



Code of Conduct and Ethics

Version 2.0_2024

MARKDOM CODE OF CONDUCT AND ETHICS

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Introduction

Markdom has a strong commitment to serve the needs of our customers, produce quality products and support employee's development. Key to our performance in these areas is an equally strong commitment to doing business ethically and with integrity.

Our Code of Conduct and Ethics is a guide to support us in performing our work in an ethical and lawful manner. It describes the principles of integrity that have defined our business and Markdom's culture. Each employee is expected to act in accordance with applicable law and be consistent with our core values and business principles. We also expect our suppliers, consultants, independent contractors, agents and other representatives to meet these standards.

The Code provides the principles we use to guide us, but it does not provide enough information to cover every circumstance or every law and regulation that affects us. We rely on you to use your judgement and if you are unsure of what to do reach for guidance and ask questions.

We encourage all employees at Markdom to speak with their Manager or Human Resources and ask questions if they are unsure about a potential problem or ethical issue. At Markdom we prohibit retaliation for disclosing a concern in good faith.

Thank you for your commitment to the same.

Markdom Ethical Commitment

At Markdom we are working to build a culture with high ethics that will outline our policies, laws, procedures and standards that impact our business. Each of us has a responsibility and duty to behave in an ethical and legal manner but most important we should lead by example.

We value our customers, employees and company therefore, we are committed to conduct our daily activities with integrity, fairness and excellence.

Our Customers

We are committed to serve our customers with the respect and value they deserve, and as we would expect for ourselves and our company. We must act honestly and in compliance with antitrust and fair competition laws and regulations.

We commit to:

- Comply with government and industry standards
- Watch and report any possible defects
- Know and apply quality in all we do
- Report any Quality concerns
- Not making unlawful agreements concerning prices, territories or markets, including informal or implied agreements
- Only use legitimate means of obtaining competitive information
- Respect the confidential and intellectual property rights of our competitors and other third parties

Our Employees

We are committed to ensure a positive and diverse working environment, where all employees respect each other equally, value

their contributions and treat each person fairly. We do not tolerate any form of discriminative behavior or harassment in the workplace.

We commit to:

- Provide fair and equitable wages, working hours, benefits and other conditions of employment in accordance with applicable laws
- Provide Safe Working conditions
- Prohibit forced labor, child labor and human trafficking
- Promote a workplace free of discrimination and harassment
- Promote a workplace free of violence
- Freedom of association and collective bargaining

Our Quality

We are committed to total customer satisfaction by providing excellent service and products; achieved through customer focus, innovation, involvement of our team members and continuous improvement in all areas.

Our Sustainability

We are committed to minimize our environmental impact, promote conservation, and contribute to a greener and more sustainable future.

Business Conduct and Ethics Policies

Anti-Corruption and Anti-Bribery

Original Issue Date: June 3, 2022

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Document Number: CCE_HR_001

Corruption is the abuse of entrusted power for private gain. Corruption is considered to be one of the biggest threats to social development and the market economy. Corruption disturbs competitive markets, leads to reallocation of resources and violations of human rights. It undermines the rule of law and the public's trust in business leaders. It is our responsibility as a company, and as individuals representing the Company, to prevent corruption in all its forms.

Our Company values ethical business practices and the law, we do not accept or offer any form of bribery. Bribery is giving or offering to give anything of value to improperly influence a business decision or government action.

- Never offer, request, accept, or indicate willingness to make or accept a payment, benefit, or anything similar
- Not provide or accept bribes, kickbacks or facilitation payments
- Not give or accept gifts or provide hospitality (e.g. meals, travel, or entertainment) where doing so is illegal or inappropriate
- Not provide benefits conditional on the recipient providing something that is not approved by the company
- Not accept or provide concealed commissions or kickbacks to suppliers, customers, contractors or others
- Not provide side deliveries of products or services at less than market value
- Never ask for a gift, favor or contribution from an individual or organization that does business with Markdom, or is actively seeking to do business with us
- Attend training and education sessions when required

Training:

Markdom understands that training is a key component of understanding how to provide Anti-Corruption and Anti-Bribery best practices therefore all affected employees will be required to complete training upon commencing their employment.

All Markdom employees will be trained on a yearly basis and the Human Resources department will manage and store the training records of each employee for tracking purposes and legal compliance.

Conflict of Interest Policy

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Markdom is committed to conducting its affairs with the highest ethical and legal standards. Markdom expects all employees to know and comply with the policies, laws, procedures, standards and regulations and apply them to the work they do and decisions they make.

A conflict of interest occurs when private interests interfere in any way, or even appear to interfere, with the interests of Markdom. In some situations, your personal or business activities and interests may be in conflict with those of Markdom. It is your responsibility to identify and report any possible or actual conflict of interest, regardless of whether or not you benefit from it.

All employees have a duty to the Company to be free from the influence of conflicting interests when they represent the Company in negotiations or make recommendations with respect to business dealings with third parties or deal with third parties on behalf of the Company. You may not accept gifts, entertainment or services from customers or suppliers, other than the customary exchange of gifts,

such as Christmas gifts. Employees must disclose Christmas gifts to their direct managers.

Every employee has a responsibility to proactively disclose actual, potential or apparent conflicts of interest before involving in those potential conflicts. Employees who do not report actual, potential, or apparent conflicts of interest or are in violation of the Conflicts of Interest may be subject to disciplinary actions, up to and including termination.

Training:

Markdom understands that training is a key component of understanding Conflict of Interest and therefore all affected employees will be required to complete training Business Ethics training upon commencing their employment.

All Markdom employees will be trained on a yearly basis and the Human Resources department will manage and store the training records of each employee for tracking purposes and legal compliance.

Whistleblower Policy

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Markdom is committed to conducting its business with honesty and integrity at all times. If, at any time, this commitment is not respected or appears to be in question, Markdom will endeavour to identify and remedy such situations. Therefore, it is the company's policy to ensure that when a person has reasonable grounds to believe that an employee, manager or any other person related to the company has committed, or is about to commit, an offence that could harm the company's business or reputation, it denounces the wrongdoers in question.

The whistleblowing policy has been put in place to:

- Encourage employees, partners or managers to disclose this information or behaviour;
- Protecting complainants from reprisals;
- Treated all parties to an investigation in a fair and equitable manner;
- To ensure confidentiality as much as possible;
- Take corrective and disciplinary action if wrongdoing is discovered.

Scope:

This policy applies to all employees of Markdom, as well as contractual third parties or partners doing business with the company.

Duty to report misconduct:

It is the duty of all employees, contractual third parties or partners to report misconduct or suspected misconduct, including fraud and financial impropriety to the board. This includes misconducts such as but not limited to:

- Providing false or misleading information, or withholding material information on Markdom financial statements, accounting, auditing or other financial reporting fraud or misrepresentation;
- Misappropriation or misuse of Markdom resources such as funds, supplies or other assets;
- Unauthorized alteration or manipulation of computer files
- Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of federal, provincial law or regulations or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal or provincial law or regulations

- Violations of federal, provincial or state laws that could result in fines or civil damages payable by Markdom, or that could otherwise significantly harm Markdom's reputation or public image;
- Unethical business conduct in violation of any Markdom policies and/or Markdom Code of Conduct and Ethics;
- Danger to the health, safety, or well-being of employees and/or the general public
- Forgery or alteration of documents
- Authorizing or receiving compensation for goods not received or services not performed, or paying for services or goods that are not rendered or delivered
- Authorizing or receiving compensation for hours not worked
- Embezzling, self-dealing, or otherwise obtaining an unlawful private benefit (i.e., Markdom assets being used by anyone in the organization improperly for personal gain).

