

# Code of Conduct and Ethics

**Version 003**



<b>Document Title:</b> Code of Conduct & Ethics	Document #	CCE_HR_001
	Process Owner:	Human Resources
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## Introduction

At Markdom, we are committed to creating a culture of high ethics that establishes our policies, laws, procedures, and standards that impact our business. Every employee, contractor, and supplier is expected to comply with this Code and all supporting policies.

Our Code of Conduct and Ethics guides us in performing our work lawfully and ethically. It outlines core principles that define our culture. Every employee, as well as our suppliers and representatives, is expected to comply with these standards.

While the Code provides general principles, it cannot address every situation. We rely on your judgment, so if you're unsure about how to proceed, please seek guidance.


We encourage all employees to discuss any concerns or ethical dilemmas with their Manager or Human Resources. We prohibit retaliation against anyone who raises a concern in good faith.

Thank you for your commitment to the same.




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Nick Orlando  
President & Chief Executive Officer (CEO)

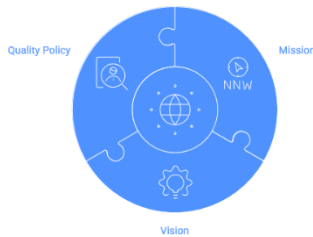
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## Markdom International


**Our Mission** is to achieve a leadership position in the Global Market in the field of Injection Moulded Thermoplastic Components and Assemblies, by serving the needs of our customers in innovative ways, by being the best in everything we do.

**Our Vision** is vibrant and clear: we are dedicated to serving the needs of our customers, producing quality products and supporting employees' development. Key to our performance in these areas is an equally strong commitment to doing business ethically and with integrity.

**Our Quality Commitment** is to achieve excellence. We are committed to total customer satisfaction by providing excellent service and products, achieved through a customer-focused approach, innovation, the involvement of our team members, and continuous improvement in every aspect of our business.



**Our Ethical Commitment** is 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 ethically and legally, but most importantly, we should lead by example. By leading by example, we foster a deep sense of respect for our customers, employees, and

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organization; therefore, we are committed to conducting our daily activities with integrity, fairness and excellence in all that we do.

**Our Safety Commitment** is to have a positive safety culture that encourages open communication, hazard reporting, and employee involvement in safety initiatives. Our goal is zero injuries, and we take all reasonable precautions to ensure the safety of everyone in our facilities, including employees, contractors, customers, and visitors. Everyone in our facilities, including employees, contractors, customers, and visitors.

**Our Environmental Commitment** We are dedicated to minimizing our environmental footprint by actively reducing our energy consumption, greenhouse gas (GHG) emissions, water usage and discharge, air pollution, waste management, and the life cycles of our products to drive a sustainable future for our planet.

We take pride in actively supporting the Ten Principles of the **United Nations Global Compact**, which emphasize critical areas such as human rights, labour standards, environmental sustainability, and anti-corruption. These principles are integral to our strategic framework, corporate culture, and daily practices.



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## Our Core Values

### Customers

We are committed to serving 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

### Employees

We are committed to ensuring a positive and diverse working

environment where all employees respect each other equally, value their contributions and treat each other fairly. We do not tolerate any form of discriminatory behaviour or harassment in the workplace.

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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 labour, child labour and human trafficking
- Promote a workplace free of discrimination and harassment
- Promote a workplace free of violence
- Freedom of association and collective bargaining


## Quality

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

## Environmental

We are committed to minimizing our environmental impact, promoting conservation, and contributing to a greener and more sustainable future.



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## Business Conduct and Ethics Policies

Markdom maintains a formal [Business Ethics Investigation Program \(PRG\\_HR\\_05\)](#) that defines the standardized process for receiving, assessing, investigating, documenting, and resolving allegations of unethical conduct.


The Program applies to all reports involving, but not limited to:

- Bribery, corruption, or kickbacks
- Conflicts of interest
- Fraud, theft, or financial misconduct
- Harassment, discrimination, or retaliation
- Human rights, forced labour, or child labour concerns
- Supplier or third-party misconduct
- Violations of this Code of Conduct or any Markdom policy

Investigations are conducted in a fair, timely, confidential, and impartial manner by Human Resources and/or Legal/Compliance and may involve external counsel where appropriate. All investigations are conducted in accordance with applicable employment, privacy, and data protection laws in the jurisdictions in which Markdom operates.

Markdom may impose disciplinary, contractual, and legal sanctions, up to and including termination of employment or contract and referral to authorities. Markdom will implement corrective and preventive actions to address root causes and prevent recurrence where misconduct is substantiated.

A copy of PRG\_HR\_05 is available from Human Resources upon request or on the internal Global HR SharePoint portal.

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## Anti-Corruption and Anti-Bribery

*Original Issue Date: June 3, 2022*

*Latest Revision Date: September 5, 2025*

*Document Number: CCE\_HR\_001*

**Purpose** - Markdom is committed to conducting business with integrity, fairness, and transparency. Corruption, in all its forms, is incompatible with our values. Markdom adopts a zero-tolerance approach to bribery and corruption. We fully comply with all applicable anti-corruption laws and regulations in every jurisdiction where we operate.


**Scope** - This policy applies to all employees, contractors, suppliers, and business partners who represent or act on behalf of Markdom.

**Prohibited Actions:** Employees and representatives must not:

- Offer, give, solicit, or accept any form of bribe, kickback, or facilitation payment.
- Provide or accept gifts, entertainment, or hospitality that could improperly influence decision-making.
- Offer personal benefits, favours, or commissions to gain unfair business advantage.
- Conceal or misreport transactions or benefits.
- Request or accept personal favours or gifts from suppliers, customers, or potential partners.

**Implementation and Training:**

- **Mandatory Training:** All employees complete anti-corruption training at onboarding and annually thereafter.

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- **Tracking:** HR maintains records of participation and monitors compliance.
- **Leadership Role:** Managers must promote ethical behaviour and report risks or suspicious activities.

## Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Zero-tolerance culture toward bribery and corruption	0 confirmed cases of bribery or corruption	Annual	HR / Compliance
Employee awareness and accountability	100% of employees are trained annually in anti-bribery and anti-corruption	Annual	HR / Training
Promote safe reporting and transparency	100% of employees, contractors and suppliers were informed of the anonymous reporting system	Annual	HR / Compliance
Ensure supplier compliance	100% of high-risk suppliers to sign Supplier Code of Conduct with anti-corruption clause	By Dec 2025	Procurement and HR / Compliance
Continuous improvement	Conduct at least one internal audit or risk assessment on anti-bribery compliance.	Annual	HR / Audit

## Reporting and Whistleblowing

Markdom encourages open communication and provides a confidential reporting mechanism for suspected violations. Reports can be made anonymously without fear of retaliation.

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All reports of suspected bribery or corruption will be investigated in accordance with [PRG\\_HR\\_05 – Business Ethics Investigation Program](#).


The Markdom Speak Up Reporting Form allows employees, suppliers, contractors, visitors and others to report concerns anonymously via phone or web. The service is provided by an independent company. At Markdom, we do not tolerate retaliation for making a good-faith report.

- You can contact Markdom Speak Up Reporting Form using the following link [MARKDOM SPEAK UP / REPORTING FORM – Fill out form](#)
- You can use the QR
- You may submit incidents directly to HR by sending an email to [hr@markdom.com](mailto:hr@markdom.com)



### Monitoring and Review

A yearly review will be conducted to ensure alignment with Markdom and UNGC, best practices, and standards. Compliance metrics will be part of the monthly KPI. Results and progress regarding this policy will be shared in the company's ESG Environmental Social Governance (ESG) Report.

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## Gifts, Hospitality & Business Courtesies Policy

*Original Issue Date: Jan 20, 2024*

*Latest Revision Date: Feb 25, 2025*

*Document Number: CCE\_HR\_001*

**Purpose** - The purpose of this policy is to prevent improper influence, bribery, corruption, or perceived conflicts of interest by establishing clear rules governing the giving and receiving of gifts, hospitality, entertainment, and business courtesies.

**Scope** - This applies to all employees, managers, officers, and directors; temporary workers and contractors; Suppliers; consultants; agents; and other third parties acting on behalf of Markdom.


### Definitions

- ✓ **Gift:** Anything of value offered or received without charge, including items, services, discounts, or promotional products.
- ✓ **Hospitality / Business Courtesies:** Meals, beverages, entertainment, travel, lodging, or event attendance provided in a business context.
- ✓ **Cash or Cash Equivalent:** Money, gift cards, prepaid cards, vouchers, loans, or anything readily convertible to cash.

**Policy Statement** - Markdom prohibits the offering, giving, soliciting, or accepting of gifts, hospitality, or business courtesies that could improperly influence, or appear to influence, a business decision.

### Acceptable Practices

- Only nominal-value gifts are permitted (maximum CAD \$100 or local equivalent).

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- Gifts and hospitality must be infrequent, reasonable, and customary for legitimate business purposes.
- Items must never create an expectation of preferential treatment.
- Modest meals or refreshments in a business setting are acceptable when appropriate.

**Prohibited Practices** - The following are strictly prohibited:

1. Cash or cash equivalents (gift cards, vouchers, prepaid cards, etc.).
2. Gifts or hospitality intended to influence a business decision.
3. Gifts or hospitality during active tenders, bids, or contract negotiations.
4. Lavish, excessive, or recurring gifts.
5. Gifts to government officials without Legal & Compliance approval.


### **Pre-Approval Requirements**

Any gift or hospitality with a value above CAD \$100 requires written pre-approval from HR. Pre-approval must be obtained before offering or accepting the item.

### **Disclosure & Recordkeeping**

- All gifts and hospitality (given or received), regardless of value, must be reported and tracked by Human Resources.
- Records must include date, description, estimated value, parties involved, and approval (if applicable).

**Violations** - Violations of this policy may result in disciplinary action up to and including termination of employment, and may lead to civil or criminal penalties where applicable.

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## Conflict of Interest Policy

*Original Issue Date: January 1, 2019*

*Latest Revision Date: September 10, 2025*


*Document Number: CCE\_HR\_002*

**Purpose** - Markdom is committed to conducting its affairs with the highest ethical and legal standards. This policy upholds Markdom’s integrity and ensures all business decisions are made objectively, free from personal influence or bias.

**Scope** - This policy applies to all Markdom employees, board members, contractors, consultants, suppliers, and contractual third parties or partners doing business with the company.

### Definitions:

- Conflict of interest (COI)** occurs when private interests interfere in any way, or even appear to interfere, with the interests of the 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.
- Conflict of Interest Prevention:** Employee, Supervisor, Manager or Director who has the capacity to and in compliance with our ethical and conduct guidelines, take the required decisions and actions to ensure a potential conflict of interest does not develop into an actual one, and even eliminate the possibility of the conflict occurring.
- Conflict of Interest Disclosure:** an action by which the Employee, Supervisor, Manager or Director reports the

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existence, nature, and any relevant facts related to an Actual, Potential or Apparent Conflict of Interest.


### Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Maintain transparency and ethical decision-making	100% of employees complete annual COI declaration	By 2026	HR / Compliance
Prevent misuse of company resources	0 confirmed cases of misuse of resources for personal gain	Continuous	Finance / HR / Compliance
Promote early reporting of potential COIs	At least 90% of potential COIs were disclosed before becoming actual conflicts.	Annual	All Employees / Managers
Strengthen awareness and prevention	100% of employees are trained annually on COI and business ethics	Annual	HR / Training

### Prevention and Disclosure

Employees are responsible for identifying and disclosing any potential or actual COI immediately to their supervisor, manager or HR. Examples include:

- Personal relationships affecting hiring or promotion decisions.

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- Outside employment with a competitor, customer, or supplier.
- Use of company assets for personal purposes.
- Financial interests in organizations doing business with Markdom.

### Reporting Procedures


- **Step 1:** Disclose any potential COI as soon as it is identified.
- **Step 2:** Seek guidance from local HR.
- **Step 3:** Formal disclosure through the company COI form.
- **Step 5:** HR evaluates and records all disclosures confidentially.
- You can also report using our Markdom Speak Up Reporting Form
  - ✓ Open the form using the link: [MARKDOM SPEAK UP / REPORTING FORM – Fill out form](https://www.markdom.com/REPORTING-FORM-Fill-out-form)
  - ✓ By email at [hr@markdom.com](mailto:hr@markdom.com)
  - ✓ You can use the QR



Disclosed or suspected conflicts of interest will be assessed and investigated in accordance with [PRG\\_HR\\_05 – Business Ethics Investigation Program](#).

### Monitoring and Review

A yearly review will be conducted to ensure alignment with Markdom and (UNGC) guidelines, best practices, and standards. Regular monitoring and reporting of compliance metrics will be part of the monthly KPI.

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## Whistleblower Policy

*Original Issue Date: May 20, 2024*

*Latest Revision Date: September 12, 2025*

*Document Number: CCE\_HR\_021*

**Purpose** - Markdom is committed to conducting business with honesty, integrity, and transparency, and to working against corruption in all its forms. This policy ensures that any employee or stakeholder can report misconduct, unethical behaviour, or policy violations without fear of retaliation.


**Scope** - This policy applies to all Markdom employees, board members, contractors, consultants, suppliers, and contractual third parties or partners doing business with the company.

## Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Promote a culture of transparency and accountability	100% of employees were informed about whistleblower rights and protections	Annual	HR / Compliance
Ensure safe and confidential reporting	100% of reports handled confidentially, with 0 retaliation incidents	Continuous	HR / Compliance
Encourage ethical reporting	At least one awareness campaign per year promoting ethical reporting and non-retaliation	Annual	HR / Training

## Duty to report Misconduct:

All employees, contractual third parties or partners have a duty to report suspected or actual misconduct that could harm the company or its reputation. This includes, but is not limited to:

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- Fraud or misrepresentation in financial reporting.
- Misuse or theft of company resources.
- Forgery or document falsification.
- Bribery, corruption, or unethical conduct.
- Violations of laws, regulations, or internal policies.
- Unsafe practices that may endanger health, safety, or the environment.
- Retaliation or harassment against whistleblowers.

### 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.


### Protection Against Retaliation

Markdom strictly prohibits retaliation against anyone who makes a report in good faith. Retaliation includes dismissal, demotion, harassment, threats, or discrimination. Any person found retaliating against a whistleblower will face disciplinary action, up to and including termination

### Reporting Procedure

Reports may be submitted confidentially or anonymously using our Markdom Speak Up Reporting Form or directly to the HR Department via:

- Email to [hr@markdom.com](mailto:hr@markdom.com) or
- Postal mail marked “Confidential – Whistleblower.”  
Including:
  - ✓ Description of the offence, date on which the complainant became aware of the offence, name of the person suspected of the offence.

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- ✓ Actions taken (if applicable) before filing a complaint or allegation (i.e. talk to the supervisor)
- ✓ Acknowledgment of receipt will be sent to the complainant within 15 working days.


## Investigation Process

HR will review all allegations and, when appropriate, refer matters to legal counsel. Investigations will be conducted discreetly and confidentially, and findings will be communicated to the whistleblower and management as appropriate. If misconduct is confirmed, corrective or disciplinary action will be taken.

Markdom strictly prohibits retaliation against anyone who reports a concern in good faith. Employees will not face dismissal, demotion, suspension, harassment, threats, or discrimination for making a report. Any employee who retaliates against a complainant may be subject to disciplinary action up to and including termination.

All complaints will be handled confidentially and with sensitivity. Whistleblowers may remain anonymous unless disclosure is required by law or necessary for the investigation or legal proceedings. In such cases, reasonable measures will be taken to protect the complainant from prejudice.

Investigations of reported misconduct or retaliation will follow [PRG\\_HR\\_05 – Business Ethics Investigation Program](#).

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## Monitoring and Review

HR will monitor and document all reports along with their corresponding resolutions. An annual review of the whistleblower policy, associated procedures, and overall performance will be incorporated into the Environmental, Social, and Governance (ESG) report.

## Non-Retaliation and Protection from Reprisal Policy

*Original Issue Date: January 1, 2019*


*Latest Revision Date: September 21, 2025*

*Document Number: CCE\_HR\_020*

**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.

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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.
- Protect whistleblowers from dismissal or discrimination.

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- 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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## Sustainable Procurement & Supplier Due Diligence Policy

*Original Issue Date: December 20, 2025*

*Latest Revision Date: December 20, 2025*

*Document Number: CCE\_HR\_024*


**Purpose** - This Policy defines minimum supplier requirements and a risk-based due diligence approach to ensure compliance with Markdom expectations, applicable laws, IATF 16949 principles, ISO 14001 principles, UN Global Compact principles, and EcoVadis requirements.

**Scope** - Applies to all suppliers, sub-suppliers, contractors, service providers, and logistics partners supplying goods or services to Markdom, as well as to Markdom employees involved in supplier selection and purchasing. Suppliers are expected to cascade these requirements to their supply chains.

**Policy Statement** - Markdom will select, monitor, and evaluate suppliers using a risk-based process. Suppliers are expected to meet or exceed Markdom Supplier Performance Expectations and the Markdom Supplier Code of Conduct. Failure to comply may result in corrective action, suspension, or termination of the supplier relationship.

**Supplier Due Diligence Framework** - Markdom applies a risk-based due diligence lifecycle:


- a) **Supplier Onboarding** - Before approval, suppliers may be required to:
  - ✓ Complete a sustainability and ethics self-assessment.
  - ✓ Sign the Markdom Supplier Code of Conduct.

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- ✓ Provide certifications (e.g., IATF 16949, ISO 14001, or equivalent).
- b) **Risk Assessment** - Suppliers are categorized by risk considering:
  - ✓ Country and regional risk.
  - ✓ Product criticality.
  - ✓ Use of hazardous materials.
  - ✓ Labour-intensive processes.
  - ✓ Prior performance and audit results.
- c) **Monitoring & Verification** - Markdom may conduct:
  - ✓ Desktop reviews and questionnaires.
  - ✓ On-site audits or third-party audits.
  - ✓ Performance scorecards.
  - ✓ Documentation reviews (PPAP, APQP, PFMEA, Control Plans, certifications).
- d) **Corrective Action & Remediation** - Where non-conformance is identified:
  - ✓ A corrective action plan with defined timelines is required.
  - ✓ Progress will be monitored.
  - ✓ Failure to remediate may result in suspension or termination of the business relationship.

**Minimum Supplier Requirements:** Suppliers must comply with all applicable laws and Markdom requirements, including:

- 1) Health, Safety & Environmental
  - ✓ Inform Markdom of changes affecting product HSE impacts.
  - ✓ Provide current SDS/MSDS prior to new product shipment and keep updated.
  - ✓ Support carbon reduction (energy, water, hazardous materials, air pollution, waste, and GHG reductions).

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2) Ethical Business Conduct


- ✓ Zero tolerance for bribery, corruption, kickbacks, facilitation payments, and improper gifts.
- ✓ Comply with fair competition/antitrust and applicable regulations in production/sales regions.
- ✓ Support Markdom Conflict Minerals requirements.
- ✓ Fair competition and compliance with antitrust laws.
- ✓ Respect for intellectual property.
- ✓ Compliance with applicable laws

3) Social & Human Rights

- ✓ Support and respect internationally recognized human rights.
- ✓ Eliminate forced labour, child labour, and human trafficking.
- ✓ • Treat workers fairly and without discrimination.
- ✓ Provide equal opportunity regardless of race, gender, sexual orientation, disability, age, nationality, religion, or health condition.
- ✓ Respect freedom of association and collective bargaining.
- ✓ Provide safe and healthy working conditions.

4) Quality & Delivery Performance

- ✓ 100% defect-free product expectation; used for non-conforming product; supplier responsible for replacement stock and chargebacks per Supplier Manual.
- ✓ Maintain 100% on-time delivery expectation; communicate shortages immediately; plan per releases and maintain reasonable flexibility/safety stock.

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**Reporting & Non-Retaliation** - Suppliers and stakeholders may report concerns via:

- ✓ [MARKDOM SPEAK UP / REPORTING FORM – Fill out form](#)
- ✓ By email at [hr@markdom.com](mailto:hr@markdom.com)
- ✓ Supplier can use the QR



### Responsibilities


- ✓ **Procurement/Supply Chain:** Supplier due diligence, monitoring, corrective actions.
- ✓ **Quality:** Supplier quality performance and NCR/MDR management.
- ✓ **HR/Compliance:** Ethics and human rights alignment.
- ✓ **Suppliers:** Compliance and cascading requirements to sub-suppliers.

### Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Supplier acknowledgment	100% sign-off	By 2026	Procurement / HR
Supplier screening	100% new suppliers screened	Ongoing	Procurement
Supplier accountability	100 % of supplier contracts include non-retaliation clause	Annual	HR / Procurement
High-risk suppliers	100% assessed/audited as needed	Annual	HR / Procurement

### Monitoring and Review

A yearly review will be conducted to ensure alignment with Markdom and (UNGC) guidelines, best practices, and standards

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## Antitrust and Competition Laws

*Original Issue Date: June 3, 2022*

*Latest Revision Date: September 22, 2025*

*Document Number: CCE\_HR\_003*

**Purpose** - Markdom is committed to conducting business fairly, honestly, and in full compliance with all antitrust and competition laws.

**Policy Statement** - We comply with all applicable export, import, and trade compliance laws in all countries with which we do business, and we also commit to promoting free and fair competition.


Markdom employees must not engage in practices that restrict competition or manipulate markets. This includes, but is not limited to:

- Fixing or coordinating prices, discounts, or terms of sale.
- Dividing customers, territories, or markets.
- Limiting production or output to control market prices.
- Coordinating bidding activities.
- Boycotting specific suppliers or customers.
- Conduct business in any jurisdiction that is subject to an embargo or comprehensive trade restriction.

Markdom will comply with all applicable trade compliance laws, export controls, anti-boycott regulations, and sanctions programs.

## Training

All relevant employees are required to complete Business Ethics and Antitrust Training at the start of employment and

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annually thereafter. HR will manage and store training records for tracking and legal compliance.

