



Dempsey Corporation

Whistleblower & Ethics Reporting Policy

Effective Date: December 3, 2024

Prepared by: VP – ESG

Version: Public Web Version

Policy Purpose

Dempsey Corporation is committed to conducting business with the highest ethical standards. This Whistleblower & Ethics Reporting Policy outlines the framework that enables employees, suppliers, partners, and other stakeholders to report unethical, illegal, or non-compliant activities in a safe and confidential manner without fear of retaliation.

Scope

This policy applies to:

- All employees and board members of Dempsey Corporation
- Third-party logistics providers (3PLs), transporters, suppliers, and subcontractors
- Certification bodies and regulatory authorities interacting with our operations

Whistleblower Protection

Dempsey maintains a zero-tolerance approach to retaliation. Any individual who, in good faith, reports a concern or suspected misconduct will be protected from retaliation, harassment, or adverse employment consequences. All reports are handled confidentially and investigated promptly.

Reporting Channels

Reports of ethical concerns, suspected misconduct, or compliance breaches can be submitted through the following confidential channels:

- A direct supervisor or manager
- VP – ESG, VP- HR
- Confidential reporting email: redflag@dempseycorporation.com



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Ethics Oversight & Supply Chain Inclusion

This policy is part of Dempsey's broader Ethics & ESG Governance system. We extend our whistleblower protections and ethical expectations across our certified product supply chains. This includes:

- Encouraging ethical practices from all certifying bodies, logistics providers, and sourcing partners
 - Conducting periodic training and audits to promote transparency and compliance
 - Partnering with regulators to strengthen accountability throughout the value chain
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Training & Awareness

All employees receive regular ethics training, including guidance on recognizing and reporting unethical conduct. Awareness campaigns and internal updates support a culture of responsibility and openness.

Review & Governance

This policy is reviewed annually by VP – ESG to ensure continued relevance and effectiveness. Updates are communicated company-wide and published on Dempsey Corporation's website.