Acting in Good Faith

Any person who files a complaint alleging misconduct must act in good faith and have reasonable grounds to believe that the information disclosed indicates wrongdoing.

No employee, third party contractor or partner who makes a denunciation in good faith will be subject to retaliation. Retaliation is any direct or indirect harmful action that threatens a person or is taken against a person who has reported an event or action. Anyone who retaliates against a person who has made a report in good faith is subject to disciplinary action up to and including dismissal.

However, making allegations that are deemed unfounded and malicious or knowingly false may result in disciplinary action up to and including termination of employment.

Procedure

A complaint may be submitted in writing to Human Resources Department. The written statement must include the following information:

Description of the offence

- Date on which the complainant became aware of the offence
- Name of the person suspected of the offence
- Actions taken (if applicable) before filing a complaint or allegation (i.e. talk to the supervisor)

The declaration must be sent in writing by e-mail or by post. The complainant should expect to receive confirmation of receipt of the complaint within 15 working days.

The complainant will not be dismissed, demoted, suspended, threatened, harassed or otherwise discriminated against because of the communication of a genuine concern. Any employee of Markdom who contravenes this policy when dealing with a complainant may be terminated.

A person is not required to prove the truth of an allegation but is required to act in good faith and provide sufficient evidence to the person contacted to demonstrate that there are sufficient grounds for concern. The number of contacts between the complainant and the investigative body will depend on the nature of the question and the clarity of the information provided.

All complaints will be treated in a confidential and sensitive manner. In addition, the complainant must be able to remain anonymous, except in cases where the nature of the disclosure and/or resulting investigation makes it necessary to disclose his or her identity (e. g. investigations or judicial proceedings). In such cases, all reasonable measures must be taken to protect the complainant from any prejudice resulting from a disclosure.

Investigation

All relevant cases, including suspicious but unproven cases, will be reviewed and analyzed by a competent Human Resources. In some cases, this may involve an investigation by a legal adviser or an accountant. All investigations will be kept confidential to the extent possible. Appropriate corrective action will be taken, if necessary, and the findings will be communicated to the whistleblower and his or her supervisor/Manager

Antitrust and Competition Laws

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We not only comply with all applicable export, import, and trade compliance laws in all countries we do business with but also, commit to a free and fair competition. Our employees are committed to complying with all applicable antitrust and competition laws. We will not engage in any activities that violate these laws such as agreeing with our competitors to fix prices, discounts or terms of sale, limit production, divide markets, coordinate bidding activities or boycott customers or suppliers.

We do not conduct business in any jurisdiction that is subject to an embargo or comprehensive trade restriction;

- We follow anti-boycott laws;
- We comply with any trade sanctions that apply to our Company

Training:

Markdom understands that training is a key component of understanding Conflict of Interest Antitrust and Competition Laws and therefore all affected employees will be required to complete training Business Ethics training upon commencing their employment.

All Markdom employees will be trained on a yearly basis and the Human Resources department will manage and store the training records of each employee for tracking purposes and legal compliance.

Outside Business Activities Policy

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Document Number: CCE_HR_004

Outside business activities (such as dual employment) are not objectionable as long as such activities do not violate laws or terms of your employment with Markdom, and do not interfere with an employee's time and interest to the detriment of their job with the Company and do not violate conflict of interest. The use of Company resources to conduct outside business activities is expressly prohibited.

You may not conduct activities that are not work-related during working hours including looking for a new job. You may not use Markdom's equipment or facilities for activities that are not work-related.

Workplace Conduct and Ethic Policies

Human Rights Policy

Original Issue Date: January 1, 2019

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Document Number: CCE_HR_005

Markdom is committed to providing equal treatment with respect to employment according to the protected grounds established under the Ontario Human Rights Code.

Our Statement: This Human Rights Policy outlines the principles and guidelines that govern the employment practices, benefits, and workplace conduct within Markdom. It is designed to ensure fair treatment, promote a positive work environment, and support the professional growth and well-being of our employees.

Recruitment & Selection: We will recruit and select candidates based on their qualifications, skills, and abilities relevant to the job requirements. Hiring decisions will be made without bias or discrimination. Our recruitment process will adhere to applicable laws and regulations.

Compensation Structure: We establish a fair and competitive compensation structure based on market trends, job responsibilities, and individual performance. Compensation will be reviewed periodically and revised if and when necessary.

Accommodation: Markdom shall strive to allow for religious accommodation where the accommodation does not conflict with established Health and Safety Policies. Clothing or gear with a health or safety rationale may constitute a reasonable occupational requirement.

Markdom shall work to provide workplace accommodation up to the point of undue hardship. Undue hardship may occur where all options

have been considered and it is established that no forms of appropriate accommodation exist, or where the creation of accommodation would cause excessive costs that create undue hardship for the organization, or where the accommodation would create a health and safety hazard. Where the provision of accommodation is found to cause undue hardship to the organization, Markdom shall work to find a fair and equitable compromise that meets the needs of the employee and the organization to the greatest extent possible.

Workplace Conduct: While Markdom will ensure to adhere to following the Human Rights Code in all of its practices, it is essential that employees adhere to the Code as well. All records of direct and indirect discrimination and harassment, reports filed, and subsequent investigations are considered confidential and will not be disclosed to anyone except to the extent required by law.

Non-Discrimination and Harassment: We have a zero-tolerance policy for discrimination, harassment, or retaliation of any kind. Employees are encouraged to report any incidents promptly, and the organization will promptly and thoroughly investigate all complaints in a confidential manner.

Violence in the Workplace Policy

Original Issue Date: January 1, 2019

Latest Revision Date: April 29, 2024

Document Number: CCE_HR_006

Markdom is committed to providing and maintaining a safe working environment and to complying with its obligations under the Occupational Health and Safety Act. Markdom has a zero tolerance for Workplace Violence. Markdom will take all reasonable and practical measures to prevent Workplace Violence.

This Policy applies to all employees, independent contractors, subcontracted employees, students, customers, suppliers and visitors.

Any workplace violence committed by an employee will be subject to discipline up to and including termination of employment.

Workplace means any place where business or work-related activities are conducted. It includes, but is not limited to the physical work premises, work-related social functions, work assignments outside Markdom's offices or plants, work-related travel and work-related conferences or training sessions.

Employees are prohibited from engaging in workplace violence, which includes any act that could cause another individual to feel threatened or unsafe.

Workplace violence means:

- (i) the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
- (ii) an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker;
- (iii) a statement or behavior that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Domestic Violence

It may occur where a person has a personal relationship with a worker, such as a spouse or former spouse, current or former intimate partner, or a family member who may physically harm, attempt to harm, or threaten to harm that worker at work. Domestic violence is considered workplace violence in such situations.

All employees are responsible for preventing and reporting acts of Workplace Violence that threaten or perceive to threaten a safe work environment. Every individual at Markdom has responsibilities to ensure a healthy, safe and respectful workplace.

Responsibilities

Management Responsibilities:

- Act respectfully at work and while conducting all work-related activities;
- Comply with the provisions of the Occupational Health and Safety Act
- Conduct a risk assessment to identify workplace violence and harassment, potential hazards and provide results of assessment to the Joint Health and Safety Committee annually or when gaps are identified;
- Take all reasonable precautions to minimize or eliminate violence related hazards;
- Establish procedures for preventing, reporting, investigating, documenting and debriefing workplace violence and any form of harassment incident;
- Ensure workers are provided with the necessary information and instruction that is appropriate regarding contents of the policy and program with respect to the prevention of workplace violence and harassment;
- Ensure that an investigation is conducted into incidents and complaints of workplace harassment that is appropriate in the circumstances;
- Review consultation with the Joint Health and Safety committee the efficiency of the Markdom Violence and Harassment prevention policy annually or when gaps are identified.

