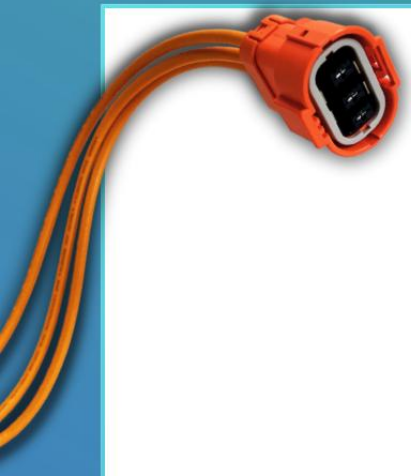

# CORPORATE SOCIAL RESPONSIBILITY

Revision: 5

Electrical Components International

PROMARK ÉLECTRONIQUES | ELECTRONICS

PRO EV™

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# Overview

This policy applies to all employees, contractors, and vendors. It is reviewed annually and aligns with federal and provincial law.

# 1. Mission

Promark Electronics, a manufacturer of electronic interconnect products since 1987, strives to work in partnership with our customers and team members to understand their challenges and solve them. Using technology, we are constantly innovating, driving value for our customers, and empowering our team to provide a meaningful contribution to our business.

Promark is also committed to aligning with our parent company, ECI, in upholding the highest standards of safety, integrity, empathy, and accountability. No business result is ever worth compromising the well-being of our employees, customers, or communities.

# 2. Values

**INNOVATION & EXCELLENCE**

We embrace new ideas and technologies to deliver the highest quality solutions

**PARTNERSHIP & CUSTOMER FOCUS**

We work hand-in-hand with our customers and partners, creating value and shared success

**INTEGRITY & ACCOUNTABILITY**

We do the right thing, take responsibility for our actions, and build trust through transparency

**SAFETY & WELL-BEING**

We never compromise on the health, safety, dignity and well-being or our people

**TEAMWORK, DIVERSITY & EMPATHY**

We value different perspectives, support one another and foster an inclusive, respectful culture

# 3. Ethics and Compliance Overview

Promark strives to uphold the highest standards of integrity in all it does and is committed to full compliance with applicable laws, rules and regulations. Practices accepted in other industries may not be accepted or lawful in ours.  Employees are expected to know and comply with applicable standards.

Promark provides a work environment that encourages employees to openly communicate with their manager and HR, without fear of retaliation. Retaliation against any employee who seeks advice, raises concerns or reports misconduct, is prohibited and will not be tolerated.

Leaders have an enhanced duty to model ethical behavior, create a culture of respect, and ensure issues are escalated appropriately.

# 4. Reporting concerns and Ethics Helpline

Employees have an obligation to seek advice when needed, raise concerns and report suspected or known violations of law, regulation or Company policy. You may report to your manager, HR or anonymously through the Ethics Helpline.

Helpline Contact : 24/7 confidential access at
1 800 235 6302
http://www.eciethicshelpline.com/

Reports will always be investigated promptly and fairly. No tolerance for retaliation. Leaders must respond respectfully, protect confidentiality and escalate all issues.

# 5. Diversity, Equity and Inclusion

Promark actively promotes diversity in its hiring and career development practices. The company is committed to equitable treatment and removing systemic barriers to advancement.

# 6. Environment

It is the policy of Promark to conduct its operations in a manner that is environmentally responsible and befitting of a good corporate neighbor and citizen. In accordance with this policy, Promark complies with all environmental laws and manages all phases of its business in a manner that minimizes the impact of its operations on the environment. To further this policy, Promark shall:

Comply with applicable environmental laws and regulations and voluntary commitments to which the facility subscribes.

Eliminate, or reduce to the maximum practical extent, the release of contaminants into the environment, first through pollution prevention (material substitution and source reduction), then recycling, and finally through treatment and control technologies.

Effectively communicate with facility employees, suppliers, regulators, and customers, as well as the surrounding community, regarding Promark's policy.

Periodically review and demonstrate continuous improvement in the facility's environmental performance, including areas not subject to regulations.

For the safety of our products, food and beverages are not permitted on the Manufacturing floor.

