



Code of Conduct



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Englobe's Code of Conduct



Our practical guide to doing the right thing

Englobe’s mission and vision are founded on enabling tangible change by creating a sustainable future for our families, our clients and partners, and the communities we live in.

Every day, in every project, you deal with situations that demand integrity and the exercise of sound judgment and good business practices. This Code is your practical guide to doing the right thing. It sets out the commitments we all make, in order to meet the highest standards of business conduct.

The Code is a beacon that guides your work. It helps you make responsible decisions or find the courage to speak up when things don’t seem right. That’s why understanding it and embodying its principles – whether your actions are visible or not – is so important.

Englobe’s *Code of Conduct* is central to our corporate culture. It is at the heart of all the core values we share and collectively seek to demonstrate.

Radical caring

Empowering transparency

Optimism first, always

All for one and one for all

Positive intrapreneurship

In the end, unwavering ethics and integrity are at the heart of what we all want to achieve: a working environment that’s based on trust and respect; actions, products and services that are consistently of the highest quality; and an even stronger commitment to employee safety, environmental protection and sustainable development.

Mike Cormier
President



A few definitions and applications

Code of Conduct

The *Code of Conduct* (“Code”) is mandatory and applies to all employees, consultants, officers, members of the Board of Directors, and representatives of Englobe and its subsidiaries (“Englobe” or “Company”). Furthermore, we expect any third party to meet our minimum standards and respect our values.



Compliance with the Code and Certification

You just joined Englobe’s family:

As a condition of employment, all new employees are required to complete the certification process, acknowledging their understanding, and agreeing to comply with the Code. If you do not understand a specific section of the Code, you should ask your manager, Human Resources business partner, or a member of the Legal team for clarification. All employees should make sure they fully understand the Code before completing the certification process.

You are an active Englobe employee:

All employees are required to complete the re-certification process on an annual basis. Any employee who does not do so may be subject to disciplinary action, up to and including immediate dismissal.



The Code and the law

Englobe is committed to strictly observing all relevant applicable laws. Failure to comply may subject the Company and the individual or individuals involved to substantial civil and criminal penalties. Compliance with the law is the minimum required standard of conduct in all Company business.

Since our parent company, Englobe Corp., is incorporated in Canada, our employees around the world are often subject to Canadian laws. We also operate in many countries and therefore may also be subject to various laws in these countries of operation. When local laws allow a behaviour that is not permitted by our Code, our Code prevails. If you are uncertain whether a particular law applies, consult your local Legal team before proceeding.



The Code and you

Each Englobe representative, including but not limited to employees, managers and directors, has specific responsibilities under the Code. All representatives have the responsibility to understand and comply with the Code.

Englobe's *Code of Conduct* reflects our company's commitment to quality, integrity and professionalism. It outlines the standards expected from all representatives, whether you are an employee, a manager, a director, or a contractor. It is "non-negotiable" in terms of the way in which we are all expected to think and behave. Everyone has a responsibility to understand and comply with the Code. It is designed to help each of us maintain the very highest standards of expected conduct.



Employees' responsibilities

As an employee, you must:

- Perform your duties with fairness and integrity;
- Make decisions that align with the Code;
- Have ready access to the Code and refer to it when needed;
- Comply with the acts and regulations of the jurisdiction in which you work and do business;
- Promptly report any actual or possible breach of the Code;
- Cooperate with any investigation into a reported violation;
- Consult your immediate supervisor, a Human Resources representative or the Legal team if in doubt;
- Advise your immediate supervisor of any change (non-renewal, revocation, etc.) of a professional title, certification or licence needed to practice your profession;
- Inform your immediate supervisor and Human Resources if you are charged with or convicted of a violation that could impact Englobe's reputation or operations, or which could prevent you from performing your duties;
- Attest to complying with the Code, annually.

Managers' responsibilities

In addition to assuming the responsibilities of employees listed above, managers must also set a good example. Since they supervise the work of individuals under their responsibility, they must foster a corporate culture that reflects the Code's objectives and standards. They must also promote a healthy climate of trust and respect in the workplace that encourages employees to openly discuss their concerns and issues.

