



BDR Employee Code of Conduct Content

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I, _____ have read and understand the BDR Code of Conduct and will abide by and will assist in its enforcement. The expectation is to create and sustain a positive, productive environment that Customers, employees and the public can benefit from.

Signature

Date

BDR Employee Code of Conduct

As an employee, you are responsible to behave appropriately at work. We outline our expectations here. We can't cover every single case of conduct, but we trust you to always use your best judgment. Reach out to your manager if you face any issues or have any questions.

1. Responsibilities

1.1 Employees/Owner Operators

As an employee, you are expected to:

- Assume personal responsibility for performing your duties with safety, fairness and integrity;
- Agree to do your part to achieve BDR's objectives to the best of your abilities, while making decisions consistent with the Code, and without compromise;
- Have a basic understanding of the Code and review it from time to time.
- You should also have a detailed knowledge of its provisions that apply specifically to your job; and consult your manager if you have any questions about the Code.

If you become aware of a possible violation of the Code, you are expected to:

- Act promptly and in good faith by raising it with your manager
- Take your concern beyond your Manager if the suspected breach you have reported was not resolved
- Be prepared to cooperate in BDR's investigations regarding violations of the Code.

1.2 Management

The responsibilities of BDR's managers include and go beyond those of other employees. As a manager, you are expected to:

- Know the Code in detail and actively promote it in the workplace;
- Lead by providing a model of high standards of ethical conduct, creating a work environment reflecting the content and the spirit of the Code;
- Be vigilant in preventing, detecting and responding to any violations of the Code; protect those who report violations

2. Work Environment

2.1 Employment Practices

- BDR treats all employees fairly, ethically, respectfully and with dignity. The Corporation offers equal employment opportunities without regard to any distinctions based on age, gender, sexual orientation, disability, race, religion, citizenship, marital status, family situation, country of origin or other factors, in accordance with the laws and regulations of each country where it does business.

2.2 Harassment and Discrimination

- BDR policies protect employees from harassment, bullying and victimization in the workplace, including all forms of sexual, physical and psychological abuse. As an employee, you are entitled to, and are expected to preserve, a positive, harmonious and professional work environment
 - Examples of disrespectful and or inappropriate behavior are:
 - Lewd, profane, abusive or demeaning language
 - Yelling at another person
 - Threatening, bullying or intimidation
 - Fighting
 - Rough, boisterous or disruptive behavior
 - Jokes that demean or belittle others, even when no offence is intended-such as racist, sexist and sexual orientation jokes
- Harassment and discrimination are not tolerated. Every worker has the right to a workplace free of harassment and discrimination. Discrimination and harassment can take many forms, such as abuse of authority, bullying, sexual harassment, sexual solicitation and systemic discrimination. Everyone is expected to treat others with respect, courtesy and fairness, and exercise authority with responsibility.
- We promote a culture of inclusion that prohibits any form of discrimination. We must be inclusive and demonstrate respect and acceptance of others.
- Harassment occurs when a worker engages in a course of inappropriate comment or conduct against another worker that is known, or should reasonably be known, as unwelcome. Workplace harassment can include bullying, intimidating or offensive jokes, nicknames or innuendos, displaying or circulating offensive pictures or materials, or making offensive or intimidating phone calls.
- Sexual harassment occurs when a worker engages in a course of inappropriate comment or conduct against a worker that is known, or should reasonably be known, as unwelcome because of sex, sexual orientation, gender identity or gender expression; or making a sexual solicitation or advance where the person making the solicitation or advance is in a position of influence or authority and should be aware the solicitation or advance is unwelcome.

2.3 Health, Safety and the Environment

- The occupational health and safety of employees and environmental protection are priorities at BDR, where they are regarded as a fundamental corporate social responsibility. We strive to reduce the impact of our activities and of the performance of our products on the environment, and work towards a “total life-cycle” view in services, while maintaining our competitiveness.
- BDR and its employees comply with all applicable laws and regulations. We adopt standards, procedures, contingency measures and management systems to ensure that our operations are managed safely, ecologically and in a sustainable way.
- To protect their own safety as well as that of their colleagues and communities, employees undertake not to work under the influence of any substance that could impair their judgment or interfere with the effective and responsible performance of their duties

2.4 Communications

As a BDR employee, you should be truthful and straightforward in your dealings and not intentionally mislead colleagues, customers or suppliers. Use appropriate, professional language, both in written documents and public conversations. Communications with the media, the investment community and regulators are the responsibility of designated corporate spokespersons. Inquiries received by an employee must be referred to an authorized spokesperson. Use the appropriate amount of communication with other employees so as to be affective in getting the task completed.

