



## JAMIESON WELLNESS | CODE OF ETHICAL CONDUCT 2025

### Inspiring Better Lives Every Day starts with us.

At Jamieson Wellness, we're focused on what brings people together, and what unites us is through our purpose of Inspiring Better Lives Every Day. Our physical, mental and social wellbeing is an essential element of being human, and the pursuit of it is something we all have in common, no matter where we live.

As our world evolves, how we see and think about the role of our organization, and the role of our brands, has evolved, too. We're a purpose-driven company whose high-quality products are here not only to fill immediate needs, but also to make a meaningful, long-lasting impact on the lives of people around the globe.

### LIVING OUR VALUES & GLOBAL PRINCIPLES

The Jamieson Code of Ethical Conduct is based upon our company values of Accountability, Respect, Excellence & Agility. It helps us ensure that our behaviours and the decisions we make are honest, ethical, responsible, and in accordance with all applicable laws and regulations. We pride ourselves on our reputation of quality and integrity that supports our purpose of Inspiring Better Lives Every Day.

At Jamieson Wellness we promote a values-based culture and expect all employees, and those that work on behalf of us, to conduct business using the principles of this code as a guide.

As we work together to achieve our Purpose, our Code of Ethical Conduct reminds us that a healthy foundation must be maintained to continue building a healthier world.

#### Commitment to Corporate Sustainability

At Jamieson Wellness, corporate sustainability is rooted in our core values and a principles-based approach to doing business. This means upholding fundamental responsibilities in human rights, labour, the environment, and anti-corruption across all areas of operation.

Responsible organizations act consistently with these principles, ensuring that good practices in one area are not used to justify harm in another. By embedding the Ten Principles of the United Nations Global Compact into our strategies, policies, and procedures, we cultivate a culture of integrity. This commitment not only fulfills our obligations to people and the planet but also lays the groundwork for sustainable, long-term success.

#### The Ten Principles of the UN Global Compact

These principles are drawn from globally recognized frameworks:

- **The Universal Declaration of Human Rights:** Upholding dignity and equality for all individuals.
- **The International Labour Organization's Declaration on Fundamental Principles and Rights at Work:** Promoting fair and safe working conditions.
- **The Rio Declaration on Environment and Development:** Advocating for environmental stewardship and sustainable practices.
- **The United Nations Convention Against Corruption:** Fighting corruption in all its forms.

By aligning our operations with these principles, Jamieson Wellness reinforces its dedication to ethical, sustainable, and impactful business practices worldwide.

## STAKEHOLDER COMMITMENT TO OUR CODE

Our Code of Ethical Conduct, along with the policies that support it, outlines the standards expected of all our employees. We also require our partners and their teams to operate in alignment with these principles, ensuring that together we uphold our shared commitment to integrity and excellence in health and wellness.

**References in the Code and Code Policies to ‘covered persons’ include the following:** Jamieson Wellness employees, whether full-time or part-time, all contract employees, including independent contractors. Jamieson Wellness Directors and Officers

All employees are responsible for:

- **Understanding our Code of Ethical Conduct:** Familiarize yourself with the expectations outlined in our Code of Ethical Conduct and its’ supporting policies.
- **Completing Training:** Participate in any required training as directed by your manager or Jamieson Wellness Corporate Ethics Officers\*.
- **Adhering to Standards:** Follow the Code of Ethical Conduct and its’ supporting policies. If you are unsure about their interpretation or whether specific actions align with these standards, seek guidance from your manager or the Corporate Ethics Officer(s).
- **Reporting Concerns:** Promptly report any actual or potential violations of the Code of Ethical Conduct and its supporting policies. This includes concerns about your own behavior, colleagues, or individuals acting on behalf of the organization, whether intentional or accidental. Also, flag instances where partners’ conduct may fall short of these standards.

### Reporting Concerns and Responsibilities

#### Reporting Potential or Actual Breaches:

Employees are encouraged to report any potential or actual breaches to their direct manager. If this is not appropriate, they should contact one of the following:

- **Human Resources department**
- **Corporate Ethics Officers:** Reach out to the Corporate Ethics officers responsible for ethical oversight.
- **Confidential Whistle-blower Support Line:** Use the organization's confidential and/or anonymous reporting line (via phone or web) as per the contact details below, where permitted by law.
  - 24-hour toll-free hotline: All countries: 1-833-900-0010
  - by online submission at [www.lighthouse-services.com/jamiesonwellness](http://www.lighthouse-services.com/jamiesonwellness).

The inappropriate delay in reporting a known or reasonably suspected violation is itself a violation of this Code.

If a manager or another employee discourages reporting a potential breach, the employee must immediately notify the Corporate Ethics Officer or the confidential support line.

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### Additional Responsibilities for Managers and Above:

Leaders at the managerial level and beyond must:

- **Lead by Example:** Lead ethically by exemplifying the organization's Code of Ethical Conduct and its supporting policies, while actively cultivating a culture of integrity.
- **Team Accountability:** Ensure all team members, including new hires:
  - Have reviewed the Code of Ethical Conduct and its supporting policies.
  - Have completed all required training.

