity, human rights, and environmental sustainability.

Scope: This policy applies to all suppliers, contractors, and business partners of AEG, regardless of their location. It outlines the expectations and requirements for ethical conduct, compliance with legal and regulatory standards, and the promotion of safe, fair, and sustainable practices throughout the supply chain.

By implementing this policy, AEG aims to foster a responsible and sustainable supply chain that aligns with our core values and ethical standards, ensuring positive impacts on society and the environment.

2 Ethical Standards and Compliance

Anti-Bribery & Corruption:

- AEG is committed to conducting all business transactions fairly and transparently. All suppliers, contractors, and business partners must adhere to our [Anti-Bribery & Corruption Policy](#) to protect the company's reputation, foster trust among stakeholders, and prevent legal and financial risks associated with bribery and corruption allegations.

Economic Sanctions:

- Suppliers and partners must comply with international trade laws and regulations as outlined in our [Economic Sanctions Policy](#). This compliance mitigates the risk of penalties, fines, and reputational damage, and helps maintain positive relationships with government agencies and international partners.

Export Controls:

- We require strict adherence to our [Export Controls Policy](#) to ensure compliance with export laws and regulations, including restrictions on sensitive technologies and goods. This prevents unauthorized exports that could pose national security risks and protects the company from legal and financial liabilities.

Money Laundering:

- To prevent the company from being used as a vehicle for illegal financial activities, all partners must follow our [Money Laundering Policy](#). This policy protects the integrity of financial transactions and the company's financial system, maintaining trust and confidence among customers, investors, and regulatory authorities.

Tax Evasion:

- Compliance with tax laws and regulations in all jurisdictions where we operate is mandatory. Our [Tax Evasion Policy](#) ensures that we prevent legal and financial consequences associated with tax evasion allegations and supports the company's reputation as a responsible corporate citizen.

By integrating these existing policies into our Responsible Supply Chain Policy, AEG ensures a comprehensive and cohesive approach to ethical standards and compliance throughout our supply chain.

3 Human Rights and Labor Practices

Modern Slavery:

- AEG is committed to eradicating modern slavery and forced labor from our supply chain. All suppliers and partners must adhere to our [Modern Slavery Policy](#), demonstrating our commitment to human rights and ethical labor practices. This policy mitigates the risk of inadvertently supporting or being associated with modern slavery, thereby protecting our ethical standing, reputation and brand value.

Anti-Harassment:

- We promote a safe, respectful, and inclusive work environment. Suppliers and contractors are expected to follow our [Anti-Harassment Policy](#), which prevents discrimination, harassment, and retaliation in the workplace. This policy fosters employee morale, productivity, and loyalty by prioritizing well-being and dignity.

Human Rights Policy:

- Our [Human Rights Policy](#) establishes a framework that integrates human rights principles into all aspects of AEG's operations. Suppliers and partners must safeguard the rights of all individuals affected by our activities, including employees, contractors, and local communities, promoting respect, dignity, and equality. Compliance with local and international human rights laws is mandatory.

Labor Law Policy:

- Compliance with all applicable labor laws is essential. Our [Labor Law Policy](#) ensures adherence to laws against child labor, discrimination, and wage violations. This policy expresses AEG's commitment to maintaining safe, healthy, and fair working conditions and encourages the reporting of violations and compliance with labor laws and ethical standards.

4 Health, Safety, and Environmental Responsibility

Safe Working Conditions:

- AEG is dedicated to ensuring that all suppliers and partners provide safe and healthy working environments. This commitment includes compliance with local and international health and safety regulations, regular risk assessments, and the implementation of appropriate safety measures. Suppliers are required to provide necessary training and resources to their employees to maintain high standards of workplace safety.

Environmental Sustainability:

- We promote environmentally sustainable practices throughout our supply chain. Suppliers and partners must comply with all applicable environmental laws and regulations, minimizing their environmental impact through responsible resource management, waste reduction, and pollution prevention. We encourage our suppliers to adopt innovative practices that enhance environmental sustainability.

5 Monitoring and Compliance

Supplier Assessments:

- AEG conducts regular assessments and audits of its suppliers and partners to ensure compliance with our Responsible Supply Chain Policy. These assessments may include on-site inspections, reviews of documentation, and interviews with workers. Suppliers are expected to cooperate fully with these assessments and provide accurate and timely information.

Reporting Mechanisms:

- We have established clear and accessible mechanisms for reporting violations or concerns related to our Responsible Supply Chain Policy. All stakeholders, including employees, suppliers, and community members, can report issues confidentially through our ethics hotline, email, or online reporting platform. We are committed to protecting whistleblowers and ensuring that there is no retaliation against individuals who report concerns in good faith.

