



Markdom Supplier Code of Conduct



Document Title: Supplier Code of Conduct	Document Number:	SCC_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. As individuals, we have a responsibility to act ethically and legally, and, most importantly, to lead by example.

We understand our corporate responsibility towards the people, communities, and environment where our suppliers and we do business. As such, Markdom expects suppliers and business partners to uphold the standards of integrity, transparency, and accountability reflected in this Supplier Code of Conduct.

This Code defines the minimum requirements that suppliers must meet to do business with Markdom, in alignment with applicable laws, Markdom policies, UN Global Compact principles, and recognized sustainability and ethical sourcing expectations.

Definitions

1.1 **Supplier** means any company or individual that manufactures, trades, delivers goods, or provides services to Markdom (including consulting, outsourced services, contractors, and distribution partners), or supports Markdom operations, customers, or programs.

1.1.1 **Sub-supplier** means any upstream supplier or subcontractor that provides goods or services that contribute to products or services delivered to Markdom

1.1.2 **Agreement** means or refers to this Agreement as amended from time to time and any indenture, agreement, or instrument supplemental or ancillary hereto or in implementation hereof.

1.1.3 **Person** means any individual, company, corporation, partnership, firm, trust, sole proprietorship, government, or entity



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howsoever designated or constituted.

Words importing the singular number include the plural, and vice versa, and words importing the masculine gender include the feminine and neuter genders.

The division of this Agreement into articles and insertion of headings is for convenience and reference only and shall not affect the construction or interpretation of this Agreement.

Scope of Code of Conduct

This Code applies to all suppliers and sub-suppliers that provide goods or services to Markdom globally, without limitation by jurisdiction. Suppliers must comply with all applicable laws and this Code. Where local law and this Code differ, the stricter requirement applies, unless prohibited by law.

Suppliers are expected to cascade these requirements to their sub-suppliers and subcontractors and maintain controls to verify compliance.

Legal and Regulatory Compliance

Suppliers and Service providers of Markdom shall conduct their business operations according to the laws and regulations that are in place in their regions, jurisdictions, or countries while they are linked to Markdom by a supplier’s agreement.

These obligations will be after the laws and legislature of their jurisdiction, but will not be limited to the following:

- Anti-Corruption / Anti-Bribery**

Suppliers must not directly or indirectly offer, give, solicit, or accept bribes, kickbacks, facilitation payments, or improper benefits. Suppliers must comply with applicable anti-



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corruption laws; these laws include but are not limited to the Combating of Corrupt Activities Act, United States Foreign Corrupt Practices Act, the UK Anti-Bribery Act, and any other such legislation in the country of your business operations.

II. Antitrust / Fair Competition

Suppliers must comply with competition laws and must not engage in price-fixing, bid rigging, market allocation, or unfair competition practices. Under no circumstances should you make illegal payments directly or indirectly to any government or corporate officials to illicit the abuse of his/her position to obtain or retain contractual business from said organizations.

III. Environmental Compliance

Suppliers must comply with environmental laws related to hazardous materials, air emissions, waste, wastewater discharge, transportation, storage, disposal, and spill prevention. and the release of these waste products and materials into the environment.

IV. Honest and transparent Conduct

Suppliers must engage honestly and transparently with government agencies, regulators, auditors, and Markdom representatives

V. Trade Compliance and Sanctions

Suppliers must comply with applicable import/export laws, sanctions, embargoes, and trade restrictions where relevant to their operations supporting Markdom



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Monitoring, Due Diligence and Review

Markdom has a focused supplier relationship management process in place that assists with the selection, monitoring, and evaluation of the supply chain network. Markdom maintains a risk-based supplier relationship management process aligned with Markdom's [Sustainable Procurement & Supplier Due Diligence Policy \(CCE_HR_024\)](#).

