



Frontier Supply Chain Solutions Inc., including its subsidiaries, divisions, and related businesses (Frontier North America Inc., Frontier Supply Chain Solutions USA, Inc.) share the same Code of Conduct policy. All Employees and Contractors are expected to be aware of, and comply, with the Code of Conduct and its related policies and expectations.

The Code of Conduct is meant to outline the obligations of Employees and Contractors in specific areas while carrying out their duties. The Code of Conduct cannot anticipate every possible event or situation and Employees and Contractors are expected to use their best judgement in the spirit of this Code of Conduct.

The Code of Conduct policy describes the terms for Business Ethics, Conflicts of Interest, Attendance, Dress code and Grooming, Relationships, Visitors, Company Property Use, Technology Use, Internet, Company systems, and Client Relations.

## Business Ethics

Employees and Contractors will perform their duties with honesty in order to promote trust and confidence among clients, business partners, regulators, and co-workers.

Employees and Contractors will show respect to clients, business partners, carriers, suppliers, officials, and co-workers.

Employees and Contractors agree to follow acceptable behaviours. Unacceptable behaviours include rudeness to a client, business partner, carrier, supplier, official, regulators etc. Other examples include undervaluing imports, submitting false claims for duty and tax refunds, accepting or offering a bribe, possessing prohibited drugs, impairment while on duty, unauthorized removal of equipment, distributing intellectual property or information from Company systems.

Conduct and language must meet acceptable standards. Engagement in any activity which could be construed as sexual or personal harassment including but not limited to verbal or physical abuse or threats, unsolicited and/or unnecessary physical conduct, displaying lewd or offensive or obscene materials, offensive remarks about a person's characteristics etc. are not accepted.

Employees and Contractors agree to disclose any outside financial interests that might influence their decisions or actions on the job. This includes outside employment, directorships, consulting, gifts, or ownership of more than 1% of any supplier, customers, clients, or competitors. Exploitation in any working relationships for private advantage, gain or benefits are not permitted.

Employees and Contractors are expected to maintain the highest degree of confidentiality when handling customer matters, internal documents, internal processes, company information, and any other conversations or matters in the workplace. Disclosure of the above to other customers, coworkers who are not involved in the matter, friends, family members etc. are not permitted.

Any conduct which contravenes the standards set in the business ethics may be grounds for disciplinary action, up to termination of employment.

## Conflict of Interest

Conflicts of interest occur when an employee, contractor, or job applicant's personal interests may not align with company needs or interests. If an Employee or Contractor uses their position for personal



gain, engages in activities that will increase competitor profits, or acts in a way that could compromise the Company's legal position; these behaviors are considered conflicts of interest.

If an Employee or Contractor feels that a conflict of interest is likely to occur, that Employee or Contractor is instructed to discuss conflicts with their direct manager, human resources, or a member of the executive management team. All managers, human resources, and the executive management team are responsible for monitoring potential conflicts in the workplace and working to prevent them. In the event that conflicts cannot be prevented, Employees or Contractors are instructed to work with the Company's legal counsel to mitigate risks and exposure to the greatest extent possible.

Personal and financial interests should be kept entirely separate from activities that may oppose the Company's interests. Violation of the Conflict of Interest policy may result in suspension or termination of employment or contract.

## Client Relations

The Company strives to provide our clients with a consistent service that is of exceptional quality and value. To meet this consistency Employees and Contractors will be expected to complete the following: provide courteous service in prompt and efficient manner, establish and maintain positive relationships by gaining their trust and respect through professional and honest interactions, handle complaints quickly and professionally or review/seek guidance with a senior manager if not able to resolve, communicate in a professional manner whether in person, phone, fax, email, video conference etc.

Employees and Contractors represent the company. The Company's reputation and our client's perception of our company is attributed to each Employee or Contractor.

## Attendance

Attendance is a standard measure of job performance. Punctuality and regular attendance are expected of all Employees and Contractors. Employees or Contractors with excessive unexcused absences or repeated tardiness may be subject to a negative performance review or termination of employment or contract.

Attendance will be discussed in an attempt to measure the Employee or Contractor's commitment to position or contract, and to determine if they are well suited for the position or contract, they hold.

Excessive absences must be reported to Director of the Department, Human Resources, or project manager to be reviewed and addressed further.

The Company will not knowingly permit any person to remain or enter the workplace while the person's ability to work is affected by alcohol, drugs or other substances so as to endanger that person or anyone else.

Employees or Contractors have a responsibility to be fit for duty while at work or at work functions. The Employee or Contractor must not knowingly come to work or do work where any impairment (mental, physical as a result of alcohol, drugs, other substances, or other) may create an undue risk to the Employee, Contractors or any other person.

Employees or Contractors will not be allowed to enter the workplace when their ability to work is affected by alcohol, drugs or other substances so as to endanger the person or anyone else.



## Dress Code & Personal Grooming

Employees and Contractors are required to dress in a manner appropriate to the conditions, location, and work being carried out. Good judgment should be exercised when selecting work attire. Traditional business attire, casual business attire, uniforms, or personal protective equipment (PPE) or safety gear must be worn as dictated by job function and/or amount of direct interaction with clients. Clean and neat attire are expected. Personal protective equipment and/or safety gear must be kept in good working order and not damaged to impair the safety of the Employee or Contractor. Dress code policy will be adjusted as needed to account for changes in culture and work needs.

Employee or Contractor appearances and mannerisms should strive to create and maintain a favourable impression of the Company with the public, our clients, and co-workers. Good grooming and maintained hygiene is expected of all Employees and Contractors.

