

Ethics, Conduct and Confidentiality Policy

1. PURPOSE:

Establish a framework that defines the values by which Taghleef Industries Canada Inc. (TI), as an organization, and our employees in particular, must conduct themselves in our relationships with all stakeholders. The policy highlights the standards that all personnel must adopt. Taghleef Industries Inc. and its staff are fully committed to the principles of honesty, integrity, and fairness. All personnel must ensure that operations are handled in an open, fair, and impartial manner.

This policy does not aim to reflect all the different realities that its recipients may face. It does not replace our responsibility and accountability when it comes to exercising good judgment and seeking advice regarding appropriate conduct in our activities. We are encouraged to seek guidance and support from our immediate supervisors. It is the strength of our collective knowledge and the sharing of this knowledge and experiences that make our organization strong.

2. OBJECTIVES:

Although we conduct our activities within the framework of professional standards, laws, regulations, and internal policies in force, we also recognize that these do not govern all types of behavior. By defining our policy, our management team and all employees aim to align our behavior with the principles and values outlined in our mission and guiding vision and to adhere to them.

3. SCOPE:

This policy applies to all employees and managers, whether permanent, temporary, or contractual. It is also intended for all those whose interests are directly or indirectly involved in the company's activities. All employees are required to comply with it; it must be read and understood by everyone. Please note that the company may revise, add, or remove any portion of this policy at any time if deemed appropriate.

4. ETHICS, CONDUCT AND CONFIDENTIALITY POLICY

In accordance with our mission, vision, and guiding principles, we commit to respecting the following core values:

- Comply with Canadian laws, rules, and regulations related to our organization.
- Respect and protect proprietary and confidential information entrusted to each of us within the organization.
- Treat all colleagues, our members, and other parties with whom we do business with respect, dignity, fairness, and courtesy to create a healthy work environment where they contribute to the success of our organization and benefit directly from the results.
- Treat all stakeholders with respect and dignity.
- Adopt only business and sales practices that foster positive relationships with current and potential members, clients, and other stakeholders in the community.
- Collaborate with everyone respectfully and with dignity in all relationships we maintain.
- Make sincere and complete efforts in fulfilling our obligations.
- Take pride in the diversity of our workforce and view it as a competitive advantage to be cultivated and maintained.

- Comply with workplace safety and hygiene regulations to prevent and minimize occupational risks.
- Respect internal procedures and policies established by TI.
- Comply with this policy and support others in adhering to it.
- Respect and comply with applicable regulations based on the type of service or task involved.
- Respect both the letter and spirit of Canadian and Quebec laws related to our personal and professional activities.
- Recognize and demonstrate that I am an ambassador and representative of TI in my community and ensure I always project a positive and professional image OF TI.
- Assume responsibility for our decisions and actions.
- Employees must refrain from associating TI, directly or indirectly, with:
 - a) Any personal initiative, particularly those related to political activities.
 - b) Any stance reflecting personal opinions, especially on websites, blogs, or social media.

Safety and Health Practices

We are committed to providing a workplace free from injuries and illness, in compliance with all relevant laws and regulations that protect worker safety. All our employees must perform their work safely according to the standards established by TI.

Fair Competition

This policy prohibits any anti-competitive practices that could have the effect of limiting, restricting, or distorting competition, as well as any unfair competition practices. Consequently, our employees may not agree (formally or informally) with competitors to reduce prices or any other transaction conditions; limit or control production, marketing, technical development, or investment; manipulate or divide markets or sources of supply; participate in bid rigging or any other form of collusive tendering; restrict market access and freedom of competition for other companies; apply unequal conditions for equivalent performance to business partners, thereby creating a competitive disadvantage; or make the signing of contracts conditional upon acceptance of additional obligations that, by their nature or according to commercial usage, have no connection with the subject of those contracts. It is prohibited to engage in any act of unfair competition manifested by diverting TI clients by using relationships established with those clients during a previously held position within TI; dismissing or attracting TI collaborators to capture TI clients; or hiring TI employees with the intent to disrupt its operations. Likewise, our employees must not undertake actions that harm the legitimate interests of consumers or other operations in violation of competition law.