Supplier onboarding may require suppliers to:

- Complete sustainability/ethics self-assessments and questionnaires
- Sign this Supplier Code of Conduct
- Provide certifications as applicable (e.g., IATF 16949, ISO 14001, or equivalent)
- Provide product compliance documentation


Risk assessment may consider:

- Country/regional risk
- Product criticality
- Use of hazardous materials
- Labour-intensive processes
- Prior performance, audit outcomes, and complaints

Monitoring and verification may include:

- Desktop reviews and questionnaires
- On-site or third-party audits
- Performance scorecards
- Documentation review (e.g., PPAP/APQP/PFMEA/Control Plans where applicable)

If non-compliance is identified, suppliers must implement a corrective action plan within defined timelines. Failure to remediate may result in suspension or termination.

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Standard Business Practices

The suppliers, vendors, and service providers must conduct their business with integrity and in compliance with all agreements with Markdom. Furthermore, suppliers will do the following:

- I. **Records and Financial Integrity** - Suppliers must accurately record all business transactions and information and comply with the relevant laws, regulations and audit expectations.
- II. **Confidentiality, Data and Asset Protection** - Suppliers must protect Markdom data, assets, and confidential information and use Markdom systems only for authorized purposes. Responsibly act on behalf of the Company when dealing with clients and other suppliers to protect the data and assets of the Company, as well as intellectual property.
- III. **Acceptable Use of Technology** - It is strictly prohibited to use the technology and systems to create, access, send, print, store or solicit any abusive, sexually explicit, or any offensive material that is deemed inappropriate. The production of false, derogatory, or malicious communications using the Company's technology or systems is strictly prohibited.
- IV. **Intellectual Property and Licensing** - Maintain security to protect the intellectual property rights of the Company, which includes but is not limited to copyrights, patents, trademarks, or trade secrets. Any usage of software, hardware, or content, electronic or otherwise, must comply with the specific terms of the license agreements associated with them.



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- V. **Media and Public Statements** - Suppliers must not conduct press conferences or issue public statements on behalf of Markdom without written authorization.

- VI. **Gifts, Hospitality, and Business Courtesies** - At all times, use good judgment when giving gifts or providing entertainment, which must comply with the Company's Code of Conduct to avoid breaching the Company's ethical standards. At no time will a supplier offer any bribes, kickbacks, or any type of barter for business or incentive to any employee of the Company.

- VII. **Conflicts of Interest** - Suppliers must avoid actual, potential, or perceived conflicts of interest. Suppliers must disclose any conflict involving Markdom employees, relatives, or business relationships that could impair impartial decision-making.

No supplier will conduct any business with Markdom if their spouse, life partner, or any other family member is employed in the department with which they deal. This policy will extend to the negotiation of the supplier's contract before a business relationship is initiated.

- VIII. **Avoid Insider Trading** - practices when buying or selling Markdom shares if you (supplier) come into any information that has not been shared with the public or information that could influence the sale or purchase of company shares. Products or services.



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Employment Practices & Human Rights

The Company maintains a high standard regarding human rights and workplace equal opportunity. We require our suppliers to comply with this standard in their employment policies and to remain in line with the current laws and regulations in their jurisdictions. The following aspects will gain special attention, but will not be limited to these aspects:

I. **Non-Discrimination and Anti-Harassment -**

Suppliers must maintain workplaces free from harassment, discrimination, and retaliation, and provide fair employment practices. Ensure that the workplace is free of harassment and unlawful discrimination.

II. **Working Conditions and Legal Compliance**

Suppliers must comply with laws regarding wages, working hours, overtime, rest periods, and employment standards. Maintain a work environment that does not include hiring discrimination, inequality of compensation, access to training and promotion, wrongful termination or retirement based on age, religion, disability, gender, marital status, sexual orientation or union memberships, as well as political views or legally protected categories.

III. **Forced Labour and Human Trafficking (Zero Tolerance)**

Suppliers must prohibit forced, bonded, or compulsory labour and human trafficking, including:

- Withholding wages
- Retaining identity documents



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- Restricting movement
- Debt bondage, threats, or coercion
- Workers must have the right to leave employment voluntarily with reasonable notice.

IV. Child Labour (Zero Tolerance)

Suppliers must comply with minimum working age laws and must not use child labour. Suppliers must implement age verification controls.


V. Freedom of Association

Suppliers must respect lawful freedom of association and collective bargaining rights where applicable.

VI. Safe Work Environment

Maintain a safe work environment that promotes mental and physical health and complies with all relevant health and safety regulations.

