

## ORION MACHINING AND DESIGN, INC. **CODE OF BUSINESS CONDUCT AND ETHICS**

### **To all employees and suppliers of Orion Machining and Design, Inc.:**

Companies everywhere are adopting Environmental, Social and Governance (“ESG”) policies to improve their businesses. Even though Orion is a small company, we try to work according to the highest standards and follow industry best practices. As a result, we have adopted this Code based on other companies that are leaders in the area of ESG.

Please read and understand the document fully. If you have any questions about the Code, how it applies in the company, or if you know of any situation which may be a breach of this Code, please contact Shawn Davidson, Director and General Manager. Thank you.

### **Integrity and Trust**

We strive to do the right thing and to build and strengthen bonds of trust in all of our business relationships. We know that trust is essential to good, profitable business, and that a loss of trust cannot be easily restored. Trust between ourselves, our customers and suppliers make our jobs fulfilling and worthwhile. Every person at Orion is expected to conduct themselves with integrity, fairly and in a trustworthy manner in all of their workplace and business interactions. We will therefore never undertake any action which would undermine trust in our business dealings and relationships.

### **Labour and Human Rights**

We will follow all Alberta employment and labour laws. We will comply with applicable laws in relation to minimum wage, working hours, overtime work, safety conditions, benefits, leaves, breaks, vacation time, and other labour issues. We will accommodate employees when required in their workplace.

We aim to provide a safe and healthy work environment. We are committed to the principle of treating all people equally, fairly, and with dignity and respect. We will not tolerate any form of discrimination based on race, ethnicity, nationality, sex, sexual orientation, gender, age, language, disability, religion, political or other opinion, or other diversity characteristics. We will not tolerate any form of abuse or harassment, whether it be physical, verbal, psychological, or sexual. Any employee who feels harassed or discriminated against should report the incident to Shawn Davidson.

### **Conflicts of Interest**

We will always strive to look after the interests of the Company first and foremost such that we will never let our personal interests conflict with the interests of the Company. A conflict of interest may arise in any circumstance in which our loyalties between a personal interest and the best interests of the Company conflict. Examples include an undisclosed investment interest in a supplier to the Company, using Company funds to benefit friends or family, personal pursuit of Company opportunities and undisclosed gifts and entertainment from business partners that are outside of the Company's social host policies.

We acknowledge that perceived conflicts of interest may be just as harmful to the Company as actual conflict of interests. Every employee therefore agrees to disclose or report any situation in which a conflict of interest exists or might be perceived as soon as they become aware of it to senior management.

We will never accept cash gift or enticement in any business relationship. We will not accept gifts or event hosting valued at more than \$200 in value without approval.

## Environment

Business practices need to be reconciled with a responsibility to the environment. Environmentally sound products and services indicate our commitment to reducing waste and emissions. The use of environmentally sustainable products can provide savings over time.

We will comply with all environmental legislation, rules and regulations. We will assess the environmental impact of our business operations and seek to improve environmental performance where necessary. We will use recyclable and renewable materials where possible. We will implement measures in relation to water management, waste management, energy consumption, pollution, and other environmental issues. We will report any environmental issues to the proper authorities.

## Confidentiality

We will hold in strict confidence all confidential information acquired during the performance of our duties. Confidential information can include all information, knowledge, and data about the Company. Confidential information extends to the Company's partners, customers and business relationships. We must not disclose confidential information outside of the Company and must undertake to preserve confidentiality.

## Accurate Record Keeping and Reporting

Accurate record keeping is an important dimension of our integrity and trustworthiness as a company. We will therefore keep honest and accurate accounting records and reports. We will not fabricate, change or suppress any information which is required to be reported or kept. We will record information so far as possible in a timely fashion. We will adhere to all applicable accounting standards and legal requirements for keeping and maintaining business records.

## Legal Compliance

We will comply with the letter and spirit of the law. We will endeavor to be informed at all times of the relevant legal requirements in every jurisdiction and to educate our employees of the Company's obligations. The legal requirements include health and safety procedures and regulations, as well as civil and criminal laws.

## Business Partners Ethics and Due Diligence

We will only do business with suppliers and distributors who have values that are compatible with our own. Before entering into a supplier or distribution relationship with any business partner we will undertake appropriate due diligence to ensure compatibility.

## Fair Competition

Fair competition encourages excellence, innovation, service quality, growth and job satisfaction, to name only a few benefits. We will therefore not engage in any anti-competitive behaviors. Competition law is complex but generally it prohibits conduct such as price fixing, market allocation, collusion or bid rigging. These behaviors usually involve co-ordination, either overt or

tacit, with competitors. We will therefore avoid any situation in which our communications with competitors may be seen to be anti-competitive.

### Fraud or Corrupt Practices

We will not tolerate fraudulent or corrupt practices of any sort. Our business records, communications and dealings with others will be honest and in good faith. We will not attempt to deceive or mislead business partners for our own gain. We will not use bribery or improper methods of influence to obtain business. We will not breach the *Criminal Code* or *Corruption of Foreign Public Officials Act* (Canada), state or federal criminal laws, or the *US Foreign Corrupt Practices Act*. We will not knowingly engage in any transaction intended to avoid international sanctions.

### Annual Review and Compliance Accountability

The Director and General Manager will review this Code annually to ensure effectiveness and ongoing relevance.

Shawn Davidson  
Director and General Manager  
September 1, 2021