Corrective Actions:

- If a supplier is found to be in violation of our Responsible Supply Chain Policy, AEG will work with them to develop and implement a corrective action plan. This plan will outline specific steps and a timeline for addressing the identified issues. Failure to comply with the corrective action plan or repeated violations may result in the termination of the business relationship.

6 Continuous Improvement

Feedback and Collaboration:

- AEG believes in the power of collaboration to drive continuous improvement in supply chain practices. We actively seek feedback from our suppliers, contractors, and other stakeholders to identify areas for enhancement. Regular communication and collaborative initiatives help to share best practices, address challenges, and innovate solutions that benefit all parties involved.

Training and Capacity Building:

- We are committed to supporting our suppliers and partners in improving their practices. AEG provides training programs and resources to help suppliers understand and comply with our policies. These programs cover key areas such as human rights, labor practices, health and safety, environmental sustainability, and ethical business conduct. By building the capacity of our supply chain partners, we aim to elevate standards and promote sustainable and responsible practices across the board.

Benchmarking and Best Practices:

- AEG engages in benchmarking activities to compare our supply chain practices against industry standards and leading practices. We regularly review and update our policies and procedures to reflect the latest advancements and best practices in responsible supply chain management. By staying informed and adaptive, we ensure that our supply chain remains resilient, ethical, and sustainable.

Innovation and Technology:

- Leveraging innovation and technology, AEG seeks to enhance supply chain transparency and efficiency. We invest in advanced tools and systems to monitor compliance, track performance, and manage risks. By adopting cutting-edge technologies, we aim to proactively address challenges and drive continuous improvement in our supply chain operations.

7 Implementation and Review

Policy Dissemination:

- AEG is committed to ensuring that all suppliers, contractors, and business partners are fully aware of and understand our Responsible Supply Chain Policy. We will disseminate the policy widely through multiple channels, including direct communications, supplier onboarding materials, and our company website. All suppliers are required to acknowledge their understanding and acceptance of the policy.

Training and Communication:

- To facilitate effective implementation, AEG will provide training sessions and workshops for suppliers and internal stakeholders. These sessions will cover the key aspects of the policy, including compliance requirements and reporting mechanisms. Regular updates and reminders will be communicated to reinforce the importance of adhering to the policy.

Regular Review and Updates:

- The Responsible Supply Chain Policy will be reviewed annually to ensure its relevance and effectiveness. This review process will consider feedback from suppliers, changes in regulatory requirements, and evolving best practices in responsible supply chain management. Any necessary updates or revisions will be made to ensure the policy continues to meet high standards of ethical and responsible conduct.

Stakeholder Involvement:

- AEG values the input and participation of all stakeholders in the implementation and review process. We will engage with employees, suppliers, and other relevant parties to gather insights and suggestions for improving the policy. Stakeholder feedback will be an integral part of the policy review process, ensuring that it remains comprehensive and responsive to emerging issues.

Documentation and Record-Keeping:

- Accurate documentation and record-keeping are essential for effective policy implementation and review. AEG will maintain detailed records of supplier assessments, training sessions, reported violations, and corrective actions taken. These records will be reviewed regularly to monitor compliance and identify trends or areas for improvement.



8 Contact Information

Responsible Officer:

- Henry Gomez, Chief Financial Officer (CFO), is responsible for overseeing the implementation and adherence to AEG's Responsible Supply Chain Policy. For any inquiries, concerns, or reports related to this policy, please contact him directly.
- **Name:** Henry Gomez
- **Title:** Chief Financial Officer (CFO)
- **Email:** hgomez@aegprime.com

Reporting Channels:

- AEG has established a channel for stakeholders to report violations or seek guidance regarding our Responsible Supply Chain Policy. This channel ensures confidentiality and protection against retaliation for those who report concerns in good faith.
- **Online Reporting Platform:** <https://aegprime.com/ethics-and-compliance/>

Response and Follow-Up:

- All reports and inquiries will be acknowledged promptly, and thorough investigations will be conducted where necessary. The compliance team and management will ensure that appropriate actions are taken to address any identified issues and that stakeholders are kept informed about the status and outcomes of their reports.

Sincerely,

Aaron Wheeler
CEO
Aperion Energy Group LLC



Appendix: Supplier Acknowledgment Form

Supplier Information

Company Name

Contact Person

Title

Address

Phone Number

Email

Acknowledgment

Policy Received (Date)

Comments

Commitment to Compliance

We hereby acknowledge that we have reviewed and understand the Aperion Energy Group Responsible Supply Chain Policy. We commit to adhering to the principles and requirements outlined in this policy and ensuring compliance within our operations and supply chain.

Authorized Signatory

Name

Title

Signature

Date

Please fill out and sign this acknowledgment form and return it to:

Henry Gomez, CFO

Aperion Energy Group

Email: hgomez@aegprime.com