- VII. Worker Documentation** - Maintain clear written employment information for all employees that defines remuneration, deductions, and terms of employment. This employment documentation should also clearly define the disciplinary actions and procedures that govern interactions between the employer and the employee.

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Health & Safety Requirements

1. Safe and Healthy Workplace

Suppliers must provide a safe and healthy workplace and comply with applicable occupational health and safety laws and regulations. Suppliers must:


- Maintain safety programs and risk controls appropriate to their operations
- Provide training, information, and PPE as required
- Report hazards, near-misses, and incidents promptly
- Cooperate with investigations and corrective actions
- Ensure contractors and visitors comply with safety rules

When on Markdom premises, suppliers must comply with all Markdom site rules, safety procedures, and reporting requirements.

2. Environmental Responsibility & Sustainability

Suppliers must support Markdom’s environmental commitments and comply with applicable environmental laws. Suppliers are expected to:

- Implement responsible practices (waste reduction, recycling, energy efficiency)
- Manage hazardous materials safely and maintain SDS/MSDS where applicable
- Prevent spills and environmental contamination
- Support Markdom initiatives to reduce environmental impact (including GHG-related initiatives where applicable)
- Provide environmental performance information upon request and demonstrate continuous improvement

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Confidentiality Requirements:

1. Data Privacy, Confidentiality & Cybersecurity

Suppliers must protect personal information and confidential business information related to Markdom, including employee, customer, supplier, and operational data. Suppliers must:

- Use and share data only for legitimate business purposes
- Implement reasonable safeguards to prevent unauthorized access, disclosure, loss, or misuse
- Promptly report any suspected data breach impacting Markdom information to Markdom (HR/IT as applicable)
- Maintain confidentiality obligations during and after the business relationship

2. Intellectual Property & Counterfeit Prevention

Suppliers must:

- Respect and protect Markdom's intellectual property and trade secrets
- Avoid counterfeit, unlicensed, plagiarized, or infringing materials
- Comply with contractual confidentiality and IP clauses
- Implement controls to prevent IP theft and unauthorized disclosure

Non-compliance may result in termination and legal action.



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Fair Practices Requirements :

1. Accessibility, Inclusion & Non-Discrimination

Suppliers are expected to uphold fair and inclusive practices, including:

- Non-discrimination in hiring, pay, training, promotion, and termination
- Reasonable accommodation practices consistent with applicable law
- Accessible grievance mechanisms for workers
- Respectful treatment of all individuals

2. Reporting, Speak Up & Non-Retaliation

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

Reporting Channels

Suppliers, supplier workers, contractors, visitors, and other stakeholders may report concerns via:

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





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Non-Retaliation

Suppliers must not retaliate against any person who reports a concern in good faith or participates in an investigation. Retaliation may result in corrective action, suspension, or termination of the supplier relationship.

Investigations

All allegations involving unethical conduct, human rights concerns, or supplier misconduct may be investigated in accordance with [PRG_HR_05 – Business Ethics Investigation Program](#), conducted fairly, timely, confidentially, and impartially by HR and/or Legal/Compliance, and may involve external counsel as appropriate.


Code of Conduct Compliance

Suppliers are responsible for ensuring that their employees, representatives, and sub-suppliers comply with this Code. Suppliers must:

- Communicate this Code to relevant personnel
- Maintain policies and controls supporting compliance
- Provide evidence of compliance upon request
- Cooperate with Markdom audits and investigations

Markdom may request the removal from Markdom-related work of any supplier personnel who violate this Code.

Markdom reserves the right to conduct audits at its discretion to evaluate compliance.

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Breach of Conduct & Corrective Actions

Obligation to Report and Cooperate

Suppliers must promptly report any actual, suspected, or potential violation of this Code of Conduct or applicable law related to Markdom business.

Suppliers must:

- Fully cooperate with Markdom investigations.
- Provide timely access to relevant documentation, records, and personnel.
- Preserve records related to the alleged violation.
- Not obstruct, delay, or interfere with any investigation.

Failure to cooperate may itself constitute a breach of this Code.

