



# MARKET ALERT LIMITED

## SUPPLIER GUIDELINES for BUSINESS CONDUCT

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### **Purpose**

These Supplier Guidelines for Business Conduct (the “Supplier Guidelines”) set out Market Alert Limited’s (“MAL” or “Market Alert Ltd”) principles and expectations as to how organizations who supply goods and services to Market Alert Limited (“Suppliers”), including their employees and representatives are to conduct business and deal with Market Alert Limited.

### **Scope**

In alignment with our values, Market Alert Limited is committed to striking the correct balance across shareholder groups, clients, employees, directors, officers, associates, agents and communities. Our values are predicated on providing excellent service, accurate research and insightful recommendations to our clients and each other. This is a work ethic that promotes teamwork to succeed, taking personal responsibility for exceptional performance, diversity for growth, as well as integrity and innovation in everything we do. Our organizations and everyone associated with it, have a duty to comply with applicable laws and regulations, and are expected to behave responsibly and ethically. We expect our Suppliers to operate in accordance with values comparable to ours and in a manner which is consistent with sound business practices.

### **Business Integrity**

#### **Compliance with Laws**

In all their activities, Suppliers must ensure they conduct business in compliance with the applicable laws, regulations and rules of the jurisdictions in which they operate.

#### **Anti-Bribery & Anti-Corruption**

Suppliers must not engage in any conduct that would put Market Alert Limited at risk of violating anti-bribery or anti-corruption laws.

#### **Information Barriers and Inside Information**

In their dealings with Market Alert Limited, if Suppliers become aware of inside information about Market Alert Limited or our clients, we expect Suppliers to have in place policies and procedures for the proper handling and use of that information (including information barriers). These policies and procedures must meet applicable legal and regulatory requirements to prevent inappropriate access or disclosure of inside information.

#### **Conflicts of Interest**

In their relationship with our directors, offices, employees, associates, or agents, Suppliers must not try to gain improper advantage or preferential treatment for other relationships they may have with us (for example, as a referral contact or as a client).



### **Gifts and Entertainment**

The nature of gifts and entertainment must not, by their quality, quantity or timing, be used by Suppliers to gain improper advantage or preferential treatment. We expect that Suppliers will maintain appropriate records of exchanges of gifts and entertainment with our directors, officers, employees, associates, agents or third party contractors and service providers.

## **Responsible Treatment of Persons**

### **Respect and Diversity**

Suppliers must maintain workplaces that reflect professionalism, and respect for the diversity and dignity of every person with whom their directors, officers, employees, associates or agents interact, including respect for differences such as gender, race, colour, age, disability, sexual orientation, ethnic origin and religion. Suppliers must not tolerate harassment, discrimination, violence, retaliation, and other disrespectful and inappropriate behaviour.

### **Health and Safety**

Market Alert Limited expects Suppliers to provide healthy and safe workplaces, and to comply with all relevant health and safety laws in the jurisdictions in which they operate. It is expected that Suppliers will provide all their directors, officers, employees, associates, and agents with adequate information and instruction on health and safety concerns and to enable their directors, officers, employees, associates and agents to meet their responsibilities for the maintenance of a healthy and safe work environment.

### **The Environment**

We expect Suppliers to work with Market Alert Limited to promote environmental sustainability. Suppliers are to assist in reducing environmental footprints whenever possible and conduct business in an environmentally responsible manner.

### **Employment and Contracting Practices**

Suppliers must follow all applicable employment standards, labour, non-discrimination and human rights legislation. Where laws do not prohibit discrimination, or where they allow by different treatment, we expect Suppliers to be committed to non-discriminatory principles and not to operate in manner that differentiates.

Supplier must also demonstrate that, in their workplaces that:

- a) Child labour is not used;
- b) Employees are free to raise concerns and speak up without fear of reprisal;



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- c) Clear and uniformly applied employment standards are used that meet or exceed legal and regulatory requirements;
- d) All forms of discrimination and harassment are prohibited, and when they occur, prompt corrective action is taken; and
- e) Appropriate and reasonable background checks, including investigations for prior criminal activity, have been completed to ensure the integrity of the Supplier's directors, officers, employees, associates and agents.

Suppliers will not sub-contract services without the specific written consent of Market Alert Limited. In applying for consent, Suppliers will be required to make available and disclose to Market Alert Limited the specific contractual arrangements with the sub-contracted party.

Suppliers will also not hire foreign workers from outside Canada when performing services on behalf of Market Alert Limited, where a worker eligible to work in Canada is available and able.

Suppliers will notify Market Alert Limited immediately if they have been in breach of any immigration laws, employment standards, or Canadian Human Rights.

### **Record Keeping**

Suppliers are to maintain adequate internal records to ensure proper compliance with their obligations to Market Alert Limited. Suppliers must not destroy records pertaining to Market Alert Limited that may be relevant to any pending or threatened legal or regulatory proceeding of which the Supplier becomes aware.

### **Supplier Guideline Compliance & Monitoring**

It is expected that Suppliers will comply with these Guidelines, and failure by a Supplier to comply with these Guidelines may result in the termination of a Supplier's relationship or association with Market Alert Limited. We may also require a Supplier to periodically confirm in writing that they meet the requirements of these Guidelines, as well as request the ability to monitor and audit the Supplier's control mechanisms and environment.