As a manager, you must take on all employee responsibilities, and also:

- Be thoroughly familiar with the Code and promote its application in your workplace;
- Maintain exemplary conduct that demonstrates the highest ethical standards and promote a workplace that reflects the spirit of the Code;
- Recognize compliance-related risks facing Englobe;
- Help employees understand the Code and its application;
- Promptly find answers to employees' questions and direct them to the appropriate resource;
- Exercise vigilance in preventing, detecting and resolving any breach of the Code;
- Deal swiftly with any violation;
- Protect any whistleblower who reports a breach of the Code;
- Inform management of any breach of the Code;
- Apply appropriate disciplinary measures, after consulting Human Resources or the Legal team.

Englobe's responsibilities

Englobe undertakes to uphold the highest standards in all its business operations.

As an employer, Englobe must:

- Disseminate the Code internally and externally;
- Foster a corporate culture based on integrity in all internal and external relations;
- Recognize, prevent and resolve risky behaviours and situations;
- Respond fully and appropriately to anyone requiring help in applying the Code;
- Periodically review the Code to ensure it supports best governance practices and the highest compliance standards.



We want our clients and communities to feel that we care and that they are in good hands. But above all, our top priority is ensuring our colleagues and teams operate in a professional, healthy, and safe work environment. Englobe promotes risk awareness and safe behaviour by all employees, in all situations.

Health and safety are everyone’s responsibility

Health and safety at work (OHS) is Englobe’s number one priority – wherever our employees are working. Adopting safe behaviours and achieving our Zero Incident objective is paramount. Englobe emphasizes the vital importance of these safe behaviours by putting all the requisite procedures and resources in place to prevent industrial accidents and illnesses, and to meet its clients’ requirements.

Englobe has adopted a strict policy and a framework program based on internationally-recognized ISO 45001 certification.

Englobe’s commitment includes:

- Empowering managers, project leaders and all employees;
- Complying with all legal and regulatory requirements in the jurisdictions where Englobe operates;
- Continuously educating employees about the risks associated with their work;
- Developing prevention programs tailored to each project;
- Ensuring every task is assigned to appropriately-qualified personnel;
- Qualifying and supervising subcontractors;
- Applying concrete measures regarding alcohol and drug use in the workplace;
- Regularly controlling and verifying existing procedures and measures, and continuously improving them;
- Managing and analyzing workplace accidents and other incidents to prevent recurrence.

You must always report any situation in which:

- You are asked to perform a task you believe to be dangerous;
- You are asked to perform work for which you do not believe you have the necessary training, or which may injure you or someone else;
- You see another person performing a task you believe to be dangerous or for which that person is not adequately trained;
- You believe a vehicle or piece of equipment is not operating properly and might be dangerous;
- You observe a situation that presents a danger or a potential danger to you or others.

Safety is everyone’s responsibility. You must consider your own safety and that of your colleagues, our clients, and the affected communities, in every step in your work. This mindset reflects how much we care about each other.

Always perform your work in accordance with Englobe’s policies, rules and standards. Before starting any assignment, refer to Englobe’s Health and Safety policy. Don’t do it for us – do it for yourself.

In case of doubt, consult your immediate supervisor. If you are faced with a situation that could endanger your safety or that of your colleagues, clients or the public, take appropriate action. We must work together to reduce the seriousness of accidents by reporting and eliminating dangerous working conditions.

Quality and integrity of our projects and services

An ongoing commitment to the highest standards

Every project counts. That’s why all projects must meet the highest quality standards while remaining within budget and on schedule. This demands unfaltering commitment on the part of our employees and managers. Respecting our policies and procedures will ensure we’re always doing our best work.

The reason we are determined to follow all applicable laws of Canada and the other jurisdictions where we do business is because we care. This attitude comes with a commitment to the very highest standards of quality – each and every time.

To continue meeting or exceeding our clients’ expectations as well as regulatory requirements and quality standards, Englobe’s commitments must be honoured – not only by our employees, but also by our partners, subcontractors and other third parties.