Investigation Process

Allegations of supplier misconduct may be investigated in accordance with:

- PRG_HR_05 – Business Ethics Investigation Program
- Markdom’s Human Rights and Forced Labour Prevention framework
- Applicable laws and regulatory requirements

Investigations may include:

- Document review
- Management interviews
- Worker interviews (with or without management presence)
- Site inspections or audits
- Third-party or external expert review
- Supply chain traceability verification

Investigations will be conducted in a fair, timely, confidential, and impartial manner. Markdom reserves the right to involve Legal Counsel, external auditors, or independent third parties.



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Classification of Breaches

Breaches may be categorized as:

A. Minor Non-Conformance

Administrative or procedural gaps with no immediate risk to health, safety, human rights, or legal compliance. Examples:

- Incomplete documentation
- Delayed policy updates
- Minor procedural deviations

B. Major Non-Conformance

Significant failures that may expose Markdom to legal, operational, reputational, or ESG risk. Examples:


- Failure to maintain required safety controls
- Environmental regulatory non-compliance
- Inadequate labour documentation
- Repeated minor violations

C. Critical Breach (Zero Tolerance Violations)

Severe violations that fundamentally contradict Markdom's ethical and legal standards. Examples include, but are not limited to:

- Bribery, corruption, kickbacks
- Forced labour or child labour
- Human trafficking
- Retaliation against whistleblowers
- Deliberate falsification of records
- Serious environmental contamination
- Counterfeit materials or IP theft
- Obstruction of investigation
- Criminal conduct related to Markdom business

Critical breaches may result in immediate suspension or termination.

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Corrective Action Process

Where non-compliance is identified, Markdom may require:

1. A written Corrective Action Plan (CAP) within a defined timeframe.
2. Root cause analysis.
3. Specific remediation steps.
4. Assigned responsible persons.
5. Defined deadlines.
6. Evidence of implementation.

Markdom may:

- Monitor implementation progress.
- Conduct follow-up audits.
- Require third-party verification.
- Require enhanced reporting.

Failure to implement corrective actions within agreed timelines may escalate enforcement actions.

Remediation in Human Rights and Forced Labour Cases

If child labour, forced labour, or human rights violations are identified or reasonably suspected:

Markdom may require:

- Immediate removal of affected individuals from harmful conditions.
- Protection of workers from retaliation.
- Safeguarding of welfare and dignity.
- Access to remediation measures where appropriate.
- Supply chain traceability disclosure.

Markdom may suspend procurement activities pending remediation. Failure to remediate may result in termination of the business relationship.



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15.6 Suspension of Business

Markdom reserves the right to suspend:

- New purchase orders
- Shipments
- Approvals
- Supplier onboarding
- Payments where contractually permissible

Suspension may occur when:

- There is a credible risk of legal or reputational harm.
- A serious breach is under investigation.
- The supplier fails to cooperate.
- Corrective action is not implemented.

Termination of Business Relationship

Markdom may terminate its business relationship with a supplier when:

- A critical breach is confirmed.
- The supplier fails to remediate major non-conformance.
- Repeated violations occur.
- There is evidence of intentional misconduct.
- The supplier engages in retaliation.
- Legal or regulatory exposure requires disengagement.

Termination may occur immediately in cases of severe misconduct.



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Supplier Acknowledgement

Supplier Legal Name: _____

Business Address: _____

Supplier Contact Name / Title: _____

Email / Phone: _____

By signing below, the Supplier confirms that it:

1. Has read and understands the Markdom Global Supplier Code of Conduct – Version 003;
2. Will comply with this Code and all applicable laws;
3. Will cascade these requirements to relevant sub-suppliers and subcontractors;
4. Will cooperate with Markdom due diligence, audits, and investigations;
5. Will report concerns using Markdom Speak Up channels and prohibit retaliation.

Authorized Signature: _____

Name / Title: _____

Date: _____



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Appendix A: Markdom Environmental Sustainability Policy

Original Issue Date: April 27, 2022

Latest Revision Date: February 10, 2025

Document Number: CCE_HR_010

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.

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.
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.



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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.
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.




