



ARRAY MARKETING CANADA INC.

Code of Conduct



Dear Colleagues:

Welcome to Array!

For over 35 years, Array Marketing Canada Inc. and Subsidiaries ("Array" or "Company") has demonstrated an unwavering commitment to performance and integrity, through each of us taking the right actions and making the right decisions every day. This Code of Conduct and Business Ethics (the "Code") provides a foundation for how we conduct ourselves as a company and as individuals representing the company. Every action we undertake reflects on us, our values and our character.

At our core, we are in business to earn a fair return for our shareholders, but we will not compromise on integrity. We must use our company's assets wisely and we must deliver on our promises to our customers, our partners and our people. These are the ethics that guide our conduct and decisions.

This Code is your guide for ensuring that Array conducts business with integrity consistent with sound business practices and fostering relationships of trust with its employees, commercial partners, shareholders and government authorities. Our conduct impacts our reputation, public confidence in our business and our financial strength.

Please read the Code carefully and spend some time thinking about your personal commitment to do the right thing every day. Array has earned an excellent reputation for how we do business. As Array employees, it is our responsibility to preserve that reputation through our integrity, honesty and respect for others.

Sincerely,

A handwritten signature in blue ink that reads "Anthony J. Gosse".

Tony Gosse
Chief Executive Officer



ENTERED INTO FORCE

Dec 2016

Updated January 2022, reviewed April 2025

PURPOSE AND SCOPE

We all are responsible for promoting, monitoring and implementing the Code. You should avoid acting or encouraging others to act contrary to this Code, even if such deviations under the circumstances may appear to be in Array's financial interest. Each day you will face and make decisions that are critical to our success. The Code is a practical reference that can help guide you in making good decisions. You should read it carefully, make sure you understand its contents and exercise good judgment consistent with this Code in your daily work. You should also reference Array's policies, procedures, and work rules before making decisions.

Adherence to this Code is a condition of your employment and/or contractual relationship and therefore you must sign and return the Acknowledgment Form to the Human Resources Department. The Acknowledgment Form is a separate form in the back of this Code. Array has the right to change this Code at any time and will inform you of such changes. Any amendments or waivers will be publicly disclosed if required by law or stock exchange regulations.

This Code applies to Array and its direct or indirect subsidiaries and controlled affiliates, (collectively "Company") and their directors, officers, full and part time and temporary employees, and all contractors no matter of the legal basis of the relationship worldwide. As to non-controlled entities, Array will use reasonable efforts to encourage such entities to implement a code of conduct substantially similar to this Code or at least adhere to the spirit of the Code, and failing that, the situation should be reported to assess the continuation or termination of such relationship. External third parties representing Company, including but not limited to sales agents and representatives, joint ventures and vendors, ("External Intermediaries") should also be made to comply with relevant aspects of our compliance policies, and employees working with them must include contractual obligations to comply, provide education and information about policy requirements and take action including terminating a relationship after learning that a third party failed to abide by applicable Company policies. While these are minimum standards, each affiliate may within its local jurisdiction and consistent with local laws, adopt more specific guidelines that shall be binding on those in that jurisdiction. Such special revisions should be referred to Array's Financial Officer (CFO), for review prior to implementation.

Any waiver of the Code for Executive Officers or directors requires the prior written approval of Array's Board of Directors.

RESPONSIBILITIES

Leaders, Managers and Supervisors must create a culture of compliance in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation; encourage ethical conduct and compliance with the law by personally leading compliance efforts; consider compliance efforts when evaluating and rewarding employees; and ensure that employees understand that business results are never more important than ethical conduct and compliance with Array policies. You are expected to **prevent, detect and respond to compliance issues**:

PREVENT	DETECT	RESPOND
Identify business compliance risks	Implement control measures, such as “dashboards” and “scorecards,” to detect heightened compliance risks and/or violations	Take prompt corrective action to fix identified compliance weaknesses
Ensure that processes, tailored to address your particular risk areas, are communicated and implemented	Promote an effective ombudsperson system/Integrity Helpline/ Online Whistleblower Form	Take appropriate disciplinary action
Provide education on policies and applicable law to employees and (where appropriate) board members and third parties	Ensure that periodic compliance reviews are conducted, with the assistance of business compliance leaders and/or the Corporate Audit Staff	Consult with your department lead, a senior finance leader, a Senior HR leader, the Director of Sustainability & Risk Management, the Array's Attorney-at-law or Commission of Ethics and make appropriate disclosures to regulators and law enforcement authorities
Commit adequate resources to the compliance program		

Employees are expected to contribute to Array's culture of compliance by understanding Array's policies, embracing Array's commitment to integrity and acting to enforce compliance and avoid violations. You should understand policies and raise concerns.

