

# POLICIES AND PROCEDURES HUMAN RESOURCES

# OLYMEL CODE OF CONDUCT, ETHICS AND VALUES

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Olymel Code of Conduct, Ethics and Values

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Olymel Code of Conduct, Ethics and Values

## 1. Introduction

#### 1.1 Our Mission, Our Vision, Our Values

A leader in the agri-food industry, proud of its Quebec roots, the superior quality of its products and its 12,000 Employees, Olymel is driven by a daily focus and mission: **together we feed the world.** 

Olymel is a modern company that draws on a pool of know-how rooted in a long tradition of excellence and best practices in the industry. Our core values are delineated by never compromising on quality, always improving our performance with the goal of better serving its Customers and, finally, taking actions that inspire confidence.

Olymel considers innovation an essential factor in its sustainability and also attaches critical importance to promotion of its products. By listening to our Suppliers and Customers, our company keeps abreast of new consumer trends to better meet consumer expectations. Proud of its products and its own brands, such as Olymel, Flamingo and Lafleur, our company also applies its expertise and major manufacturing capabilities to serve private brands, also recognized for their excellence on the market.

Olymel is dedicated to meeting and exceeding the highest industry standards in all its operations. Our company also strives to be socially responsible, setting an example with its personnel management and animal welfare practices and environmentally friendly processes, and by supporting the communities in which it operates. On these conditions we can live up to our mission.

## Our values

### **Integrity**

Integrity is a value that ensures we make no compromises on the quality of what we produce. This value corresponds primarily to our total commitment to the safety and wholesomeness of our products, the ultimate factor in customer and consumer trust.

#### Respect

Respect must reflect an attitude of constantly seeking the best solution for our customers. This means making every effort to improve our performance.

#### Trust

Without trust, there is nothing. This is true in all areas, but particularly important in our relationships with our various customers. The things we do in performing our work every day must insoire confidence.





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#### 1.2 Goal and Objectives

A company of Olymel's size must have business relations based on integrity, trust, frankness, respect and professional ethics so that it can achieve its objectives of quality and leadership in its target markets.

Olymel has enjoyed the confidence of its Suppliers, Customers and Employees for several decades. This confidence is surely attributable, among other factors, to the standards of business conduct it has imposed on itself and the integrity of its Employees. Indeed, the Employees' conduct is inseparable from the image projected by a company like Olymel.

Furthermore, the choice of our Suppliers must always be based on their reliability and economic stability, in a constant search for the best price, considering the quality sought by Olymel. Our Suppliers thus will be informed of the existence of this Code.

Each of them must adhere to a code of conduct establishing the rule of professional ethics and apparent conflicts of interest. The Code's provisions thus are mandatory, constituting a condition of employment, and thereby must be respected by each Employee.

#### The objectives of this code:

- Ensure that all Employees know and respect the rules of ethics and conduct Olymel has adopted;
- Provide a tool to help Employees make decisions and take actions while showing judgment and prudence;
- Implement the rules establishing the conduct of Employees to be compatible with the values advocated by Olymel in business relationship situations.
- Recognize that a principle of "reasonableness" and common sense must guide each Employee's decisions.
- Show our Suppliers and Customers that Olymel adopts the necessary tools to pursue its business relations with honesty and integrity.
- Help us clearly understand what is expected of us and to apply these principles in all our activities.

The terms "we", "us" and "our" collectively refer to all Employees, Consultants and Suppliers of Olymel and serve to indicate that respect for the Code is both a personal and collective responsibility.

The Code generally addresses a range of ethical and legal questions that many of us may face from time to time. It was established to guide our judgment and help us understand the ethical requirements and restrictions related to our work. The Code contains information on the key principles of ethical conduct, disclosure of information on wrongdoing and administration of the Code.





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#### 1.3 Persons to Whom the Code Applies

The Code applies to all Olymel Employees, i.e. the members of the Board of Directors, the Executive Committee, the managers and the Employees, whether contractual, temporary, full-time or part-time. We invite the Suppliers and the partners with whom we collaborate to study and comply with our Code.

