



October 1, 2019

IMPERIAL'S CODE OF CONDUCT AND ETHICS POLICY

MANAGEMENT POLICIES AS A SUPPLIER TO ALL OUR CUSTOMERS

1. Imperial complies with all applicable laws and regulations of Canada.
2. No employee shall suffer harassment, physical or mental punishment, or other form of abuse.
3. Imperial will comply with all applicable wage and hour laws, as a minimum, as well as rules and regulation, including minimum wage, overtime and maximum hours as prescribed by the laws of Canada.
4. Imperial will not use any forced or compulsory labor in our company.
5. All employees are free to leave their employment (after reasonable notice).
6. There is no use of Child labor, specifically we comply with relevant ILO standards (ref C182 Worst forms of Child labor convention, 1999; Reference ILO C138-Minimum Age Convention, 1973).
7. We respect the right of our employees to freedom of association and recognition of employees' rights to collective bargaining, where allowable by law.
8. The workplace shall have safe and healthy working conditions.
9. All operations by management and all employees shall be done with care for the environment including compliance with all relevant legislation in Canada.
10. All products and services will be delivered to meet the quality and safety criteria specified in relevant contract elements, and will be safe for their intended use.
11. No payments, services, gifts, entertainment or other advantages will be offered or given to any employee of our customers or third party, which are intended to influence the way in which the employees of our customers or third party goes about his or her duties.
12. No payments, services, gifts, entertainment or other advantages will be accepted from any employee of our customers or third party which are intended to influence the way in which employees of our customers or third party goes about his or her business.
13. We do not engage in any actual or attempted money laundering activities.
14. Our suppliers are also expected to follow similar codes of conduct, as above.
15. Imperial is a member of SEDEX and completed successfully a SEDEX Members Ethical Trade Audit (SMETA 4 pillars) in 2017.
16. Annually, management will assess compliance with our policies.

Val Miller, CEO D. Farouk, COO Tim Miller, Director Parvinder Coshal, Controller

Jan Paliwoda, M'tce Manager Mirela Vanjgeli, Quality Leader Adam Andrewjewski, Plant Manager

(Managers attest to the sections that are applicable to them)