RAISE YOUR VOICE

This Code cannot give you an answer for every situation, but it does provide a number of resources to help you deal with ethical and compliance related questions and guide you through the most difficult business issues and dilemmas. But the answers to some problems may not be obvious. Take the extra time to think things through before you act.

Ask Questions

Asking yourself these questions can help you make good, ethical decisions consistent with the principles set forth in this Code:

- Do I have all the relevant facts, and have I reviewed them carefully?
- Is it legal?
- Is it consistent with the Code?
- Have I used the resources available to me?
- Have I considered all the issues and thought carefully about my options?
- Have I considered the consequences of my choices?
- If it appeared in the news, would it reflect well on the Company?
- Will my decision stand the test of time?

If you are still not sure what to do, **seek guidance and approval** when required from

- Your supervisor or manager
- Senior finance leader
- The Human Resources Department
- The Director of Sustainability & Risk Management
- The Finance or Internal Audit Department
- Array's Attorney-at-law
- Ethics Committee (if locally exists),
- The Array Intranet, where you'll find our policies and procedures,
- The Array Integrity Helpline,
- Online Whistleblower Form,
- other accepted way of raising employment issues

UNDERSTAND	RAISE CONCERNS
Gain a basic understanding of the policy requirements summarized in this booklet	Promptly raise any concerns about potential violations of any Array policy
Learn the details of policies relevant to your job and take the training required for your job	Understand the different channels for raising integrity concerns: Integrity Helpline, Online Whistleblower Form, Commission of Ethics, manager, HR, lawyer, auditor or other compliance resource
Check the Array Intranet site for the complete and up-to-date policies	If a concern you raise is not resolved, pursue the issue! Raise it through another of Array's channels
Go to your Manager, Human Resources (HR), Chief Financial Officer (CFO) or other Array resources with any questions about the policies	Cooperate in Array investigations related to integrity concerns

Duty to Raise Integrity Concerns

Raising an integrity concern protects the Company, our colleagues and other stakeholders. You are responsible to report in good faith any and all actual or potential violations of laws, regulations, policies, procedures or this Code (“Reportable Items”), including and especially complaints as to accounting or auditing irregularities or fraud and corruption. Raise concerns early before they get worse. You may report issues as noted above to your supervisor or manager, Human Resources, or General Counsel and others. If you are not comfortable reporting an issue to your immediate supervisor or manager, or you believe your supervisor or manager has improperly dealt with the issue, you may ask a question or raise a concern through the Online Whistleblower Form or Array Integrity Helpline 24 hours a day, 7 days a week via calling one of the toll-free numbers listed below.

Integrity Helpline Toll-Free Numbers

Country	Phone Number
Canada	1-800-661-9675
U.S.A	1-800-661-9675
Mexico	0-1-800-062-2572
China	00-1-80033881766
Hong Kong	001-80033881766
Singapore	001-80033881766
Poland	00-80033881766
United Kingdom	1-800-661-9675
Germany	00-80033881766
France	001-80033881766

You may remain anonymous, but if you identify yourself, we are able to provide feedback. Your identity and information you provide will be shared only on a “need-to-know” basis with those responsible for resolving concerns.

All questions received by Integrity Helpline, Online Whistleblower Form will be promptly forwarded to the most suitable functional area within the Company for resolution. All Online Whistleblower Form are confidential, will not be traced, and will be resolved promptly. We will protect the identity of anyone who makes a good faith inquiry consistent with our legal obligations, and local laws and regulations.

Investigations

Every report to the Integrity Helpline, Online Whistleblower Form is handled promptly, discreetly, and professionally. We treat seriously all reports made in good faith and will investigate them – promptly and in confidence – and resolve them appropriately. When reporting a concern, you may be asked to provide the time, location, names of the people involved, and other details so that we can investigate your concerns.

