	<b>Document Title:</b>	<b>Document Number:</b>	CCE_HR_020
	<b>Non-Retaliation Policy</b>	<b>Process Owner:</b>	Human Resources Manager
		<b>Revision Number:</b>	004
		<b>Revision Date:</b>	Sep 21, 2025

## Non-Retaliation and Protection from Reprisal Policy

**Purpose** - Markdom is committed to maintaining a culture of integrity, trust, and accountability where employees and stakeholders can raise concerns without fear of retaliation.

This policy ensures compliance with human rights, ethical business, and whistleblower protection standards under the UNGC frameworks.

**Scope** - This policy applies to all Markdom employees, contractors, consultants, board members, and third parties acting on behalf of Markdom, including suppliers and vendors. It also protects anyone who reports a violation, participates in an investigation, or refuses to engage in unethical or illegal activities.

**Policy Statement** - Markdom prohibits any form of retaliation against individuals who, in good faith, report or assist in investigating discrimination, harassment, health and safety violations, fraud, corruption, conflicts of interest, environmental or human-rights breaches, or violations of company policies or laws.

Retaliation may include dismissal, demotion, salary reduction, loss of opportunities, intimidation, or harassment. Employees may report concerns anonymously through designated reporting channels without fear of reprisal.

**Reporting Channels** - Individuals may report concerns via:

- Their supervisor/manager or another manager in your management chain
- Anonymous reporting email or at any time by calling or contacting the HR Department or the Markdom Speak Up Reporting Form online.
- Directly to the HR for sensitive matters.

All reports will be handled promptly, impartially, and confidentially.


### Investigation Process

1. **Receipt and Review:** HR logs and acknowledges all complaints within 5 business days.
2. **Investigation:** Conducted by HR or external counsel, ensuring fairness and confidentiality.
3. **Outcome:** Findings shared with relevant leadership; corrective or disciplinary actions taken when warranted.
4. **Follow-Up:** HR confirms the complainant experiences no retaliation as a result of their report.

### Supplier and Partner Expectations

Markdom requires all suppliers and partners to:

- Maintain non-retaliation and grievance mechanisms in their organizations.

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- Protect whistleblowers from dismissal or discrimination.
- Report any concerns about unethical behavior within their supply chains.

Suppliers found retaliating against whistleblowers may face suspension or termination of business relations.

### Confidentiality and Good-Faith Reporting


- “Good faith” means the report is made with honest intent based on a reasonable belief of wrongdoing.
- Reports made in good faith will never result in punishment, even if unsubstantiated.
- False or malicious reports made deliberately are subject to disciplinary action.

### Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Strengthen non-retaliation culture	100 % of employees complete annual ethics & non-retaliation training	By 2026	HR / Compliance
Protect whistleblowers	0 confirmed retaliation incidents	Annual	HR
Supplier accountability	100 % of supplier contracts include non-retaliation clause	Annual	HR / Procurement
Transparency	Annual reporting of ethics & retaliation metrics to leadership	By 2026	HR / Compliance

### Policy Review

This policy will be reviewed annually to ensure alignment with Canadian Whistleblower Protection and Occupational Health & Safety legislation.

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**RECORD OF REVIEWS**

<b>Date</b>	<b>Revision Description</b>	<b>Approved By</b>	<b>Revision Level</b>
Jan 01, 2019	Initial Release	President – Joerg D.	001
June 03, 2022	Annual Revision	HR Manager – Johanna A.	002
May 4, 2024	Added non-retaliation content and additional reporting information. Document # allocated	HR Manager – Johanna A.	003
Sep 21, 2025	Changed name to: <b>Non-Retaliation and Protection from Reprisal Policy</b> Added Reporting Channels Investigation Process Supplier & Partner Expectations Objectives and Targets Aligned with UNGC Principles	HR Manager – Johanna A. VP Global Operations – Billy Z.	004