Supervisor Responsibilities:

- Act respectfully at work and while conducting all work-related activities;
- Comply with the provisions of the Occupational Health and Safety Act
- Encourage the reporting of incidents of violence and harassment;
- Maintain records of violence and harassment related incidents, issues, concerns and investigations;

- Participate/assist in investigating claims of workplace violence and any form of harassment;
- Take every precaution reasonable in the circumstances for the protection of a worker, if management is aware or ought reasonably to be aware, of domestic violence that would likely expose a worker to physical injury may occur in the workplace;
- Provide information related to a risk of workplace violence from a person with a history of violent behavior if another worker can be expected to encounter that person in the course of their work.

Employee Responsibilities:

- Act respectfully at work and while conducting all work-related activities
- Attend training and education sessions when required.
- Immediately report incidents and/or knowledge of workplace violence and any form of harassment, or has reason to believe these will occur.
- Cooperate with investigations;
- Follow the policies, measures and procedures set out for Markdom.
- Employees must not engage in violent, threatening, intimidating or disruptive behaviors.
- Employees are expected to co-operate with the police, company investigators or other authorities as required during any investigation related to this Policy.

Markdom has a duty under the Occupational Health and Safety Act to disclose information about a risk of violence in the workplace to its employees. This includes the disclosure of personal information about a person with a history of violent behavior to those employees who:

- Can be expected to encounter this person in their work.
- To those employees who are likely to be exposed to physical injury due to the risk of Workplace Violence.

- Markdom will only disclose the personal information that is reasonably necessary to protect those employees that would fall under (a) or (b) from physical injury.

Reporting

If you believe that you have been subjected to objectionable conduct, including discriminatory conduct, workplace harassment, sexual harassment or workplace violence, or if you witness such objectionable conduct, you are encouraged to explain to the offender that such conduct is unwelcome, but are not required to do so. Such conduct should be reported immediately to any Supervisor, Manager or the Human Resources Department. You may also report any such conduct (anonymously if you are a witness to such behavior), at any time by calling or contacting Human Resources Department.

Investigation and Discipline

Markdom is committed to protecting individuals who report or participate in “Good Faith”. Markdom supports employees who file reports for harmful, discriminatory or unethical behaviors. Whether accusations are true or false, Markdom wants to prevent victimization and retaliatory behavior towards the employee.

If a complaint under this Policy is made in good faith, no action will be taken against the complainant if his or her complaint is found to be unsubstantiated. A complaint filed in bad faith under this Policy may result in disciplinary action up to and including termination of employment. Misconduct or the results of the investigation may be reported to proper authorities.

The following steps are to be followed when reporting a complaint:

- Employees are required to immediately report any threats, attempts, or incidents of Workplace Violence to a manager or supervisor.

- In the event of any injury to an employee because of Workplace Violence in the workplace, the manager or supervisor will assess the injury(s), may administer first aid and call an ambulance and/or the Ministry of Labor depending on the seriousness of the injury (ies) or as may be required by law.
- Markdom will assess any immediate risks of Workplace Violence and take action to minimize those risks and to protect the safety of employees. The police and/or the Ministry of Labor may be called in the event of a serious risk of Workplace Violence.
- Markdom will investigate any reports of threats, attempts or incidents of Workplace Violence in a fair and timely manner.
- Any employee that is the potential cause of a threat or risk, or cause of actual Workplace Violence may be placed on a leave of absence by Markdom pending the outcome of an investigation.
- This policy prohibits any form of reprisal to any employee, who in good faith reports an incident of workplace violence or harassment.
- Confidential information will not be disclosed unless necessary for the investigation or required by law.

A breach of the Violence in the Workplace Policy is a serious offence. If there has been a breach of this Policy, Markdom shall determine the appropriate consequences for person(s) who violated the Policy including but not limited to: verbal or written reprimand, suspension with pay, suspension without pay, termination of employment and/or legal action.

Markdom will conduct risk assessments to determine whether a risk of workplace violence exists in the workplace due to the nature of the work and/or the work environment.

Workplace Harassment Policy

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Document Number: CCE_HR_007

All employees must treat each other with courtesy, consideration, and respect. Markdom will not tolerate harassment of any employee, vendor, customer or other visitors by any other employee, supervisor, vendor, customer or other visitor.

Harassment can unreasonably interfere with an individual's work performance or create an intimidating or offensive work environment.

Harassment violates Company policy and is prohibited by the *Code* and the *Occupational Health and Safety Act*. This policy applies to all employees, consultants, contract workers and temporary employees of Markdom.

Harassment/ Discrimination

Harassment / discrimination is unwanted, unreasonable and offensive behavior towards the person being harassed, which creates an intimidating, hostile or humiliating work environment for the person concerned.

There are different types of harassment that can occur at work, it can be based on:

- Race, ethnic origin, nationality or skin color
- Gender identity and/or sexual orientation
- Religious or political convictions
- Disabilities, illness, sensory impairments or learning difficulties
- Age
- Pregnancy/maternity/paternity
- Sexual jokes, sexual advances or requests for sexual favors

- Abusive language, physical aggression, intimidating or violent behavior
- Bullying, disparaging comments, or otherwise unwelcome and inappropriate conduct – whether verbal, physical, visual, or electronic, and whether committed in person or in some other way.

This list is not exhaustive

Bullying is a form of harassment and is usually seen as acts or verbal comments that could psychologically or 'mentally' hurt or isolate a person in the workplace. Sometimes, bullying can involve negative physical contact as well. Bullying usually involves repeated incidents or a pattern of behavior that is intended to intimidate, offend, degrade or humiliate a particular person or group of people. It has also been described as the assertion of power through aggression.

Anti-gossip Markdom strives to establish and maintain an atmosphere of respect and kindness. Negative or excessive gossip disrupts production, lowers morale, and inhibits trust. Gossip and negative comments are embarrassing and humiliating to the subject of the gossip. In fact, gossip can cross the line into harassment, and it can become a health and safety or human rights issue. Therefore, Markdom does not allow gossip at work.

Sexual Harassment can be defined as:

- (i) engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or
- (ii) making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Workplace Sexual Harassment * is any conduct, comment, gesture or contact of a sexual nature:

1. That is likely to cause offence or humiliation to any employee.
2. That might, on reasonable grounds, be perceived by that employee as placing a condition of a sexual nature on employment or on any opportunity for training or promotion.

**As defined by the Ontario Occupational Health and Safety Act*

The company prohibits inappropriate conduct that is sexual in nature of work, on company business, or at company-sponsored events including the following:

- Offensive or humiliating behaviour that is related to a person's sex;
- Behaviour of a sexual nature that creates an intimidating, unwelcome, hostile or offensive work environment;
- Behaviour of a sexual nature that could reasonably be thought to put sexual conditions on a person's job or employment opportunities.
- Comments, jokes, or degrading language;
- Sexually suggestive objects, books, magazines, photography, cartoons, pictures, calendars, posters, electronic communications, or other materials;
- Unwelcome sexual advances, requests for sexual favours, or any sexual touching;
- Offering favourable terms or conditions of employment or benefits in exchange for sexual favours or threatening or imposing less-favourable terms or conditions of employment if sexual favours are refused.

- Sexual harassment is prohibited whether it's between members of the opposite sex or members of the same sex.

What is not considered to be Harassment?

Any reasonable action taken by the employer or supervisor relating to the management and direction of workers or the workplace, is not workplace harassment. Examples include: Changes in work assignments, scheduling, job assessment and evaluation, workplace inspections, implementation of dress codes and disciplinary action. Differences of opinion or minor disagreements between co-workers are not typically examples of harassment.