Financial disclosure

All transactions of Taghleef Industries Canada Inc. must be duly recorded in a manner that allows for the preparation of clear financial statements in accordance with generally accepted accounting principles. No false or misleading entries may be made in TI's books and records for any reason, and no employee may engage in any arrangement that results in such a prohibited act. From time to time, Taghleef Industries Canada Inc. may publish or communicate policies on financial information, disclosure, and compliance to reinforce the expectations regarding financial reporting outlined in this policy. All employees, regardless of their level, must implement and strictly follow these policies.

No undisclosed or unrecorded funds or assets may be created for any purpose whatsoever. No payment on behalf of TI (including cash) may be made without adequate supporting documentation or with the intention or understanding that any part of such payment will be used for purposes other than those described in the documents justifying the payment.

Conflict of interest

A conflict of interest arises when a colleague's private interests compete with or conflict with the interests of TI. Private interests include both financial and personal interests of the employee or those of their relationships, including family members and other close affiliates; personal friends; clubs and societies to which they belong; and any person to whom they owe a favor or have an obligation in any way.

Employees must avoid using their official position or any information made available to them in the course of their duties for their own benefit, that of their affiliates, or any other person with whom they have personal or social ties. They must avoid placing themselves in a position that could lead to an actual or perceived conflict of interest with Taghleef Industries Canada Inc.

Bribery, corruption and acceptance of advantages

It is prohibited to solicit or accept any advantage from any person having business relations with TI (e.g., clients, suppliers, contractors) for personal benefit. Employees who wish to accept any advantage from such people must seek advice and authorization from their immediate supervisor.

TI prohibits bribery and corruption in all forms: we neither offer nor accept bribes, whether directly or indirectly. We conduct all our activities in full compliance with all applicable laws. Failure to comply with these laws can seriously harm TI's business success and reputation and may result in civil and/or criminal liability for the Company and the individuals involved.

Any gift offered voluntarily to employees in their official capacity is considered a gift for TI and must not be accepted without authorization. By default, staff must refuse the offer if acceptance could be perceived as contrary to TI's interests or lead to complaints of bias or irregularity.

Under the law, it is prohibited for companies and individuals, including officers, directors, employees, agents, or anyone acting on their behalf, to bribe foreign officials to obtain or retain business.

Guidelines:

- We may not offer or accept gifts, meals, trips, or entertainment ("business courtesies") for or on behalf of TI unless they are consistent with ordinary and customary business practices and reasonable under the circumstances.
- We may only give or accept business gifts if they are appropriate for the occasion, tasteful, not provided regularly or frequently, and would not embarrass TI if publicly disclosed.
- Anyone providing such business courtesy for or on behalf of TI, or based on their relationship with TI, must ensure that these benefits are not given (in fact or appearance) with the expectation of receiving anything in return.
- In the case of any offer of business gifts to entities or government officials, the Group HR Manager must be informed in advance to ensure proper and current documentation that the gift or business courtesy complies with applicable laws.
- Transactions with government or foreign entities or officials must always be guided by strict compliance with applicable legal provisions, principles of transparency, honesty, and accuracy, as well as relevant procedures in place.

- Relationships with government officials are exclusively reserved for delegated and authorized department heads. In such transactions, we must never attempt to unduly influence government representatives, especially officials who handle or decide matters concerning TI's business transactions.

Prohibitions and restrictions:

- We do not offer or accept gifts or other business courtesies in cash or cash equivalents, except for customary tokens or gifts of modest value.
- We may not grant any business courtesy intended to influence a supplier, service provider, or other third party, or to obtain an undue advantage with these parties.
- We may never grant any business courtesy intended to facilitate government approvals or influence a government official or entity.
- We may not accept business courtesies if they could influence or be perceived as influencing TI's decision-making process.
- We must not solicit business courtesies from those doing business with TI and must never exchange business courtesies if doing so would violate any law or policy applicable to the other party in the transaction.

Respect for property, all company assets

Employees who have access to any property belonging to TI must ensure that it is properly used solely for the purpose of conducting TI's business. Misappropriation of property for personal use or resale is strictly prohibited.