# 7. Responsible Sourcing of Materials

Promark develops and maintains strong supplier relationships that are ethical and focused on continuous improvement of their environmental performance and compliance. We strive to ensure that our suppliers' values align with our own and expect them to uphold the same level of ethics, behavior and environmental sustainability standards, acting responsibly and complying with all applicable laws, rules and regulations.

# 8. Anti-Bribery & Corruption

Promark will never offer, pay, solicit or accept bribes in any form, either directly or indirectly. We will not participate in any kind of corrupt activity, either directly or through any third-party.

Promark takes disciplinary action against employees who are found to be giving or taking bribes or who offer, promise or give any improper or corrupt financial or other advantage.

This may lead to dismissal or termination of employment and, if appropriate, criminal proceedings. We will terminate business relationships with any agent or third-party representative that violates any provision of this Policy. We will not hide or fail to record properly our activities or falsify any company records or accounts.

Guidance Information Bribery is offering, providing or receiving something of value, including cash, gifts, hospitality or entertainment, to persuade someone to do something or as a reward for something improper or illegal. Any demand for, or offer of, a bribe in whatever form to any company employee or representative must be rejected and reported immediately to your manager.

Corruption involves, but is not limited to, any of the following types of activities: bribery, extortion, fraud, deception, collusion, abuse of power, embezzlement and money laundering.

# 9. Antitrust & Fair Competition

Promark believes that the welfare of its customers is best served by economic competition and seeks to excel while operating honestly and ethically, never through taking unfair advantage of others. Promark is committed to ensuring compliance with all relevant antitrust, competition and fair-dealing laws to the extent that they are applicable, and this Policy reflects that commitment, as well as our core values of integrity, corporate responsibility and transparency in conducting business.

# 10. Trade compliance and Sanctions

As part of ECI, Promark complies with all trade laws, export/import controls, sanctions and anti-money laundering regulations. Employees involved in shipments must ensure the information provided to customs/tax authorities is accurate. Do not engage in business with sanctioned individuals, entities or countries without legal approval.

Violations can lead to serious fines, reputational damage, or loss of export privileges.

# 11. Political contributions and Charitable giving

Promark employees may not use company funds, assets or facilities for political contributions. Personal political opinions must never be represented as those of Promark or ECI. Charitable donations in the name of Promark must be pre-approved by legal/compliance.

# 12. Leadership responsibilities

Leaders have three (3) core duties:

# 13. Policy Against Human Trafficking and Modern Slavery

Promark is committed to a work environment that is free from human trafficking and slavery, including forced labor and unlawful child labor. Promark will not tolerate human trafficking or slavery in any part of our organization. This policy reflects Promark's Code of Conduct and our core values to protect and advance human dignity and human rights in our business practices. This Policy applies to all personnel employed by Promark including, but not limited to, Promark's employees, officers, temporary employees, contingent workers, casual staff, and independent contractors, as well as Promark's vendors, customers and partners.

Promark prohibits trafficking in persons and slavery. Promark employees and others through whom Promark conducts business must not engage in any practice that constitutes trafficking in persons or slavery and must comply with all applicable law and contract. This includes, but is not limited to, the following activities: engaging in any form of trafficking in persons; procuring commercial sex acts; using forced labor in the performance of any work; denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority; using misleading or fraudulent practices during the recruitment of candidates or offering of employment/ contract positions regarding the key terms and conditions of employment; using recruiters that do not comply with local labor laws of the country in which the recruiting takes place; charging applicants/ candidates recruitment fees.

Promark and its employees will cooperate fully with the appropriate governmental authorities in audits or investigations relating to such violations.

# 14. Health and Safety

Promark strives to provide a work environment that is healthy and safe, free of unreasonable hazards, and in compliance with all applicable laws regulating workplace safety, security and health. All employees have a responsibility to learn the safety procedures applicable to the conduct of their duties and to follow them. Employees are also responsible for immediately reporting accidents, and unsafe or potentially hazardous practices or conditions, including actual or potential security risks.

Employees who violate safety standards, who cause hazardous or dangerous situations, who fail to report or, when appropriate, remedy such situations, may be subject to disciplinary action, up to and including termination of employment with just cause.