A clear focus on quality, every step of the way

The quantity and quality of the tools and materials we use in our projects must also meet applicable standards. We also control the quality of plant manufacturing and provide construction site supervision. Our engineers and technicians attest to complying with applicable standards. When supervising operations, we make sure the work is of good quality and consistent with project plans, technical specifications, and contractual requirements.

A passion for building strong relationships

Every day, we must deal with challenges stemming from our role in a given contract. We make it our duty to meet deadlines, stay within budget, and make the necessary effort to deliver the technical quality the project requires. Since each client has its own requirements, having a thorough grasp of the issues and adapting to the client’s specific expectations are vitally important.

We must encourage and support any activity that is likely to enhance the quality and availability of our professional services.

We believe that to nudge things in the right direction, we must build meaningful relationships with clients, contractors, suppliers, and partners, with an approach that’s based on honesty, impartiality, professional independence, credibility and mutual trust. We act with integrity, diligence and competence – always.

Every day, Englobe’s reputation for quality is in your hands. If you encounter a problematic situation or have any questions about project quality, discuss the matter with your immediate supervisor.

Alcohol and drugs

We care about everyone’s safety, and we believe everyone is entitled to work in a safe environment. This means that when you and your colleagues come to work, you should not be under the influence, nor in possession, of any alcohol or drugs. Doing so endangers your colleagues, clients, and the general public, and can seriously undermine your professional performance.

Report any individual, colleague, supplier, subcontractor, visitor or other person who is under the influence of alcohol or drugs to your immediate supervisor. Never take risks with your safety or that of others.

Respect in the workplace

At Englobe, we are all committed to promoting a respectful, healthy, professional work environment. In our work, we treat everyone involved with respect. All must be treated with equity.

A safe, secure and violence-free environment

We're all entitled to a professional, safe, secure, and violence-free workplace. This means we must all behave in ways that maintain and protect this healthy working environment. No violence or threat of violence in the workplace will be tolerated by Englobe.

An environment free of discrimination and harassment

Each day, we encounter people from all walks of life who differ from us in age, citizenship, political affiliation, culture, intellectual and physical ability, sexual orientation, ethnic or national origin, religion, gender and family status, as well as many other aspects.

At Englobe, we believe everyone is entitled to respectful and equitable treatment in the workplace and can aspire to their very own career path. As a result, we forbid all forms of discrimination, harassment, bullying and violence in word or deed or of any other kind.

Although the legal definition of harassment varies between jurisdictions, Englobe considers the following behaviours to be unacceptable:

- Sexual, verbal, physical or psychological abuse;
- Offensive language or humour targeting someone's race, colour, nationality, sexual orientation or other defining aspect;
- Racial, ethnic, sexual or religious insults;
- Inappropriate physical contact;
- Degrading comments;
- Threatening or bullying behaviour;
- Expressions of hostility towards an individual characteristic;
- Any behaviour that could be perceived as offensive or disrespectful by the targeted individuals.

At Englobe, it's our duty to provide a work environment based on respect and dignity, and free of violence, abuse of power and harassment. We protect employees against all forms of harassment, bullying and victimization, be it sexual, physical or psychological. In turn, we want our relationships with clients, suppliers and contractors to be based on this same degree and form of respect.

Harassment does not need to involve repeated occurrences. A single incident may be considered harassment if it has a lasting effect on someone.

If you suffer or witness discrimination or harassment, tell your immediate supervisor or one of the persons listed in the "Resources" section.

Environmental protection and sustainable development

We care deeply about tangible, practical changes that improve our future. In our business, we must pay special attention to our social obligations and consider the environmental consequences of our actions. We have consciously taken responsibility for being great agents of change, and we're fully committed to protecting the environment in all of our projects.

As a result, we rigorously comply with applicable acts and regulations. Through multidisciplinary projects, we also contribute to securing and improving the quality of the environment, while ensuring safe and environmentally responsible operations and supporting sustainable development.