- Understand how to raise concerns or report potential breaches.
- **Deliver with Support:** Facilitate support, team discussions, or briefings as requested by the Corporate Ethics Officer(s) or senior leaders. Offer guidance to team members on Ethical Conduct and escalate unresolved concerns to the Corporate Ethics Officers.
- **Protect Whistleblowers:** Ensure that individuals who raise concerns are treated with respect and without retaliation. Whistleblowers acting in good faith should be protected even if their claims are ultimately unsubstantiated.

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## Addressing Concerns:

### Managers must:

- Take all reported concerns seriously, addressing them promptly and with discretion.
- Consult with the Corporate Ethics officers to determine the appropriate course of action, including additional notifications if necessary.
- Participate in investigations or documentation, including sharing lessons learned or completing case files as required by the Corporate Ethics officers.
- Assess and implement any additional training, communication, or procedural updates needed to prevent similar issues from recurring.

By fulfilling these responsibilities, we uphold our commitment to integrity and trust across all aspects of our organization.

### Employees are prohibited from:

- **Overlooking or failing to report** situations they suspect may involve a breach of the Code of Ethical conduct or Supporting Policies.
- **Discouraging others from reporting** potential or actual breaches or pressuring them to dismiss concerns.
- **Sharing information** about a potential or actual breach under investigation with others, unless explicitly authorized by the investigation team.

To the fullest extent of its ability, Jamieson Wellness will ensure that no Covered Person will face retribution or retaliation for making good-faith reports of known or reasonably suspected violations of this Code. Jamieson Wellness will also take all reasonable steps to prevent such retaliation. Ensuring that Covered Persons can report concerns without fear is essential to the effective implementation of this Code.

## Accountability and Compliance

The Board of Jamieson Wellness, along with the Corporate Ethical Officer(s), is responsible for overseeing compliance with this Code. Any Covered Person, including any officer, who violates this Code will face disciplinary action, up to and including termination of employment, based on the specific circumstances. Violations of this Code by a member of the Board of Directors will be addressed appropriately, considering the particular situation.

### Jamieson Wellness Corporate Ethics Officers:

- Senior VP & General Council
- Senior Director ESG & Culture

## Jamieson Wellness Legal Team:

- Senior VP & General Council

## LEGAL CONSULTATION

### Code Policy: Compliance with Legal Standards and Seeking Legal Advice

At Jamieson Wellness all employees, directors, and officers ("Covered Persons") are expected to strictly adhere to the laws and regulations of the countries in which we operate. Compliance is a fundamental responsibility for all, and ignorance of the law is not acceptable.

To safeguard our organization's interests and ensure ethical business practices, it is critical to seek timely legal consultation when needed. This policy outlines the circumstances under which employees must engage with the Jamieson Wellness Legal Team:

1. **Understanding Legal Requirements:** Employees must familiarize themselves with the laws relevant to their roles and responsibilities. Proactively seeking clarification is essential to maintain compliance.
2. **Seeking Legal Advice:** Employees are required to consult with the Legal Team in situations where:
  - The legality of a business activity or decision is unclear.
  - There is potential exposure to legal or regulatory risks.
  - When entering a new business relationship with a contract, contracts or agreements require review to align with applicable laws and company policies.
  - Regulatory bodies or legal authorities are involved.
3. **Timeliness of Consultation:** Legal consultation must occur promptly to avoid delays that could compromise our organization's interests or compliance obligations.

This Code serves to protect our employees, our reputation, and our business opportunities. Failure to comply with this policy may result in disciplinary action.

For further guidance or questions, please contact the General Counsel for Jamieson Wellness.

## Requirements for Legal Engagement and Reporting

### Employee Responsibilities

All employees must:

- Immediately inform their manager or an appropriate designated individual (refer to the Code Policy on Commitment to the Code) if they suspect or uncover any illegal activity related to the organization's operations or associated activities involving third parties.
- Seek legal advice without delay to address and manage such concerns effectively.

Employees must promptly consult the Jamieson Legal Team in the following circumstances:

#### 1. Contracts and Transactions

- **Commercial Agreements:** Includes contracts for goods or services, leases, licenses, and intellectual property agreements such as technology licenses, trademarks, joint development, or technical assistance contracts.
- **Mergers and Acquisitions:** Includes transactions involving mergers, acquisitions, disposals, or joint ventures.

## 2. Litigation and Regulatory Actions

- **Civil Litigation:** Employment or contractual disputes, whether threatened or actual, including initiating or settling such disputes.
- **Criminal Prosecutions:** Matters involving criminal charges, whether threatened or actual, by or against the organization or its employees.
- **Government or Regulatory Communications:** Includes unexpected investigations or actions Jamieson Wellness is seeking or responding to, such as compliance with international or domestic regulations or other requirements.

## 3. Competition and Antitrust

- Compliance with competition or antitrust laws, including trade terms, exclusivity arrangements, or pricing.