In the case of accidents that result in injury, regardless of how insignificant the injury may appear, employees should immediately notify Human Resources and a member of the Health & Safety Committee which consists of the Production Managers, Human Resources and the First Aid Responders. Such reports are necessary to comply with applicable laws, and initiate insurance and workers' compensation benefits procedures.

Employees are encouraged to report any unsafe or unhealthy working conditions, by informing Human Resources and the Health & Safety Committee.

# 15. Working Conditions

Promark will conduct periodical risk assessments and job hazard analysis to discover what could cause harm to employees. We'll establish preventative measures accordingly.

Potential threats and dangerous situations include but are not limited to:

- Performing tasks on heights, scaffolds, ladders and other unsteady structures
- Chemical substances
- Operating dangerous equipment
- Slippery or uneven surfaces / Unclean work environment
- Temperature
- Quality of air
- Excessive weight-lifting or repetitive motions

Promark will take the following preventative measures:

- Only those with valid licenses can operate dangerous equipment
- We'll provide protective gear like gloves, protective uniforms, goggles etc.
- Inspectors and quality control employees will inspect equipment regularly
- We'll hold employee training sessions in health & safety standards and procedures.
- Continuous Improvement Engineers will evaluate processes and revise work procedures regularly
- We will also analyze past incidents to assess what went wrong and prevent recurrences.

# 16. Smoke-Free Policy

Mindful of the health of its employees, Promark strives to maintain an office environment that is safe and minimizes risks to employees.

Accordingly, smoking is prohibited and limited to outdoor designated areas. All individuals share in the responsibility for adhering to and enforcing this policy, which applies to all Promark personnel and visitors. Any issues or concerns should be brought to the attention of your manager or Human Resources.

Those employees who would like to take the opportunity to quit smoking, are eligible to claim for products to help a person quit smoking that require a prescription. Please refer to your group benefits handbook.

# 17. Solicitations and Distributions

inconvenience to employees and customers, the following rules will apply to solicitation for any cause and distribution of literature of any kind on Promark property:

- ✓ Solicitation and distribution of literature by non-employees on Company property is prohibited for any purpose, anywhere and at any time.
- ✓ Solicitation by employees during working time is prohibited. Distribution of literature (other than for charitable purposes) by employees in work areas at any time is prohibited. Working time includes the working time of both the employee doing the soliciting and/or the employee being solicited. Under no circumstances, may an employee disturb the work of others to solicit or distribute literature to them during their working time.
- ✓ The sale of merchandise for profit by employees, as well as the advertisement and/or delivery of such merchandise, is not permitted on Company property.
- ✓ For purposes of this policy, "working time" does not include lunch periods, and the time before and after work.

- ✓ This policy applies to all people, employed or not employed by Promark.

# 18. Freedom of Association

Promark freely allows employees' lawful rights to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment.

Promark upholds the freedom of association of its employees and the effective recognition of the right to bargain collectively and strive to create a positive workplace with open lines of communication, making third-party representatives for its employees unnecessary.

# 19. Non-Discrimination in Employment

Promark is an equal opportunity employer. Promark is committed to implementing, applying and upholding the principles of the applicable provincial human rights legislation, to ensuring that our employees and potential employees are evaluated on the basis of business needs, merit, qualifications and ability, and without regard to prohibited factors such as race, ancestry, place of origin, color, ethnic origin, citizenship, creed, sex (including whether a woman is or may become pregnant), sexual orientation, age, gender expression and gender identity, marital or same sex partnership status, family status, disability or other prohibited grounds of discrimination as may be recognized by applicable provincial human rights legislation.

This non-discrimination policy applies equally to all employees, healthcare professionals, patients, customers, vendors and any other person who comes in contact with our employees. This non-discrimination policy also applies to all policies and procedures relating to recruitment and hiring, training, promotion, transfer, displacement, suspension, compensation, benefits, termination and all other terms and conditions of employment.

All Promark employees are required to cooperate fully in the fulfillment of this non-discrimination policy. Violations of this policy will result in disciplinary action up to and including termination of employment for just cause.

