	Document Title: Non-Discrimination Policy	Document Number:	CCE_HR_014
		Process Owner:	Human Resources Manager
		Revision Number:	005
		Revision Date:	June 10, 2025

Non-Discrimination Policy

Purpose

This policy establishes Markdom’s commitment to providing a fair, inclusive, and respectful workplace that upholds the principles of human rights, equality, and diversity. It ensures that all employment practices are free from discrimination and align with the OHRC, UNGC, International Labour Organization (ILO) and Markdom’s ethical standards.

Scope

This policy applies to all Markdom employees, management, executives, job applicants, contractors, interns, and temporary workers. Suppliers, vendors, and business partners acting on behalf of Markdom.

Policy Statement

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

This principle applies to all employment decisions, including but not limited to:


- Recruitment, selection, and hiring
- Promotion, transfer, and training opportunities
- Compensation, benefits, and performance evaluations
- Discipline and termination

Any employment decision based on these protected grounds is strictly prohibited and contrary to both Markdom policy and the Ontario Human Rights Code.

Commitment

Markdom is committed to:

- Providing a workplace free from discrimination, harassment, and retaliation.
- Ensuring fairness, dignity, and respect in all employment practices.
- Promoting equal opportunity, inclusion, and workforce diversity.
- Providing reasonable accommodation for employees and applicants, unless doing so would cause undue hardship.
- Encouraging open communication and ensuring that employees can raise concerns without fear of reprisal.

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Accommodation

Markdom will provide workplace accommodation for employees' disabilities or religious practices, as required by law, unless doing so would cause undue hardship due to excessive cost or health and safety concerns.

Where undue hardship exists, Markdom will work collaboratively with the employee to find a fair and practical alternative that meets both organizational and individual needs.

Supplier Inclusion and Fair Labour Standards

Markdom extends its commitment to fairness and equality throughout its supply chain.


All suppliers, vendors, and contractors are expected to:

- Comply with this Policy and all applicable human rights, labour, and anti-discrimination laws.
- Prohibit forced, bonded, or child labour.
- Respect freedom of association and collective bargaining rights.
- Promote gender equality, fair wages, and safe working conditions.
- Provide grievance mechanisms accessible to all workers.
- Maintain transparent records and cooperate in any supplier audits or assessments.

Failure to comply may result in corrective action plans, suspension, or termination of the business relationship.

Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Promote workplace equity and inclusion	Achieve 100% completion of annual Human Rights & Anti-Discrimination training	Annually	HR Teams
Ensure fair recruitment and promotion practices	Conduct annual audits of hiring and promotion processes	By 2026	HR Teams
Ensure zero tolerance for discrimination and harassment	Zero founded cases of unaddressed discrimination	Annually	HR Teams
Supplier fair labour standards	100% supplier compliance with Markdom's Supplier Code of Conduct	By 2026	HR / Procurement

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Reporting and Investigation

Employees or applicants who believe they have experienced or witnessed discrimination or harassment should promptly report the incident to Human Resources or their immediate supervisor or manager.


All complaints will be:

- Treated confidentially and with sensitivity;
- Investigated promptly and fairly; and
- Resolved in accordance with Markdom’s values and legal obligations.
- No employee will experience reprisal for reporting a concern or participating in an investigation.

Violations of this policy may result in disciplinary action up to and including termination of employment or contract.

Policy Review

This Policy will be reviewed annually or as required by changes in legislation or business practices. Updates will be communicated to all employees and stakeholders to ensure continued compliance and improvement

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RECORD OF REVIEWS

Date	Revision Description	Approved By	Revision Level
Jan 01, 2019	Initial Release	President – Joerg D.	001
Feb 14, 2023	Annual Revision	HR Manager – Johanna A.	002
May 2, 2024	Added commitment and reporting Document # allocated	HR Manager – Johanna A.	003
Mar 29, 2025	Added: - Objectives and targets - Reporting updated	HR Manager – Johanna A.	004
June 10, 2025	Aligned with UNGC Principles Added Goals and Targets Reporting & Investigation	HR Manager – Johanna A. VP Global Operations – Billy Z.	005