Olymel does not establish or maintain any relationship with a person or a company that does not cultivate standards of business conduct and ethics compliant with its Code.

#### 1.4 Compliance with the Code

We must read, know, understand and comply with the Code. The same applies for the Olymel Policies, which have a direct impact on our work and our interactions with others.

Dishonest, unethical or illegal conduct is an offence against the Code, regardless of whether it expressly addresses said conduct.

Any Employee who, by action or omission, infringes the standards set out in the Code, may be the subject of a review or corrective or disciplinary actions, up to and including dismissal.

Any transgression of the Code by a Consultant or a Supplier could lead Olymel to terminate the business relationship.

The Board of Directors supervises the observance of the Code, relies on the Internal Committee to ensure control thereof and regularly reports to the Committee.

The Code cannot cover all situations we could be called on to face. Olymel expects us to apply not only the letter of the Code, but also its intention and principles.





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## 2. Principles of Ethical Conduct

Olymel intends to show the greatest integrity in its relations with the Employees, Suppliers, Customers and other persons for the purposes of instituting mutually advantageous relations. Anyone who deals with Olymel as a Supplier, Customer or otherwise has a right to fair and equitable treatment. These persons, companies or organizations must have every confidence in the integrity of Olymel and its Employees.

The ethical principles set out hereinafter constitute minimum standards and are not meant to be exhaustive. They cover the most common situations that raise ethical or legal concerns. We must therefore understand and respect the concept of professional integrity that underlies these standards.

#### 2.1 Observance of Laws, Ethics and Policies

In the performance of our functions, we comply at all times with the laws, rules, regulations, ethical rules and applicable practices in the jurisdictions where Olymel carries on its activities. The obligations that emanate from these laws and regulations translate into policies, guidelines, procedures and business rules that are incorporated into this Code and other internal documents. We are all required to read these documents, which can be consulted on the premises in the location dedicated to this purpose, or obtained from your immediate supervisor or a member of management, understand them and confirm to us that you have read and understood them.

Olymel does not participate in any illegal activity and does not permit us to engage in such activities on its behalf.

#### 2.2 Decision-making - Ethical Reasoning

If, in a given situation, the legal texts, the ethical rules or Olymel's policies do not allow a clear determination of "the best behaviour to adopt", we must refer to the items that compose our ethical culture (mission, vision and values) to make a decision in Olymel's interests.

This means applying **ethical reasoning** to our decision-making.

Here are some questions that may guide your reflection when the rules seem insufficient, you are conflicted or uncomfortable in a given situation, or it is difficult to know what would be the best thing to do.





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STEP	SUBJECT	HELPFUL QUESTIONS FOR DECISION-MAKING
01	Events and issues	<ul><li>What are the precise facts and the issues?</li><li>What are the possible options?</li></ul>
02	Professional obligations	<ul> <li>Do laws, regulations or ethical rules exist that may apply to the situation?</li> <li>Is my answer found in the Code or another Olymel policy?</li> </ul>
03	Ethical considerations	<ul> <li>Is there a risk of harming Olymel's mission or vision?</li> <li>What are the possible impacts on the health, safety or welfare of others? (Customers, Employees, general public, colleagues, Suppliers, contractors, partners, etc.)</li> <li>What are the possible impacts on the environment?</li> <li>What are the values at stake or in conflict? Which should be preferred?</li> <li>In the circumstances, given the values at stake and the possible behaviours, what action would be preferred and why?</li> </ul>
04	Consistency of the decision	<ul> <li>Would it be acceptable for another person to take the same action I am preparing to take?</li> <li>Does this project a professional and responsible image of me, my colleagues and Olymel?</li> <li>Would I feel comfortable if my decision were made public?</li> <li>Would I act in the same way if a relative or a friend were watching me?</li> <li>Would I be able to justify my decision according to Olymel's mission, vision and values?</li> </ul>

If you answered "no" to one of the questions concerning consistency, if you noted potentially significant consequences or if you are unsure of your answer, consult before acting!