# 20. Non-Harassment in Employment

Promark is committed to implementing, applying and upholding the principles of the applicable provincial human rights, employment and/or other legislation, and to ensuring that the Promark workplace is free from any and all forms of harassment, including with respect to race, ancestry, place of origin, color, ethnic origin, citizenship, creed, sex (including whether a woman is or may become pregnant), sexual orientation, gender expression, gender identity, record of offences,

age, marital or same sex partnership status, family status, disability or other prohibited grounds of harassment as may be recognized by applicable provincial human rights, employment and/or other legislation.

This non-harassment policy applies equally to all employees, healthcare professionals, patients, customers, vendors and any other person who comes in contact with our employees. This non-harassment policy also applies to all aspects of employment with Promark including, but not limited to, recruitment, hiring, training, placement, compensation, promotion, layoff, recall, transfer, leave of absence and termination of employment.

All Promark employees are required to cooperate fully in the fulfillment of this non-harassment policy. Violations of this policy will result in disciplinary action up to and including termination of employment for just cause.
For the purposes of this non-harassment policy, “harassment” includes, without limitation:

a) Any verbal or physical conduct, which denigrates or shows hostility or aversion toward an individual because of his/her race, ancestry, place of origin, color, ethnic origin, citizenship, creed, sex (includes whether a woman is or may become pregnant), sexual orientation, record of offences, age, marital or same sex partnership status, family status, disability or other prohibited grounds of harassment as may be recognized in the applicable provincial human rights, employment and/or other legislation and that:

    1. has the purpose or effect of creating an intimidating, hostile or offensive work environment;
    2. has the purpose or effect of unreasonably interfering with an individual’s work performance; or
    3. Otherwise adversely affects an individual’s employment opportunities.

b) Unwelcome or unsolicited sexual advances, demands or requests for sexual favors or other comments or conduct of a sexual nature. Other forms of sexual harassment may include:

    1. submission to such conduct is made explicitly or implicitly a condition of an individual’s employment;
    2. submission or rejection of such conduct is used as a basis for an employment decision affecting the employee;
    3. rejection of such conduct results in threats or actions of reprisal against the employee; or
    4. Such conduct has the purpose or effect of unreasonably interfering with the employee’s ability to do his/her job by creating an environment that is intimidating, hostile or offensive to the employee.

c) Hitting, pushing or other aggressive physical conduct or threats to take such action.

d) Any statements, epithets, slurs, negative stereotyping or threatening, intimidating or hostile acts, which relate to a person's race, ancestry, place of origin, color, ethnic origin, citizenship, creed, sex (includes whether a woman is or may become pregnant), sexual orientation, gender expression, gender identity, record of offences, age, marital or same sex partnership status, family status, disability or other prohibited grounds of harassment as may be recognized in the applicable provincial human rights, employment and/or other legislation.

e) Written or graphic material that is placed on walls, bulletin boards, elsewhere on Promark's premises or circulated in the workplace that denigrates, shows hostility or aversion toward an individual or group because of race, ancestry, place of origin, color, ethnic origin, citizenship, creed, sex (includes whether a woman is or may become pregnant), sexual orientation, gender expression, gender identity, record of offences, age, marital or same sex partnership status, family status, disability or other prohibited grounds of harassment as may be recognized in the applicable provincial human rights legislation.

f) Any other unwelcome or unsolicited comments or conduct, which is intended to or should reasonably be known to have the effect of creating or contributing to a hostile or offensive work environment.

Workplace harassment does not, however, include properly discharged management responsibilities including disciplinary action, management of performance and other conduct that does not interfere with a climate of understanding and respect for the dignity and worth of our employees.

## 20.1 Reporting Discrimination and Harassment

Employees who believe that they have been subject to discrimination or harassment in the workplace should:

- Advise the person engaging in discrimination or harassment, if possible, that his/her behavior is offensive and unwelcome, and will be reported if continued. If you are uncomfortable confronting this individual directly, or cannot otherwise do so, you may report your concerns to your manager, your second level manager or Human Resources.
- If the discrimination or harassment continues, contact Human Resources and your manager or your second level manager, who will address the problem. However, do not discuss the incident(s) with your fellow employees.
- If the individual engaging in discrimination or harassment is a person designated to respond to allegations of harassment, the affected employee should bring his/her concern to the attention

of Human Resources or any other appropriate management representative to have the matter addressed.