More specifically, Englobe undertakes to:

- Comply with applicable acts and regulations and manage projects in a safe, ecological and sustainable manner;
- Favour environmentally-responsible measures in our projects;
- Implement the necessary measures to prevent pollution and to conserve, recycle and make rational use of natural resources;
- Develop emergency response plans that address environmental concerns;
- Support clients in seeking and implementing solutions so their projects comply with and harmoniously integrate into the environment and the community;
- Inform employees, managers, clients and suppliers about our commitment to the environment.

If you learn of a situation that could negatively impact the environment, report it to your immediate supervisor.



Inspiring trust

At Englobe, we take pride in being ethically unyielding and honest, inspiring trust, and taking responsibility for our actions.

As an employee, you play an important role in protecting our reputation. Your personal interests should never taint your judgment or compromise Englobe's reputation, or your own.

Avoiding conflicts of interest

A conflict of interest is a situation in which Englobe's interests compete with yours, your family's, or those of someone you have engaged in a personal or professional relationship. You should always avoid such situations, as they may compromise your judgment, independence and objectivity.

A conflict of interest may be real, potential or perceived. We should always avoid the *appearance* of a conflict of interest (situations where an outsider might assume a conflict of interest exists) since this perception can have the same effect as an actual conflict of interest.

A conflict of interest can also be caused by the activities of family members or close friends. You should avoid participating in, appearing to participate in, or exerting any influence on decisions that could put your own interests in conflict with those of Englobe. In other words, your position at Englobe should not be used for your personal benefit, or to benefit your relatives or close friends. In these situations, a good rule of thumb is to ask yourself "what's the right thing to do?"

We must carefully consider the potential conflict of interest before accepting outside employment. Mandates and engagements outside of Englobe, including Board memberships, can result in a conflict of interest. Therefore, you should request prior approval by Englobe before accepting any board position.

Many actual or potential conflicts of interest can be resolved in an acceptable way for both you and the company. You must disclose all conflicts of interest, whether real, perceived, or potential, to your immediate supervisor. In turn, the supervisor will coordinate with Human Resources. You will likely be required to complete the Conflict of Interest Disclosure Form. For more detail on this, consult the Englobe Conflict of Interest Policy.

Gifts and benefits

Giving or receiving a gift, benefit or other consideration is a routine part of business activities. However, in certain cases these situations may place you in an awkward position since they could be construed as a form of bribery or undue influence.

Gifts or benefits may be given, received or accepted only when appropriate, and in situations where the risk of being perceived as influencing the recipient's decision, or of being influenced by this decision, is non-existent. The accepted gifts and benefits must always be of minimal value and entertainment must not go beyond what is reasonable.

We urge all employees to be particularly mindful of these guidelines when dealing with government officials at all levels. Your innocent gesture could be misinterpreted and subject to anti-corruption laws, which are very strict in most jurisdictions.

Englobe prohibits all requests or solicitation of gifts, entertainment, or benefits of any kind, including non-material and intangible advantages.

To help you determine whether a gift may be accepted, Englobe’s *Code of Conduct* states that you must decline it if:

- The consideration is cash, a cheque, a gift certificate, a loan, a service, an individual discount, a rebate, a commission, shares, options, or similar benefit;
- The gift is recurring, luxurious, excessive, inappropriate or in poor taste;
- The gift might be perceived as a reward, bribe or attempt to influence a business decision or choice.

If in doubt, ask yourself the following questions and/or consult your immediate supervisor:

- **Could the gift or entertainment influence, or appear to influence, business decisions?**
- **Would giving or receiving the gift violate laws, professional standards and regulations, or this *Code of Conduct*?**
- **Could the gift potentially cause embarrassment or have a negative impact on Englobe or our brand?**

Anti-corruption and bribery

Corruption is the misuse of public power for private profit, or the misuse of entrusted power for private gain. For its part, bribery is the offer, promise, or payment of cash, gifts, or even excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person’s views or conduct or to obtain an improper advantage.

Bribery and corruption can take many forms, including the provision or acceptance of cash payments, fictitious jobs or “consulting” relationships, kickbacks, or facilitation payments.