No Retaliation

Array will not retaliate against any person who in good faith raises an ethics or compliance issue through proper channels. Individuals who raise concerns or who help us resolve reported matters are protected against retaliation. Anyone who uses the Integrity Helpline, Online Whistleblower Form or other means to spread falsehoods, threaten others, or damage another's reputation will be subject to disciplinary action.

Discouraging other employees from making a report or getting the help they need is prohibited and could result in disciplinary action.

Disciplinary Action

Violations of laws, regulations, this Code, or our policies and procedures can have severe consequences for you and for Array. Some violations may be criminal in nature and punishable by fine or imprisonment. Violations can jeopardize our relationships with our customers and suppliers and could result in loss of the privilege to do business in the countries where we operate. If you authorize, direct, cover-up or in any way participate in any such violations, you will be subject to appropriate disciplinary action, which may include dismissal or termination, reimbursement to Array for any losses or damages resulting from the violation, and civil and/or criminal liability. Also, Array may as appropriate implement system-wide changes and/or notify the relevant governmental office or agency.

Guiding Integrity Principles

Review and apply the seven guideposts below when analyzing business issues that may arise during your work:

1. Obey the law
2. Avoid Conflicts of Interest
3. Keep accurate and honest records
4. Honor business obligations
5. Treat people with dignity and respect
6. Protect Company information, assets and interests
7. Commit to be a responsible global citizen

These seemingly simple principles that encourage responsible conduct, integrity and sound business practices are often challenging to apply in the business context. The Code provides practical guidance for many situations, but it is not a substitute for common sense and good judgment. When faced with an issue and unable to find an immediate answer in the Code, stop and think about your proposed action, discuss it with a manager or other colleagues.

1. OBEY THE LAW

A. Generally

- 1) Array is a global business, headquartered in Canada. It is Array's policy to observe and adhere to all applicable laws and regulations wherever we do business, without waivers or exceptions in the name of competitive demands, social traditions, or other exigencies, except as permitted or required by law.
- 2) Where local laws are less restrictive than this Code, you must comply with the Code, even if your conduct would otherwise be legal. On the other hand, if local laws are more restrictive than the Code, you must always, at a minimum, comply with those laws.
- 3) Outside of your home country, you may encounter unfamiliar rules, regulations, business customs, manners, and cultures. Become familiar with other countries' laws, regulations, and commercial practices as they pertain to your activities. If you are unsure, or if a conflict arises as to the laws of two or more countries, contact department lead, a senior finance

leader, a Senior HR leader, the Director of Sustainability & Risk Management, the Array's Attorney-at-law or Commission of Ethics for assistance.

- 4) If unclear about the application of the law to specific responsibilities or circumstances, or unsure about the legality or integrity of a particular course of action, seek the advice of the people mentioned in the point 3) above. Employees, officers and directors will be held personally responsible for improper or illegal acts committed by them during their employment with Array. It is your duty to understand the laws applicable to your job responsibilities and to comply with both the spirit and the letter of those laws, avoiding not only actual misconduct but also the appearance of impropriety.
- 5) Whenever the Company is precluded from doing something directly, we cannot allow a third party to engage in that same conduct on Array's behalf. For that reason, all External Intermediaries are expected to comply with applicable laws and regulations, and standards outlined in this Code. If you have any doubt or concerns about whether an External Intermediary may violate the law, you must resolve the concerns before proceeding.
- 6) There are potentially severe consequences for Array and its officers, directors, employees and third parties for failure to comply with applicable laws, either directly or indirectly. Violations of law can result in civil or criminal penalties for Array and/or its officers, directors, employees or third parties, including fines, imprisonment and/or the denial of the privilege to participate in certain areas of business.