## 20.2 Responding to and Investigating a Violation

Any employee or manager who has been advised or has knowledge that this policy has been violated must promptly and fully inform Human Resources. Failure to inform Human Resources may subject the employee or manager to disciplinary action, including the termination of employment for just cause if warranted.

Once Human Resources has been notified, a confidential, impartial, and comprehensive investigation will be promptly conducted. Appropriate disciplinary action will be determined based on the facts presented and the facts found to have occurred.

All employees are obligated to fully cooperate in any such investigation as a condition of employment.

Any disciplinary action, up to and including termination of employment for just cause, which is taken as a result of a substantiated claim or claims of harassment, must be reviewed and approved by Human Resources before communication and implementation.

## 20.3 Retaliation

Retaliation in any manner against an employee who complains of or who cooperates in an investigation of harassment, in good faith, is absolutely prohibited.

## 20.4 Reporting a False Claim

Because an individual's life (reputation, career, marriage, etc.) can be irreparably damaged by an accusation of discrimination or harassment, disciplinary action, from verbal reprimand to termination of employment for just cause, may be taken against an employee, who is found to have filed a complaint that was not made in good faith or is believed to knowingly have included false information.

Any questions regarding Promark's non-discrimination and non-harassment policies or a specific situation should be addressed to the appropriate manager, second level manager or Human Resources.

# 21. Workplace Violence

Promark is committed to protecting all employees and providing a respectful work environment that is free from any threat of violence in compliance with all applicable provincial occupational health and safety legislation. Promark will provide workplace violence and harassment policies, train and inform employees, and assess the workplace environment for potential hazards, as required by applicable provincial occupational health and safety legislation.

The definition of violence in the workplace is broader than physical violence and can include abuse, threats, intimidation or assaults in his/her employment. Any employee who commits or threatens to commit a violent act will be subject to disciplinary action, up to and including termination of employment for just cause. Any employee, who believes he/she is or may become the subject of violence in the workplace, should immediately contact Human Resources and their manager or their second level manager.

Prohibited violent acts will include any act of:

- physical force by a person against an employee in the workplace that causes or could cause physical injury;
- any attempt to exercise physical force against an employee in the workplace that could cause physical injury; and/or
- any statement or behavior that is reasonable for a person to interpret as a threat to exercise physical force against them in the workplace that could cause physical injury to the employee.

**EXAMPLE** of workplace violence will include but are not limited to:

- any assault or physical attack, which will include fighting, punching, slapping, hitting, pushing, shoving, kicking or any threat or attempt at such acts;
- the use of a weapon or threatened use of any object as a weapon;
- any threatening behavior such as shaking fists, throwing objects, physical confrontation or intimidation (such as crowding or cornering an individual);
- stalking;
- sabotage; or
- verbal or written threats.

Prohibited behaviors, as described above, will be considered unacceptable when it occurs in or at the workplace, and at or in connection with other work-related events, which will include business trips, social events with co-workers (whether the social event is sponsored by Promark or not) and off-site training events.

# 22. Targeted Violence and/or Threats of Domestic Violence

Promark will take steps to plan for the unique safety and security requirements of employees who are the targets of violence, including from an abusive spouse or that otherwise arise from a domestic situation. Promark will take every precaution reasonable in the circumstances for the protection of an employee who is likely to be exposed to physical injury in the workplace from an individual who has a history of violence. In this regard, Promark must have current knowledge and understanding of the safety, security and privacy needs of persons who may be experiencing such abuse or concern. Promark will guard against the spouse, partner, relative or acquaintance of an employee being threatened with violence, and the possibility of that individual arriving at the workplace. While some disclosure of personal information could be necessary to address the possibility of such an event occurring, disclosure will be limited to that which is reasonably necessary to protect the employee from physical injury.

Any employee who has received a protection order preventing contact from or restraining access by another individual to the employee, should immediately inform Promark of the “restraining” order, its content and terms, and the identity of the individual being restrained.

If an employee or manager becomes aware of a potential threat, reasonable precautions should be taken to safeguard all employees.

