



Markdom Supplier Code of Conduct



MARKDOM SUPPLIER CODE OF CONDUCT

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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 in an ethical and legal manner, but most importantly, we should lead by example.

We understand our corporate responsibility towards the people, communities, and environment where we and our suppliers do business. As such, we have implemented a sustainable development policy, and the behavior of our people and suppliers is an integral part of this policy. Our supplier network is governed by our business integrity policy and our company ethics standards, which are a crucial part of our organizational conduct policy.

Therefore, in consideration of the mutual covenants and agreements contained herein and for other good and valuable considerations, the parties hereto agree as follows:

Definitions

1.1 At Markdom, suppliers are the companies and individuals that manufactures, trades, or delivers services to the Company or our clients by means of consulting outsourced services, or distribution of products. The suppliers' code of conduct sets out the guidelines for these business partners so that all interactions can be monitored and reviewed for improvement. Whenever used in this Agreement, the schedules thereto, or any ancillary document thereto, the following terms, unless the subject matter or context otherwise requires, shall have the following meanings:

1.1.1 "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.

1.1.2 "Person" means any individual, company, corporation, partnership, firm, trust, sole proprietorship, government, or entity howsoever designated or constituted; and

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

1.3 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.

1.4 The preamble hereto forms an integral part of this Agreement.

Scope of Code of Conduct

The code of conduct as prescribed in this document pertains to any and all companies and individuals that fall within the definition of a supplier as set out in this document. This includes organizations that are operating as an extension of Markdom under legal authority as

service providers to the Company. The code of conduct is not limited by jurisdiction or region but not superseding any regulations or laws that might be in effect within these regions. Markdom expects that suppliers apply this code of conduct to their businesses and enact similar policies to their own supplier network.

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:

- I. Strict compliance to anti-corruption laws within the countries of operation, these laws include but are not limited to the Combating of Corrupt Activities Act, United States Foreign Corrupt Practices Act or the UK Anti Bribery Act or any other such legislation in the country of your business operations. Under no circumstance 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.
- II. Conduct your business in full compliance with any anti-trust or fair competition regulation in place within your jurisdiction of business operations.
- III. Conduct your business in full compliance with environmental laws and statutes when it comes to the handling of hazardous material, air emissions, waste products, waste water discharge. This includes the transportation, storage, disposal,

and release of these waste products and materials into the environment.

- IV. Conduct your business in an honest and transparent manner with any agency or government officials at all time

Monitoring 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. This system is based on a risk-based methodology to determine compliance with the code of conduct as well as the internal policies and procedures of the Company currently in place.

Each supplier will be evaluated according to this risk-based process before business operations are entered into between the Company and Supplier. We will also be conducting regular assessments to review the status of each supplier to maintain a high standard of the business relationship between all parties.

The assessments will be conducted using a self-test questionnaire as well as further in-depth evaluations if it is required. These in-depth assessments will be conducted as and when the Company deems it necessary. If any non-compliance is found, we will direct the supplier on which corrective actions need to be taken to ensure compliance and continuation of the business relationship.

If any non-compliance is brought to the attention of the Company through any other means, we reserve the right to conduct independent investigations to determine the validity on a case-by-case basis. This does not limit our statutory or contractual rights in any way.

Standard Business Practices

The suppliers, vendors, and employees of the Company will at all times conduct their business with integrity and in compliance with any and all agreements with the Company. Furthermore, suppliers will do the following:

- I. Accurately record all business transactions and information and comply with the relative laws and regulations pertaining to the recording and storage of this information.
- II. Maintain accurate records both created and stored in compliance with the regulation pertaining to financial record keeping in your jurisdiction. Responsibly act on behalf of the Company when you are dealing with clients and other suppliers to protect the data and assets of the Company as well as intellectual property.
- III. Use Company technology and systems for authorized business interactions with clients and providers. 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 by means of the Company technology or systems is strictly prohibited.
- IV. 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.