2.5 Dress code

Our company’s office dress code is *Business Casual*. This includes [*slacks/ loafers/ blouses/ boots.*] However, an employee’s position may also inform how they should dress. If you frequently meet with clients or prospects, please conform to a more formal dress code. We expect drivers and staff to be clean when coming to work and avoid wearing clothes that are unprofessional (e.g. no political slogans, profane logos/comments, ripped clothes, etc.). Also we need to be aware of sensitivity to strong scents by fellow employee’s and visitors. Be responsible when applying personal products.

3. Cyber security and digital devices

This section deals with all things digital at work. We want to set some guidelines for using computers, phones, our internet connection and social media to ensure security and protect our assets.

3.1 Internet usage

Our corporate internet connection is for business purposes only. You must not use our internet connection to:

- Download or upload obscene, offensive or illegal material.
- Send confidential information to unauthorized recipients.
- Invade another person's privacy and gain access to sensitive information.
- Download or upload pirated movies, music, material or software.
- Visit potentially dangerous websites that can compromise our network and computers' safety.
- Perform unauthorized or illegal actions, like hacking, fraud or buying/selling illegal goods.
- Use for the purposes of bullying online

3.2 Cell phone

We allow use of cell phones at work. But, any personal use must be during scheduled break times. We ask you to follow a few simple rules:

- Use your cell phone in a manner that benefits your work (business calls, productivity apps, calendars.)
- Keep personal calls and/or texts to scheduled break times and use an empty meeting room or common area so as not to disturb your colleagues.
- Don't use your phone for any reason while driving a company vehicle.
- Don't use your phone to record confidential information.
- Don't download or upload inappropriate, illegal or obscene material using our corporate internet connection.

3.3 Email

Email is essential to our work. Use your company email for work.

- **Work-related use.** You can use your corporate email for work-related purposes.
- **Personal use.** You cannot use email for personal use unless approved by your manager.

Our general expectations

We expect you to avoid:

- Signing up for illegal, unreliable, disreputable or suspect websites and services.
- Sending unauthorized marketing content or emails.
- Registering for a competitor's services, unless authorized.
- Sending insulting or discriminatory messages and content.
- Spamming other people's emails, including your coworkers.

In general, use strong passwords and be vigilant in catching emails that carry malware or phishing attempts. If you are not sure that an email you received is safe, ask your manager.

3.4 Social media

We want to provide practical advice to prevent careless use of social media in our workplace. We address two types of social media uses: using personal social media at work and representing our company through social media. You are not permitted to access your personal accounts at work.

Representing our company through social media

If you handle our social media accounts or speak on our company's behalf, we expect you to protect our company's image and reputation. Specifically, you should:

- Be respectful, polite and patient.
- Avoid speaking on matters outside your field of expertise when possible.
- Follow our confidentiality and data protection policies and observe laws governing copyrights, trademarks, plagiarism and fair use.
- Coordinate with your Manager when you're about to share any major-impact content.
- Avoid deleting or ignoring comments for no reason.
- Correct or remove any misleading or false content as quickly as possible.

4. Conflict of interest

When you are experiencing a conflict of interest, your personal goals are no longer aligned with your responsibilities towards us. For example, owning stocks of one of our competitors is a conflict of interest.

In other cases, you may be faced with an ethical issue. For example, accepting a bribe may benefit you financially, but it is illegal and against our business code of ethics. If we become aware of such behaviour, you will lose your job and may face legal trouble.

For this reason, conflicts of interest are a serious issue for all of us. We expect you to be vigilant to spot circumstances that create conflicts of interest, either to yourself or for your direct reports. Follow our policies and always act in our company's best interests. Whenever possible, do not let personal or financial interests get in the way of your job. If you are experiencing an ethical dilemma, talk to your manager and we will try to help you resolve it.

4.1 Employee relationships

We want to ensure that relationships between employees are appropriate and harmonious. We outline our guidelines and we ask you to always behave professionally.

4.2 Fraternalization

Fraternalization refers to dating or being friends with your colleagues. In this policy, "dating" equals consensual romantic relationships and sexual relations. Non-consensual relationships constitute sexual violence and we prohibit them explicitly.

4.3 Dating colleagues

If you start dating a colleague, we expect you to maintain professionalism and keep personal discussions outside of our workplace.

You are also obliged to respect your colleagues who date each other. We won't tolerate sexual jokes, malicious gossip and improper comments. If you witness this kind of behavior, please report it to your manager.