At Englobe, we pride ourselves on being ethically unyielding. As a result, we’re committed to being a leader in ethical business and actively demonstrating values such as honesty, integrity, transparency, and professionalism when dealing with our clients, suppliers, competitors, and government officials. As a result, taking part in any bribery or corruption activities is strictly prohibited by this *Code of Conduct*.

Antitrust and competition laws

Antitrust and competition laws are intended to promote free competition. In turn, this fosters economic growth and prevents competitors from colluding to restrain competition.

For Englobe, complying with applicable laws in all jurisdictions where we do business is simply non-negotiable. Our policy is to ensure our employees avoid misrepresentation, manipulation, concealment or any misuse of confidential information, do not engage in negative discourse against competitors, or take part in any unfair practices with shareholders, clients, suppliers, competitors and other employees.

Among other things, we will not collude with a competitor to set prices, reductions or discounts for a client. We will not “fix” a call for tenders, or artificially limit production or the provision of services.

We ask all employees not to discuss prices, discounts, terms, costs, profit margins or expected payments with a competitor. You can obtain information about the market and our competitors, but make sure you do so within a legal and ethical framework. In addition, avoid discussing all competitive issues when attending meetings and events run by your professional association.

If you are aware of any breach or violation, you should report it to one of the persons listed in the “Resources” section.

Criminal record

You must inform your manager or Human Resources representative if you are charged and/or found guilty of a criminal offence, particularly one that impacts your suitability to continue working for us, or represent a serious breach of the law. In certain circumstances, if you are charged or found guilty of an offence, there may be employment consequences, including termination.

The specific monetary value of acceptable gifts and other benefits is available in our Gift and Hospitality Policy. Where registration is required, the gift or benefit must be recorded in Englobe’s registry. For more information and guidance on receiving, accepting, and giving gifts, entertainment, benefits and hospitality, consult the Englobe Gift and Hospitality Policy.

Englobe’s policy is to compete fairly and engage in business practices that comply with the Corruption of Foreign Public Officials Act (“CFPOA”) and the Criminal Code (“Criminal Code”) in Canada; the Foreign Corrupt Practices Act of 1977, as amended (“FCPA”) in the United States; and the Anti-Bribery Act, 2010 in the United Kingdom, along with all other anti-corruption and anti-bribery laws and regulations applicable to Englobe’s business worldwide.



Fostering a community spirit

Because we are better together, we believe and belong. We seek what is best for our colleagues and our company, rather than what's best for us. Safeguarding Englobe's assets and making sure they are used efficiently and honestly are important means to demonstrating we truly belong.

Englobe's assets include both tangible and intangible assets. These include, but are not limited to, buildings, equipment, vehicles, materials, supplies, documents, computer systems, data and programs, copyrights and patents, as well as confidential information, and information entrusted to Englobe by third parties.



Safeguarding our property

All Englobe employees must safeguard our property and use it appropriately. We expect you to take proper care of our property and protect it against loss, unauthorized access, abuse, damage, misuse, vandalism and theft.

- Our property must be used for business purposes only. Using it for personal business or personal use is prohibited.
- We expect you to use our property with respect and integrity. You must not attempt to circumvent, modify or remove computer safeguards.
- Downloading, uploading or transmitting illegal content; patented, copyrighted or trademarked material; trade secrets; or other confidential information, without express permission, is forbidden. Using our information systems to access computers or other systems without authorization, or damaging, altering or disrupting our systems in any way, is also prohibited.
- It is strictly forbidden to copy or pirate original software or to use or allow the use of copied software or unauthorized licenses within Englobe. We have a duty to properly use and protect cash, cheques, credit cards and postage, and to ensure that all expense reports, claims and invoices are authentic.

We reserve the right to record, monitor, disclose or delete messages or content that violates our policies, without prior notice.

Cars and other vehicles

As part of your duties, you may be required to use an Englobe vehicle, other types of motorized equipment, or even your own vehicle.