Employees are not authorized to disclose classified or proprietary information to anyone without authorization. Employees who have access to or control such information must always provide adequate safeguards to prevent its misuse or fraudulent use. Examples of abuse include disclosing information in exchange for monetary rewards or using information for personal purposes. It should also be noted that unauthorized disclosure of any personal data may result in a violation of applicable privacy legislation. To the extent permitted by applicable law, TI reserves the right to monitor and review how its property is used by employees; it may therefore inspect all emails, data, and files stored on its network devices.

Compliance with trade laws and regulations

TI's business transactions may, due to their global nature, be subject to various trade laws and regulations. Consequently, TI may face severe criminal and civil penalties if it fails to comply with international trade laws and regulations.

We comply with all applicable laws governing the import, export, or transfer of products, information, technologies, and services, including licensing and customs requirements, to ensure full adherence to international trade regulations and avoid any legal or operational risks.

Reporting Issues and Policy Violations

We are encouraged to report and express our concerns in good faith, in a fair, honest, and respectful manner. Taghleef Industries Canada Inc. fully supports the protection of individuals against retaliation. There are different ways for us to speak up: talk to an immediate supervisor, another supervisor or manager, a superintendent, or Human Resources (450-652-3945 ext. 5282).

No one, regardless of their level or position, is authorized to ask an employee to violate the provisions of this policy. No employee may justify inappropriate conduct based on an order from a superior or ignorance of this policy.

Individuals who violate the policy will be subject to disciplinary measures that may lead, among other things, to dismissal. Disciplinary measures will also apply to anyone who orders or approves violations or is aware of them and does not take the necessary steps to correct them.

Any doubt that may arise regarding interpretation or application must be discussed with the immediate supervisor or the Human Resources department.

All complaints must be properly investigated. TI prohibits any retaliation against employees who report issues in good faith, while ensuring that the rights of the person implicated are also protected.

Confidentiality

We value and protect our confidential information and respect the confidential information of others. We observe strict confidentiality regarding all information concerning TI, as well as that of our clients, suppliers, or other business partners, in accordance with applicable confidentiality regulations and our internal policies. Similarly, employees must protect any confidential information they may have acquired during previous employment.

We cannot derive any direct or indirect, personal or material benefit from the use of confidential information. Communication of information to third parties must be carried out exclusively by authorized individuals and in compliance with TI's policies.

When communicating authorized information to third parties for professional reasons, we must explicitly state the confidential nature of the information and request that the third party also comply with all confidentiality requirements.

Regarding access to electronic information protected by passwords, such information may only be known by designated parties who must protect it and not disclose it.

We must comply with all applicable instructions, rules, procedures, and regulations related to data access and processing, including personal data. Likewise, we ensure that all employees receive proper instructions to guarantee lawful, correct, and secure data processing, including:

Processing carried out with electronic tools (e.g., passwords, antivirus, protection against malware, use of email, access control).

Processing carried out with non-electronic tools (e.g., archiving, record and document retention, shredding and/or destruction of paper).

5. TRAINING AND EVALUATION

All new employees will receive training in the ethics and conduct policy during orientation following their hiring.

This policy will be evaluated every three years or in the event of major legislative changes, to ensure that:

- The content of the policy remains relevant and reflects the reality of Taghleef Industries Canada Inc. and applicable laws.
- The implementation of the policy is adequate and respected.

Approval:

	Signature	Position	Date
Prepared by:	Ana Sartori	<i>HR manager</i>	2025-12-21
Reviewed by:	Marie Bikok	<i>HR generalist</i>	2026-01-14
Approved by:	Sundeep Mudgal	<i>General Manager</i>	2026-01-22

Review:

Date	Revision number	Modification and cause
2025-12-22	0	Translated French to English from <i>POL-RH-14 Politique d'éthique, conduite et confidentialité</i>
2026-01-14	1	Reviewed

Sundeep Mudgal
General Manager – Canada

Note: In this procedure, the masculine form is used solely to simplify the text and, where appropriate, includes the feminine form.