



Clearway is committed to conducting business with the highest standards of integrity, ethics, and professionalism. To support this commitment, we maintain a confidential Ethics Hotline for employees and partners to raise concerns or report suspected wrongdoing.

The Ethics Hotline is operated by an independent third party and allows reports to be made anonymously, confidentially, and without fear of retaliation.

Who Can Use the Ethics Hotline?

The Ethics Hotline is available to all Clearway employees, joint venture partners, and third parties who work with Clearway, including clients, subcontractors, suppliers, and consultants.

What Should Be Reported?

Examples of concerns that should be reported include:

- ▶ Conduct inconsistent with Clearway's core values
- ▶ Fraud, theft, or financial misconduct
- ▶ Corruption, bribery, or conflicts of interest
- ▶ Breaches of laws or regulations, including those related to modern slavery
- ▶ Environmental, health, or safety concerns
- ▶ Discrimination, bullying, or harassment
- ▶ Serious breaches of company policies or codes of conduct
- ▶ Actual or potential retaliation related to reporting a concern or participating in an investigation
- ▶ Attempts to conceal any of the above

What Should Not Be Reported?

The Ethics Hotline is not intended for emergencies or situations involving an immediate threat to life or property. In these cases, please contact 911 or your local emergency services.

The hotline should also not be used for general customer service or operational matters, including:

- Questions about project schedules or service timelines
- Traffic disruptions or noise concerns
- Operational impacts on public or private property
- Negative interactions with site workers

These matters should be directed to Clearway's Head Office:

Phone: [+1 \(905\) 761-6955](tel:+1(905)761-6955) **Email:** clearway@clearwaygroup.com

Employees concerns relating to missing hours, work or crew assignments or other operations issues should be reported to the Site Superintendent.

How to Raise a Concern

The Ethics Hotline is available 24 hours a day, 365 days a year.

Reports can be submitted in two ways:

1. Online at www.clearwayethicsshotline.com using a computer or mobile device or by scanning a QR code
2. By calling 1-844-980-2967 toll-free in Canada and the United States (including territories such as Puerto Rico or the Virgin Islands).



A live operator is available to assist with submitting a report.

What Happens When You Contact the Ethics Hotline?

1. You will complete a report intake form online or with a live operator. The information provided will help support an appropriate investigation.
2. After submitting your report, you will receive a unique Report Key that allows you to follow up or, in anonymous cases, respond to additional questions that may assist the investigation.
3. You can use your Report Key to check the status of your report.

What Happens After a Report Is Received?

1. Your report will be reviewed by a Case Manager to determine the appropriate next steps.
2. Depending on the nature of the concern, an internal or external investigation team may be assigned. All information, including identities, will be treated confidentially and shared only on a strict need-to-know basis.
3. Investigations are conducted objectively and based on factual analysis. Where allegations are substantiated, senior management will determine the appropriate course of action.