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Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Reduce Scope 1 GHG emissions by 10% (fuel combustion, company vehicles, on-site energy use)	Annual GHG inventory (tCO ₂ e) verified against baseline year 2024 Direct Emissions	By 2030	HR / E&H&S Teams
Reduce Scope 2 emissions by 20% through renewable energy sourcing and efficiency upgrades (Purchased Electricity, Heat, or Steam)	Electricity consumption (kWh) and renewable energy percentage Indirect Emissions	By 2030	HR / E&H&S Teams
Identify and quantify Scope 3 emissions categories and reduce the total by 15% (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
Implement recycling programs in 100% of offices and production areas	Recycling coverage report	By 2026	HR / E&H&S Teams
Ensure 80% 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:

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- ✓ The [MARKDOM SPEAK UP / REPORTING FORM – Fill out Form](#)
- ✓ Use the QR
- ✓ Email at 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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Appendix B: Air & Water Management Policy

Original Issue Date: October 29, 2025

Latest Revision Date: October 29, 2025

Document Number: CCE_HR_022

** Water Policy (CCE_HR_022) title change to include air resource responsibility**

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.
- **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,



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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.
- **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



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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.

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.



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Appendix C: Markdom Conflict Minerals Policy

Original Issue Date: January 20, 2024

Latest Revision Date: October 16, 2025

Document Number: CCE_HR_011

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)**.

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



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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.
- 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.



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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.

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



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.



Document Title: Supplier Code of Conduct	Document Number:	SCC_HR_001
	Process Owner:	Human Resources
	Revision Number:	002
	Revision Date:	Jan/23/2026

Appendix D: Markdom 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.
- Continuously improving Health and Safety Programs.
- Providing training, information, and personal protective equipment (PPE).
- Conducting risk assessments and incident investigations.



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- 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:

- 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	0 lost-time injuries per year (SR and IR)	Annual	HR / E&H&S Teams



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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



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



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.



Document Title: Supplier Code of Conduct	Document Number:	SCC_HR_001
	Process Owner:	Human Resources
	Revision Number:	002
	Revision Date:	Jan/23/2026

Appendix E: 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.
- 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.



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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.

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.



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Suppliers must demonstrate traceability to ensure that their materials and products for Markdom are free of forced labour and sourced from non-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.

Objectives and Tagerts

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	Continuous	Procurement



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	traceability assurance		
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.
- 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






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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 consistent with internationally recognized human rights standards.

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		Revision Number: 002
		Revision Date: Jan/23/2026

Appendix F: Child and Forced Labour Prevention Policy

Original Issue Date: Feb 02, 2024

Latest Revision Date: Feb 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 wages, restricting movement, retaining identity documents, or debt bondage



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- **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.

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.

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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 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

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(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



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



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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 to support continuous improvement of the Child and Forced Labour Prevention Policy. Noncompliance will lead to corrective actions or termination of the supplier relationship



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Appendix G: Data Privacy and Confidentiality Policy

Original Issue Date: October 23, 2025

Latest Revision Date:

Document Number: CCE_HR_023

**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 means any information about an identifiable individual other than publicly available business contact information.

Examples include:

- Name, address, phone number, date of birth, SIN.
- Payroll, benefits, and employment records.
- Performance evaluations, disciplinary actions, and emergency contacts.

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 maintaining the confidentiality, integrity, and availability of employee data and ensuring that individuals' rights are respected throughout the data lifecycle.

Data Collection and Use

Personal data is collected only for specific, lawful purposes, including:

- Recruitment, hiring, and onboarding
- Payroll and benefits administration
- Training, development, and performance management
- Health, safety, and compliance obligations
- Emergency contact and workplace safety requirements
- Legal and regulatory reporting

No personal data will be collected, used, or disclosed beyond what is necessary for legitimate business functions without explicit 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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Appendix H: 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

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-



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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**.
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



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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.



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Appendix I: Non-Discrimination Policy

Original Issue Date: January 1, 2019

Latest Revision Date: May 2, 2024

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

Any employment decision based on these protected grounds is



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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. 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.



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- 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

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



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- 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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Appendix J: 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.

Supplier Inclusion and Fair Labour Standards

Markdom requires all suppliers, vendors, and contractors to:

- Adhere to Markdom’s Human Rights and Supplier Code of



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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 promotion	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.