B. Improper Payments (Anti-bribery and Anti-Corruption)

- 1) You should never offer, promise, authorize, make, solicit or accept bribes, kickbacks or other improper payments, regardless of local practice or perceived customs. This applies to any persons, whether in the private or public sector. Bribery is illegal in the places where we do business. Even the appearance of impropriety can damage Array's reputation.
- 2) A bribe is simply giving or offering to give something of value, including hospitality and gifts, commissions, credits, favors, employment offers, gift cards, etc., directly or indirectly, to someone in exchange for improperly getting or keeping business or for any other improper business advantage. Such business advantages may include, for example, the timely or expedited performance of any official duty or action, or to ward off or postpone decisions of matters negatively affecting the Company.
- 3) **Hospitality.** Never give or receive extravagant meals, gifts or entertainment; values should always be reasonable and modest and consistent with our internal limits. Such gifts should be given and received in a transparent manner appropriate to the business relationship. All hospitality expenses must be recorded in all instances identifying the recipient name, title, organization, business purpose and date, all attendees and any other pertinent data.
- 4) **Government officials.** Interactions with government officials present heightened corruption risk and require special attention.¹ Never enter into any transaction with any

1) Government officials include any elected or appointed official (executive, legislative or judicial) of a local, state, provincial, regional or national government; any government employee, part-time government worker, unpaid government worker, or anyone empowered to act on behalf of a government (e.g., customs officer for shipments); any political party, party official, or candidate for political office; any official or employee of a public international organization such as the World Bank or United Nations; and any official, representative, or employee of a company that is under even partial ownership or control by a government, e.g. State Owned Enterprises ("SOEs"). This means that all employees of government-owned companies and instrumentalities are officials for purposes of the Code, even if the companies are operated like privately owned corporations. Rules for government officials are more stringent, usually with significantly lower limits or even a prohibition on the receipt of any hospitality and gifts.

government official (or one of their immediate family members) to perform legal, consulting, or other services related to a matter within the scope of his/her official duties or the duties and/or the responsibilities of the government body by which s/he is employed. Any other contracts or other arrangements with a government official, (or one of their immediate family members), even if not related to the scope of his/her official duties, must have the department lead, a senior finance leader, a Senior HR leader, the Director of Sustainability & Risk Management, the Array's Attorney-at-law or Commission of Ethics prior written approval.

- 5) **No Facilitation Payments.** You may encounter government officials in various areas of Array's business, such as permitting and licensing, customs and exports, sales, taxes, and interactions with SOEs. Array does not authorize facilitation payments, i.e. small payments to government officials to expedite or secure a non-discretionary routine governmental action, even if only ministerial or clerical duties. For example, you may not agree to a customs clerk's request for a small payment or gift to avoid holding up our goods from clearing customs timely.
- 6) **Political and charitable contributions.** Do not contribute any company funds or other company assets directly or indirectly to any political party or to the campaign for or against any candidate for political office, or to a charity that is affiliated with a government official.
- 7) **Third party due diligence. Array employees, officers and directors are responsible for the actions of External Intermediaries.** Third parties who act on Array's behalf should be selected cautiously. Efforts should be made to ensure that **they uphold Array's standards, adhere fully to the law, and safeguard Array's reputation.**

C. **Money Laundering Prevention**

Array is committed to preventing its operations from being used for money laundering and terrorist financing (hereafter commonly referred to as money laundering). In order to ensure that Array does not enter into a transaction that may trigger the application of anti-money laundering laws, you may not accept nor render any cash payment for any services rendered or products sold. For further guidance on the Company's requirements to prevent money laundering, please refer to the section on Restricted Parties for guidance in relation to customers and suppliers and the Company's procedures for conducting third party due diligence. You should report suspicious or unusual payment activity to your manager, financial leader, Chief Financial Officer or Ethics Committee.

D. **Antitrust, Sales Practices and Competitive Information**

- 1) Antitrust and competition laws prohibit agreements that eliminate, diminish or discourage competition. For example, agreements among competitors, whether written or oral, which relate to prices are illegal. Array is committed to fair and competitive sales practices, and to upholding all applicable antitrust laws. Array engages in transactions based on quality, service, price, suitability and similar and lawful factors.
- 2) You may violate antitrust laws even in the absence of a formal agreement. Under certain circumstances, an agreement may be inferred from conduct, such as the exchange of price information, and from communications among competitors even without an express understanding. Exchanges of some price information are permitted in certain limited circumstances, and you should seek your manager, financial leader, Chief Financial Officer or Ethics Committee guidance when in doubt.

- 3) Communications between competitors concerning problems with any customer or supplier may violate antitrust laws and should be avoided.