## Objectives and Targets


Objective	Target / KPI	Timeframe	Responsible
Ensure compliance with all antitrust and competition regulations	0 confirmed violations of competition laws	Continuous	HR / Compliance
Increase employee awareness	100% of affected employees are trained annually on competition law	Annual	HR / Training
Promote ethical supplier engagement	100% of supplier contracts to include a fair competition clause	By 2026	Procurement & HR
Continuous improvement	Conduct one risk assessment per year on compliance	Annual	HR / Compliance

## Reporting Procedure

Reports may be submitted confidentially or anonymously using our Markdom Speak Up Reporting Form Online or directly to the HR Department

## Monitoring and Review

Regular reviews will be conducted to ensure compliance with laws and continuous improvement in fair competition practices. Violations will result in disciplinary action, including possible termination.

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## Outside Business Activities Policy

*Original Issue Date: January 1, 2019*

*Latest Revision Date: September 25, 2025*

*Document Number: CCE\_HR\_004*

**Purpose** - This policy aims to ensure that employees' outside business activities do not interfere with their responsibilities to Markdom or create conflicts of interest. It aligns with Markdom's criteria and the United Nations Global Compact's principles regarding ethical conduct.


**Policy Statement** - Outside business activities, including dual employment, are permitted only if they do not:

- Interfere with an employee's job performance or work hours.
- Create conflicts of interest with Markdom's business.
- Involve the use of company resources, equipment, or confidential information.
- Violate any law, regulation, or company policy.

Employees must notify their manager and HR of any secondary employment or outside business interest that could potentially conflict with their duties at Markdom.

## Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Preventing conflicts arising from external employment	100% of employees with secondary employment disclose it to HR	By Q2 2026	HR / Managers
Protect company resources	0 cases of company asset misuse for external business	Continuous	HR / IT / Managers
Raise awareness of policy compliance	100% of employees trained on Outside Business Activities policy	Annual	HR

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**Prohibited Conduct:** Employees may not:


- Conduct non-work-related business during working hours.
- Use company systems, email, or materials for personal or external business.
- Accept outside work that competes with Markdom or creates divided loyalty.

**Reporting and Disclosure**

Employees must disclose all outside business activities in writing to their manager and HR for approval. HR will assess the potential conflict and maintain a confidential record of disclosures.

**Monitoring and Review**

HR will monitor compliance, review reported cases annually and update this policy as necessary to ensure alignment with ethical business standards.

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## Workplace Conduct and Policies

### Human Rights Policy

*Original Issue Date: January 1, 2019*

*Latest Revision Date: August 26, 2025*


*Document Number: CCE\_HR\_005*

**Purpose** - Markdom is committed to respecting, supporting, and promoting human and labour rights in alignment with the Ontario Human Rights Code, UN Principles on Business Human Rights (UNGPs), Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211), Uyghur Forced Labour Prevention Act (UFLPA) and Markdom Supplier Code of Conduct. We integrate these principles across our operations and supply chains.


**Scope** - This policy applies to all employees, managers, contractors, vendors, business partners, and suppliers providing goods or services to Markdom.

#### Policy Statements:

1. **Recruitment & Selection:** Markdom ensures that all hiring and promotion decisions are based solely on merit, qualifications, and ability. Discrimination based on gender, race, ethnicity, religion, disability, age, sexual orientation, or any other protected status is strictly prohibited.
2. **Fair Compensation:** Markdom maintains a fair, competitive, and transparent compensation system. Compensation is reviewed to ensure compliance with local laws, market standards, and internal equity principles.

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3. **Accommodation and Accessibility:** Markdom is committed to accommodating employees’ religious, medical, or personal needs up to the point of undue hardship. Every effort will be made to create a physically and psychologically accessible workplace.
  
4. **Freedom of Association & Collective Bargaining:** Markdom respects workers’ rights to organize, join associations, and engage in collective bargaining
  
5. **Non-Discrimination and Harassment:** Markdom strictly prohibits discrimination, harassment, and retaliation. Reporting mechanisms are accessible and confidential, and employees are encouraged to report incidents promptly.
  
6. **Supplier Code of Conduct & Supply Chain Responsibility:** All suppliers must uphold the same standards of ethics, labour, and human rights as defined in this Policy and in the Markdom Supplier Code of Conduct, including:
  - Compliance with applicable laws and international conventions on human rights, labour, environmental protection, and anti-corruption.
  - Prohibit all forms of forced, bonded, or child labour, and ensure safe, fair, and respectful working conditions.
  - Fair treatment, safe conditions, and transparent labour practices.
  - Be transparent in material sourcing and labour practices. - Implement due diligence to identify and mitigate human rights risks in their operations and supply chains.

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## Human Rights Due Diligence

Markdom complies with the Uyghur Forced Labour Prevention Act (UFLPA) enacted in June 2022 and prohibits sourcing from the Xinjiang Uyghur Autonomous Region (XUAR) or any area linked to forced labour. Suppliers must provide proof of supply chain traceability.

Suppliers must demonstrate traceability to ensure that their materials and products for Markdom are free from forced labour and not sourced from restricted regions. Noncompliance will result in corrective action or termination. Noncompliance may lead to investigation and termination of the supplier relationship.

Markdom is committed to the following principles across its operations and supply chain:

- a) **Prohibit** all forms of forced, bonded, or child labour, as well as any form of human trafficking. [CCE\\_HR\\_008 – Child and Forced Labour Prevention Policy](#)
- b) **Comply** with local and international labour laws, including working hours, rest, and leave.
- c) **Respect** the rights of workers across all operations and supply chains.
- d) **Ensure** fair and non-discriminatory employment practices.
- e) **Promote** gender equality and equal opportunities in recruitment and advancement.
- f) **Respect** freedom of association and the right to collective bargaining.
- g) **Provide** grievance and remediation channels accessible to all workers and partners.
- h) **Protect** the health, safety, and welfare of all workers and other stakeholders, including local communities.


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## Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Eliminate forced and child labour in the supply chain	0 confirmed cases	Continuous	HR / Procurement
Supplier Code of Conduct adherence	100% signed acknowledgment	By 2026	HR / Procurement
UFLPA compliance	100% supplier traceability assurance	Continuous	Procurement
Prevent workplace discrimination	Zero confirmed incidents	Annual	HR / Compliance
Increase gender diversity by 15% hiring of women	HR data vs. 2024 baseline	2030	HR
Increase employee training by 10% training hours	HR data vs. 2024 baseline	2030	HR
Pay Equity	Conduct one pay equity assessment	2026	HR / Compliance
Promote safe reporting and transparency	100% of employees, contractors and suppliers were informed of the anonymous reporting system	By 2026	HR / Compliance

## Monitoring & Reporting

- HR and Supply Chain teams will jointly perform annual human rights and supplier due diligence reviews and surveys.

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- Progress and findings will be reported in Markdom’s Annual Sustainability and ESG Report.
- Corrective actions and continuous improvements will be reviewed and approved annually.

### Remedy & Grievance

Markdom provides accessible, confidential reporting channels for employees, suppliers, and third parties, including:

- ✓ HR Department
- ✓ Management
- ✓ Anonymous reporting mechanisms such as:

[MARKDOM SPEAK UP / REPORTING FORM – Fill out form](#)  
QR code




When adverse human rights impacts are identified, Markdom will:

- Investigate promptly and fairly
- Require corrective action plans
- Support remediation for affected workers where appropriate
- Escalate serious violations to senior management
- Terminate relationships when remediation is not achieved

Retaliation against reporters is strictly prohibited.

Where adverse impacts are confirmed, Markdom will support or enable remediation in a manner consistent with internationally recognized human rights standards.

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## Violence in the Workplace Policy

*Original Issue Date: January 1, 2019*

*Latest Revision Date: September 30, 2025*

*Document Number: CCE\_HR\_006*

**Purpose** - Markdom is committed to ensuring a safe, respectful, and violence-free workplace, in compliance with the Occupational Health and Safety Act and aligned with UNGC Principles.

**Scope** - This Policy applies to all employees, contractors, students, suppliers, customers, and visitors.


**Policy Statement** - Markdom has a zero-tolerance policy for any form of workplace violence, threats, intimidation, or abuse. All reasonable and practical measures will be taken to prevent and address such incidents. Workplace violence includes:

- Physical force or threats that cause or could cause injury
- Attempts to exercise physical force
- Verbal or written threats interpreted as potential harm

### Definitions:

**A workplace** refers to any location 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.

**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

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that worker at work. Domestic violence is considered workplace violence in such situations.


## 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 annual workplace violence and harassment risk assessments.
- Take all reasonable precautions to minimize or eliminate violence-related hazards.
- Establish clear reporting, investigation, and follow-up procedures.
- Ensure workers are provided with the necessary information and instruction that is appropriate regarding the contents of the policy and program with respect to the prevention of workplace violence and harassment.

### 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.
- Participate in investigations and ensure corrective actions are applied.
- Take every precaution reasonable in the circumstances for the protection of a worker, if

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management is aware or ought reasonably to be aware that domestic violence that would likely expose a worker to physical injury may occur in the workplace;


- Share information about potential risks (e.g., individuals with a known history of violence).

### 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 have 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 behaviours.

### Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Workplace violence prevention	Zero verified cases of workplace violence	Annual	HR / Compliance
Raise awareness of policy compliance	100% of employees trained on Violence and Harassment in the workplace	Annual	HR
Continuous improvement	Conduct 1 risk assessment per year	Annual	HR / Compliance
Safe reporting and transparency	100% of employees were informed of the anonymous reporting system for Violence in the workplace	By 2026	HR / Compliance

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### Disclose Information:

Under the Occupational Health and Safety Act, Markdom (MPP) must inform employees about the risks of workplace violence. This includes sharing personal information about individuals with a history of violent behaviour with employees who may:


- a. Encounter these individuals in their work, or
- b. Be at risk of physical injury.
- c. Markdom will only disclose the necessary information to protect those at risk.

### Reporting - Employees can report concerns to:

- ✓ Their supervisor/manager or another manager in your management chain
- ✓ Joint Health & Safety Committee Members
- ✓ You may also report any such conduct (anonymously if you are a witness to such behaviour) at any time by calling or contacting the HR Department or the Markdom Speak Up Reporting Form Online
  - ✓ Open the [MARKDOM SPEAK UP / REPORTING FORM – Fill out form](#)
  - ✓ By email : [hr@markdom.com](mailto:hr@markdom.com)

### Monitoring and Review

Senior management and the HR department will review this policy annually or after any incidents occur. Findings from these reviews will be reported to senior management and included in Markdom's annual ESG report. Continuous improvement actions will be implemented based on the results of audits and feedback received.

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## Workplace Anti-Harassment Policy

*Original Issue Date: June 03, 2022*

*Latest Revision Date: August 26, 2025*

*Document Number: CCE\_HR\_007*


**Purpose** – Markdom is committed to maintaining a workplace free from harassment, discrimination, and retaliation, ensuring that all individuals are treated with dignity and respect. We strive to foster an inclusive, equitable, and safe work environment that aligns with the principles of the UN Global Compact and applicable human rights standards.

**Scope** - This policy applies to all Markdom employees, consultants, contract workers, and temporary employees.

**Policy Statement** - Harassment is strictly prohibited by company policy, the Code, and the Occupational Health and Safety Act. All employees must treat each other with courtesy, consideration, and respect. Markdom will not tolerate harassment of any employee, vendor, customer, or other visitor by any other employee, supervisor, vendor, customer, or other visitor.