Responsibilities

Management are responsible for:

- Promoting a harassment-free workplace and setting an example of appropriate behaviour in the workplace;
- Communicating the process for investigating and resolving harassment complaints filed by employees;
- Dealing with harassment situations immediately after becoming aware of them, whether or not a harassment complaint has been made;
- Taking appropriate action during a harassment investigation, including the separation of the parties to the harassment complainant, if necessary; and
- Ensuring that harassment situations are handled in a sensitive and confidential manner.

Employees are responsible for:

- Treating others with respect in the workplace;
- Informing your immediate supervisor or the human resources department of any harassment;

- Collaborating in a harassment investigation and respecting the confidentiality of the investigation process;

Employees can expect:

- To be treated with respect in the workplace;
- That reported harassment will be dealt with in a timely, confidential and effective manner;
- To have their rights to a fair process and to their confidentiality respected during a harassment investigation; and
- To be protected against retaliation for reporting harassment or cooperating with a harassment investigation

Reporting:

Creating a workplace free of discrimination and harassment is everyone's responsibility. If you observe or believe that you are a victim of discrimination, sexual harassment or any other form of harassment at work, in the course of the company's business or any other activity sponsored by the company, you must immediately report it to one of the following:

- Your supervisor/manager or another manager in your management chain
- Human Resources

An employee may file a harassment complaint by contacting his/her supervisor/manager or the HR. The complaint may be verbal or in writing. If the complaint is made verbally, the manager or the HR will record the details provided by the employee. The employee should be prepared to provide details such as what happened; when it happened; where it happened; how often and who else was present (if applicable).

Complaints should be made as soon as possible but no later than within one year of the last incident of perceived harassment, unless there are circumstances that prevented the employee from doing so.

Any claims of discrimination or harassment will be investigated promptly and discreetly. All complaints are treated with sensitivity and are kept confidential as possible.

In addition, you are not required to report your complaint to the person who is the subject of the complaint. For example, if your complaint concerns your supervisor, you can talk to someone in Human Resources.

Human Resources will promptly investigate complaints. You must cooperate fully in such investigations. If warranted, the company will take appropriate corrective action, up to and including termination of employment.

The company prohibits any form of reprisal against a plaintiff for reporting discrimination or harassment or for participating in an investigation of a complaint of discrimination or harassment. If you believe you have been subjected to reprisal, you can use any of the resources described above to report your concern.

Child and Forced Labour Prevention Policy

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Document Number: CCE_HR_008

Markdom is committed to conduct business by always complying with and respecting human rights and workers' rights as well as ensuring that employees have the right to enter work voluntarily and freely, without menace of any penalty. Therefore, Markdom will act

professionally, fairly and with full integrity without giving tolerance to all forms of child labor and forced labor, either directly or indirectly.

Definitions

Child is every person under 18 (eighteen) years old.

Child Labour work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and/or
- interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

The definition of child labor is based upon the internationally recognized standards of the International Labor Organization (ILO).

Forced Labour can include practices such as restricting people's movement or imprisoning them; withholding wages or identity documents to force them to stay on the job; or entangling them in fraudulent debt from which they cannot escape. Forced labor is a criminal offence and a violation of fundamental human rights.

Voluntary means workers' consent to enter into employment and to their freedom to leave the employment at any time, with reasonable notice in accordance with Ontario's law or Markdom's contract agreements.

Principles

1. Prohibition of Child Labour

Markdom strictly prohibit and do not tolerate any child labor practices in all of Markdom's activity. In the event of any failure to comply with

the regulation, Markdom will require that the situation be remedied as quickly as possible and any employee who violate the regulation will be imposed with sanction and disciplinary action up to, termination of employment in accordance with the Markdom's Code of Conduct and Ethics

1.1. Preventive Strategy

Markdom implements reliable control mechanism and strategy in order to prevent child labor practices. This effort may be conducted by verifying the age of applicants for employment using the following techniques:

- Provision of multiple documents which present valid identifications issued by an official authority (ex. Driving license, work permit, passport ID);
- Detailed interviews with employees and applicants who appear to be too young;
- Recruitment Agency should send the registration enrollment form which includes ID to support verification of age
- Child Labour Compliance (Age) part of the New Hire checklist form

2. Prohibition of Forced Labour

Markdom strictly prohibit and does not tolerate any forced labor practices. The freedom of workers may not be restricted and must be ensured at all times. In the event of any failure to comply with the regulation. Markdom will require that the situation be remedied as quickly as possible and any employee who violates the regulations will be imposed with sanction and disciplinary action up to, termination of employment in accordance with the Company's Code of Conduct and Ethics.

2.1. Preventive Strategy

Markdom implements strategy in order to prevent forced labor practices using the following techniques:

Continuously monitor and provide information to shareholders and potential investors regarding ethical business practice including prevention of forced labor as part of commitment to operate a sustainable business;

Ensure that all employees have written contracts, specifying employee's payment of wages, overtime, retention of identity documents, and other issues related to preventing forced labor.

Provide onboarding training to all our employees regarding Ontario Human Rights Code, Forced Labour, Human Trafficking and Child Labour.

3. Supplier Expectations

It is Suppliers' responsibility to operate above and beyond Markdom's business ethical principles including but not limited:

- a) Provide safe and inclusive workplace
- b) Compliance with environmental protection
- c) Respect legislations or regulations applicable in the production countries and the areas/ countries where the product is sold or used.
- d) Support and respect the protection of human rights
- e) Eliminate all forms of forced labour and child labour and/or human trafficking
- f) Suppliers' employees must be treated in a fair and non-discriminatory manner.
- g) Provide equal opportunity and prohibit discrimination against race, gender, sexual orientation, health condition, disability, age, nationality or religion.

3.1. Preventive Strategy

Markdom implements strategy in order to prevent forced labour practices using the following techniques:

- Notification of the Markdom's Supplier Code of Conduct to all suppliers
- Follow up with supplier Agreement form

4. Dealing with Violations:

This policy contains a set of rules that cover procedural and investigatory measures to be adopted if there is any practices using child labor. In order to ensure the well-being of the child in such cases, Markdom requires compliance with the minimum conditions set forth below:

- The child must cease work immediately;
- The employer must provide the child with appropriate compensation for the loss of employment;
- The employer must safeguard and promote the welfare of the child, which include, for example, verification of continuation of compulsory schooling and financial assistance for the family of the respective child.

Health & Safety Policies

Health & Safety Policy

Original Issue Date: April 29, 2018

Latest Revision Date: April 19, 2024

Document Number: CCE_HR_009

This document serves to outline Markdom’s health and safety policy, including, individuals’ roles in maintaining and ensuring the success of the policy. This applies to all Markdom employees, contractors, suppliers, vendors and visitors and all facilities.

It is the responsibility of all employees of Markdom to uphold this policy and ensure it is followed. It is the responsibility of Human Resources to ensure that this policy is reviewed annually and remains adherent to Federal and Provincial Laws and guidelines as well as broader Markdom policies.

Markdom is vitally interested in the health and safety of its employees. Protection of employees from injury or occupational disease is a major continuing objective. We will make every effort to provide a safe and healthy work environment.

All managers, team leads and workers must be dedicated to the continuing objective of reaching zero injuries for all who enter our facilities. Markdom is ultimately responsible for worker health and safety, and will take every reasonable precaution possible for the protection of its employees.

We are committed to promoting a safe and healthy workplace for all employees, contractors, customers and visitors. Markdom will develop, implement and enforce policies and procedures that promote our objective.