E. Third Party Competitive Information and Intellectual Property

- 1) Properly gathered business information is valuable. However, you should only gather information about our competitors from public sources that are freely available to others. Never spy or steal in order to obtain competitive information. Seek advice if you think someone is giving you confidential information that you should not have. Unless disclosure is authorized, protect all commercially sensitive information that you obtain through your work.
- 2) Never obtain or use any outside individuals' or companies' intellectual property or confidential information illegally or unethically. Intellectual property includes patents, copyrights, trademarks and trade secrets and other confidential information and know-how.
- 3) When you obtain information legally and pursuant to a confidentiality agreement, you must make sure that everyone complies with all restrictions as to its use.

F. Exports of Goods, Technology, and Services

The United States and many other countries, including EU member countries, Japan and Australia, maintain laws that govern the transfer of goods, technology, and services. Prior to exporting or re-exporting goods, technology, or services, you must determine whether your activity is subject to these export control laws, and in particular whether it requires a license from a government agency. If you do not know whether your activity is subject to export control laws and/or requires a license, contact your manager, or the Ethics Committee.

G. Restricted Countries and Parties

- 1) **Restricted Countries.** Canada, the United States, and many other countries, including the EU member countries, Japan and Australia, maintain laws that restrict Array's dealings with certain countries, entities, and individuals. Prior to engaging in business, you must ensure that your planned activity does not involve "Restricted Countries". For a full list of restricted countries related to Canada please visit the Global Canadian Affairs website http://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/types.aspx?lang=eng. This is a fluid area that may change without notice, so please consult your manager, financial leader, Chief Financial Officer or Commission of Ethics for guidance. Currently, as of Nov 2020, the United States maintains economic sanctions laws that may prohibit Array from engaging in nearly all activities involving a list of few countries. The foregoing countries are referred to collectively as "Restricted Countries". For a full list of the restricted countries in US please visit the US Department of the Treasury's website: <https://www.treasury.gov/resource-center/sanctions/programs/pages/programs.aspx>. The list of restricted countries and/or third parties is published also by European Commission on a following website: <https://sanctionsmap.eu/#/main>. Employees and External Intermediaries should never engage directly or indirectly in business with, or with citizens of, Restricted Countries without first contacting your manager, financial leader, Chief Financial Officer or Commission of Ethics.
- 2) **Restricted Parties.** The United States also maintains economic sanctions laws that restrict dealings with various individuals and entities located around the world, such as certain

government officials, government agencies, and state-owned entities, and terrorists and drug traffickers. These individuals and entities are designated on lists maintained by the U.S. Department of Commerce, U.S. Department of State, and U.S. Department of Treasury. Canada and the EU maintain similar lists. Individuals and entities designated on these lists are referred to collectively as “Restricted Parties.” Prior to entering into relationships with new customers, suppliers, and External Intermediaries, Array requires that all such parties, and their controlling shareholders, and any other parties to the transactions, e.g. banks, distributors, are screened to confirm that none are Restricted Parties. If you have questions about whether a customer, supplier, or External Intermediary should be screened, contact your manager, financial leader, Chief Financial Officer or Commission of Ethics.

2. AVOID CONFLICTS OF INTEREST

- A. You must devote professional attention to the interests of Array and its customers above your own personal interests or interests of others. **A conflict of interest exists when an individual's personal interest or position in a transaction or situation interferes or has the potential to interfere in any way with the interests of Array.** You should base business decisions on the Company's needs, rather than your own interests, the interests of family or friends, or your desire for personal gain.
- B. **Personal Business Relationships. You and your immediate family (defined as spouse, partner, child, grandparent,** father/mother, brother/sister, son/daughter, mother/father-in-law, brother/sister-in-law, son/daughter-in-law, grandchild, stepparent and stepchild), **should** avoid volunteering or accepting outside employment with, borrowing from or lending funds to, or acquiring or maintaining a direct or indirect ownership interest in any business enterprise of a competitor, customer, or supplier of goods, services or credit to the Company.
- C. **Company Opportunities.** Business opportunities are company assets, and any business opportunities that you discover or work on while using company resources belong to Array. It is your duty and responsibility to advance Array's legitimate business interests whenever you have the chance to do so. Avoid taking personal advantage of an opportunity that you learned of through your job.
- D. **Disclose conflicts. Employees and External Intermediaries must promptly disclose and discuss any potential conflict of interest with, in the first instance, their supervisor and Human Resources, to determine steps to avoid creating any actual conflict of interest or the appearance of one. If disclosing to a supervisor is not practical or effective in the circumstances, then disclosure shall be made to and approval sought from** your manager, financial leader, Chief Financial Officer or Commission of Ethics. **You also have an immediate duty to disclose to** your manager, financial leader, Chief Financial Officer or Commission of Ethics **any positions that your immediate family members hold in a public authority or state-owned enterprise. Failure to disclose or obtain required approval shall subject you to termination of your association with Array.**