## Relationships

Personal relationships may exist within the organization. Employees and Contractors are expected to maintain professionalism in the workplace regardless of the status of their relationship. At work, Employees and Contractors are expected to behave in a way that does not distract colleagues from their duties, take away from work hours, or create a hostile work environment. Employees or Contractors that exhibit inappropriate behavior in the workplace may be subject to disciplinary action. Personal relationships that occur between a manager and their junior Employee are highly discouraged. Changes may occur to prevent favouritism or behaviours that will affect the professionalism and judgement of both parties.

## Visitors

All visitors are required to register their entrance at the visitor log and wear a visitor tag while on premises.

Clients, Contractors, or service vendors will be received by the office administrator prior to contacting the intended party. Within the facility, the intended party will escort the client, Contractor, or service vendor and ensure they are safely escorted to their destination.

Employees or Contractors who receive personal visitors must greet their visitors and stay with the personal visitor throughout their entire visit. Inappropriate behavior by personal visitors, including engaging in offensive speech, causing disruption in the workplace, or stealing company property, will not be tolerated. Personal visitors that behave inappropriately will be removed from the premises.

## Company Property Use

The Company reserves the right, on reasonable suspicion that company policy is being violated, to conduct searches or inspections of Employees and their desks, workstations, computer history, email history, baggage, lockers, and other property located on Company premises or work sites. Entry on Company premises or worksites constitutes consent to searches or inspections.

All computers, vehicles, technology systems, workstations, and communications equipment etc. are the property of the company and to be used only to conduct company business. Use of the above for personal use is permitted only upon the discretion of management. It is the responsibility of the



Employee or Contractor to protect the above while in their possession from misuse, damage and/or theft, while ensuring the above is secure at all times.

## Technology Use, Internet, Company systems

Voice mail, Email, Intranet system, Company maintained systems and access to Internet are provided to Employees or Contractors for the benefit of the organization and its clients and to facilitate business. All messages sent, received, composed, stored on these systems are property of the Company and are subject to inspection and review at the Company's discretion. Every Employee or Contractor has the responsibility to use the internet in a productive manner. To ensure that all Employees and Contractors are responsible, the following guidelines have been established when using the internet.

### Acceptable Use of the Internet

All communication should be used for professional reasons. Employees and Contractors are responsible for seeing that the internet is used in an ethical, effective and lawful manner. Virtual applications and message applications can be used to conduct official company business, or to gain technical or analytical advice. Email may be used for business contacts.

### Unacceptable Use of Internet

The internet should not be used for personal gain or advancement of individual view. Solicitation of non-company business or any use of the internet for personal gain is strictly prohibited. Use of the internet must not disrupt the operation of the company network or the network of other users. It must not interfere with productivity.

### Communication

Each Employee and Contractor is responsible for the content of all text, audio or image that they place or send over the internet or phone. Fraudulent, harassing or obscene messages are prohibited. All messages communicated on the internet or phone should have the Employee or Contractor's name attached. No messages will be transmitted under an assumed name. Users may not attempt to obscure the origin of any message. Information published on the internet should not violate or infringe upon the rights of others. No abusive, profane or offensive language must be transmitted through the system. Employees or Contractors who wish to express personal opinions on the internet are to use noncompany internet systems. Personal use of voice mail or email or intranet which interferes with the Employee or Contractor's work performance will not be tolerated.

Messages on the voice mail, email, or intranet systems are to be accessed by the intended recipient or by others at the direct request of intended recipient. However, the Company reserves the right to access messages on any system at any time. Attempts by persons other than the above to access messages on any system will constitute a violation of company policy.

### Software & Copyright

To prevent viruses from being transmitted through the system, there will be no unauthorized downloading of any software. All software downloads require prior management or IT department approval. All software installed on company systems must be used in compliance with all applicable licenses, notices, contracts, and agreements. The IT department reserves the right to uninstall any unapproved software from any company device. Copyrighted materials belonging to entities other than our company may not be transmitted by Employees on the internet. Failure to observe copyright or license agreements may result in disciplinary action, up to and including termination or legal action by the copyright owner.



### Security

All messages created, sent, or retrieved over the internet are the property of the Company and should be considered public information. The Company reserves the right to access and monitor all messages and files on the computer system as deemed necessary and appropriate. Internet messages are public communication are not private. All communication including text and images can be disclosed to law enforcement and or other third parties without prior consent.

### Passwords

Passwords are a crucial part of information and network security. Employees or Contractors are required to take appropriate steps to ensure that they create strong secure passwords and keep them safeguarded at all times.

### Social Media

Social media, which may include applications such as Snapchat, Instagram, Twitter or other Internet networking applications like Facebook, Messenger should not be used during work hours except as it relates to business and virtual communication. Employees or Contractors who spend inappropriate amounts of time on personal social media accounts during work hours will be subject to poor performance reviews and appropriate discipline procedures applied.

Employees and Contractors are expected to handle their personal social media accounts appropriately outside of the office. Employees and Contractors should always work to ensure that their personal accounts clearly state that their views do not represent the Company. Employees and Contractors should never share any intellectual property, or the status of any of their assignments on social media.

When representing the Company, Employees and Contractors should always be respectful and avoid speaking in specifics about their work. Employees and Contractor should never post discriminatory, offensive, or other illegal language on social media. Employees and Contractor must always correct or remove statements posted to their social media that are made on behalf of the company.

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## Acknowledgement of Code of Conduct

My signature below indicates that I have received a copy of Frontier Supply Chain Solutions Inc. Code of Conduct document. I understand that the document contains information regarding policies and expectations which affect me as an Employee or Contractor. I acknowledge that I have read and understood and will comply with the Code of Conduct policies. I also understand that the Company may revise, supplement or rescind policies, procedures or benefits described in the Code of Conduct, with or without notice.

Print Name \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_