The health and safety of our people is our top priority at Englobe. Make sure you always drive with care and show respect and courtesy to other motorists. Remember also that when driving a car or other vehicle, you must comply with all laws and regulations that apply in your current location. You will be held personally responsible for any violation or fine to which you may be subject while driving for Englobe.

In addition, driving while impaired or under the influence of any drug or substance is strictly prohibited, as noted in a previous section.

Intellectual property

Intellectual property includes (but is not limited to) trademarks, logos, trade secrets, written reports, patents, inventions, discoveries, processes, know-how and copyrights.

All employees must respect and protect Englobe’s intellectual property from unauthorized use or disclosure, both during your employment with Englobe and after you leave the company.

You must acknowledge that any right, title or interest pertaining to research and development, patents, copyrights or any other form of intellectual property derived from work performed while employed, either alone or in collaboration, remains the property of Englobe. This includes all files, notes and reports acquired or created during the course of your employment, as well as data generated on a company device/network for business purpose.

Englobe’s name and logo are trademarks that can only be used in the context of your duties.

Protecting confidentiality

Confidentiality is a business imperative. Our clients and people expect it, and our brand depends on it. Our confidential information and trade secrets include, but are not limited to, information relating to the following:

- Manufacturing processes and methods;
- Product research;
- Business proposals;
- Operating and marketing programs;
- Client and supplier lists;
- Salaries, benefits and medical records;
- Unpublished financial and pricing information;
- Legal files;
- Computer programs;
- Plans for mergers, acquisitions or transfers;
- Clients’ specifications;
- Confidential information entrusted to Englobe by a third party.

You must never discuss such confidential information with anyone outside Englobe. Internally, you should refrain from sharing confidential information when it is not necessary for business purposes. In exceptional circumstances, some specific information may be disclosed, with prior authorization from the Legal team.

When you do need to share confidential information with colleagues – either in person or over the phone – in public spaces such as elevators, airplanes, trains, restaurants, or others, remain attentive to your surroundings and look out for eavesdroppers. Someone could be listening to your conversation without your knowledge.

When employees leave Englobe, they must return any confidential information in their possession. They should also continue protecting any confidential information obtained while employed at Englobe.

Employees who disclose confidential information without appropriate authorization are subject to disciplinary sanctions, up to and including immediate dismissal.

Personal information

We are committed to protecting our employees’, clients’ and partners’ personal information, in compliance with applicable privacy legislation, and to collecting and processing personal information only when permissible and for purposes relevant to our business. At all times, the use of personal information will be limited to the purposes for which it was originally collected.

Insider trading

It is illegal for an employee to engage in insider trading, i.e. to buy or sell securities (shares or options) if they are in possession of confidential information.

External communications

When providing information to the public, we seek to present data, reports and documents that are complete, understandable, and accurate.

No one may engage with the public, media, investors, or financial analysts on behalf of Englobe without our express authorization. If approached, respectfully decline to comment, and direct the person to the Communications & Marketing department.

Accounting records and financial reports

Our accounting records must be accurate and confidential, as the information they contain form the basis of many of our business decisions. This information is also needed to fulfil our obligations to third parties, and to remain compliant with financial and tax laws and regulations.

You must comply with all applicable regulations regarding financial and accounting reports. Our books, files and accounts must be consistent with generally-accepted accounting practices and must reflect all of Englobe’s financial operations honestly and accurately.

IT security and social media

We will make sure you have all the electronic resources you need to do your job. These resources include information technology (IT) systems, computer equipment, software suites and programs, and access to the internal network and the Internet. Such equipment and tools remain the Company's property at all times. In addition, these tools and equipment must not be used for illegal or improper purposes.

In every corner of the world, social media are changing the way we communicate with colleagues, suppliers, clients and third parties. Facebook, LinkedIn, Twitter, YouTube, blogs, message boards and other tools and platforms make it possible to quickly interact with various groups.

These new platforms come with new responsibilities. You should exercise caution and good judgment on social media, even when you are engaged in personal activities.