#### 2.3 Protection of Olymel's Reputation

Olymel's reputation is at the core of its success and must be protected constantly. Forged over the years, it depends on our common commitment to respect Olymel's principles of ethical conduct.

In the performance of our duties, it is always incumbent on everyone to behave in a way that maintains public confidence.

It is incumbent on everyone to manage the risk of reputational damage and build our brand image.





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If you notice a situation that risks having an impact on Olymel and its reputation, or that could erode confidence in Olymel, you must immediately report it to your immediate supervisor, the Human Resources Department or any other member of management, or on the communications platform specifically provided for this purpose.

#### 2.4 Impartiality and Integrity of Relations

We provide fair treatment to everyone with whom we interact. We expect all relations between Employees to be based on mutual respect, transparent actions, open communication and a spirit of mutual aid.

We also act according to the powers that have been delegated to us.

Olymel intends to show the greatest integrity in its relations with the Suppliers, Customers and other persons for the purposes of instituting mutually advantageous relations. Anyone who deals with Olymel as a Supplier, Customer or otherwise has a right to fair and equitable treatment. These persons, companies or organizations must have confidence in the integrity of Olymel and its Employees.

Examples of prohibited behaviours considered to be cases of misconduct that may result in disciplinary actions:

- Abuse of others
- Manipulation
- Dissimulation
- Deliberate obstruction
- Sabotage
- False statements

- Falsification of documents
- Misuse of privileged information
- Misleading information
- Incivility
- Harassment, bullying and violence
- Sexual violence

#### 2.4.1 Relations Between Individuals

Our commitment to people does not stop at relations with Customers and Suppliers. It applies to all our relations. To best serve Olymel's interests, we must behave at all times in a respectful, open, honest, collaborative and professional manner with everyone with whom we interact.

Any individuals who consider they have been treated unfairly must not hesitate to report the situation through the available channels of communication.

#### 2.4.1.1 Diversity and Inclusion

Olymel recognizes the value of diversity and inclusion to make Olymel a remarkable work environment. Olymel is a stronger and healthier organization when it takes advantage of each individual's differences. These differences include, but are not limited to race, ethnic origin, colour, gender identity or expression, family status, religion, age or capacity.





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Moreover, we attach great importance to diversity of experience, points of view and expression.

Beyond the applicable standards and laws concerning employment equity, Olymel requires that all its Employees be treated equitably, ethically and in respect for diversity. Olymel encourages its Employees to come to work as their true selves, so that they feel appreciated and can be productive and contribute to its mission.

Olymel must prepare for the arrival of new workers who increasingly are from diverse backgrounds. Our workers deserve the best treatment and Olymel requires everyone to treat them equitably, ethically and in respect for their dignity. Their work is valued, respected and encouraged. They are an integral part of Olymel's big family.

# 2.4.1.2 Workplace Free of Harassment, Discrimination, Violence and Sexual Violence

Olymel acknowledges its Employees' right to work in an environment that is free of harassment, sexual violence and discrimination. It undertakes to apply and enforce its Policy against harassment, sexual harassment, discrimination and violence in the workplace, promptly investigate any incident, treat complaints equitably, implement the appropriate corrective actions and support the victims. Any violation of this policy is considered to constitute a serious matter, and measures shall be taken to put an end to it and avoid recurrence, depending on the context.





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#### 2.4.1.3 Alcohol and Drug Abuse

Olymel undertakes to ensure a workplace without alcohol or drugs.

At Olymel, it is our responsibility to be fit to perform our duties when we report to work, and not to be under the influence of any substance altering our faculties. Dependence on alcohol or drugs is treated. Early intervention improves the chances of a lasting recovery. Olymel encourages each of us to act, request professional assistance if applicable, and take advantage of its Employee and Family Assistance Program, if applicable.

Any person who infringes one or more principles could be the subject of penalties up to and including dismissal.

#### 2.4.2 Relations with Customers and Suppliers

The selection of Suppliers must be based on the quality of goods and services, the price and the benefit Olymel derives.