- V. Conduct any press conferences or issue press releases on behalf of the Company without prior authorizations.
- VI. At all times use good judgment when entertaining Markdom’s employees. The giving of gifts or entertainment must comply with the Markdom’s Code of Conduct so as not to breach the ethical standards of the Company. 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. Maintain clear business relationships that do not appear or are in fact improper or might be seen as improper. No supplier will conduct any business with Markdom if their spouse, life partner, or any other family member is employed in the department that they deal with. This policy will extend to the negotiating of the supplier's contract prior to a business relationship being initiated.
- VIII. Avoid any 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.

Employment Practices

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

- I. Ensure that the workplace is free of harassment and unlawful discrimination. We will at all times be focused on creating and maintaining 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.
- II. Comply with the relative employment regulations as stipulated in the country of business legislation.
- III. Maintain a safe work environment that promotes mental and physical health and complies with all relevant health and safety regulations. This will include any usage of Company premises and the interactions with any people authorized to access the property.
- IV. Prevent the use or possession and distribution of illegal drugs on any property associated with the business practices of the Company.
- V. Prohibit the use of forced labor in any facilities or properties associated with the business operations of the Company.
- VI. Comply with the local minimum working age and at no time be a party to child labor practices or exploitive labor practices.
- VII. Maintain clear written employment information for all employees that define remuneration, deductions, and terms of employment. This employment documentation should also clearly define the disciplinary actions and procedures that will govern the interactions between employer and employee.

- VIII. Maintain proper employee records in accordance with local regulations and legislation.

Sustainability

Markdom believes in living up to a high social responsibility and sustainability standard. We are constantly striving to live up to our stewardship of the environment and this is extended to all our suppliers and their business practices. The Company and Supplier will at all times work on finding better ways of fulfilling the commitment to the environment and business sustainability.

Code of Conduct Compliance

It is the responsibility of the supplier to ensure that all employees and its representatives comply with the Code of Conduct contained within this document. Any transgression or violation of these policies must be reported to prevent damage to the business relationship with the Company's clients and supply chain. In the event of a violation, the Markdom reserves the right to request the removal of persons or persons that committed the transgression, and in this regard, Markdom reserves the right to conduct audits to evaluate the compliance at its discretion.

Breach of Conduct

Any breach of conduct must be reported to the relative Company office in the region as soon as possible or to the Head Office at the following address:

Markdom Plastic Products
1220 Birchmount Road, M1P 2C6, Toronto

Markdom's Environmental Sustainability Policy

1. Purpose

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

2. Scope

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

3. Policy Statements

Resource Conservation

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

Waste Reduction and Recycling

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

Energy Efficiency

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

Emission Reduction

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

Sustainable Procurement

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

Environmental Compliance

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

Environmental Awareness

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

Reporting and Transparency

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

4. Responsibilities

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

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

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

5. Responsibilities

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

6. Policy Review

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

Markdom's Conflict of Minerals Policy

1. Purpose

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

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

2. Scope

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

3. Responsibilities

We prohibit human rights abuses associated with the extraction, transport or trade of minerals. We also prohibit any direct or indirect support to non-state armed groups or security forces that illegally control or tax mine sites, transport routes, trade points, or any upstream actors in the supply chain.

Similarly, we do not tolerate corruption, money-laundering and bribery. We require the parties in our supply chain to agree to follow the same principles and are working with our supply chain to improve the traceability of minerals and ensure responsible sourcing.

Suppliers who manufacture components, parts, or products containing tin, tantalum, tungsten, and/or gold must commit to only sourcing those materials from environmentally and socially responsible sources.

In order to comply with the rules and regulations promulgated by the U.S. Securities and Exchange Commission (“SEC”) under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, we will review our sourcing supply chain to identify any minerals that may qualify as “conflict minerals” under the SEC rules. Information will be requested from suppliers as appropriate.

4. Expectations

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

- We expect our suppliers to promptly, completely and accurately respond to our informational requests with respect to the production of such products, including by completing and delivering the Conflict-Free Sourcing Initiative Conflict Minerals Reporting Template or similar survey (the “Survey”) when asked to do so.
- We expect our suppliers to implement policies and management systems to support compliance with these expectations and require their upstream suppliers to adopt similar policies and systems.

- We expect our suppliers to cooperate in the event we determine that any further inquiry or due diligence is required or advisable with respect to the supply of 3TG in any such products.

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

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

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

5. Policy Review

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