Our Management Team ensures that every reasonable precaution will be taken for the protection of our employees and all who enter our facility by ensuring the following:

- Developing, implementing, and enforcing Markdom policies and procedures.
- Implementing and enforcing health and safety legislation, policies, procedures and practices and look for ways to continuously improve our Health and Safety Programs.
- Ensuring that employees are trained in safe work procedures, instruction, information, and use of personal protective equipment (PPE)
- Supporting the activities of the Joint Health and Safety Committee (JHSC)
- Ensuring that each hazard identification, risk management and incident investigation is investigated and that we take appropriate preventative actions.
- Reviewing all monthly workplace inspections and/or JHSC minutes and facilitate corrective action plans.
- Taking direct responsibility and accountability for the health and safety of workers under their supervision.
- Ensure that machinery and equipment are safe and that employees work in compliance with established safe work practices and procedures.
- Ensure that employees receive adequate training in their specific work tasks to protect their health and safety.
- Ensuring that all contractors, suppliers, vendors and visitors adhere to all relevant legislation, policies, procedures and practices
- Providing a work environment in which all workers are treated with respect and dignity.
- Workplace violence and/or harassment will not be tolerated from any person in the workplace

Every employee understands the importance of their participation in keeping our workplace safe and healthy. Adherence to safety legislation, policies, procedures and practices is a condition of employment for all workers. The following points summarize our employees' commitments to health and safety:

- Actively participate in all required health and safety training and apply the knowledge that is learned.
- Complying with occupational health and safety policies, procedures, safety legislation and practices.
- Promptly reporting without fear of reprisal hazards, incidents, near-misses, as well as occupational injuries and illnesses to managers or HR, so they may be dealt with quickly.
- Using appropriate personal protective equipment as required.
- Performing their duties in a manner conducive to a safe workplace, following all safety practices and procedures.
- Reporting any acts of violence or harassment in the workplace.
- Learning the posted Emergency Plan detailing Markdom facilities procedures pertaining to: Fire, Weather, or Medical Emergency.

Joint Health & Safety Committee (JHSC) The OHSA sets out certain functions and powers that apply to the committee or representatives as a whole, and specific duties and powers that apply to worker members. The committee's key functions are to:

- Identify hazards in the workplace through activities like workplace inspections, accident investigations and information analyses
- Make recommendations to the employer on health and safety issues and on programs and procedures to improve health and safety.

Responsibilities and powers of the health and safety representative include:

- Identify workplace hazards
- Inspect the workplace at least once a month
- Make recommendations to the employer
- Investigate work refusals and serious accidents

We believe that conditions which can lead to injuries and illnesses are best addressed proactively by fostering an environment in which all parties work together to eliminate and control hazards.

- Employees that voice or identify a health and safety concern to management will not be subject to retaliation.
- Health and safety comments will be reviewed by Management and an investigation will be initiated on each reported and/or potential hazard.
- Employees are encouraged to inform their supervisor or Human resources of any matter they perceive to be an actual or potential workplace hazard.
- Communication can be written or oral, and may be anonymous, if so desired.

Periodic auditing of our Health and Safety Management System will be undertaken to ensure its continued suitability and effectiveness and we will review this policy at least annually and revise it as often as is appropriate.

If each and every one of us puts safety at the heart of everything we do, together we can help ensure that our workplace is safe.

Environmental Sustainability Policy

Original Issue Date: April 27, 2022

Latest Revision Date: March 14, 2024

Document Number: CCE_HR_010

The purpose of this Environmental Sustainability Policy is to articulate Markdom's commitment to sustainable and responsible business practices that minimize our environmental impact, promote conservation, and contribute to a greener and more sustainable future. This Policy reflects our dedication to environmental stewardship and corporate responsibility.

Scope: This Policy applies to all employees, contractors, vendors, visitors, and authorized representatives acting on behalf of Markdom. It encompasses all aspects of environmental sustainability, including resource conservation, pollution prevention, and responsible consumption.

Policy Statements

a) Resource Conservation

Markdom is committed to conserving natural resources, including water, energy, and raw materials, by implementing efficient processes and practices.

b) Waste Reduction and Recycling

We will minimize waste generation and promote recycling, reuse, and responsible disposal practices within our operations.

c) Energy Efficiency

Markdom will strive to reduce energy consumption and promote the use of renewable and clean energy sources where feasible.

d) Emission Reduction

We will work to reduce greenhouse gas emissions by implementing energy-efficient technologies and transportation alternatives.

e) Sustainable Procurement

We will consider environmental sustainability criteria when selecting suppliers and products, with a preference for those with eco-friendly and sustainable certifications.

f) Environmental Compliance

Markdom will comply with all applicable environmental laws, regulations, and standards in all jurisdictions where we operate.

g) Environmental Awareness

We will provide training and awareness programs to employees to promote environmentally responsible behaviour and practices.

h) Reporting and Transparency

Markdom will maintain transparency in our environmental sustainability efforts by regularly reporting our progress, achievements, and challenges to stakeholders and the public.

Responsibilities

Management: Responsible for supporting and promoting environmental sustainability efforts, providing resources, and aligning business strategies with sustainability goals.

Employees: Responsible for adhering to this Policy, actively participating in sustainability activities, and promoting environmentally responsible behaviour within the organization.

Suppliers and service providers are expected to conduct their business operations in compliance with Markdom's Environmental Sustainability Policy and all applicable laws and regulations in their respective regions, jurisdictions or countries. They are encouraged to actively participate in sustainability activities and promote environmentally responsible behaviour throughout the course of their business operations.

Compliance and Consequences

Non-compliance with this Environmental Sustainability Policy may result in corrective actions in accordance with Markdom's policies and procedures. This may include disciplinary actions, depending on the severity and frequency of the violation.

This Environmental Sustainability Policy will be reviewed annually or more frequently if necessary. Updates or changes to the Policy will be communicated to all relevant personnel to ensure continued adherence to environmental sustainability guidelines.

Conflict Minerals Policy

Original Issue Date: January 20, 2024

Document Number: CCE_HR_011

Markdom is committed to legal compliance, ethical conduct, human rights, anti-corruption and environmental protection, which extend to our expectations of our partners, subcontractors and suppliers. As a responsible company, Markdom supports the goal of the Dodd-Frank Act of preventing armed groups in the Democratic Republic of the Congo and adjoining countries from benefitting from the sourcing of Conflict Minerals from that region.

This Policy on Conflict Minerals clarifies the illegal trade of natural resources, particularly certain minerals, known as Conflict Minerals.

We recognize the need to end the illegal extraction and trade of natural resources, and the associated human rights violations, conflict and environmental degradation, which result from this trade. These issues are in a critical state in the region of the Democratic Republic of Congo (DRC) as a result of certain unlawful practices in the extraction and trade of ores of tantalum, tin, tungsten and gold, which flow to world markets (including the automotive industry) through the DRC

region. We are taking action to increase transparency, ensure responsible procurement, and drive positive change in this area.

Responsibilities

We prohibit human rights abuses associated with extracting, transporting or trading minerals. We also prohibit any direct or indirect support to non-state armed groups or security forces that illegally control or tax mine sites, transport routes, trade points, or any upstream parties in the supply chain. Similarly, we do not tolerate corruption, money laundering and bribery. We require the parties in our supply chain to agree to follow the same principles and are working with our supply chain to improve the traceability of minerals and ensure responsible sourcing.

Suppliers who manufacture components, parts, or products containing tin, tantalum, tungsten, and/or gold must commit to only sourcing those materials from environmentally and socially responsible sources. To comply with the rules and regulations promulgated by the U.S. Securities and Exchange Commission (“SEC”) under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, we will review our sourcing supply chain to identify any minerals that may qualify as “conflict minerals” under the SEC rules. Information will be requested from suppliers as appropriate.