4.4 Dating managers

To avoid accusations of favoritism, abuse of authority and sexual harassment, supervisors must not date their direct reports. This restriction extends to every manager above an employee.

Also, if you act as a hiring manager, you aren't allowed to hire your partner to your team. You can refer them for employment to other teams or departments where you don't have any managerial or hiring authority.

4.5 Friendships at work

Employees who work together may naturally form friendships either in or outside of the workplace. We encourage this relationship between peers, as it can help you communicate and collaborate. But, we expect you to focus on your work and keep personal disputes outside of our workplace.

4.6 Employment of relatives

Everyone in our company should be hired, recognized or promoted because of their skills, character and work ethic. We would not like to see phenomena of nepotism, favoritism or conflicts of interest, so we will place some restrictions on hiring employees' relatives.

To our company, a "relative" is someone who is related by blood or marriage within the third degree to an employee. This includes: parents, grandparents, in-laws, spouses or domestic partners, children, grandchildren, siblings, uncles, aunts, nieces, nephews, step-parents, step-children and adopted children.

As an employee, you can refer your relatives to work with our company. Here are our restrictions:

- [*You must not be involved in a supervisory/reporting relationship with a relative.*]
- [*You cannot be transferred, promoted or hired inside a reporting relationship with a relative.*]
- [*You cannot be part of a hiring committee, when your relative is interviewed for that position.*]

If you become related to a manager or direct report after you both become employed by our company, we may have to [*transfer one of you.*]

5. Workplace visitors

If you want to invite a visitor to our offices, please ask for permission from *your Manager* first. Also, inform our *reception* of your visitor's arrival. Visitors should sign in and show identification. They will receive passes and will be asked to return them to *reception* once their visit is complete.

When you have office visitors, you also have responsibilities. You should:

- Always tend to your visitors (especially when they are underage.)
- Keep your visitors away from areas where there are dangerous machines, chemicals, confidential records or sensitive equipment.
- Prevent your visitors from proselytizing your colleagues, gathering donations or requesting participation in activities while on our premises.

Anyone who delivers orders, mail or packages for employees should remain at our building's reception or gate. If you are expecting a delivery, *reception* will notify you so you may collect it.

6. Solicitation and distribution

Solicitation is any form of requesting money, support or participation for products, groups, organizations or causes which are unrelated to our company (e.g. religious proselytism, asking for petition signatures.) Distribution means disseminating literature or material for commercial or political purposes.

We don't allow solicitation and distribution by non-employees in our workplace. As an employee, you may solicit from your colleagues only when you want to:

- Ask colleagues to help organize events for another employee (e.g. adoption/birth of a child, promotion, retiring.)
- Seek support for a cause, charity or fundraising event sponsored, funded, organized or authorized by our company.
- Invite colleagues to employee activities for an authorized non-business purpose (e.g. recreation, volunteering.)

In all cases, we ask that you do not disturb or distract colleagues from their work.

7. REPORTING VIOLATIONS

Any individual in the employ of BDR, or any customer, supplier, partner or other third party, who becomes aware of a possible violation of the Code, or of a violation of the law by the Corporation or any of its employees, has an important duty to report it. While it is natural to have misgivings about raising such a concern, you are strongly encouraged to do so, as remaining silent could have serious negative consequences for the Corporation. When an Action is Unethical, when in doubt about a decision that involves workplace ethics, ask yourself the following questions. If the answer(s) makes you feel uncomfortable, the proposed action might not be appropriate.

8. Governance of the Code

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Is my action in line with the BDR Code?

–

Is my action legal?

–

Is my action honest and fair?

–

How would my family, friends and neighbours react if they knew about my action?

–

Would customers or shareholders approve of my action?

Who to Contact

If you have questions, need guidance or have grounds to believe that a provision of this Code has been breached, or that you may have breached the Code, you should promptly speak to one of the following:

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Your supervisor; your manager; your office manager;

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Generally, your supervisor should be able to resolve the issue rapidly. If you report a violation and it is not investigated, raise it with one of the other contacts listed above. BDR employees, customers, suppliers, partners and other third parties can also raise concerns with BDR's President. Appropriate disciplinary action will be taken depending on the severity of the breach of our code of conduct. As a reminder our disciplinary policy is found in our Handbook under Administrative Policies, and reads:

“Preceding termination the following progressive discipline actions will be performed given the nature of the offence – **Verbal warning, Written Warning, Suspension, Termination**. All Terminations and suspensions are to be determined by the severity of the violation and at the sole discretion of the company.