3. KEEP ACCURATE, COMPLETE, AND HONEST RECORDS

A. Creating and Managing Business Records

- 1) All communications that you generate or receive that are related to your job or Array's business should be considered business records, including emails, phone calls and notes, expense reports, time sheets, memoranda, contracts, etc. You are responsible for maintaining necessary records related to Array's business. These should always be complete and truthful since Array relies upon their accuracy to make required reporting to shareholders and appropriate regulatory entities.
- 2) All business records must always reflect the true nature of transactions and events. Never intentionally falsify a record or try to disguise what actually happened and avoid unnecessary exaggeration, colorful language and legal conclusions. It is always possible for business records to become public through litigation, media, investigations, etc.
- 3) Maintain all records for seven (7) years, or otherwise in accordance with Array's document retention policy and practice or local laws. You will be notified if for legal reasons you are required to keep records for a longer period. Even absent any notification, it is never permitted to destroy records related to pending, threatened or anticipated litigation. This could expose you and the Company to severe penalties.

B. Financial Statements and Controls

- 1) Shareholders, creditors and other stakeholders rely upon the accuracy of our financial information. We use it to prepare government returns, tax filings, price our products and services and other performance measurements. Array complies with International Financial Reporting Standards ("IFRS") and all applicable tax and other financial reporting laws. Array maintains books and records in accordance with the laws of the relevant jurisdiction where our offices are located.
- 2) Array is committed to transparency and accuracy in all dealings while respecting privacy and confidentiality obligations. For financial and tax purposes, you should ensure that information recorded and provided is timely, complete and fair, and accurately reflects in reasonable detail Array's assets, liabilities, revenue and expenses and all other pertinent transactions. Do not for any reason make false, artificial, misleading or misstated entries in any of Array's books, records or financial statements or engage in any arrangement that results in such prohibited acts. You are responsible for recording all transactions accurately and to follow all accounting procedures. Ensure that all financial entries reflect the real nature and purpose of the transaction reported, and never use corporate funds, assets, services or facilities except as described by the documents supporting the use in question.
- 3) Do not make or receive payments without adequate supporting documentation or establish or maintain undisclosed or unrecorded funds or assets ("off the books") for any purpose. Never agree to falsify invoices or pay expenses that are unusual, excessive, inadequately described, insufficiently documented, or that otherwise raise questions.

4. HONOR BUSINESS OBLIGATIONS

- A. Relationships between Array and its customers and suppliers are founded on the principles of fairness, loyalty and mutual respect.** Our business relationships are a key to our enduring success. We communicate honestly, respect information entrusted to us and stand behind our commitments. **Array shall not misrepresent material facts in order to gain a personal or business advantage.**

- B. **Customers.** You should make only commitments that Array can keep. Think before you promise and do not over commit to something that Array cannot deliver. If Array is at risk of not being able to meet a commitment, work with the affected counterparty to find a solution and next steps. Accurately record all performance criteria required by the customer.
- C. **Suppliers, Sales Representatives and Consultants.** You should select our suppliers, sales representatives and other consultants based on objective criteria such as Price, Quality, Reputation, Prior Performance and Corporate Social Responsibilities Performance. **Array** requires competitive bids where appropriate, and you should fairly evaluate all proposals for work, and conduct appropriate due diligence.
- D. **Data Privacy.** You must protect information and personal data you learn about customers and others including External Intermediaries and other natural persons as Array protects its own and at least in accordance with local laws and regulations regarding data privacy and personal data protection.