The Employee may not exercise any influence to obtain special treatment from a Supplier. Any offer of a benefit based on volume or a new business relationship is up to Olymel.

For Olymel, the relationship with our Customers is crucially important and must be based on mutual respect. Occasionally, it is possible to show our appreciation of the Customers with gifts, favours or entertainment provided that such tokens of appreciation:

- are compliant with Olymel's practices;
- correspond to industry standards;
- do not constitute in any way a form of hidden compensation;
- are not in breach of any corporate policy or code of ethics.

#### 2.5 Conflict of Interest

It is our responsibility to avoid any real or perceived Conflict of Interest.

To honour this obligation, we must all, at all times:

- act to avoid placing ourselves in a conflict of interest situation, including apparent Conflict of Interest, so as not to undermine the confidence of owners, Suppliers, Customers and Employees in Olymel;
- be able to make clear, impartial, free and informed decisions, not tainted by personal relationships or opportunities for gain with Suppliers or Customers;
- organize our personal affairs to avoid any real, potential or perceived Conflict of Interest:
- avoid taking advantage of our role at Olymel or accessing the contact network or databases or otherwise using or benefiting from it for our own use or at the request of others;





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- report according to the procedure any situation where our personal interests might conflict or seem to conflict with our responsibilities;
- avoid granting favoured treatment to anyone, including Family Members or Interested Persons:
- report according to the procedure any situation where we supervise, directly or indirectly, colleagues who are Family Members or Interested Persons;
- ensure we are not accountable or do not give the impression of being accountable to a person who could benefit from favoured treatment;
- follow the disclosure and approval process for any Conflict of Interest situation.

#### 2.5.1 Employment or Activities Outside of Olymel

We expect that no permanent Employee working full time will hold another outside job that could hinder their availability to Olymel.

It is permitted for Employees to hold a job or carry on activities outside working hours at Olymel, whether as an employee or as a self-employed worker (paid or not), provided that each of the following conditions is respected:

- 1. There is no real or perceived Conflict of Interest;
- 2. The tasks are performed outside normal working hours;
- 3. The situation does not lead to a reduction of performance or the quality of work produced at Olymel, or an occupational health and safety issue for Olymel;
- 4. The situation does not prevent Employees from performing tasks or assuming responsibilities objectively and impartially;
- 5. The disclosure and approval process was followed.

Priority must be given at all times to their job at Olymel and Olymel reserves the right to ask an Employee to terminate employment outside of Olymel or any other business activity at any time, if one of the conditions specified above is no longer satisfied.





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#### 2.5.2 After Employment

At the time of an Employee's departure, any document, material, intangible or other media belonging to the company that contains confidential information must be remitted to the immediate supervisor.

The confidentiality obligations specific to each position remain even after the Employee's departure.

#### 2.5.3 Financial Interests

No Employee shall have financial or economic interests that could conflict with the performance of their duties, i.e. may not be an owner, director, manager, partner or consultant or play any role whatsoever in an outside company that would do business or compete with Olymel.

#### 2.5.4 Solicitation and Charitable Activities

Any solicitation of Employees done during business hours and with a commercial intention is prohibited. However, the sale of articles for the benefit of charities or non-profit organizations is acceptable if it does not involve abusive use of the Employees' time and if the management of your department has approved it in advance.

#### 2.5.5 Gifts and Participation in Activities

Olymel acknowledges that certain gifts or participation in activities with our business relations may be appropriate.

It is important to remember that the offer of a benefit to an Employee by a Supplier must be unrelated to Olymel's past or future purchases, and that the benefit offered by a Supplier to an Employee shall in no case be based on volume or replace a discount from which Olymel would benefit on the price of a product or a service.

#### The basic rules to follow:

- When Olymel representation at an activity organized by a Customer or a Supplier is sound and compliant with the business relations Olymel must maintain, Employees must request authorization from their immediate supervisor to participate in the activity, pay for their participation and be reimbursed for the expenses from their expense allowance;
- When Olymel representation at an activity organized by a Customer or a Supplier is sound and compliant with the business relations Olymel must maintain, but it is inappropriate for Olymel to pay the expenses, Employees must request authorization from their immediate supervisor to accept the invitation;
- When Olymel representation at an activity organized by a Customer or a Supplier does not have the effect of achieving Olymel's business objectives, the Employee should not accept such an invitation.