## 22.1 Reporting Obligation

Any employee, who believes that he or she has been subjected to behavior that violates this policy, should immediately report the matter to Human Resources and their manager. In addition, any manager who witnesses discrimination, harassment, receives a report of discrimination or harassment or becomes aware of discrimination, harassment or a threat of violence involving an employee or in the workplace (or receives a complaint regarding such events), must report the situation immediately to Human Resources and second level management as appropriate in the circumstances. Inaction on the part of any individual to whom a complaint has been made may result in disciplinary action.

All employees are equally responsible for notifying Human Resources and their manager of any actual or potential threats, verbal or physical, that they have witnessed, received or have been told that another person has witnessed or received. This includes threats by employees as well as threats by clients or any other persons.

## 22.2 Response

When a violent incident occurs, action must be taken to minimize its impact. Employees should respond to incidents of violence and must summon immediate security and health care assistance. Such assistance should include, but not be limited to, depending on the incident, the involvement of managers, contacting workplace and/or site security, emergency services, police and/or health services, directly or through 911. In the event of potential or actual injury, medical assistance must be contacted immediately. Depending on the requirements of the legislation in which you work, Promark may be required to contact the *Normes du travail*, Ministry of Labor or other governmental body.

Employees who report and/or witness an incident should provide the following information:

- Date(s), time(s), and location(s) of the incident(s)
- Description of the incident(s)
- Name(s) of anyone present during each incident
- Name(s) of anyone with whom the individual may have discussed the event.

## 22.3 Investigation

Every report of harassment, discrimination, violence or threat of violence will be investigated promptly and impartially. Promark will endeavor to keep the complaint and the results of the investigation confidential to the extent possible and as allowable by law.

A report which summarizes the incident, investigation and results will be completed, although it may not be disclosed. Promark will determine the parties authorized to investigate and resolve the complaint and shall monitor the investigation process.

## 22.4 Retaliation

No employee will be retaliated against for making a good faith report of harassment, discrimination, allegation of violence or for cooperating in an investigation of any such complaint. Any employee, who feels that he/she has been retaliated against in violation of this policy, is responsible for reporting the retaliation to Human Resources and their manager or second level manager in the same manner as any other forms of breach should be reported.

# 23. Malicious Reports

Where it is determined that a person has made a complaint in bad faith or with the intent to harm another person/employee and/or has misrepresented facts, formal disciplinary action may be taken against the person up to and including the termination of employment for just cause. Conduct based on mistakes or misunderstandings shall not constitute malicious conduct.

# 24. Whistle Blowing

The purpose of this Whistleblower Policy is to provide direction to all employees regarding the communication of events/occurrences or concerns, with respect to issues of integrity and honesty and, in particular, of questionable financial or operational matters.

Promark is committed to conducting itself with honesty and integrity at all times. Employees are celebrated, not punished, for speaking up in good faith and it is the policy of Promark to ensure that when an employee has reasonable grounds to believe that another employee has committed, or is about to commit, a financial or other wrongdoing:

- The employee should disclose this information
- The matter will be reviewed and if warranted, investigated by Management or designated Officers/Individuals
- The whistleblower will be protected from retaliations;
- The Confidentiality of the whistleblower will be maintained.
- The subject of the disclosure will be provided with an opportunity to respond to the allegations;
- All parties to an investigation will be treated fairly and equitability;
- If wrongdoing is found, appropriate remedial and disciplinary actions will be taken.
- The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

# Revision Control

| Rev # | Description of Modifications and Changes | Author(s) | Approver | Date |
|---|---|---|---|---|
| 1 | Initial release. | Jamie K. | Jarred K. | 11-May-2021 |
| 2 | Minor formatting updates; clarified section headings | Jamie K. | Jarred K. | 16-Aug-2021 |
| 3 | Minor administrative edits; spelling/grammar corrections | Jamie K. | Jarred K. | 09-Aug-2022 |
| 4 | Reviewed and revised content for consistency with company objectives | Jamie K. | Jarred K. | 09-May-2023 |
| 5 | Administrative updates and general housekeeping; improved readability and layout | Jessica N. | Basil S. | 18-Aug- 2025 |