Expectations

Markdom has the following expectations of its suppliers of components for products that we manufacture or for products that we contract with them to manufacture:

- We expect our suppliers to promptly, completely and accurately respond to our informational requests with respect to the production of such products, including by completing and delivering the Conflict-Free Sourcing Initiative Conflict Minerals

Reporting Template or similar survey (the “Survey”) when asked to do so.

- We expect our suppliers to implement policies and management systems to support compliance with these expectations and require their upstream suppliers to adopt similar policies and systems.
- We expect our suppliers to cooperate in the event we determine that any further inquiry or due diligence is required or advisable with respect to the supply of 3TG in any such products.

We have incorporated the principles of this policy into the requirements of our contractually binding Supplier Manual and we work with our suppliers to increase transparency in the supply chain. Markdom supports industry initiatives, such as the Conflict Free Smelter Program (CFS), to validate that the metals used in our products are not contributing to conflict and come from sustainable sources. Once validated smelter lists are available, suppliers will be requested to procure materials only through validated smelters.

If we determine that a supplier may be violating this policy, we may require them to commit to and implement a corrective action plan within a reasonable timeframe, or we may terminate our business relationship with such supplier.

We maintain a database of material composition information for all our products which allows us to identify suppliers that use tin, tantalum, tungsten and/or gold in their products. Material composition data along with information gathered from suppliers, industry initiatives (e.g. Conflict Free Smelter program), and other available sources are used to assess risks of non-compliance to this policy.

This Policy will be reviewed annually or more frequently if necessary. Updates or changes to the Policy will be communicated to all parties involved to ensure continued adherence.

Inclusion and Accessibility

IASR - Integrated Accessibility Standards Policy

Original Issue Date: August 19, 2021

Latest Revision Date: August 20, 2023

Document Number: CCE_HR_012

The following policy has been established to govern the provision of the Integrated Accessibility Standards under the Accessibility for Ontarians with Disabilities Act, 2005. These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

Commitment

Markdom is committed to ensuring equal access for persons with disabilities and excellence in serving all customers. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence and meet the needs of people with disabilities in a timely manner. In fulfilling our mission, we will provide our goods and services in a way that respects the dignity and independence of people with disabilities. We will provide people with disabilities with the same opportunity to access our goods and services and allow them to benefit from the same services, in the same place and in a similar way as other customers.

Accessibility Plan

Markdom will develop, maintain and document an Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities. The plan will be reviewed every five years and upon request, will be provided in an accessible format.

Training

Markdom will train all employees in the requirements of the IASR and the Human Rights Code as it pertains to persons with disabilities.

This training will be provided to staff, volunteers, persons who participate in developing Markdom’s policies and anyone who provides goods, services or facilities on behalf of Markdom. New employees will be trained and Markdom will maintain records of the training provided.

Built Environment

Markdom will continue to assess and make plans as required to improve the accessibility of its offices and facilities for staff and persons with disabilities. If ever applicable, Markdom will meet the Accessibility Standards for the Design of Public Spaces (Built Environment Standard) when building or making major modifications to public spaces.

Information & Communications Standards

Feedback

Markdom will continue to ensure that the process for receiving and responding to feedback is accessible to persons with disabilities by providing accessible formats and communications support upon request.

Accessible Formats and Communication Supports

Upon request, Markdom will provide accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person’s accessibility needs due to disability. Markdom will work with the requestor to ensure that what is provided meets his/her needs. Markdom will also notify the public about the availability of accessible formats and communications support.

Employment Standards

Recruitment

Markdom will notify its employees and the public about the availability of accommodation for job applicants with disabilities during the recruitment, assessment, and selection processes. If an applicant who

requires accommodation requests it, Markdom will provide or arrange to provide suitable accommodation that takes into account the applicant's needs. Upon extending an offer of employment, Markdom will notify successful applicants of its policies for accommodating employees with disabilities.

Markdom will inform current and new employees of its policies to support employees with disabilities, including any job accommodations that an employee may need due to disability.

Workplace Emergency Response Information

Markdom will provide individualized workplace emergency response information as soon as reasonably possible to employees who have a disability, so long as Markdom is aware of the need for accommodation.

Should the employee require assistance, Markdom will obtain consent of the employee and provide the workplace emergency response information to the person designated by Markdom to provide assistance to the employee.

Markdom will review the individualized workplace emergency response information if the employee moves to a different location in the organization or if the employee's accommodation needs change.

Return to Work Process

Markdom maintains a documented return to work process for its employees who have been absent from work due to a disability and who require accommodations in order to return to work. The process outlines the steps that Markdom will take to facilitate the return to work and includes individual accommodation plans.

Performance Management, Career Development and Advancement & Redeployment

Markdom will consider the accessibility needs of employees with disabilities as well as individual accommodation plans when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

AODA - Customer Service Policy

Original Issue Date: August 19, 2021

Latest Revision Date: April 29, 2024

Document Number: CCE_HR_013

Our Mission Markdom is committed to excellence in serving all customers.

Our Commitment In fulfilling our mission, we will provide our goods and services in a way that respects the dignity and independence of people with disabilities. We will provide people with disabilities the same opportunity to access our goods and services and allow them to benefit from the same services, in the same place and in a similar way as other customers.

Providing goods and services to people with disabilities We will carry out our functions and responsibilities in the following areas:

1. Communication

We will communicate with people with disabilities in ways that take into account their disability. We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities, and how to communicate with customers over the telephone in clear and plain language. We will offer to communicate with customers by any other applicable means of communication if telephone communication is not suitable to their needs or is not available.

2. Assistive devices

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will ensure that our staff is trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services.

3. Billing

We are committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in the following formats upon

request: hard copy, large print and e-mail.

4. Use of service animals and support persons

We are committed to welcoming people with disabilities who are accompanied by a service animal or support person on the parts of our premises that are open to the public and other third parties. We will ensure that all staff, volunteers and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal. Any person with a disability who is accompanied by a support person will be allowed to enter the premises with his or her support person.

5. Notice of temporary disruption

We will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at all public entrances on our premises.

6. Training

Markdom will provide training to all employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures.

Training will include the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person

- How to use the equipment available on Markdom’s premises or otherwise that may help with the provision of goods or services to people with disabilities
- What to do if a person with a disability is having difficulty in accessing Markdom’s goods and services
- Markdom’s policies, practices and procedures relating to the customer service standard

Markdom understands that training is a key component of understanding how to provide accessible customer service therefore all new employees will be required to complete training upon commencing their employment. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

Feedback process

Feedback regarding the way Markdom provides goods and services to persons with disabilities is part of our commitment to provide accessible customer service. Markdom welcomes feedback and the ability to respond. Feedback can be made through the following avenues:

- Contact the Human Resources Department at (416) 752 – 4290 ext. 238
- Complete a Feedback Form in person at the Reception
- In writing to Markdom Human Resources

Upon receiving feedback, Markdom will investigate the submission and meet with the appropriate personnel to resolve the issue and ensure no similar instances occur in the future. We will then follow up with the individual who provided us with feedback regarding our provision of goods and services to persons with disabilities.

This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to the Human Resources department at Markdom. This policy is available to the public upon request.

Non – Discrimination Policy

Original Issue Date: January 1, 2019

Latest Revision Date: May 2, 2024

Document Number: CCE_HR_014

Markdom does not discriminate against any employee or applicant with respect to employment because of race, ancestry, place of origin, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, color, age, marital status, record of offences, family status or disability as defined by the Ontario Human Rights Code (the “Code”).