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Certain **items with a value not exceeding \$300** are acceptable without authorization when they do not include any solicitation on the part of the Employee and when the frequency of the value is not compromising and does not influence the Employee's decision:

- business meal;
- tickets to sports and cultural activities;
- supplier receptions (when several Customers are invited, such as corporate anniversaries, plant openings, etc.);
- golf tournaments (when they are held outside business hours).

#### Certain items are acceptable with management approval:

- any gift or event mentioned above with a value exceeding \$300;
- trip to plants or other facilities of the Supplier; Olymel then reimburses Employees for all of their transportation, lodging or meal expenses.

#### **Prizes won** by the Employee:

- during a meeting or an activity, as a representative of the company, the Employee
  may win a prize when no purchase is required and no additional cost for the
  company is involved. In this case, the Employee may keep this prize, provided that
  its value does not exceed \$300; in all other cases, the Employee must consult
  management, which will authorize the Employee in writing to keep this prize or will
  ask that it be turned over to the company for collective purposes;
- all bonus points attached to trips and credit cards belong to the Employee, provided that the costs of the airline tickets are not higher when choosing the air carrier;
- any prize or premium won in Supplier draws remains the company's property when the bet is based on Olymel purchasing volume.

#### Certain items require your supervisor's approval. For example:

- use of the Supplier's goods for recreational or vacation purposes;
- purchase of a product at a price lower than the retail price;
- acceptance of gifts in cash or an equivalent form;
- payment of vacation expenses;
- all recreational trips, such as hunting, fishing, etc.





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#### 2.5.6 Disclosure of Conflicts of Interest

We must all report and justify any situation that could result in a real, potential or perceived Conflict of Interest.

Reporting and justification must be done in writing, following the appropriate process, upon hiring, annually and at each change in your situation.

#### 2.6 Animal Welfare

Olymel makes animal welfare a priority. All the necessary measures are taken to improve the comfort of animals, reduce their stress, prevent injuries and avoid suffering. Adopted in 2012, Olymel's Animal Welfare Policy requires that any person called on to handle live animals take appropriate training and comply with the regulations in force and the codes of practice recognized in the industry to ensure animal welfare.

There is zero tolerance for any action that could impair animal welfare or inflict suffering on animals. Olymel monitors activities closely, both on its farms and in its slaughter plants.

Any witness to an offence in this regard is responsible for reporting this practice.

#### 2.7 Use of Olymel Property

Olymel makes various equipment available to its Employees that facilitates their everyday work. In general, this equipment should be used only for work purposes, and its personal use should be limited to the strict minimum.

We therefore count on each Employee's integrity to make appropriate use of all phones, photocopiers, fax machines, computers and other equipment made available to them. Any abusive or inappropriate use will be penalized.

Moreover, confidentiality, protection of the company's physical, intangible or other assets (examples: computer data, formulations, price lists or Customer lists) and appropriate use are paramount duties for all Employees. Each Employee should see to the protection of these assets against misuse, unauthorized use and any criminal act:

- it is forbidden to sell or lease the company's assets without your immediate supervisor's authorization;
- It is forbidden to borrow or use the company's assets for personal purposes without a formal authorization from your immediate supervisor;
- all Employees who have financial and/or confidential documents in their possession, such as cheques, invoices or cash, Customer lists, formulation data and/or price lists and/or software, must ensure the full and complete security of these valuables, both in their handling and their safekeeping;
- paid work time remains one of the company's most important assets. In this spirit, it is up to all Employees to comply with the work schedules with precision and honesty.

#### 2.8 Confidential Information

Confidential information may be defined summarily as information unknown to the general public and, for example, may include commercial strategies, contracts and transaction costs,





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products in development, product composition process, technical knowledge, research results, financial projections, financial results, privileged information on our Customers or Suppliers, collective bargaining strategies, personal information on Employees, etc.

