

## Introduction

At Dempsey Corporation, we are dedicated to maintaining the highest standards of integrity, transparency, and professionalism. This Code of Conduct outlines the principles that guide our behavior and decision-making processes, ensuring that we operate ethically and responsibly in all our business activities.

## Compliance with Laws and Regulations

Dempsey Corporation adheres to all applicable local, national, and international laws and regulations. Our operations are subject to regular audits by Health Canada, Transport Canada, SGS Canada, Intertek, and Responsible Distribution Canada. We expect all our employees and partners to understand and comply with the legal requirements relevant to their roles and responsibilities, ensuring that our operations are conducted within the framework of the law. This is done through regular internal training and awareness campaigns.

## Ethical Standards

Our company is built on a foundation of integrity. Employees must conduct themselves with honesty and integrity in all business dealings. We are committed to fairness and equity in our interactions with colleagues, customers, and business partners. We foster a respectful and inclusive workplace where diversity is valued and everyone is treated with dignity.

## Conflict of Interest

Employees are required to avoid situations where personal interests conflict, or appear to conflict, with the interests of Dempsey Corporation. Any potential conflicts must be disclosed to management immediately to ensure that our business decisions are made objectively and in the best interest of the company.

## Anti-Corruption and Bribery

Dempsey Corporation has a zero-tolerance policy towards bribery and corruption. Employees are prohibited from offering, giving, soliciting, or receiving any form of bribe or kickback. We are committed to conducting business with integrity and ensuring that our operations are free from corrupt practices.

## Health and Safety

We prioritize the health and safety of our employees, providing a safe working environment and promoting a culture of safety. Employees are expected to adhere to all health and safety regulations and report any hazards or incidents promptly. Our commitment to safety extends to all our operations and is integral to our business practices. Our safety practices are regularly reviewed and audited by external agencies, including Health Canada and Transport Canada.

### Environmental Responsibility

Dempsey Corporation is committed to minimizing our environmental impact through sustainable practices. We actively manage and reduce our environmental footprint by implementing responsible waste management, minimizing emissions, and conserving resources. Employees are encouraged to support initiatives that promote environmental stewardship. Our environmental practices are also audited by SGS Canada and Intertek to ensure compliance and continuous improvement.

### Fair Labor Practices

Dempsey Corporation strictly prohibits the use of forced labor, child labor, and any form of modern slavery. We comply with international labor standards and local labor laws to ensure fair treatment of all employees. Dempsey Corporation complies with Canada's Bill S-211 regarding forced and child labour in the supply chain. Our supplier evaluation and onboarding process includes rigorous checks to ensure compliance with these standards and regulations.

### Confidentiality and Data Protection

Protecting the confidentiality of Dempsey Corporation's information and the personal data of our employees, customers, and partners is paramount. Employees must handle sensitive information with care and are prohibited from unauthorized disclosure of such information.

### Social Media and Communication

Employees should use social media responsibly, ensuring that their online presence reflects the values of Dempsey Corporation. Confidential information and the company's reputation must be safeguarded at all times. We expect employees to communicate respectfully and professionally in all online interactions.

### Whistleblower Protection

Dempsey Corporation encourages employees to report any unethical behavior or violations of this Code of Conduct. We have established a Whistleblower Hotline, "Integrity Line," to provide a confidential and secure way to report concerns. We are committed to protecting whistleblowers from retaliation and ensuring that all reports are investigated thoroughly.

### Training and Awareness

We provide regular training to employees to ensure they understand and comply with this Code of Conduct. Continuous education on ethical standards and legal requirements is essential for maintaining our commitment to integrity. Employees are required to participate in training programs and stay informed about the latest developments in compliance and ethics.

## Code of Conduct

By adhering to this Code of Conduct, we ensure that Dempsey Corporation remains a trusted and ethical organization. All employees are expected to uphold these principles and contribute to our culture of integrity and respect. This commitment to ethical conduct is vital to our success and reputation as a leading company in our industry.

For any questions or clarifications regarding this Code of Conduct, please contact us at [info@dempseycorporation.com](mailto:info@dempseycorporation.com)