Markdom is committed to:


- Preventing all forms of harassment and discrimination.
- Promoting respect, inclusion, and equal opportunity.
- Providing a clear, confidential process for reporting and resolving complaints.
- Ensuring no employee faces retaliation for reporting a concern in good faith.

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## Definitions

**Harassment/discrimination** is unwanted, unreasonable, and offensive behaviour that creates an intimidating, hostile, or humiliating work environment. It can be based on:

- Race, ethnic origin, nationality, or skin colour
  - Gender identity and/or sexual orientation
  - Religious or political convictions
  - Disabilities, illness, sensory impairments or learning difficulties
  - Age
  - Pregnancy or parental status
  - Abusive language, physical aggression, or intimidation
  - Sexual jokes, sexual advances or requests for sexual favours
  - Bullying, gossip, or other unwelcome conduct (verbal, physical, visual, or electronic)
  - *This list is not exhaustive.*
- a. **Sexual harassment** includes unwelcome sexual advances, requests for sexual favours, or other conduct of a sexual nature that may create a hostile or intimidating work environment or affect employment decisions.
- b. **Workplace Sexual Harassment** includes any sexual conduct, comment, gesture, or contact that: 1) is likely to offend or humiliate any employee, or 2) can reasonably be perceived as placing a sexual condition on employment or opportunities for training or promotion.
- c. **Bullying** involves actions or verbal comments that can psychologically harm or isolate someone at work. It often

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involves repeated patterns of behaviour aimed at intimidating or humiliating a person or group.

- d. Anti-gossip** Negative or excessive gossip can disrupt production, lower morale, and even escalate into harassment, posing a health and safety concern. Therefore, it is not allowed in the workplace.

### Responsibilities

#### Management is responsible for:


- Promoting a harassment-free workplace and setting an example of appropriate behaviour in the workplace.
- 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 complaint, if necessary; and
- Ensuring that harassment situations are handled sensitively and confidentially.

#### 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.

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- 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

### Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Awareness and prevention of workplace harassment	100% completion rate of annual Anti-Harassment training	Annual	HR / Compliance
Zero tolerance for harassment	Zero substantiated cases of unaddressed harassment	Annual	HR
Encourage transparent reporting and accountability.	Launched a formal reporting system to increase the confidence rate.	2026	HR / Compliance

Markdom prohibits all inappropriate sexual conduct during work, company business, or company-sponsored events, including:

- Offensive or humiliating behaviour related to sex.
- Sexual behaviour that creates an intimidating or hostile work environment.
- Inappropriate comments, jokes, or degrading language.
- Possession of sexually suggestive materials or objects.

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- Offering benefits for sexual favours or threatening retaliation for refusals.
- Imposing sexual conditions on job opportunities or employment terms.


Sexual harassment is illegal, regardless of the genders involved.

### Reporting Procedure

Creating a workplace free of harassment is everyone’s responsibility. Employees who experience or witness harassment should report it to:

- Their supervisor/manager or another manager in your management chain
- Joint Health & Safety Committee Members
- You may also report any such conduct (anonymously if you are a witness to such behaviour) at any time by calling or contacting the HR Department or [MARKDOM SPEAK UP / REPORTING FORM – Fill out Form](#)
- You can fill out the [Harassment Complaint Form](#) located in the Human Resources SharePoint > How do I > Harassment Complaint Form
- You may submit incidents to Human Resources by sending an email to [hr@markdom.com](mailto:hr@markdom.com)

All complaints will be investigated promptly, confidentially, and impartially. Retaliation against anyone who reports a concern in good faith is strictly prohibited. Harassment complaints will be investigated in accordance with the [PRG\\_HR\\_04 – Workplace Anti-Harassment Program](#) and, where applicable, [PRH\\_HR\\_05 – Business Ethics Investigation Program](#).

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## Child and Forced Labour Prevention Policy

*Original Issue Date: Feb 02, 2024*

*Latest Revision Date: June 04, 2025*

*Document Number: CCE\_HR\_008*


**Purpose** - Markdom is committed to eliminating all forms of child labour, forced labour, and human trafficking in its operations and supply chains. This policy supports the principles of the UNGC and the International Labour Organization (ILO) standards.

This policy also establishes a formal remediation and responsible disengagement framework to address any identified or suspected instances of child labour or forced labour in a manner that protects affected individuals, prevents further harm, and aligns with applicable legal and ethical obligations, including Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211).

**Scope** - This policy applies to all Markdom employees, managers, contractors, business partners, and suppliers, including all third parties who provide goods or services to Markdom

### Definitions:

- **Child:** Any person under 18 (eighteen) years old.
- **Child Labour** Work that deprives children of their childhood, education, potential, or dignity, and is harmful to their physical or mental development, as defined by the International Labour Organization (ILO).
- **Forced Labour:** Any work or service exacted from a person under threat or coercion, including withholding

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wages, restricting movement, retaining identity documents, or debt bondage

- **Voluntary Employment** 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 the Markdom's contract agreements.

## Policy Statements


### a. Prohibition of Child Labour

Markdom strictly prohibits and does not tolerate any use of child labour in its operations or supply chains. If a violation occurs, corrective measures will be taken immediately, including safeguarding the child's welfare and ensuring the continuation of their schooling.

**Preventive Measures:** Markdom has established a reliable strategy to prevent child labour by verifying the ages of job applicants through the following methods:

- Verification of employee age through valid government-issued identification
- Requiring the Recruitment Agency to submit a registration form with ID for age verification.
- Inclusion of age verification in the new hire checklist.

If a violation occurs, corrective and remediation measures will be taken immediately, including safeguarding the child's welfare and ensuring access to education.

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## b. Prohibition of Forced Labour

Markdom prohibits all forms of forced, bonded, or compulsory labour. Workers must have freedom of movement and the right to leave employment voluntarily with reasonable notice.


**Preventive Measures:** Markdom implements a strategy in order to prevent forced labour practices using the following techniques:

- Written employment contracts for all employees specifying wages, working hours, and rights.
- Prohibition of withholding identity documents or wages.
- Regular training on the Ontario Human Rights Code, Forced Labour, and Human Trafficking.
- Engage shareholders and potential investors on ethical practices, focusing on forced labour prevention as part of our commitment to responsible business.

## c. Supplier Expectations

All suppliers, contractors, and partners must adhere to Markdom's ethical standards as outlined in the Supplier Code of Conduct. Key requirements include:

- Compliance with all laws regarding labour, environment, and human rights.
- Elimination of forced, bonded, or child labour.
- Provision of safe and inclusive workplaces.
- Support for human rights and fair labour practices.
- Acknowledgment and signing of the Supplier Code of Conduct.
- Suppliers must ensure fair treatment and equal opportunities for all employees, prohibiting discrimination based on race, gender, sexual

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orientation, health condition, disability, age, nationality, or religion.

### Monitoring & Compliance:

Markdom requires suppliers to provide traceability of raw materials to ensure compliance with the Uyghur Forced Labour Prevention Act (UFLPA) and other relevant laws. Markdom may initiate due diligence, targeted audits, or remediation actions where elevated risk is identified.

**Reporting** – Employees, visitors, contractors, and suppliers can report concerns anonymously if they are a witness to any use of child labour.

- ✓ They can use the [MARKDOM SPEAK UP / REPORTING FORM – Fill out Form](#)
- ✓ Use the QR
- ✓ Email at [hr@markdom.com](mailto:hr@markdom.com)



### Remediation Protocol

#### 1. Immediate Protective Actions


If child labour or forced labour is identified or reasonably suspected:

- Affected individuals will be immediately removed from the harmful situation without retaliation.
- Procurement activity with implicated suppliers may be suspended;
- Immediate steps will be taken to protect health, safety, dignity, and well-being.

#### 2. Supplier Corrective Action & Accountability

If a supplier is implicated:

- A documented corrective action plan will be required;

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- Enhanced monitoring, audits, or third-party verification may be implemented;
- Failure to remediate may result in termination of the supplier relationship

### Documentation & Governance


- All remediation actions will be documented.
- Issues may be escalated to senior management and the Board.
- Lessons learned will inform training, supplier risk scoring, and policy updates.

### Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Awareness and prevention of child and forced Labour	100% completion rate of annual training for employees and suppliers	Annual	HR / Procurement
Zero tolerance for child and forced labour	Zero substantiated incidents across operations and supply chains	Annual	HR/Procurement
Strengthen supplier due diligence	100% of Tier 1 suppliers assessed for child and forced labour risks.	By 2026	HR / Compliance
Remediation readiness	100% cases addressed per protocol	Ongoing	HR / Compliance

### Monitoring and Review

Regular reviews will be conducted to ensure compliance with laws and continuous improvement in the Child and Forced Labour Prevention Policy. Noncompliance will lead to corrective actions or termination of the supplier relationship

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## Health & Safety Policies

### Health & Safety Policy

*Original Issue Date: April 29, 2018*

*Latest Revision Date: August 20, 2025*

*Document Number: CCE\_HR\_009*

**Purpose** - This policy demonstrates Markdom’s commitment to providing a safe, healthy, and respectful workplace for all employees, contractors, suppliers, vendors, and visitors. We aim to prevent injury, illness, and unsafe conditions through proactive management, continuous improvement, and shared accountability.

**Scope** - This policy applies to all employees, contractors, suppliers, vendors, and visitors at all Markdom facilities.


**Policy Statement:** Markdom is dedicated to maintaining a workplace that protects the health, safety, and welfare of everyone on site. We will comply with all applicable Federal and Provincial Health and Safety laws, the Occupational Health and Safety Act (OHSA), and internal procedures.

We strive for zero workplace injuries through prevention, participation, and continuous improvement. All employees, at every level, share responsibility for maintaining a safe and healthy work environment.

### Responsibilities

**Management and Supervisors:** Markdom's management ensures the safety of workers and visitors by:

- Developing and enforcing health and safety policies.


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- Continuously improving Health and Safety Programs.
- Providing training, information, and personal protective equipment (PPE).
- Conducting risk assessments and incident investigations.
- Ensuring safe equipment use and compliance with safety practices.
- Supporting the Joint Health and Safety Committee (JHSC).
- Complying with health and safety legislation and company standards.
- Ensuring contractors and visitors follow safety guidelines.
- Promoting a workplace free from violence, harassment, and discrimination.

**Employees:** Every employee is responsible for:

- Following all safety procedures, instructions, and use of PPE.
- Reporting hazards, near misses, and incidents immediately to management or HR.
- Participating in required training and applying learned safety practices.
- Reporting acts of workplace violence or harassment without fear of reprisal.
- Knowing emergency procedures for fire, medical, and severe weather events.

**Joint Health and Safety Committee (JHSC)** The JHSC plays a key role in maintaining workplace safety by:

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- Identifying hazards through inspections and investigations.
- Recommending improvements to management.
- Participating in the review of incidents and corrective actions.
- Conducting monthly workplace inspections and monitoring compliance.


## Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Achieve zero workplace injuries (SR and IR)	0 lost-time injuries per year (SR and IR)	Annual	HR / E&H&S Teams
Promote a reporting culture	90% of employees report near-misses or hazards through formal channels	Annual	HR/E& H&S Teams
Strengthen employee safety engagement	100% participation in annual safety training	Annual	HR / Safety

**Reporting:** preventing injuries and illnesses is best achieved by fostering collaboration to identify and manage hazards. Employees who report health and safety concerns will not face retaliation, and all reports will be investigated. Employees can report to:

- Their supervisor/manager or another manager in your management chain
- Joint Health & Safety Committee Members
- You can fill out the [Safety Event Report Form](#) link
- Or use the QR



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Employees, visitors, contractors, and suppliers can report concerns anonymously if they witness any safety or hazard concerns. They can use:


- ✓ the [MARKDOM SPEAK UP / REPORTING FORM – Fill out Form](#)
- ✓ Use the QR
- ✓ Email at [hr@markdom.com](mailto:hr@markdom.com)



Periodic audits of our Health and Safety Management System (HSMS) will ensure its effectiveness. This policy will be reviewed annually and updated as necessary. For more details, see the [HSMS\\_HR\\_001 Health and Safety Management System](#) procedure.

### Monitoring and Review

Regular reviews will be conducted to ensure compliance with Markdom Health and Safety Policy to ensure safety and best practices in the workplace.

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## Environmental Sustainability Policy

*Original Issue Date: April 27, 2022*

*Latest Revision Date: November 28, 2025*

*Document Number: CCE\_ESG\_001*

*\*Policy document number has changed from CCE\_HR\_010 to CCE\_ESG\_001 to align with the ESG structure.*


**Purpose:** This policy articulates 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 serves as the umbrella environmental framework. All other ESG environmental policies are subordinate to and aligned with this policy

**Scope:** This Policy applies to all employees, contractors, vendors, visitors, suppliers, and authorized representatives acting on behalf of Markdom.

**Policy Statements -** Markdom is committed to:

1. **Resource Conservation** – Using water, energy, and raw materials efficiently across all operations.
2. **Waste Reduction and Recycling** - Reducing waste generation and promoting reuse and recycling wherever possible.
3. **Energy Efficiency** - Implementing energy-saving measures and adopting renewable and clean energy sources when feasible.
4. **Emission Reduction** - Minimizing greenhouse gas emissions through efficient technologies and sustainable logistics.

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5. **Sustainable Procurement** - Prioritizing suppliers and materials that meet recognized environmental and sustainability standards.
6. **Environmental Compliance** - Markdom will comply with all applicable environmental laws, regulations, and standards in all jurisdictions where we operate.
7. **Environmental Awareness** - Providing training and fostering a culture of environmental responsibility among employees and partners.

**Commitment:** Markdom is dedicated to continuous environmental improvement by:

- Reducing GHG emissions (Scopes 1, 2, and 3).
- Monitoring water consumption.
- Expanding recycling programs.
- Minimizing energy use and waste emissions in product design.


### 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.

**Supplier and Partner Expectations:** Markdom expects all suppliers, contractors, and business partners to:

1. Comply with environmental laws in their operating areas.


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2. Adopt responsible practices like waste reduction and energy efficiency.
3. Provide sustainable and safe materials and products.
4. Collaborate on initiatives to reduce environmental impact.
5. Share environmental performance upon request and show continuous improvement.

Failure to meet these expectations may impact relationships and future business opportunities.

### Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Reduce <b>Scope 1</b> GHG emissions by <b>10%</b> (fuel combustion, company vehicles, on-site energy use)	Annual GHG inventory (tCO <sub>2</sub> e) verified against baseline year 2024 <b>Direct Emissions</b>	By 2030	HR / E&H&S Teams
Reduce <b>Scope 2</b> emissions by <b>20%</b> through renewable energy sourcing and efficiency upgrades (Purchased Electricity, Heat, or Steam)	Electricity consumption (kWh) and renewable energy percentage <b>Indirect Emissions</b>	By 2030	HR / E&H&S Teams
Identify and quantify <b>Scope 3</b> emissions categories and reduce the total by <b>15%</b> (Value Chain Emissions)	Supplier and logistics GHG reports, business travel data	By 2030	HR / E&H&S Teams
Reduce total water consumption by 5% across all facilities	Water use (m3) per production unit against the baseline year 2024	By 2027	HR / E&H&S Teams

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Implement recycling programs in 100% of offices and production areas	Recycling coverage report	By 2026	HR / E&H&S Teams
Ensure <b>80%</b> of key suppliers meet Markdom's Environmental & Human Rights standards	80% of key suppliers answered Markdom's survey and signed a commitment	By 2026	HR / Procurement

**Reporting:** Employees, visitors, contractors, and suppliers can report anonymously, reporting any environmental concerns they may encounter. This can include issues related to waste management, resource conservation, or safety protocols that impact our ecosystem. They can use:


- ✓ The [MARKDOM SPEAK UP / REPORTING FORM – Fill out Form](#)
- ✓ Use the QR
- ✓ Email at [hr@markdom.com](mailto:hr@markdom.com)



### Monitoring and Review

Non-compliance with this Environmental Sustainability Policy may lead to corrective actions, including disciplinary measures based on the severity and frequency of the violation.

The Policy will be reviewed annually or as needed, with updates communicated to all relevant personnel to ensure continued adherence to sustainability guidelines.

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## Air & Water Management Policy

*Original Issue Date: October 29, 2025*

*Latest Revision Date: November 28, 2025*

*Document Number: CCE\_ESG\_002*

*\* Water Policy title changes to include air resource responsibility, and document number have changed from CCE\_HR\_022 to CCE\_ESG\_002 to align with the ESG structure.*

### Purpose

Markdom recognizes the importance of environmental stewardship, particularly in managing water and air resources responsibly. This policy outlines our commitment to efficient water and energy use, pollution prevention, and continuous improvement in air and water quality management. Our goal is to minimize environmental impact, maintain regulatory compliance, and promote sustainability in all operations across all locations.


### Scope

This policy applies to all Markdom facilities, employees, contractors, suppliers, and visitors involved in activities affecting air quality or water use, treatment, or discharge. It covers all production processes, cooling systems, wastewater treatment, and emission sources within our facilities.

### Commitment

Markdom is committed to minimizing its environmental footprint through the following actions:


- Regulatory Compliance:** Comply with all relevant air and water regulations, including the Canadian Environmental Protection Act (CEPA), the U.S. Clean Air Act, and Mexico's LGEEPA.

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- **Water Use:** Reduce water consumption via efficient equipment, closed-loop cooling systems, and leak prevention.
- **Wastewater Management:** Treat process water before discharge or reuse to meet or exceed local and international standards.
- **Air Quality Protection:** Limit emissions of greenhouse gases (GHGs), volatile organic compounds (VOCs), and particulate matter (PM).
- **Pollution Prevention:** Prevent contamination from oils, lubricants, and chemicals through proper handling and storage.
- **Monitoring & Reporting:** Track and analyze air and water performance indicators and report progress transparently.
- **Supplier Engagement:** Require suppliers to adhere to equivalent environmental standards and provide traceability of materials.
- **Training & Awareness:** Educate employees and contractors on air and water conservation best practices.

## Responsibilities

- **Management:** Provide resources and leadership to achieve compliance and drive continuous improvement.
- **Supervisors:** Enforce operational controls, monitor efficiency, and address non-conformities.
- **Employees:** Use water and energy efficiently, report environmental issues immediately, and follow established safety and environmental protocols.

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- Suppliers and Contractors:** Adhere to Markdom’s Air & Water Management Policy and relevant environmental laws and standards.


Markdom complies with all applicable Canadian, U.S., and international laws and standards.

### Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Prevent water contamination	0 confirmed contamination or spill incidents	Annual By 2026	HR / E & H&S
Promote transparency	Publish water metrics and audits	Every two Years	HR/ E & H&S Compliance
Water Discharge Standards	Maintain 100% compliance with wastewater discharge standards.	Annual	HR/ E & H&S Compliance
Maintain full compliance with air and water regulations	0 violations or fines	Annual	HR/ E & H&S Compliance

### Monitoring & Review

This policy will be reviewed annually or more frequently if required by operational changes or updates in environmental legislation. Markdom will continue to seek opportunities for sustainable innovation, pollution prevention, and responsible resource use.

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The EHS and HR teams will review this policy annually and communicate updates across all operations, ensuring continuous improvement and transparent reporting.

Non-compliance with this policy may lead to corrective actions, including disciplinary measures based on the severity and frequency of the violation.

### Conflict Minerals Policy

*Original Issue Date: January 20, 2024*

*Latest Revision Date: November 28, 2025*


*Document Number: CCE\_ESG\_003*

*\*Policy document number has changed from CCE\_HR\_011 to CCE\_ESG\_003 to align with the ESG structure.*

**Purpose** - Markdom is committed to responsible business conduct, transparency, and respect for human rights throughout our operations and supply chain. This policy outlines our commitment to preventing the use of minerals that directly or indirectly finance armed conflict or contribute to human rights abuses.

We fully support the objectives of Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act and the global goal of eradicating armed conflict financing in the Democratic Republic of the Congo (DRC) and adjoining regions through responsible mineral sourcing.

**Scope** - This policy applies to all Markdom operations, employees, contractors, suppliers, vendors, and business partners involved in the sourcing, procurement, or production of components or materials containing **tin, tantalum, tungsten, or gold (3TG)**.


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**Policy Statements** - Markdom is committed to:

- **Eliminating human rights abuses** associated with the extraction, transport, or trade of conflict minerals. UNGC principles 1-2
- **Prohibition of forced and child labour** UNGC principles 4-5
- **Prohibiting direct or indirect support** to armed groups or security forces that control mining or trade routes in the DRC and surrounding countries.
- **Ensuring transparency** in our mineral supply chain through responsible sourcing and supplier engagement.
- **Prohibiting bribery, corruption, and money laundering** related to the mineral trade. UNGC Principle 10
- **Requiring supplier due diligence** to ensure sourcing only from verified conflict-free smelters and refiners.
- **Complying with all applicable legislation** governing conflict minerals and ethical supply chain practices.

**Supplier Engagement & Accountability** - Markdom expects all suppliers to:

- Establish internal policies and management systems aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.
- Respond accurately and promptly to Conflict-Free Sourcing Initiative (CFSI) / Responsible Minerals Initiative (RMI) inquiries using the Conflict Minerals Reporting Template (CMRT).
- Source 3TG minerals exclusively from conflict-free validated smelters or refiners.

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- Maintain traceability systems to ensure transparency throughout their supply chain.
- Support training and awareness programs on responsible sourcing.
- Commit to corrective actions if non-compliance is identified or risk factors emerge.

If a supplier is found to be in violation of this policy, Markdom will require a corrective action plan within a defined timeframe. Failure to remediate may result in termination of the relationship.

**Due Diligence and Monitoring - Markdom will:**

- Conduct annual supplier risk assessments, supplier surveys and due diligence.
- 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.
- Maintain a database of material composition and smelter data.
- Publish annual progress reports on responsible mineral sourcing in our sustainability disclosures.

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.