When using communication tools, always remember that you are still an Englobe employee. Therefore, be vigilant, polite and respectful, and make sure you do not adversely affect the reputation of Englobe or its stakeholders in any way. Always state that your opinions are your own and not Englobe's. Our Communication and Marketing team is the only authorized spokesperson for Englobe. When in doubt, please consult the Englobe Security policy.

Files, registers and documents

Our documents and registers must be recorded, processed and retained in accordance with legal requirements. Entries in Englobe's books, registers and accounts must be complete, accurate and timely. No relevant information may be omitted. Do not destroy old files without verifying that their destruction is consistent with legal requirements and Englobe's record-keeping policies.

Whenever it is likely that documents of any type will be required as evidence in connection with a lawsuit or investigation, all such documents must be kept, and their integrity preserved.

Documents and registers include but are not limited to memos, letters, emails, presentations, Web pages, voice messages, plans, videos, drawings, photographs, films, agreements, contracts, etc. Registers include but are not limited to print and electronic files, files located in Englobe's offices, and archived files.



Advocating for better approaches

Englobe is present in many parts of the world and works to enhance the communities where it operates. We are committed to conducting our business with integrity and adhering to high ethical and good conduct standards and principles. However, it is impossible to foresee every situation that might arise during our operations.

Our optimism and positive attitude come into play as we adapt to the unexpected through our willingness to challenge situations when warranted. Making tough decisions with courage and suggesting better and more ethical approaches is what we are committed to doing to protect Englobe’s integrity and reputation, or our own.

Community activities, donations and sponsorships

We are proud of the work we do “in the field” alongside our communities. Our projects help improve community life and quality of life. As a responsible corporate citizen, we support charitable organizations and groups under certain circumstances and when they align with Englobe’s mission and values.

Sponsorships and charitable donations must fit into our marketing strategy, be free of any appearance of impropriety, conflict of interest or other improper advantage to the benefit of the recipient, and be consistent with the Code.

Any request for sponsorship or donation should be referred to the Communications and Marketing team, who will analyze it and respond. Priority will be given to projects and organizations that align closely with our values.

A course of action may not seem like the right thing to do, even though it does not violate any act or regulation. In that case, ask yourself the following questions:

- Is this legal?
- Am I acting with integrity?
- Is it the right thing to do under the circumstances?
- Does it project an appropriate image of Englobe, of me and my colleagues?
- Is it in keeping with Englobe’s values, policies, business practices and the Code?
- Will the decision be perceived positively by employees, managers, partners, clients, the media and the general public?
- Would I be comfortable if this decision was reported in the media?

If you answer “no” to any of these questions, if you are unsure, or if you need help or advice, consult your immediate supervisor or one of the “Resources” listed at the end of this Code.

Political activities and contributions

You are free to participate in political activities on a personal basis as long as they do not create a situation of real, potential or perceived conflict of interest. Such activities must be at your own expense and on your own time and should not make use of Englobe’s property or resources. Do not use Englobe’s resources to solicit support for a political party’s campaign or candidate.

Any financial contribution to a candidate or party must be made on a personal basis. We will not cover or reimburse any political contribution, your time or any other form of compensation related to your political activities, unless it was authorized in advance by the Legal team.

Lobbying

Lobbying entails communication (telephone calls, written communications or meetings) with government officials for the purpose of introducing or amending acts, regulations, policies, or programs, or securing grants, contributions or other benefit from the government. Communications for purposes such as requesting information do not constitute lobbying.

We are dedicated to being a trusted partner in all our countries of operation. To achieve this, we rigorously comply with all applicable legislation, policies, and laws in the regions where we operate and do business. This means we are also responsible for complying with lobbyist registration policies and applicable laws in these jurisdictions.

For clarity:

In some Canadian provinces, businesses must register and provide a list of government departments and agencies they deal with, as well as a list of employees who act as lobbyists on behalf of the business. Managers must ensure that all employees engaged in lobbying are also personally registered as lobbyists.

In the U.S., the rules are particularly stringent. No Englobe employee should contact a U.S. government agency without first consulting Legal Affairs.