5. TREAT PEOPLE WITH DIGNITY AND RESPECT

- A. **Diversity and Equal Employment Opportunity.** Our success depends in great part on our work environment. Array supports a positive environment in which all individuals may grow, contribute, and participate free from discrimination. We value our diversity, reaping unique contributions from everyone, allowing each to strive for their own individual potential. Array does not discriminate on the bases of gender, local custom, race, creed, color, nationality, ethnic origin, social group, age, marital status, disability, religion, political affiliation, connection with a national minority, sexual orientation, political opinion or socioeconomic status. Array is committed to legally compliant human resource policies and practices in all aspects of employment, including: recruiting, hiring, evaluation, training, discipline, work and service assignments, career development, compensation, promotion, and termination.
- B. **No Harassment.** Harassment is behavior that disrupts another employee in his or her work because of the person's race, color, religion, sex, pregnancy, national origin, disability, age, veteran status, sexual orientation, gender identity, or other protected status. "Workplace harassment" means engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome regardless of protected status. Each of us has the right to be free from improper or offensive conduct at work. Unwelcome, insulting, or offensive remarks or actions have no place at our company, either while on premises or attending work functions off premises.
- C. **Drug Free Work Place.** You should conduct your work while free from the influence of controlled substances, including alcohol and drugs. Their misuse can endanger your or someone else's safety, health and productivity, and possibly compromise the safety of our products and services. You should report all known or suspected violations of this policy to your supervisor or manager, or Human Resources.
- D. **No workplace violence.** We do not tolerate violent behavior or threats of same at any workplace, whether committed by or against our employees. The following conduct is prohibited: making threatening remarks, causing physical injury to someone else, intentionally damaging someone else's property, or acting aggressively in a way that causes someone else to fear injury. Weapons are generally prohibited on Company premises or while at Company activities.

6. PROTECT COMPANY RESOURCES

- A. Protect Company and other Stakeholders' resources and assets within your control or supervision from loss, theft, or misuse, and use available means to protect these assets at all times and guard against waste and abuse. Do not remove Company assets from premises unless properly authorized for a clear business purpose.
- B. Use Company resources for company use only, unless otherwise authorized in writing. Never use Array resources for personal gain or illegal or unethical activities. Limit personal use of email, texts, Internet, phone and other communication systems. Where permitted by local laws and regulations, Array may exercise its rights to inspect its property, electronic communications, and all other resources and assets that are in your possession.
- C. You must notify Array's Human Resources or Commission of Ethics immediately if you learn about any inspection, investigation, or request for information from any outside organization and seek guidance prior to communicating with any such persons. During an inspection, never destroy or alter any documents, lie to or mislead an inspector, or obstruct the collection of information.
- D. **Media Inquiries.** We are very thoughtful about what we say when releasing information publicly. In order to ensure a coordinated interface with external parties, all external inquiries about Array or its business or employees, including all media inquiries, shall be directed to the Human Resources
- E. **Social Media.** Array treats its image and reputation as very important assets. While using social media such as Facebook, LinkedIn, Twitter, Pinterest, blogs, photo and video sharing websites (YouTube, Flickr, etc.), wikis and discussion forums, you should use precaution. Only duly authorized employees may speak on the company's behalf or post information, images, comments, etc., in connection with the company on social media. Before posting any picture or information including coworkers, always ask their permission and ensure that the information does not represent any risk of being interpreted in a way that may harm the Company's or our colleagues' image.
- F. **Intellectual Property and Confidential Information**
 - 1) **Intellectual Property is one of Array's most valuable assets.** This includes copyrights, patents, trade secrets, trademarks, ideas, inventions, source codes and processes and know-how. We respect and protect intellectual property, whether it belongs to us or to others. Array owns all Intellectual Property and other confidential information created by employees on the job and/ or produced using Company resources. As a condition of employment, you may be requested to execute a transfer of proprietary rights granting Array all such ownership rights.
 - 2) Do not reproduce, distribute, or alter copyrighted material without permission of the copyright owner or its authorized agents. This includes photocopying and distribution of copyrighted materials (articles, treatises, etc.), including computer software used in connection with Company business. Using unlicensed software may constitute copyright infringement.
 - 3) **Confidential information is information that a person would consider private, i.e., that which is not common knowledge outside Array. Confidential information includes Intellectual Property and all non-public information that might be of use to competitors or harmful to Array or its customers, suppliers or other business associates or any of**

