

SUPPLIER CODE OF CONDUCT POLICY

DIRTT®

DIRTT ENVIRONMENTAL SOLUTIONS LTD.

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Supplier Code of Conduct Policy

DIRTT Environmental Solutions Ltd. (“DIRTT”) is committed to conducting business in an ethical, responsible, and sustainable manner. Our long-term success is tied to the health, safety, and integrity of our employees, our suppliers, our clients, and the communities in which we operate. This Supplier Code of Conduct (“Code”) establishes the minimum standards and expectations we require of all suppliers, contractors, and service providers (“Suppliers”) who conduct business with DIRTT.

DIRTT expects all Suppliers to share and promote the values set out in this Code within their own organizations and throughout their supply chains. Suppliers are also expected to ensure that these requirements flow through to their own suppliers, subcontractors, and business partners. Compliance with this Code is a key part of our supplier evaluation process.

01 Standards of Conduct

Suppliers must conduct business ethically, comply with all applicable laws and regulations, and operate in a manner consistent with responsible Environmental, Social, and Governance (ESG) principles.

02 Health and Safety

Suppliers shall provide a safe and healthy workplace, consistent with all applicable occupational health and safety laws.

Suppliers must identify and manage health and safety risks, implement safe operating procedures, provide necessary protective equipment, and maintain appropriate emergency preparedness and response systems.

Suppliers working on DIRTT premises must comply with all DIRTT health and safety policies, including DIRTT’s Code of Conduct and Respectful Workplace policies.

03 Human Rights and Labor Practices

DIRTT respects internationally recognized human rights and expects its suppliers to do the same.

- **No modern slavery or child labor:** Suppliers must prohibit modern slavery, human trafficking, bonded labor, forced labor of any kind, and the exploitation of children, in line with International Labour Organization (ILO) conventions and national legislation such as the Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act.
- **Indigenous Peoples and local communities:** Respect the rights, cultures, and traditions of Indigenous Peoples and local communities. Where operations or projects may affect Indigenous Peoples, suppliers are expected to engage in meaningful consultation and support processes consistent with the principle of Free, Prior and Informed Consent (FPIC), as recognized in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and applicable laws.
- **Freedom of association:** Suppliers shall respect the rights of workers to form and join trade unions and engage in collective bargaining in accordance with applicable laws.
- **Fair treatment:** Suppliers must treat all workers with dignity and respect and shall not engage in or tolerate harassment, abuse, or intimidation.
- **Non-discrimination:** Suppliers must provide equal opportunities and not discriminate based on race, ethnicity, religion, gender, age, disability, sexual orientation, union membership, or other protected characteristics.
- **Wages and working hours:** Suppliers must pay at least the minimum wage as required by law and ensure working hours, overtime, rest periods and leave entitlements comply with applicable legal legislation.

04 Environmental Responsibility

DIRTT is committed to minimizing environmental impacts and expects Suppliers to:

- Comply with all applicable environmental laws and regulations.
- Monitor environmental performance and pursue continual improvement, where feasible, in areas such as greenhouse gas emissions, energy and water consumption, waste generation, and the use of hazardous substances across business operations.
- Protect natural resources and avoid practices that cause unnecessary harm to the environment.

05 Business Integrity

Anti-bribery and corruption: Suppliers must not engage in bribery, corruption, extortion, or embezzlement in any form. Gifts, entertainment, or hospitality must not be used to obtain or retain business.

Fair competition: Suppliers must conduct business in compliance with all applicable competition and antitrust laws.

Conflicts of interest: Suppliers must avoid conflicts of interest, or the appearance thereof, in dealings with DIRTT.

06 International Trade and Compliance

Suppliers must comply with all applicable trade laws, including export controls, customs regulations, and economic sanctions.

Suppliers may not conduct business with individuals, entities, or countries subject to trade sanctions or embargoes.

07 Data Protection and Confidentiality

Suppliers must safeguard confidential information entrusted to them by DIRTT and use it only for legitimate business purposes.

Suppliers must comply with all applicable data protection and privacy laws when handling personal information.

08 Due Diligence and Record Keeping

Suppliers must maintain accurate books and records to demonstrate compliance with this Code.

Suppliers are expected to conduct their own due diligence processes to identify, prevent, and mitigate risks of modern slavery and human rights violations in their operations and supply chains. DIRTT reserves the right to request documentation, conduct audits, and require corrective action plans where non-compliance is identified.

09 Training and Awareness

Suppliers shall ensure that their employees, particularly those involved in recruitment, supply chain, and procurement, receive training on modern slavery risks and ethical business practices. DIRTT will also provide training for its procurement staff and expects suppliers to support these efforts.

10 Whistleblowing and Reporting Misconduct

Suppliers must provide a safe mechanism for employees to report concerns or violations without fear of retaliation.

Suppliers, their employees, or stakeholders may also report suspected misconduct related to DIRTT business through DIRTT's confidential reporting channels.

11 Transparency and Reporting

Suppliers are expected to cooperate with DIRTT in providing information required for regulatory disclosures and public reporting on modern slavery and supply chain due diligence. DIRTT is committed to publishing annual reports that describe actions taken to address these risks.

12 Application and Enforcement

This Code forms part of DIRTT's supplier engagement process and supplements, but does not replace, any contractual obligations between DIRTT and its Suppliers. Failure to comply with this Code may result in corrective action, up to and including termination of the business relationship.

DIRTT reserves the right to update this Code from time to time to reflect evolving legal requirements, ESG standards, and business practices.