This principle extends to all decisions related to employment including but not limited to hiring, promotion, transfer, recruitment, termination, benefits, rates of pay, other forms of compensation, and selection for training. Making employment decisions based on any of these protected grounds is against the Markdom policy and prohibited by the Code.

Markdom is committed to:

- Provide a workplace free of conflict, where employees are treated with fairness, dignity and respect.
- Prohibit discrimination and harassment on the basis of protected characteristics.
- Promote equal opportunity and diversity in the workplace.
- Provide guidelines for reporting and addressing discrimination and harassment.

Under no circumstance should any employee fear discrimination or reprisal in the workplace as a result of the filing of a complaint. In the event that a discussion is not feasible or fails to reach a reasonable resolution, a formal complaint may be filed.

Employees who believe they have experienced or witnessed discrimination or harassment are encouraged to report such incidents to their supervisors and/or Human Resources. Reports will be treated

confidentially to the extent possible. Violations of this policy may result in corrective actions in accordance with Markdom’s policies and procedures. Consequences may include disciplinary actions, up to and including termination of employment or contracts, depending on the nature and severity of the violation.

Our Behavior

Fair and Equal Treatment

Original Issue Date: January 1, 2019

Latest Revision Date: May 02, 2024

Document Number: CCE_HR_015

Markdom is dedicated to providing equal employment opportunities in accordance with the protected grounds outlined in the Ontario Human Rights Code. The company will make efforts to accommodate religious practices as long as it does not conflict with established Health and Safety Policies.

Markdom will strive to provide workplace accommodation unless it causes undue hardship. Undue hardship may occur when all options for accommodation have been considered and deemed inappropriate, or when the accommodation would create excessive costs or health and safety hazards for the organization.

Where the provision of accommodation is found to cause undue hardship to the organization, Markdom shall work to find a fair and equitable compromise that meets the needs of the employee and the organization to the greatest extent possible.

While Markdom will ensure compliance to the Human Rights Code in all of its practices, it is essential that employees comply to the Code as well. All records of direct and indirect discrimination and harassment, reports filed, and subsequent investigations are considered confidential and will not be disclosed to anyone except to the extent required by law.

Data Privacy Policy

Original Issue Date: January 1, 2019

Latest Revision Date: June 3, 2022

Document Number: CCE_HR_016

Markdom is committed to protecting the privacy and security of the personal information of its employees. This Policy covers the collection, use and disclosure of personal information belonging to employees.

For the purposes of this Policy, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications. Personal information does not include anonymous or non-personal information (i.e., information that cannot be associated with or tracked back to a specific individual).

Markdom collects and maintains different types of personal information for those individuals who seek to be, are, or were employed by us, including the personal information contained in:

- Resumes and/or applications;
- References and interview notes;
- Letters of offer and acceptance of employment;
- Mandatory policy acknowledgement sign-off sheets;
- Payroll information; including but not limited to social insurance number, and bank details;
- Wage and benefit information;
- Forms relating to the application for, or in respect of changes to, employee health and welfare benefits; including, short and long term disability, medical and dental care
- Beneficiary and emergency contact information.
- In addition to the examples listed above, personal information also includes information such as your home address,

telephone, personal email address, date of birth, employee identification number, licenses and marital status, and any other information necessary for business purposes, which is voluntarily disclosed in the course of your application for and employment with Markdom.

The personal information collected is used and disclosed for business purposes, including establishing, managing or terminating an employment relationship with Markdom. Such uses include:

- Determining eligibility for employment, including the verification of references and qualifications;
- Administering pay and benefits;
- Processing employee work-related claims (e.g. insurance claims, etc.);
- Establishing training and/or development requirements;
- Conducting performance reviews and determining performance requirements;
- Assessing qualifications for a particular job or task;
- Gathering evidence for disciplinary action, or termination;
- Establishing a contact point in the event of an emergency (such as next of kin);
- Complying with applicable labor or employment statutes; and
- Such other purposes as are reasonably required by Markdom

Markdom may use your personal information:

- For the purposes described in this Policy;
- Where an employee's consent is required by law and Markdom has obtained an employee's consent in respect of the use or disclosure of the personal information.

- Markdom may use employees personal information without your knowledge or consent where Markdom is permitted or required by applicable law or regulatory requirements to do so.
- Markdom is compliant in all Provincial and Federal Privacy
- Legislation including PIPEDA (The Personal Information Protection and Electronic Documents Act)

Data Retention:

Personal data will be retained for as long as necessary to fulfill the purposes for which it was collected or as required by applicable laws and regulations. When personal data is no longer needed, it will be securely disposed of or anonymized, unless otherwise required by law.

Data Security & Protection:

Markdom is committed to maintaining the security and confidentiality of personal data. Appropriate technical, organizational, and administrative measures will be implemented to protect against unauthorized access, loss, or misuse of personal data. Employees, contractors, and third parties who have access to personal data will be trained and required to comply with the Company's data privacy and security policies.

We take appropriate technical and organizational measures to protect personal information from unauthorized access, use, disclosure, alteration, or destruction. We limit access to personal information to authorized employees and third-party service providers who need to know the information to perform their duties. We regularly review and update our security measures to ensure they are effective and appropriate.

Confidentiality of Information Policy

Original Issue Date: January 1, 2019

Latest Revision Date: May 02, 2024

Document Number: CCE_HR_017

In the course of your employment with Markdom, you may receive confidential or sensitive information about Markdom, its staff and clients. It is critical that you keep this information in the strictest confidence. Accordingly, you may not:

- disclose at any time, during or after your employment with Markdom, Confidential Information about Markdom, its staff and clients, to any unauthorized person not employed by or associated with Markdom;
- use for your own financial gain, or disclosure for the use of others, Confidential Information obtained as a result of your employment with Markdom; or
- make improper use, directly or indirectly, of such Confidential Information.
- if in doubt, seek clarification.

Confidential information would include, but is not limited to, information concerning marketing strategies, management appointments or transfers, sales or earnings figures, information concerning major contracts, technological advances, proposed expansions, acquisitions, disposals or mergers or financial information.

Employees who disclose Information to unauthorized individuals or without authorization may be subject to disciplinary action, up to and including termination of employment.

Social Media Policy

Original Issue Date: January 1, 2019

Latest Revision Date: May 02, 2024

Document Number: CCE_HR_018

Purpose. Markdom recognizes that technology provides unique opportunities to build our business, listen, learn and engage with consumers, stakeholders and employees through the use of a wide variety of Social Media. However, how we use social media and what we say also has the potential to affect Markdom’s reputation and/or expose the Company (and each of us) to business or legal risk.

It is important to be aware that social media poses significant risks to our business. These risks include disclosure of confidential information and intellectual property, damage to our reputation and the risk of legal claims. Therefore, every employee has a personal responsibility to be familiar with and comply with Markdom’s overall Social Media Policy.

Scope: This policy covers all forms of social media, including Facebook, Instagram, LinkedIn, Twitter, Google+ Wikipedia, other social networking sites, and other internet postings, including blogs. It applies to the use of social media for both business and personal purposes, during working hours and in your own time to the extent that it may affect the business of the company. The policy applies both when the social media is accessed using our information systems and also when access using equipment or software belonging to employees or others.

It also covers all employees and also others including consultants, contractors, and casual and agency staff. Breach of this policy may result in disciplinary action up to and including dismissal.