Array's External Intermediaries if disclosed. Examples are: financial results, investment strategies and opportunities, business plans and forecasts, employees' files, new products or services and strategic initiatives. Confidential information can be in any medium or format and can be generated by Array or third parties. Much of Array's business information is confidential or proprietary and must be protected against intentional or inadvertent disclosure to unauthorized persons. You executed a Nondisclosure Agreement as a condition of your employment that requires you to keep all such information in confidence and never (during your employment or after) make unauthorized disclosure or remove confidential information from Company premises unless consistent with your duties to the Company.

- 4) Maintain Array's systems integrity and never share your passwords or otherwise provide unauthorized access to Array resources.

- G. **Never Misuse Inside Information.** You may learn of material information related to Array or other companies before the general public knows about such information. This type of information is called "insider" information. You may not buy or sell stock based on such insider information or pass insider information on to someone else who then buys or sells stock, until this information has been publicly released. These rules also apply to more complex transactions including options, puts and calls, and techniques such as selling short. The best way to know if information is public is to see it in the newspaper or on television.

7. BE A RESPONSIBLE GLOBAL CITIZEN

- A. **Human Rights.** We respect human rights and have zero tolerance for child and illegal, abusive and all forms of forced or compulsory labor and human trafficking anywhere in our operations or supply chain. We do not employ anyone under the age of 15. We follow all applicable employment laws and pay competitive wages and benefits. Our employees have the rights to freedom of association.
- B. **Security & Crisis Management.** We can no longer avoid the possibility of terrorist threats and the need to protect the security of our people, workplaces, information and businesses. Every site should implement a rigorous and comprehensive security and crisis management (SCM) plan, which also addresses cybersecurity and incident response plans, business continuity and crisis management. Obviously, we will not engage in business with terrorists or those who support terrorist activities.
- C. **Environmental, Health and Safety ("EHS") Standards**
 - 1) Array is committed to conducting its activities in compliance with the highest level of environmental, health and safety standards in its processes, facilities, and services, paying particular attention to protecting the safety of employees and other stakeholders. We provide a safe work environment and comply with all applicable health and safety standards for our industry and operations. We encourage you to make suggestions on how to improve our methods for safety, recycling and waste disposal. Employees should also protect themselves and others while in the facilities and ask any questions and report any incidents of unsafe practices or accidents they witness to their immediate supervisor and the Director, Sustainability & Risk Management or the Director, Human Resources or Commission of Ethics identified below.
 - 2) Additionally, Array strives to reduce our operations' environmental impact and conserve

natural resources in each of our locations. Prior to any major business operation change, e.g. acquiring a facility, we evaluate the environmental impact and obtain all requisite permits and approvals.

- 3) If you have any doubt whether your or someone else's actions comply with the applicable safety and environmental regulations, you must consult the Director, Sustainability & Risk Management or Director, Human Resources, Commission of Ethics and your immediate supervisor and await their authorization prior to any further actions. In extreme cases when that is not practical, consult with the CO for advice.
- 4) Report any suspected violations to the Director, Sustainability & Risk Management or the Director, Human Resources or Commission of Ethics:

Komisja Etyki

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Dział HR Polska

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E-mail: hr_poland@willson-brown.com

Human Resources Department

45 Progress Ave, Toronto ON M1P 2Y6

Phone: 416-299-4865, Director, Sustainability and Risk Management can be reached at ext. 135 and, Director, Human Resources can be reached at ext. 122

E-mail: hrto@arraymarketing.com

- D. **Conflict Minerals.** Array is committed to sourcing metals, minerals, ores and concentrates from responsible and conflict free sources. These include but are not limited to tin, tantalum, tungsten, gold, and/or their derivatives. Array will not knowingly deal in minerals or derivatives that may be considered to finance the conflict in the Democratic Republic of the Congo or adjoining countries. In order to improve the transparency and integrity of Array's supply chain, each potential source should undergo good faith inquiry, including among other items the pricing of materials, location of supplier, purity/quality of materials, to determine their level of commitment to eradicating conflict minerals.