

Human Rights, Business - Labour Ethics and Conduct Policy

1. Policy statement

Hughes Decorr - Design & Display is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure dishonest behavior is prevented. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships. We will constantly uphold all laws relating to business and labour ethics as defined by the Canadian legislation to which we are bound.

We strive to respect and promote human rights in accordance with laws of the Canadian Government in all the jurisdictions in which we operate.

2. Who is covered by the policy?

This policy applies to all employees (whether temporary or permanent), consultants, contractors, or any other person or persons associated with us, no matter where they are located. The policy also applies to Officers, at any level.

3. What is covered by the policy?

a. Human Rights

- ✓ Hughes Decorr - Design & Display is committed to providing an environment free of discrimination and harassment, where all individuals are treated with respect and dignity, can contribute fully and have equal opportunities. Ontario Human Rights Code requires that, every person has the right to be free from harassment and discrimination. Harassment and discrimination will not be tolerated, accepted or ignored at Hughes Decorr - Design & Display . If a claim of harassment or discrimination is proven, disciplinary measures will be applied, up to and including termination of employment.

b. Gifts and hospitality

Hughes Decorr - Design & Display accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- ✓ It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favors or benefits.
- ✓ It is not made with the suggestion that a return favor is expected.
- ✓ It is in compliance with local law.
- ✓ It is given in the name of the company, not in an individual's name.
- ✓ It does not include cash.
- ✓ It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- ✓ It is of an appropriate type and value and given at an appropriate time, taking in to account the reason for the gift.
- ✓ It is given/received openly, not secretly.
- ✓ It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- ✓ It is not above a certain excessive value, as pre-determined by the company's President
- ✓ It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's

c. Political Contributions

Hughes Decorr - Design & Display will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognize this may be perceived as an attempt to gain an improper business advantage.

d. Charitable Contributions

Hughes Decorr - Design & Display accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the President.

e. Forced or Compulsory & Child Labour

Hughes Decorr - Design & Display prohibits the use of all forms of forced labour. Forced labour can be understood as work that is performed involuntarily and under the menace of any penalty. It refers to situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities.

Hughes Decorr - Design & Display prohibits the hiring of individuals that are under the legal working age.

f. Work hours, wages and benefit

Hughes Decorr - Design & Display works to ensure full compliance with applicable wage, work hours, overtime and benefits law. We follow the employment standards that regulate employee's conditions of work as defined by the Canada Labour Code.

g. Diversity and Inclusion

Hughes Decorr - Design & Display works to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, colour, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law.

h. Safe and Healthy Workplace

The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.

i. Workplace Security

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

4. Employee Responsibilities

As an employee of Hughes Decorr - Design & Display, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other related information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of violations of this policy. They are required to avoid any activities that could lead to, or imply, a breach of this policy.

If you have reason to believe or suspect that an instance has occurred or will occur in the future that breaches this policy, you must notify your Manager and/or the President.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct.

Hughes Decorr - Design & Display has the right to terminate a contractual relationship with an employee if they breach this policy.

5. How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Hughes Decorr - Design & Display, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behavior can be considered bribery or corruption, you should speak to your Manager or the President

Hughes Decorr - Design & Display welcomes and will condone whistleblowing (see section 7.2 below). All employees can vocalize their concerns swiftly and confidentially.

6. What to do if you are a victim of bribery or corruption

You must tell your Manager and or the President as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity within the workplace.

7. Protection

7.1. Bribery and Corruption

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Hughes Decorr - Design & Display understands that you may feel worried about potential repercussions. Hughes Decorr - Design & Display will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken. Hughes Decorr - Design & Display will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption. Detrimental treatment refers to dismissal, disciplinary action or unfavorable treatment in relation to the concern the individual raised. If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your Manager or the President.

7.2. Whistleblowing

Whistleblowing is defined as when an employee reports an activity that he/she considers to be illegal or dishonest. Whistleblower protections are provided in two important areas – confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The company will not retaliate against a whistleblower. The right of protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

8. Training and Communication

Hughes Decorr - Design & Display will provide training on this policy as part of the induction process for all new employees. Employees will be asked to formally accept that they will comply with this policy.

Hughes Decorr - Design & Display's Business/Labour Ethics and Conduct Policy has a zero-tolerance approach that will be clearly communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.



Jason Berns
President & CEO