



Dempsey Corporation

Code of Conduct

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Version: Public Web Version

Introduction

At Dempsey Corporation, we hold ourselves to the highest standards of integrity, respect, and accountability. This Code of Conduct defines the ethical principles and expectations that guide our behavior across all levels of the organization and throughout our global value chain.

It reflects our commitment to responsible business practices and aligns with applicable laws, international standards, and third-party frameworks such as EcoVadis, the UN Global Compact, and the OECD Guidelines for Multinational Enterprises.

1. Compliance with Laws and Regulations

Dempsey complies with all applicable local, national, and international laws, including those related to:

- Occupational health and safety
- Labor and human rights
- Environmental protection
- Data privacy
- Trade and anti-corruption

We expect all employees, contractors, and partners to know and follow the laws and standards relevant to their roles.

2. Ethical Business Conduct

We conduct our business with integrity and fairness. Employees must:

- Act honestly and transparently in all business dealings
 - Avoid and disclose any real or perceived conflicts of interest
 - Comply with our Anti-Bribery and Anti-Corruption Policy
 - Refuse to offer or accept bribes, kickbacks, or unethical incentives
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3. Respect for Human Rights

We are committed to respecting and promoting human rights in accordance with the Universal Declaration of Human Rights and ILO Core Conventions. Dempsey strictly prohibits:

- Child labor and forced labor
- Discrimination, harassment, or retaliation
- Unsafe or exploitative working conditions

For more, see our Human Rights Policy and our Forced Labor Policy (Bill S-211 Canada)

4. Diversity, Equity, and Inclusion (DEI)

Dempsey embraces diversity and fosters an inclusive workplace. We do not tolerate discrimination based on race, gender, age, disability, religion, or any protected ground. Our DEI initiatives are governed by our DEI Policy and Canadian human rights and privacy legislation.

5. Health and Safety

We are committed to maintaining a safe and healthy workplace. Employees are expected to:

- Follow all health and safety procedures
- Participate in mandatory training
- Report incidents or unsafe conditions immediately

Details are outlined in our Health and Safety Policy.

6. Environmental Responsibility

We minimize our environmental footprint through proactive waste management, emissions reduction, and sustainable sourcing practices. Our expectations are defined in our Environmental Policy and progress is detailed in our ESG Annual Report.

7. Data Privacy and Confidentiality

Dempsey protects all personal and confidential information. We handle data in accordance with PIPEDA and related provincial privacy laws.



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Employees must follow our Data Privacy Policy and are prohibited from disclosing sensitive information without proper authorization.

8. Responsible Sourcing and Conflict Minerals

Suppliers must comply with Dempsey's standards for responsible sourcing. We prohibit the use of conflict minerals that finance armed conflict or human rights abuses. See our Conflict Minerals Policy and Supplier Code of Conduct.

9. Whistleblower Protection

Employees and external stakeholders are encouraged to report misconduct or ethical concerns confidentially via redflag@dempseycorporation.com. Retaliation is strictly prohibited. See our Whistleblower & Ethics Reporting Policy for details.

10. Use of Communication and Social Media

Employees must:

- Communicate professionally and respectfully
 - Avoid sharing confidential or misleading content
 - Represent Dempsey's brand and values online responsibly
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11. Training and Continuous Improvement

All staff are required to complete training on this Code of Conduct and related policies during onboarding and at regular intervals thereafter. Our Annual ESG Report highlights progress and areas for improvement across ethics, labor, environment, and procurement.

This Code is central to our corporate culture and performance. By upholding these standards, every employee contributes to Dempsey's reputation as a trusted, ethical partner. Questions or clarifications should be directed to sustainability@dempseycorporation.com.