All of this confidential information must not be disclosed to any unauthorized person without authorization from the management of your department or from the Employee in the case of information contained in the Employee's personal record.

Also, at any time, we must:

- use confidential information only for the purposes for which it was provided to us;
- restrict access to confidential information only to the persons who need to know it;
- not display any confidential information in view of everyone and not leave any confidential information lying around insecurely;
- not discuss any confidential information in a public place, particularly corridors, elevators, cafeterias or restaurants, or on blogs or social media;
- not reveal any confidential information to persons who are not part of Olymel's personnel, including Family Members or Interested Persons, or any person who does not need to know this confidential information to perform their tasks;
- only use secure means of information to transmit confidential information (e.g. take the necessary precautions during use of insecure means of information, such as cell phones) and be sure of the identity of our converser;
- destroy confidential information or dispose of it securely (e.g. shredder).





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#### 2.9 Information on Our Competitors

The business community remains highly competitive, and success requires knowledge and understanding of our competitors' strategies.

When we search for data on these competitors, we are entitled to use all legitimate and legal resources, but we absolutely must avoid any action that would be illegal or immoral or that could put Olymel in an embarrassing situation if such actions were brought to public attention.

All our commercial practices and business strategies are adopted in compliance with the applicable competition legislation. Olymel prohibits any practice with the aim of collusion, abuse of dominant position, misleading documentation or any other prohibited practice under the applicable laws.

#### 2.10 Internal Controls

Olymel has developed and deployed controls and procedures to ensure that assets of all kinds are protected and properly used, and that the various management reports and financial reports are accurate, reliable and a true reflection of reality.

In this spirit, Employees must share this responsibility and ensure maintenance and, if possible, improvement of this reliability.

All financial reports and management reports, account books, research reports, sales reports, expense statements, time sheets and other documents must clearly and precisely present the state of the situation or the true nature of the transaction and comply with generally accepted accounting principles.

Any accounting, any documentation or any financial report produced fraudulently, incompletely or with material omissions contravenes Olymel's policies and may also infringe the laws in force.





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# 3. Expressing Yourself, Sharing Your Concerns and Reporting Misconduct

Olymel promotes a culture favouring frank and open communications, allowing respectful and confidential settlement of problems and concerns. Reporting of any wrongdoing is encouraged not only to put an end to it, but also to prevent any future recurrence and improve our controls.

#### 3.1 Reporting Wrongdoing

If we have good reasons to believe that another person has committed or is on the verge of committing wrongdoing or an act contrary to the Code or that a person has been asked to commit such an act, we are required to report this. We can do so without fear of reprisals. However, any person who makes a disclosure must respect the reputation of the person involved and abstain from making false, misleading or bad faith statements. Any wrongdoing may be reported anonymously and confidentially particularly on the communications platform provided expressly for this purpose.

It should be noted that the processing of an <u>anonymous</u> report may be abandoned at Olymel's sole discretion when the report does not contain enough information to proceed with an audit or an investigation (e.g. offender not identified, victim not identified, general disclosure presenting no precise fact) or do so in respect for the parties involved.

#### 3.2 Disclosure Channels

Do not hesitate to express yourself, report your concerns and disclose any situation:

- to your immediate supervisor;
- to a member of management;
- to a member of the Human Resources team;
- by making a report on the communications platform expressly provided for this purpose, and following our *Policy on the Wrongdoing Reporting and Processing Line*: through our ClearView Connects Ethics Help Line (toll free) at 1-877-845-1448 and through the protected website www.clearviewconnects.com.





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### 4. Administration of the Code

#### 4.1 Commitment, Renewal and Mandatory Disclosure

Compliance with the Code is a condition of employment.