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## Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Conflict-Free Supply Chain	Source 3TG minerals from 100% conflict-free smelters/refiners	By 2026	HR / Procurement
Supplier Due Diligence Coverage	Achieve 100% supplier due diligence and monitoring	By 2026	HR / Procurement
Training & Awareness	Train 100% of procurement and compliance teams on responsible sourcing standards	By 2026	HR / Procurement
Transparency & Reporting	Publish an annual Conflict Minerals Report and promote transparent reporting	By 2026	HR / Procurement


**Reporting:** Any stakeholder, employee, or supplier may confidentially report concerns related to conflict minerals sourcing, corruption, or human rights violations via Markdom’s **Markdom Speak Up Form** or through HR channels. Reports will be handled confidentially and without retaliation. They can use:

- ✓ The [MARKDOM SPEAK UP / REPORTING FORM – Fill out Form](#)
- ✓ Use the QR
- ✓ Email at [hr@markdom.com](mailto:hr@markdom.com)



## Policy Review

This policy will be reviewed annually or as required by legal, regulatory, or operational changes. Updates will be communicated to all relevant stakeholders and suppliers to ensure continuous alignment with best practices.

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## Product & Environmental Governance Expansion


In November 2025, Markdom introduced three complementary policies addressing:

- I. Product Health & Safety (End Users and Consumers)
- II. Product Lifecycle Management
- III. Environmental Disclosure & Customer Collaboration

These policies form part of Markdom’s ESG Initiatives and align with:

- CoP disclosure participation
- Methodological alignment toward Science Based Targets initiative (SBTi) - (targets under validation)
- GHG Protocol (Scope 1, 2 & 3)
- Automotive customer sustainability expectations
- EcoVadis assessment criteria

While these systems are in progressive deployment, the policies establish governance foundations, measurable objectives, and continuous improvement commitments that hat will guide implementation between 2026 – 2030.

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## I. Product H&S Policy (End User & Consumers)

*Original Issue Date: November 28, 2025*

*Latest Revision Date: November 28, 2025*

*Document Number: CCE\_ESG\_004*

**Purpose** - Markdom is committed to manufacturing products that meet customer-defined specifications, quality standards, and safety requirements to protect the health and safety of end users and consumers.


As part of our Quality Commitment, Ethical Commitment, and Human Rights framework, we recognize that responsible manufacturing is critical to preventing harm, maintaining customer trust, and safeguarding public safety.

**Scope** - This policy applies to:

- All Markdom employees, contractors, and representatives involved in manufacturing, quality control, engineering, procurement, logistics, and product release activities.
- All facilities where products are manufactured, assembled, or inspected.
- All product-related complaints, engineering changes, and raw material controls.

**Policy Statement** - Markdom acts as a contract manufacturer within the automotive and industrial supply chain.

Product designs, drawings, specifications, and functional requirements are defined and approved by our customers. Markdom does not assume product design responsibility unless expressly agreed in writing.

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However, Markdom is fully responsible for:

- Manufacturing strictly in accordance with approved customer specifications.
- Implementing appropriate process controls to prevent non-conforming product.
- Maintaining traceability and documentation.
- Promptly notifying customers of any deviation, abnormality, or potential risk identified during production.

We are committed to preventing the release of products that could pose a safety risk to customers, end users, or the public.

**Our Commitments** - Markdom commits to:

### 1. Compliance with Customer Specifications


- Manufacture products in accordance with approved drawings, material requirements, and engineering specifications.
- Control and document customer engineering changes.
- Maintain documented production lot traceability.

### 2. Risk-Based Manufacturing Controls

- Apply risk-based thinking and industry best practices to identify and mitigate manufacturing risks.
- Monitor critical characteristics defined by customers.
- Implement corrective and preventive actions when deviations are identified.

### 3. Raw Material Integrity

- Ensure materials conform to customer specifications.
- Maintain certificates, safety data sheets, and relevant documentation.

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- Address non-conforming material issues promptly.

#### 4. Product Incident & Complaint Management


- Investigate 100% of product-related complaints in a timely and objective manner.
- Escalate safety-related concerns to customers without delay.
- Implement corrective and preventive measures to prevent recurrence.

#### 5. Continuous Improvement

- Monitor quality and safety performance indicators.
- Strengthen preventive controls and early detection mechanisms.
- Support a culture of accountability and operational excellence.

#### Objectives & Targets

Objective	Target / KPI	Timeframe	Responsible
Prevent product safety incidents	Zero product recalls attributable to manufacturing defects	Annual	Quality / Operation
Maintain product quality performance	Customer PPM is maintained within contractual targets	Annual	Quality
Ensure traceability	100% production lot traceability	Continuous	Quality / Operation
Timely complaint resolution	100% safety-related complaints investigated within a defined timeframe	Continuous	Quality

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## Responsibilities

### Executive Management

- Approve and support this Policy.
- Provide resources necessary to ensure effective implementation.

### Quality & Engineering

- Monitor product conformity and risk controls.
- Ensure corrective actions are implemented and documented.

### Production

- Operate strictly within defined process parameters.
- Report deviations immediately.

### Procurement

- Ensure supplier materials meet approved specifications.

### All Employees

- Report any suspected product safety concern, deviation, or quality risk immediately.


## Reporting & Non-Retaliation

Any employee, contractor, supplier, or stakeholder who identifies a potential product safety issue, quality deviation, falsification of records, or risk to end users must report it immediately.

Reports may be submitted through:

- Supervisor or Management
- Human Resources
- [MARKDOM SPEAK UP / REPORTING FORM – Fill out Form](#)
- Use the QR
- Email at [hr@markdom.com](mailto:hr@markdom.com)



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All reports will be investigated in accordance with [PRG\\_HR\\_05 – Business Ethics Investigation Program](#).

Markdom strictly prohibits retaliation against any individual who raises a concern in good faith.


**Alignment with Standards** - This Policy aligns with:

- Markdom Quality Commitment
- UN Global Compact principles
- Automotive customer requirements
- EcoVadis – Customer Health & Safety criteria
- Risk-based manufacturing and due diligence principles

**Monitoring and Review**

This policy will be reviewed annually or as required by changes in regulatory requirements, customer expectations, or operational risk assessments.

Non-compliance may result in corrective action, disciplinary measures, or contractual consequences, depending on severity.

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## II. Product Lifecycle Management Policy

*Original Issue Date: November 28, 2025*

*Latest Revision Date: November 28, 2025*

*Document Number: CCE\_ESG\_005*

**Purpose** - Markdom is committed to managing the environmental impacts associated with the lifecycle of the products we manufacture.


As part of our Environmental Commitment and ESG governance framework, we recognize that responsible lifecycle management contributes to:

- Resource efficiency
- Emissions reduction
- Waste minimization
- Circular economy advancement
- Long-term customer sustainability objectives

Although product design authority resides with our customers, Markdom plays a critical role in influencing environmental performance through responsible manufacturing practices and data transparency.

**Scope** - This policy applies to:

- All manufacturing operations
- Material and resin consumption
- Process efficiency and scrap management
- Production waste handling
- Environmental data related to Scope 1, 2, and relevant Scope 3 emissions
- Technical collaboration with customers regarding environmental performance

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This policy applies to all Markdom facilities and to employees, contractors, suppliers, and partners involved in manufacturing and material management.

### Policy Statement

Markdom acts as a contract manufacturer. Product designs, material specifications, and functional requirements are defined and approved by customers.

However, Markdom is responsible for:


- Manufacturing efficiently to minimize environmental impact
- Preventing unnecessary scrap and rework
- Monitoring environmental performance indicators
- Supporting customer sustainability requirements where contractually and technically feasible

We are committed to continuously improving the environmental performance of our manufacturing processes throughout the product lifecycle.

### Our Commitments

#### 1. Material Efficiency

- Optimize manufacturing processes to reduce scrap and material waste.
- Monitor resin and raw material consumption per production unit.
- Promote the use of recyclable or lower-impact materials where technically feasible and customer-approved.

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## 2. Energy & Emissions Management

- Monitor energy consumption across production processes.
- Reduce emissions intensity per unit produced.
- Support Markdom’s Scope 1, Scope 2, and relevant Scope 3 reduction targets.

## 3. Responsible Waste Management

- Segregate plastic and process waste streams.
- Increase internal recycling rates when technically viable.
- Minimize landfill disposal.
- Promote waste valorization opportunities where feasible.

## 4. End-of-Life Consideration (Scope 3 – Category 12)


- Evaluate environmental impacts associated with end-of-life treatment of sold products.
- Apply recognized methodologies (e.g., GHG Protocol).
- Improve traceability and accuracy of lifecycle environmental data.

## 5. Customer Collaboration

- Provide environmental data when requested.
- Support customer circular economy initiatives.
- Address OEM sustainability requirements aligned with contractual obligations.

## Objectives & Targets

Objective	Target / KPI	Timeframe	Responsible
Reduce process scrap	≥ 5% cumulative reduction vs. 2026 baseline	By 2030	Operations / Engineering
Improve internal recycling	≥ 90% plastic waste recycling (where technically viable)	By 2030	EHS / Operations

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Strengthen lifecycle visibility	100% annual evaluation of relevant Scope 3 lifecycle data	By 2027	EHS / HR
Material traceability	≥ 95% traceability of critical materials	Continuous	Procurement / Quality

## Responsibilities

### Executive Management

- Approve this Policy and provide necessary resources.

### EHS / Environmental Team

- Monitor environmental KPIs.
- Maintain lifecycle and emissions reporting.

### Engineering & Operations

- Optimize process efficiency.
- Reduce scrap and energy intensity.

### Procurement

- Promote environmentally responsible sourcing.
- Improve supplier environmental traceability.

### Employees


- Follow established environmental procedures.
- Report inefficiencies or environmental risks.

## Reporting & Non-Retaliation

Any employee, contractor, or supplier who identifies environmental risks, data integrity concerns, or lifecycle-related non-conformities must report them immediately. Reports may be submitted through:

- Supervisor or Management
- Human Resources
- [MARKDOM SPEAK UP / REPORTING FORM – Fill out Form](#)



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- Use the QR
- Email at [hr@markdom.com](mailto:hr@markdom.com)

All reports will be investigated in accordance with [PRG\\_HR\\_05 – Business Ethics Investigation Program](#).

Retaliation against individuals who raise concerns in good faith is strictly prohibited.

**Alignment with Standards** - This Policy aligns with:


- GHG Protocol (Scopes 1, 2, and relevant Scope 3 categories)
- Science-Based Targets Initiative (SBTi) – targets under validation
- UN Global Compact environmental principles
- EcoVadis environmental criteria
- Markdom Environmental Sustainability Policy (CCE\_ESG\_001)

**Monitoring and Review**

This policy will be reviewed annually or as required due to:

- Regulatory changes
- Customer sustainability requirements
- ESG reporting updates
- Operational risk assessments

Non-compliance may result in corrective actions or disciplinary measures based on severity.

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### III. Environmental Disclosure & Customer Collaboration

*Original Issue Date: November 28, 2025*

*Latest Revision Date: November 28, 2025*

*Document Number: CCE\_ESG\_006*

**Purpose** - Markdom is committed to promoting responsible environmental practices across our value chain by supporting transparency, collaboration, and data integrity in environmental performance.


As part of our Environmental Commitment and ESG Governance framework, we recognize that while we operate as a contract manufacturer, we can positively influence environmental outcomes through:

- Transparent reporting
- Responsible manufacturing practices
- Customer collaboration
- Continuous operational improvement

This Policy reinforces Markdom’s commitment to responsible growth, environmental stewardship, and alignment with international sustainability expectations.