Statements: When participating in social media in a personal capacity, employees must:

- not disclose Markdom’s confidential information, proprietary or sensitive information. Information is considered confidential when it is not readily available to the public. The majority of information used throughout Markdom is confidential.
- not communicate anything that might damage Markdom’s reputation, brand image, commercial interests, or the confidence of our customers;
- not represent or communicate on behalf of Markdom in the public domain without prior approval.
- not post any material that would directly or indirectly defame, harass, discriminate against or bully any Markdom team member, supplier or customer;
- ensure, when identifying themselves (or when they may be identified) as a Markdom team member, that their social media communications are lawful and comply with Markdom’s policies and procedures.

Responsible use of Social Media

Employee must not use social media in a way that might breach any of our policies, contractual obligations, legislation, or regulatory requirements. In particular, use of social media must comply with:

- The Anti-Bullying and Sexual Harassment Policies
- Rules of relevant regulatory bodies;
- Contractual confidentiality requirements;
- Other key policies/requirements.

When they use social media, employee must not:

- Make disparaging or defamatory statements about us, our employees, clients, customers, or suppliers;
- Harass, bully or unlawfully discriminate in any way;
- Breach copyright belonging to us;
- Disclose any intellectual property, confidential or commercially sensitive information relating to our business;

- Make statements which cause, or may cause, harm to our reputation or otherwise be prejudicial to our interests.

Employee should avoid using social media communications that might be misconstrued in a way that could damage our business reputation.

Internet and E-mail Use

Markdom has set up Internet and e-mail access to enable you to perform your job effectively. We expect you to restrict your Internet and e-mail use to work-related activities.

Markdom reserves the right to monitor your Internet use, including any web sites you visit, and read your e-mail messages, including any attachments. We may do so at our discretion and without notifying you.

You may not use your email or Internet access to:

- Engage in any illegal or unethical activities
- Distribute a virus or other harmful components
- Violate copyright laws by unlawfully downloading or using information or software that is protected by copyright
- Disclose confidential information about Markdom or its customers
- Make negative or harassing comments about Markdom or any of its employees
- Play games
- View pornography

E-mail is a form of business communication and you should treat it as such. Be professional in all e-mail communications. Remember that e-mail messages are not confidential. If you need to distribute confidential information, send it another way or make sure it is properly encrypted.

If you violate this policy or abuse your Internet, computer and e-mail access, you will be subject to discipline, up to and including termination. Illegal or unethical use, playing games, viewing pornography are cause for immediate dismissal. Markdom may discontinue your Internet or e-mail access at its sole discretion.

Breaches. Examples of potential breaches of this policy include but are not limited to:

- Uploading video footage to YouTube showing anything that could damage Markdom's reputation;
- Making derogatory comments about Markdom, employees, customers or suppliers;
- Posting obscene images or offensive comments about a work colleague where this could constitute bullying, discrimination or harassment.

Media Relations Policy

Only the Vice President may authorize corporate communications, including media releases and communication and advertising. If you are contacted by a media representative, please direct them to the Vice President. The Vice President approves the following:

- Advertising and marketing and media campaigns or initiatives
- News articles or interviews in relation to Markdom requests for corporate sponsorship, e.g., from charitable or community groups request(s) for onsite photographs, video footage etc.
- Endorsement requests to release confidential or proprietary information relating to Markdom

Disciplinary Action: Employees are responsible for adhering to the aforementioned social media guidelines. Failure to comply with the guidelines in this policy or on-line activity that otherwise cause harm to the company may be subject to disciplinary action up to and including termination of employment, as permitted by law.

Intellectual Property Policy

Original Issue Date: January 1, 2019

Latest Revision Date: May 4, 2024

Document Number: CCE_HR_019

The Intellectual Property Reporting Policy outlines our commitment to protecting intellectual property rights and preventing infringement within our organization. This Policy defines the procedures for reporting potential intellectual property infringements and establishes our dedication to addressing such matters promptly and responsibly.

Definitions:

- Intellectual Property (IP): Creations of the mind, including inventions, patents, trademarks, copyrights, trade secrets, and other intangible assets.
- Intellectual Property Infringement: Unauthorized use, reproduction, distribution, or exploitation of IP belonging to another party, which may include patents, trademarks, copyrights, or trade secrets

New designs, devices, improvements, inventions, processes or unique solutions to business problems (“Intellectual Property”) developed or discovered during the scope of employment with Markdom are the exclusive property of Markdom. They must be identified and disclosed to management. This will enable the Company to take appropriate measures to protect our Intellectual Property under applicable patent, trademark, copyright, or proprietary information laws and regulations.

Copying and/or reproducing any third party’s copyrighted, patented, or patentable material is strictly prohibited. This includes the copying of music files, video, graphics or written material.

Employee's Responsibilities

- Communicate to management any new Intellectual Property
- Keep the information confidential
- Protect our Intellectual Property under applicable patent, trademark, copyright, or proprietary information laws and regulations
- Not disclose our trade secrets
- Understand that all Intellectual Property developed as part of our work is the sole property of Markdom
- Respect the Intellectual Property and confidentiality requirements of third parties
- Secure all our and customers' confidential business information

Reporting

Upon receiving a report of potential intellectual property infringement, Markdom will respond promptly and decisively by initiating an investigation. This investigation will be conducted by HR supported by external expertise in intellectual property matters.

If the investigation confirms an intellectual property infringement, Markdom will take appropriate actions, which may include:

- Ceasing the infringing activity.
- Removing infringing content or materials.
- Compensating the injured party.
- Legal action, if necessary, in accordance with applicable laws.

No Retaliation

Markdom strictly prohibits retaliation against individuals who report suspected intellectual property infringement in good faith. Any retaliatory actions will be subject to disciplinary measures.

Non-Retaliation Policy

Original Issue Date: January 1, 2019

Latest Revision Date: June 3, 2022

Document Number: CCE_HR_020

Markdom is committed to creating a safe and respectful work environment for all employees. We believe that every individual has the right to work in an environment that is free from any form of retaliation. This Policy outlines our commitment to non-retaliation and the procedures that employees can follow if they believe they have been subjected to retaliation.

Non-Retaliation

Our organization does not tolerate any form of retaliation against any employee who has made a complaint or raised a concern regarding any kind of harassment, discrimination, unethical practices or any other illegal or unethical conduct. Retaliation includes, but is not limited to, any negative action taken against an employee, such as termination, demotion, reduction in pay, negative performance evaluation or harassment, in response to their complaint or concern.

Reporting:

We believe that reports, investigations, and constructive feedback play an important role in making our Company a great place to work. At Markdom, we are committed to protecting individuals who make a report or participate in an investigation in good faith.

"Good faith" means that an employee honestly provides all the information he/she has when making a report or participating in an investigation. It does not matter if the employee realizes later that he/she was mistaken or if the incident reported was not a violation after all.

Retaliation, harassment, and reprisals of any kind are not tolerated at Markdom. In addition, no employee will be adversely affected because

they refused to carry out a directive they believe constitutes fraud or a violation of laws, regulations, or the Code. If you know or suspect that retaliation has occurred or is occurring, report the situation to Human Resources.

We encourage employees to report any suspected retaliation and will take all complaints seriously and investigate them. Any questions about this Policy should be referred to HR department.

Conclusion

Markdom has zero tolerance for unethical behavior and retaliation. All Markdom employees regardless of the position or seniority are expected to ensure that their actions and behaviors reflect responsible and ethical practices.

Each of us is under the obligation to:

- Understand the code
- Act with honesty and integrity
- Reward Integrity
- Seek guidance if unsure about the ethics of a situation
- Take violations seriously and cooperate with investigations
- Report any unethical behavior that may represent a breach of our Code

If you ever see or know of any situation involving unethical behavior, violence, threats, intimidation or safety hazards report the incident immediately to Human Resources Department.