#### At the time of hiring, every new Employee:

- is given a presentation and a copy of the Code by the Human Resources
   Department of their facility, as part of the orientation procedure;
- must sign and date the "Commitment for all non-unionized employees" attesting that they have studied the Code and undertake to comply with it;
- must disclose any Conflict of Interest situation requiring a decision by Olymel (e.g. a second job, the presence of a Family Member within management).

#### **During employment, every Employee:**

 must disclose any change in their situation that could result in a Conflict of Interest and requiring a decision by Olymel.

#### Annually, at the beginning of each fiscal year (November 1), each Employee:

- receives a copy of the Code of Conduct with the "Commitment for all nonunionized Employees" form;
- must sign and date to indicate they have studied the Code and undertakes to comply with it.

The form attesting to the Employee's commitment is forwarded by the Director of Human Resources of the facility to the Corporate Human Resources Department, as part of the renewal process for insurance coverage choices.

Both upon hiring and upon renewal, the attestation is deposited in the Employee's record.

#### 4.2 Interpretation of the Code

When an interpretation of the Code of Conduct, Ethics and Values is necessary, it is incumbent on the Ethics Committee, composed of four persons, including one external person designated by the President and Chief Executive Officer, to render a decision based on Olymel's values.

The designation of the members is reviewed every three years.

#### 4.3 Review and Approval of the Code

Unless there is a legislative change, the Code is reviewed regularly, at least every two (2) years, and is approved by the Board of Directors.

## 5. Definitions

The following key terms, classified in alphabetical order, are defined to facilitate understanding of the Code:





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"Conflict of Interest"	Any situation in which the personal interests of an Employee, Consultant or Supplier, a Family Member or an Interested Person, or an obligation to another person or entity, infringes or seems to infringe on the responsibilities and obligations of the Employee, the Consultant or the Supplier to Olymel.
	There is a conflict of interest when an individual performs a function so as to favour his or her personal interests, those of a Family Member of an Interested Person or, unduly, those of any other person, even if such actions do not cause harm to Olymel.
"Code"	The Olymel Code of Conduct, Ethics and Values
"Consultant"	Any company or any person who is not an Employee of Olymel and who is bound to Olymel by one or more contracts to provide it with services.
"Customer"	Any person or any form of legal entity with which Olymel does business or proposes to do business in the performance of its mission.
"Directors"	Members of Olymel's Board of Directors
"Employee"	All permanent and temporary Employees of Olymel, whether they work full time or part time, including the Chief Executive Officer.
"Family Member"	A Family Member of an Employee, a Consultant or a Supplier of Olymel is considered to be a person who has a family relationship with that Employee, Consultant or Supplier or the equivalent, a cohabiting partner, a dependent, a child, a child resulting from the spouse's previous marriage, a parent, an adoptive parent, a mother-in-law or a father-in-law, a grandfather or a grandmother, a sister or a brother, a sister-in-law or a brother-in-law, regardless of whether or not this person lives under the same roof as the Employee, Consultant or Supplier.
"Interested Person"	Any person who has a close personal or professional relationship with an Employee or a Supplier.





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"Personal Information"	Any information on an identifiable person (e.g. age, ethnic origin, religion, civil status, education, financial history, medical history, opinions of or about the person). This includes personal information on the Employees, Consultants, Suppliers and Customers of Olymel (e.g. directors, managers, shareholder and guarantors of the customer companies).
"Policies"	Refers to all of the corporate policies, the general guidelines, the business rules and the procedures adopted by Olymel.
"Supplier"	Any company and any person who are not Employees of Olymel, who provide services to Olymel under a Service Agreement and one or more Statements of Work, or any other agreement (regardless of its title) stipulating the services to be provided to Olymel.





Olymel Code of Conduct, Ethics and Values



#### **Olymel Code of Conduct, Ethics and Values**

#### Commitment form for all employees

The Code must be respected by all Employees without exception.

Non-observance of the clauses of the Code will lead to severe disciplinary actions.

The undersigned declares that he(she) has studied the Olymel Code of Conduct, Ethics and Values and undertakes to comply with it.

Name in block letters:						
Date:	Signature:					
Copy placed in the Employee's record by:						
Date:						

RH-004