**Scope** - This policy applies to:

- Environmental communication with customers and suppliers
- Provision of carbon footprint and environmental data
- ESG-related customer inquiries
- Collaboration on circular economy initiatives
- Environmental performance disclosures

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This policy applies to all Markdom facilities and to employees involved in environmental reporting, engineering, procurement, quality, sales, and executive management.

**Policy Statement** - Markdom acts as a contract manufacturer. Product design and end-use control remain the customer's responsibility unless otherwise agreed in the contract. However, Markdom commits to:


- Providing accurate environmental data when requested
- Maintaining credible methodologies for emissions reporting
- Supporting customer sustainability initiatives within our operational control
- Promoting environmentally responsible practices within our influence

We will not misrepresent environmental data, sustainability performance, or ESG claims.

## Our Commitments

### 1. Environmental Transparency

- Maintain annual calculations of Scope 1 and Scope 2 emissions.
- Progressively improve visibility of relevant Scope 3 categories.
- Align methodologies with recognized frameworks (e.g., GHG Protocol).
- Participate in voluntary sustainability disclosure initiatives where appropriate.

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## 2. Customer Sustainability Support

- Provide environmental performance data upon request.
- Support OEM and customer environmental reporting requirements.
- Collaborate on scrap reduction and process efficiency initiatives.

## 3. Circular Economy Promotion


- Promote recyclable materials when technically feasible and customer-approved.
- Strengthen internal waste segregation and recycling systems.
- Support customer-driven circularity initiatives where viable.

## 4. Operational Environmental Improvement

- Improve energy efficiency in production processes.
- Reduce emissions intensity per production unit.
- Evaluate packaging optimization opportunities where applicable.

## Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Environmental data transparency	Provide environmental data to 100% of requesting customers	Initial launch Q1 – 2026 (Annual)	EHS / Sales
Emissions reporting	Maintain annual Scope 1 & 2 inventory; improve Scope 3 data	Annual	EHS / HR

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Energy improvement initiatives	At least one documented energy efficiency initiative annually	Annual	Engineering / EHS
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Environmental performance indicators will be integrated into Markdom’s ESG and Sustainability disclosures.

## Responsibilities

### Executive Management

- Approve and support environmental transparency initiatives.
- Ensure integrity of ESG communications.

### EHS / Environmental Team

- Maintain emissions inventory.
- Ensure environmental data accuracy and documentation.

### Engineering & Operations

- Implement efficiency improvements.
- Reduce environmental intensity per unit produced.

### Commercial / Sales


- Channel customer sustainability requests appropriately.
- Ensure environmental claims are verified before communication.

### Procurement

- Promote environmental expectations within the supply chain.

### All Employees

- Support environmental compliance and data integrity.
- Report concerns regarding environmental misrepresentation.

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## Reporting & Non-Retaliation

Any employee, contractor, supplier, or stakeholder who identifies:

- Environmental data inconsistencies
- Misrepresentation of sustainability performance
- Regulatory environmental risks
- Improper ESG claims

Must report concerns immediately.

Reports may be submitted through:

- Supervisor or Management
- Human Resources
- [MARKDOM SPEAK UP / REPORTING FORM – Fill out Form](#)
- Use the QR
- Email at [hr@markdom.com](mailto:hr@markdom.com)




All reports will be investigated in accordance with [PRG\\_HR\\_05 – Business Ethics Investigation Program](#).

Retaliation against individuals who raise concerns in good faith is strictly prohibited.

## Alignment with Standards

This Policy aligns with:

- GHG Protocol
- Science-Based Targets initiative (SBTi) (targets under validation)
- CDP disclosure participation (where applicable)
- UN Global Compact environmental principles

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- EcoVadis environmental and ESG criteria
- Markdom Environmental Sustainability Policy (CCE\_ESG\_001)

### Monitoring and Review

This policy will be reviewed annually or as required due to:

- Changes in regulatory requirements
- Updates to ESG frameworks
- Customer sustainability expectations
- Internal environmental risk assessments

Non-compliance may result in corrective or disciplinary action depending on severity.

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## Inclusion, Accessibility & Fair Employment

### IASR - Integrated Accessibility Standards Policy

*Original Issue Date: August 19, 2021*

*Latest Revision Date: October 15, 2025*


*Document Number: CCE\_HR\_012*

**Purpose** - The purpose of this Policy is to outline Markdom’s commitment to meeting the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Integrated Accessibility Standards Regulation (IASR) by removing barriers and promoting equal access and inclusion for persons with disabilities.

**Scope** - This Policy applies to all Markdom employees, contractors, visitors, suppliers, and business partners. It governs accessibility in employment, communication, customer service, and facilities.

**Commitment** - Markdom is committed to:

- Providing a barrier-free environment that promotes independence, dignity, and equality of opportunity for all individuals.
- Meeting the accessibility needs of persons with disabilities in a timely and proactive manner.
- Ensuring compliance with AODA, IASR, and the Ontario Human Rights Code.
- Providing training, tools, and awareness to employees to uphold accessibility and inclusion standards across all operations.
- Continuously improving accessibility through consultation, feedback, and transparent reporting

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**Accessibility Plan** - Markdom will maintain and update a documented Accessibility Plan that identifies, removes, and prevents barriers to accessibility.

- The Plan will be reviewed every five years or as needed.
- Upon request, it will be provided in an accessible format.
- Progress will be monitored and reported internally to management.

**Training** - Markdom provides mandatory training to all employees, contractors, and those involved in developing company policies on:


- The requirements of the IASR and the Ontario Human Rights Code as they pertain to accessibility.
- How to communicate and interact with persons with disabilities.
- Training records are maintained, and new employees are trained during onboarding.

**Built Environment** - Markdom will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces.

The company will continually assess and plan improvements to ensure its offices and facilities are fully accessible to employees, visitors, and customers.

**Information and Communications**

- **Accessible Formats and Supports:** Upon request, Markdom provides information in accessible formats

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and communication supports tailored to individual needs.

- **Feedback:** Markdom ensures that feedback processes are accessible and will provide alternate formats upon request.
- **Public Communication:** Notices of available accessible formats and supports will be clearly posted.

**Employment Standards** - Markdom ensures accessibility throughout the entire employment lifecycle:

### Recruitment and Hiring


- Job postings include accommodation statements.
- Candidates are informed of available accommodations during recruitment and assessment.
- Accommodation for job applicants with disabilities during the recruitment, assessment, and selection processes are available upon request.

### Employee Support

- Employees are informed of policies supporting individuals with disabilities.
- Accommodation requests are reviewed confidentially and fairly.

### Workplace Emergency Response

- Individual emergency response plans are provided for employees who disclose a disability-related need.
- Plans are updated when work location, duties, or employee needs change.

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## Return to Work

- A documented Return to Work Process ensures employees returning after disability-related absences receive individualized accommodation plans.


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

## Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Accessibility Training	100% of newly hired employees are trained on AODA, IASR, and accessibility awareness	Annually	HR Teams
Barrier-Free Facilities	Implement physical accessibility upgrades in 100% of Markdom offices	By 2028	HR Teams
Inclusive Recruitment	Guarantee accommodation availability and awareness of 100% of job postings	Annually	HR Teams

## 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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## AODA - Customer Service Policy

*Original Issue Date: August 19, 2021*

*Latest Revision Date: October 21, 2025*

*Document Number: CCE\_HR\_013*


**Purpose** - This policy ensures that Markdom provides accessible goods and services to all customers, including people with disabilities, in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) Customer Service Standard. It also supports Markdom’s commitments to inclusion, equality, and human dignity aligned with the UN Global Compact and EcoVadis frameworks.

**Scope** - This policy applies to all Markdom employees, contractors, volunteers, and any third parties who interact with customers or represent Markdom in delivering goods or services.

**Policy Commitment** - We provide persons with disabilities the same opportunities to access and benefit from our services as other customers, while continuously identifying and removing barriers that prevent full participation. We further commit to:

- Protecting the health, safety, and welfare of all workers, customers, and stakeholders.
- Proactively recognizing and mitigating accessibility barriers.
- Respecting human rights and fair, inclusive treatment for all individuals.
- Ensuring equal opportunity, inclusion, and accessibility in all interactions.
- Upholding transparency, accountability, and continuous improvement in accessibility practices.

### **Accessible Customer Service Principles**

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**1. Communication** - Markdom will communicate with customers in ways that respect individual accessibility needs. Employees will receive training on interacting with people with various types of disabilities and using clear, plain language. Alternative communication methods (e.g., email, written documents, or in-person meetings) will be offered when telephone communication is not feasible.

**2. Assistive Devices** - Customers may use personal assistive devices while accessing our services. Employees will be trained and familiar with commonly used assistive devices to support customer accessibility.

**3. Service Animals and Support Persons** - Persons with disabilities accompanied by service animals or support persons are welcome in all areas of our premises open to the public. Staff will be trained on proper interaction and etiquette.

**4. Notice of Temporary Service Disruptions** - In the event of a planned or unexpected service disruption affecting accessibility, Markdom will notify customers promptly, including the reason, duration, and alternative arrangements. Notices will be posted at public entrances and, when possible, shared online.

**5. Accessible Invoices and Documentation** - Invoices and documents are available in accessible formats upon request (e.g., large print, hard copy, or electronic formats).

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6. **Training** - All employees, contractors, and volunteers who interact with the public—or influence customer service policies—receive accessibility training.

Training includes:

- Overview of AODA and Customer Service Standards.
- Communication with people with disabilities.
- Proper use of assistive devices and interaction with service animals/support persons.
- How to handle accessibility-related challenges. Training records are maintained, and new employees are trained at onboarding or when policies change.

## 7. Feedback Process


Feedback on the accessibility of Markdom’s services is encouraged. Customers can provide feedback by:

- Phone: **(416) 752-4290 ext. 238**
- In person: **Reception Desk, 315 Nantucket Blvd, Scarborough, ON M1P 2P2**
- In writing: **Human Resources Department**

Feedback will be reviewed promptly, investigated where necessary, and followed up with the individual. Markdom commits to addressing accessibility concerns and preventing recurrence.

## Policy Review

This policy will be reviewed annually or as required by legislation, and updates will be communicated to all employees, contractors, and suppliers.

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## Non-Discrimination Policy

*Original Issue Date: January 1, 2019*

*Latest Revision Date: June 10, 2025*

*Document Number: CCE\_HR\_014*

### 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

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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.

### **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.

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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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## Fair and Equal Treatment

*Original Issue Date: January 1, 2019*

*Latest Revision Date: October 30, 2025*

*Document Number: CCE\_HR\_015*

### Purpose

Markdom is committed to fostering a workplace that promotes equality, inclusion, and respect for human rights in accordance with the Ontario Human Rights Code, UNGC Principles and Human Rights standards.


### Scope

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

### Commitment

Markdom is committed to:

- Promoting diversity, equity, and inclusion across the organization.
- Respecting human rights and ensuring fair treatment in all operations.
- Providing accessible employment practices and reasonable accommodations.
- Eliminating discrimination, harassment, and retaliation.
- Ensuring freedom of association and fair wages.
- Extending fair labour practices to all suppliers and partners.
- Conducting training on human rights and inclusive practices.
- Evaluating supplier compliance with this policy.
- Public transparency through sustainability reporting.