In other countries, the rules on lobbying vary between jurisdictions. You must ensure you fully understand and follow the applicable rules.

It is up to each employee to comply with registration and reporting requirements. When in doubt, you should consult Legal Affairs.



Acting as leaders

Englobe employees' positive intrapreneurship mindset is reflected in the way we take the initiative, rather than waiting to be told what to do. Taking responsibility for our actions and being accountable for what we do is a central aspect of our culture. Being true to that culture can only be achieved through respecting our obligations and adopting ethical behaviours.

Obligation to report violations

As an employee, you have an obligation to report any violation of the Code or applicable law. Clients, suppliers, partners and other third parties are also subject to this obligation to report. While the situation may require in-depth consideration, it's important to act quickly when you become aware of a violation. Your prompt action may enable us to correct a mistake, mitigate its consequences and protect our integrity and reputation. We must trust each other.



Reporting a violation

- Tell your immediate supervisor, who is in the best position to deal with the situation. In most cases, the problem is resolved at this stage. You can also go to the next hierarchical level;
- If your immediate supervisor is not available or is involved in the problem and you cannot go to the next hierarchical level, contact your Human Resources representative or the Legal team;
- You can also report through our secure anonymous whistleblowing service, as detailed in the Resources section.

No employee who makes a report in good faith or requests information or advice about reporting, will be penalized, dismissed, demoted, suspended, or disadvantaged in any way. All reports will be taken seriously and investigated. That's our commitment.

As employees, you are expected to cooperate fully with any investigation when required, and to refrain from purposely interfering in an investigation.

If a problem is detected, corrective action may be taken, including disciplinary sanctions up to and including immediate dismissal. Any person who violates the law exposes himself or herself, as well as Englobe, to lawsuits and/or criminal sanctions.

Obligations to the profession and the professional association

We must not make false representations about our skills or the effectiveness of our services.

Laying false claim to a professional title, membership in a professional association or place of registration of a title is prohibited.

To maintain his or her licence or right to practice, a member of a professional association, body or society must be a member in good standing. Any member who has been suspended, convicted of a violation, or sanctioned must immediately inform his or her immediate supervisor.

Compliance with the Code

Compliance with the standards set out in this Code and the accompanying policies is critically important to us. Our clients, suppliers and third parties place their trust in us and expect us to maintain the highest ethical standards. It's our way of doing things.

Any breach of the Code may tarnish our reputation and damage our relationships with clients and third parties. A violation of the Code may also compromise our right to do business in Canada or elsewhere.

In the event of a breach of the Code, Englobe may apply disciplinary measures, up to and including immediate dismissal, contract termination, or legal action.

Where to go for help

There are resources available to assist you if you need help with an ethical matter, or wish to discuss your concerns with an impartial ear. Often, these matters are not black and white, but many shades of grey. By continuing to communicate, share information and work together, we will reach our goal of doing the right thing in all situations.

ISSUE	RESOURCE	CONTACT INFO
Enquiries, questions, concerns, problems	1 Your immediate supervisor 2 Your Human Resources representative 3 Human Resources Service Centre	RH@englobecorp.com 1-866-981-0191, x107474
Media requests	Communications Dept.	Giselle Lopez Llerandi giselle.lopezllerandi@englobecorp.com
Conflicts of interest and legal issues	Legal Department / Ethics and compliance	Ethics@englobecorp.com
Anonymous complaints, enquiries or reports	Secure, anonymous whistleblowing service ClearView Connects	www.clearviewconnects.com 1-866-345-6834 (toll-free) <i>Reports may be made in English or French</i>



Englobe's commitment to non- retaliation

Englobe does not tolerate any act of retaliation against anyone reporting a potential or actual violation in good faith. No one will be penalized, dismissed, suspended, or demoted for reporting an actual or possible breach of the Code.

All requests will be handled with discretion. Anyone reporting an actual or possible breach of this Code is entitled to confidentiality and anonymity. The whistleblower could also opt to voluntarily reveal his or her identity and that of the person(s) involved to facilitate the investigation process.





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