



Rochon

Supplier Code of Conduct



Supplier Code of Conduct

Purpose and Scope

Rochon Building Corporation (Rochon) - ("the company") is a leading provider of full construction services in Canada that specializes in industrial and commercial projects.

This Supplier Code of Conduct (the "Supplier Code") sets out the standard of business behaviour expected of Rochon's suppliers. We expect suppliers to act with honesty and integrity, be guided by our ethical values, and comply with both the language and spirit of the Supplier Code.

The Supplier Code applies to Rochon suppliers, including their owners, employees, agents, partners and subcontractors who provide goods and/or services to Rochon.

Application

Rochon places substantial value upon suppliers who support and respect the behaviours outlined in this Supplier Code of Conduct and it is a requirement for all Rochon suppliers and their subcontractors to adhere to this Supplier Code of Conduct. This Supplier Code of Conduct is not to be read in lieu of, but in addition to, the supplier's obligations as set out in any contracts between the company and the supplier.

Our Commitment and Expectations of Suppliers

Rochon Building Corporation is committed to maintaining the highest standards of integrity, professionalism, and accountability in every aspect of our business. We expect our suppliers to demonstrate the same commitment by conducting their operations ethically, safely, and in compliance with all applicable laws and regulations. Suppliers are expected to deliver quality goods and services, act transparently and fairly, treat their employees and partners with respect, and continuously strive for improvement in safety, sustainability, and performance. Through mutual respect and shared responsibility, Rochon and its suppliers can achieve excellence in every project we undertake together.

Accurate Record-Keeping:

Suppliers must maintain complete, accurate, and transparent records that reflect all business transactions and dealings with Rochon Building Corporation. All financial books, invoices, time records, reports, and other documentation must be prepared in accordance with applicable laws, regulations, and generally accepted accounting practices. Falsification, misrepresentation, or concealment of information is strictly prohibited. Suppliers are expected to retain and provide access to relevant records

when requested by Rochon or authorized auditors to verify compliance with this Supplier Code of Conduct.

Acknowledgment

By doing business with Rochon Building Corp., Suppliers acknowledge and agree to adhere to the principles outlined in this Supplier Code of Conduct.

Core Values

The core business principles that will be observed at Rochon Building Corporation, as they relate to our customers, people, and suppliers, are as follows:

Our Customer

- Honesty and integrity are considered an important part of our business.
- Our clients will be treated as our business partners.
- All bids will be structured to win the business and deliver customer value.
- The Client is always right.
- All projects are to be completed on time.
- Our clients will be reputable.

Our People

- Success is determined by the work of our excellent people.
- Rochon will strive to hire the best people.
- People will know and understand our expectations.
- People will be respected as family.
- Everyone is on the marketing team. *(Projects completed with satisfied customers are considered our best marketing tool).*
- Our people are dedicated to maintaining a work environment built on principles of honesty and integrity.

Our Suppliers

- We never forget that we are only as good as our suppliers – who are the best.
- Suppliers are part of our project team.
- We respect the expertise and performance of our suppliers.
- Suppliers will always be treated fairly.

Standards of Business Conduct

Business Ethics and Integrity

1. Anti-Bribery and Anti-Corruption

Suppliers must conduct all business with integrity. Bribery, kickbacks, improper payments, and other corrupt practices are strictly prohibited. This includes offering or accepting anything of value to gain an improper business advantage.

2. Conflict of Interest

A conflict of interest occurs when personal relationships, financial interests, or other outside factors—such as family ties, close friendships, or social connections—could influence, or appear to influence, fair and objective decision-making related to Rochon's business. Such situations can compromise trust and integrity, especially if a supplier has a personal connection to a Rochon employee that might affect impartiality.

Rochon values transparency and expects suppliers to be proactive in identifying and disclosing any circumstances that might create even the appearance of a conflict, so appropriate measures can be taken to ensure ethical and unbiased business conduct.

2.1 Declaration of Actual, Perceived or Potential Conflict of Interest

Suppliers must declare any actual or potential conflicts of interest that may affect their ability to act in an impartial manner when conducting business with Rochon Building Corp. A conflict of interest arises when a supplier's personal interests interfere, or appear to interfere, with their obligations to Rochon Building Corp.

3. Gifts and Entertainment

Suppliers, vendors, and other third parties doing business with Rochon shall conduct themselves in a manner that does not compromise, or appear to compromise, the independent judgment and integrity of Rochon employees. This includes refraining from offering gifts, favours, entertainment, or other benefits that could be perceived as attempts to influence business decisions or gain preferential treatment.

Any gift or entertainment given to or received by Rochon employees must:

- Not be extravagant or excessive in value
- Be infrequent in nature

- Have a clear and legitimate business purpose
- Be permitted under all applicable laws and regulations

Suppliers must maintain appropriate records of exchanges of gifts, hospitality, and other benefits between the Supplier and Rochon.

4. Confidentiality and Data Privacy

Suppliers must protect all confidential, proprietary, and personal information received from Rochon or its stakeholders. This includes:

- Using such information only for authorized purposes.
- Implementing safeguards to prevent unauthorized access or disclosure.
- Complying with applicable data protection and privacy laws.

5. Drug and Alcohol

Rochon is committed to providing a safe work environment. Suppliers must ensure that their employees, contractors, and representatives are fit for duty while conducting work for or on behalf of Rochon Building Corp. Suppliers are expected to have and enforce policies that prohibit impairment on the job and promote a safe, sober, and productive working environment.

Employment Standards

Suppliers must uphold fair employment practices and comply with all applicable labour and employment laws. This includes providing a workplace free from discrimination, harassment, and abuse; prohibiting child, forced, or involuntary labor; ensuring fair wages, legally mandated benefits, and reasonable working hours; and respecting workers' rights to freedom of association and collective bargaining. All employment must be freely chosen, and workers must be treated with dignity, respect, and equality at all times.

Health and Safety

Suppliers must provide a safe and healthy workplace for their employees. This includes:

- Implementing appropriate health and safety policies, procedures, and training.
- Complying with all health and safety laws and regulations.
- Taking proactive measures to prevent workplace accidents, injuries, and illnesses.

- Reporting and investigating health and safety incidents promptly.

Environmental Responsibility

Rochon expects Suppliers to operate in an environmentally responsible manner and to:

- Comply with applicable environmental laws and regulations.
- Work to minimize waste, emissions, and environmental impact.
- Responsibly manage hazardous materials and waste.
- Seek opportunities to reduce energy and resource consumption.

Monitoring and Auditing

Rochon Building Corp. may periodically monitor and audit its suppliers to ensure compliance with this Code of Conduct. Suppliers are expected to cooperate with any such requests and provide necessary documentation or access to facilities as required.

Reporting Concerns

Suppliers must maintain a process for reporting concerns about unethical or unlawful conduct without fear of retaliation. Rochon encourages Suppliers to report any suspected violations of this Code or applicable laws directly to:

Rochon Building Corp.

Attn: Senior Manager, Construction & Procurement

Email: Info@rochonbuildingcorp.com

Phone: 416.638.6666

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www.rochonbuildingcorp.com