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## Supplier Inclusion and Fair Labour Standards

Markdom requires all suppliers, vendors, and contractors to:


- Adhere to Markdom’s Human Rights and Supplier Code of Conduct.
- Prohibit discrimination, forced labour, and child labour.
- Ensure equal pay and opportunities for all individuals.
- Promote a diverse workforce.
- Maintain transparent reporting and cooperate with audits..

Noncompliance may result in corrective action plans, contract suspension, or termination.

## Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Ensure fair recruitment and promotin	Annual audit of recruitment, pay equity, and promotion processes	Annually	HR Teams
Supplier compliance with fair labour and human rights standards	100% supplier sign-off on Markdom Supplier Code of Conduct	By 2026	HR / procurement
Support accessibility and accommodation	100% of accommodation requests processed within 30 days	Annually	HR Teams
Supplier fair labour standards	100% supplier compliance with Markdom's Supplier Code of Conduct	By 2026	HR / Procurement

This policy will be reviewed annually or as needed to incorporate updates and best practices in human rights.

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## Privacy, Technology & Innovation

### Data Privacy and Confidentiality Policy

*Original Issue Date: October 23, 2025*

*Latest Revision Date:*

*Document Number: CCE\_HR\_025*

*\*It consolidates both the **Data Privacy Policy (CCE\_HR\_016)** and **Confidentiality of Information Policy (CCE\_HR\_017)***

**Purpose** - Markdom is committed to protecting the privacy and integrity of all personal and business information collected during employment and operations. This policy adheres to the Personal Information Protection and Electronic Documents Act (PIPEDA), relevant provincial privacy laws.


**Scope** - This policy applies to all Markdom employees, applicants, contractors, and consultants. All personal, confidential, or proprietary information processed or stored by Markdom, in any format and third parties and service providers handling personal information for Markdom.

#### Definitions:

**Personal Information** - refers to any information about an identifiable individual, excluding publicly available business contact information. Examples include name, address, phone number, date of birth, SIN, payroll and employment records, performance evaluations, and emergency contact details.

**Confidential Information** includes all proprietary or sensitive data relating to Markdom’s business, including but not limited to:

- Financial or strategic information (e.g., budgets, contracts, acquisitions).
- Client, supplier, or employee data.

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- Marketing strategies, project plans, or internal communications.
- Technological or operational information not publicly available.
- Unauthorized access, disclosure, use, or misuse of this information is strictly prohibited.

**Policy Statement** - Markdom collects, uses, retains, and discloses personal and confidential information only for legitimate business purposes and in compliance with applicable laws. We are committed to protecting the confidentiality, integrity, and security of employee data and respecting individuals' privacy rights.

**Data Collection and Use** - Personal data is collected only as necessary for lawful business purposes, including recruitment, payroll and benefits administration, training and performance management, health and safety, emergency contact management, and legal or regulatory reporting. Personal information will not be used or disclosed beyond these purposes without consent or legal authority.

### Employee Responsibilities

1. Treat all company, client, and employee information as confidential.
2. Do not use confidential or personal data for personal gain.
3. Avoid sharing internal information with unauthorized individuals during or after employment.
4. Clarify any uncertainties about confidential information.
5. Follow all data protection procedures and security protocols.

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6. Report suspected data breaches or privacy violations to HR or IT immediately.
  7. Complete annual privacy and cybersecurity training.
- Noncompliance may lead to disciplinary action, including termination.

### Data Retention and Disposal

Personal information will be retained only for as long as necessary to fulfill its intended purpose or as required by law. When data is no longer required, it will be securely destroyed or anonymized using approved methods to prevent unauthorized access or misuse.


### Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Data protection governance	100% of employees complete annual privacy & cybersecurity training	Annually	HR / IT
Ensure legal compliance with PIPEDA	Zero confirmed regulatory violations	By 2026	HR / IT

### Data Breach Response

In the event of a data or confidentiality breach, Markdom will:

1. Contain and assess the breach immediately.
2. Notify affected individuals and regulators if required by law.
3. Investigate causes and apply corrective measures.
4. Implement improvements to prevent recurrence.
5. Follow up on the IT Incident Response Plan  
[SYS\\_PRO\\_MAN\\_010 IT Incident Response Plan](#)

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## Social Media and Artificial Intelligence Policy

*Original Issue Date: January 1, 2019*

*Latest Revision Date: October 29, 2025*

*Document Number: CCE\_HR\_018*

**Purpose** - Markdom recognizes that technology — including Artificial Intelligence (AI) and social media — provides innovative opportunities to enhance communication and productivity. However, improper or unethical use of digital tools can expose the company to reputational, business, or legal risk.

This policy defines standards for the responsible use of social media, AI tools, the internet, and email to safeguard Markdom’s integrity, privacy, and reputation.


**Scope** - This policy applies to:

- All employees, contractors, consultants, and third parties representing Markdom.
- All online platforms, AI tools, and social media channels (e.g., Facebook, LinkedIn, Instagram, YouTube, X/Twitter, blogs, forums, generative AI tools such as ChatGPT, Copilot, Gemini, etc.).
- Both professional and personal use when activities could affect Markdom’s reputation, compliance, or confidential information.

Non-compliance may result in disciplinary action up to and including termination.

### Policy Statement

Markdom promotes ethical, transparent, and responsible digital conduct. All employees are responsible for protecting

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confidential information and maintaining professional integrity across all communication channels and technologies.

Employees must **not**:

- Disclose proprietary or confidential company data.
- Use AI tools to process or share sensitive, personal, or confidential information without approval.
- Make defamatory, discriminatory, or misleading statements about Markdom, its stakeholders, or business partners.
- Represent Markdom online without authorization.
- Engage in unethical or deceptive digital or AI practices.


When using social media or AI tools, employees must:

- Clearly separate personal opinions from official company positions (use disclaimers where necessary).
- Avoid sharing internal data, project details, or customer information with public AI systems.
- Verify AI-generated content before distribution to ensure accuracy, fairness, and compliance.
- Avoid using AI to manipulate media, misrepresent facts, or create synthetic content (deepfakes, false endorsements, etc.).
- Ensure all AI use aligns with company Ethical guidelines, Data Privacy Policy, and Human Rights commitments.

### Internet and Email Use

Markdom’s internet and email systems are for authorized business purposes. Employees must:

- Use professional language and maintain confidentiality in communications.

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- Limit personal use during work hours.
- Not send offensive, harassing, or discriminatory material.
- Not use AI or automation tools to impersonate others or send mass communications without approval.

The company reserves the right to monitor electronic communications and system usage to ensure compliance and cybersecurity.

### Media Relations

Only the Vice President or designated representative may speak on behalf of Markdom. All external communications, press releases, and media inquiries must be directed to the Vice President of Global Manufacturing for review and approval.


### Disciplinary Action

Breaches of this policy, including misuse of AI, social media, or company systems, may result in disciplinary action up to and including termination.

Severe or intentional misuse (e.g., data leaks, harassment, or misinformation) may also result in legal consequences.

### Policy Review

This policy will be reviewed annually by the HR and IT Security teams to ensure compliance with Ethics and Labour Standards, PIPEDA, GDPR, and emerging AI governance frameworks.

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## Intellectual Property Policy

*Original Issue Date: January 1, 2019*

*Latest Revision Date: September 22, 2025*

*Document Number: CCE\_HR\_019*

### Purpose

Markdom is committed to safeguarding its intellectual property (IP) and respecting the IP rights of others. This policy ensures that all creations, inventions, and innovations developed during employment or partnership with Markdom are protected, ethically managed, and aligned with international human rights and business integrity standards.

### Scope


This policy applies to:

- All Markdom employees, contractors, and consultants.
- All intellectual property created, developed, or used within Markdom's operations.

### Definitions:

- **Intellectual Property (IP):** Creations of the mind, including inventions, patents, trademarks, copyrights, trade secrets, software, designs, formulas, and creative works.
- **IP Infringement:** Unauthorized use, reproduction, distribution, or exploitation of IP belonging to another party.
- **Confidential Information:** Proprietary data, trade secrets, strategies, or technologies not publicly disclosed.

### Policy Statement

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Markdom recognizes intellectual property as a key asset that supports innovation, competitiveness, and long-term sustainability.

We are committed to:

- Protecting Markdom’s intellectual property through patents, copyrights, trademarks, and confidentiality measures.
- Preventing unauthorized use or disclosure of internal or third-party IP.
- Promoting ethical innovation and respect for creators’ rights.
- Ensuring that all technological and AI-generated content complies with applicable laws and ethical standards.

### Employee Responsibilities


All employees must:

- Promptly disclose to management any new invention, design, or creative work developed during employment.
- Maintain confidentiality of Markdom’s proprietary information.
- Avoid using or reproducing third-party copyrighted, patented, or trade-secret materials without permission.
- Understand that IP created in the course of employment is the property of Markdom.
- Respect all third-party IP agreements and licensing requirements.

### Reporting and Investigation

If an employee suspects or identifies potential IP infringement:

1. Report it immediately to **HR** or **IT**.

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2. Markdom will initiate an internal investigation, supported by external IP experts if necessary.
3. If infringement is confirmed, actions may include:
  - Ceasing infringing activities
  - Removing offending materials
  - Compensating affected parties
  - Pursuing legal remedies

Retaliation is strictly prohibited. Employees reporting in good faith are protected under this policy.

### Supplier and Partner Expectations


Markdom expects all suppliers and partners to:

- Respect and protect Markdom’s intellectual property and trade secrets.
- Avoid using counterfeit, unlicensed, or plagiarized materials.
- Sign confidentiality and IP protection clauses as part of contractual agreements.
- Implement controls to prevent IP theft or data breaches.

Non-compliance may result in termination of the business relationship and legal action.

### Policy Review

This policy will be reviewed annually by HR and IT Departments to ensure alignment with WIPO (World Intellectual Property Organization) standards, Canadian IP Laws and PIPEDA.

	<b>Document Title:</b> Code of Conduct & Ethics	Document #	CCE_HR_001
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## Conclusion

Markdom maintains a zero-tolerance policy toward unethical conduct, corruption, discrimination, and retaliation. Every employee — regardless of role, level, or seniority — shares a collective responsibility to uphold our culture of integrity, transparency, and accountability in every action and decision.

Each of us is expected to:

- Understand and comply with the Code of Ethics and all related corporate policies.
- Act with honesty, fairness, and professionalism in all business dealings.
- Recognize and reward ethical behaviour that reinforces our shared values.
- Seek guidance when uncertain about the ethical or compliance implications of a situation.
- Address and report all potential violations in a timely and responsible manner.
- Cooperate fully in any investigation and protect the confidentiality of those involved.
- Report suspected misconduct, retaliation, violence, or safety hazards immediately to Human Resources or through designated confidential reporting channels.

Every decision we make reflects our commitment to fairness, respect, and responsible growth. By upholding our shared values each day, we safeguard our people, reinforce the trust of our stakeholders, and ensure that Markdom continues to thrive as an ethical, sustainable, and forward-looking organization.