BUSINESS ETHICS CODE OF CONDUCT

Apex Utilities Inc. (AUI) adheres to the highest standards of ethical behaviour, honesty and integrity in its business practices, and is committed to meeting or surpassing all requirements of legislation, standards, regulations, permits and licenses associated with conducting its business. Respect and dignity for employees, customers, suppliers, business partners and the general public are integral to all Company operations and undertakings. Employees, Directors, and Officers (collectively Employees) of AUI, along with contractors, consultants, representatives and agents engaged in conducting business with or on behalf of the Company are expected to comply with this Business Ethics Code of Conduct.

In conducting business, AUI adheres to these business principles and commitments.

- **Corporate Citizenship** — We will help improve the quality of life within the communities we serve through partnership and support for activities that help build strong, vibrant communities.
- **Environment** — We will conduct business in an environmentally responsible manner to protect the public interest and minimize our environmental footprint.
- **Health and Safety** — We will provide a healthy and safe work environment at our workplaces.
- **Respectful Workplace** — We will exercise the basic principles of civility, dignity, and respect in all of our working relationships.
- **Conflict of Interest** — We will act in the shareholders' best interests, avoiding situations that place our individual private interests and personal considerations in conflict with our responsibility to the shareholder.
- **Financial Reporting** — We will meet or exceed the highest standards in financial reporting and record keeping, in accordance with generally accepted accounting principles, laws and regulations.
- **Confidentiality** — We will safeguard information that is of a sensitive or personal nature, or that is confidential Company or Corporate information, and release it only under the appropriate authority.
- **Insider Information** — We will disclose information that is material to the marketplace only under the proper authority, and only to those Employees who require the information to perform their professional duties.
- **Certification** — We will require new Employees to certify their review of and agreement to be bound by this Business Ethics Code of Conduct as a condition of employment, and all Employees to provide this certification annually.

In adhering to these business principles, Apex Utilities Inc. will develop and communicate specific instructions to Employees, to facilitate their understanding of and adherence to this Business Ethics Code of Conduct, and will investigate all suspected violations and take corrective action.

Reissued: September 12, 2023

Graeme Feltham
President