## 4. Communications

- Press releases or public statements that could affect the organization's reputation or create legal liability or involve sensitive information (see Code Policy on Disclosure and Insider Training, as well as the External Communications Policy).

## 5. Claims, Brands, and Marketing

- Product claims, marketing materials, and trademarks, including advertising, promotional materials, packaging requirements, and competitor challenges.

## 6. Employment Matters

- Issues relating to non-compete obligations, employment disputes, terminations, and employment contract terms.

## 7. Safety

- Incidents involving product tampering, counterfeiting, consumer complaints that may lead to legal disputes, potential product recalls, or safety issues involving or impacting consumers, employees, or the environment.

## 8. Legal or Governance Structures

- Changes to legal or governance structures, including capital structures, Board membership, public filings, or relationships with third-party shareholders.

## 9. Bribery and Corruption

- Situations involving bribery, corruption allegations, or uncertainty about activities that may have such implications (see Code Policy on Anti-Bribery).

## General Guidance

- If a situation is not specifically covered but poses potential legal risks, employees must err on the side of caution and consult with Jamieson Wellness Legal Team.

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## Prohibited Actions

### Employees Must Not:

- Engage in activities deemed illegal or unlawful as per the advice of the organization's General Counsel

- Proceed with actions flagged as high-risk without explicit senior line management authorization.
- Appoint a private investigator without prior approval from General Counsel.

**Employees outside of General Counsel must not:**

- Independently appoint, manage, or remove external legal counsel.
- Pay legal fees outside of the agreed fee structures set by the Legal Team.

## Responsible Risk Management

Effective risk management is essential to our Jamieson Wellness strategy and the realization of its long-term objectives. Our success as an organization relies on our ability to identify and capitalize on opportunities and embed proactive and informed risk management within our business and the markets in which we operate.

The primary goals of Jamieson Wellness’s Risk Management program are to safeguard and enhance our operations, reputation, and brand, while supporting strategic decision-making

Managers at all levels must implement the organization’s Principles of Risk Management by adhering to the following guidelines:

### General Managerial Responsibilities

- **Accountability:** Identify and manage risks relevant to their roles.
- **Risk Appetite:** Define the acceptable level of risk to guide decision-making and determine necessary mitigation strategies.
- **Risk Mitigation:** Establish and maintain effective controls to ensure objectives are achieved while minimizing risks.

### Leadership Teams of Key Global Functions

For key global functions responsible for critical business risks, leadership teams must:

- Define each risk and ensure appropriate mitigation actions are in place.
- Maintain supporting documentation for risk management efforts.

### Leadership Teams of Business Units

Leadership teams of Business units where regulatory risk assessments are mandatory must:

- **Conduct Annual Risk Assessments:**
  - Identify key business risks under their responsibility.
  - Evaluate the management of these risks.
  - Identify gaps between actual and desired risk appetite levels.
- **Regularly Review Risks:** Ensure risks are actively monitored and mitigated to align with organizational objectives.
- **Regulatory and Statutory Risks:** Report substantial compliance risks to the relevant Business Unit(s) and the Senior Leadership Team.
- **Customer or Channel Risks:** Escalate significant customer or channel risks to the relevant Business Unit(s) and the Senior Leadership Team.

### Project Leaders

For strategic business transformation projects, project leaders and their teams must:

- Identify the key risks that may hinder the project from achieving its objectives.
- Develop and implement risk mitigation plans.
- Regularly review progress and adjust strategies as necessary.

By embedding these principles, the organization ensures a structured approach to risk management, supporting sustainable growth and operational excellence.

## ANTI-CORRUPTION AND ANTI-BRIBERY

### Commitment to Preventing Bribery and Corruption

At Jamieson Wellness, the prevention, detection, and reporting of bribery and corruption is a shared responsibility for everyone within the organization. We are committed to maintaining the trust of our employees, customers, and business partners. This trust is upheld when we act ethically and with integrity, regardless of any immediate business pressures. Any suspected violations of anti-bribery laws of any jurisdiction must be reported promptly to the Jamieson Wellness Corporate Ethics office, to the 3<sup>rd</sup> party Hotline, the Audit Committee chair or the Board of Director Chairperson.

- **Zero Tolerance for Corruption:** We never engage in bribery or any corrupt practices, irrespective of citizenship, domicile, or location.
- **No Bribes:** We do not offer, give, solicit, or accept bribes under any circumstances.
- **No Facilitating Payments:** We do not make or authorize facilitating payments, nor do we allow others to act on our behalf in ways that violate these principles.

By adhering to these standards, we reinforce a culture of integrity and ethical conduct, ensuring that our actions align with our values and legal obligations.

To uphold Jameison wellness' zero-tolerance stance on bribery and corruption, employees must:

- **Clearly Communicate Zero Tolerance:** Internally and when engaging with third parties, emphasize that the company will not—directly or indirectly—offer, give, request, or accept any payment, gift, or favour intended to improperly influence a business outcome.
- **Report Suspected Violations:** Immediately inform the Corporate Ethics Officers and relevant leadership if they encounter any suggested or actual payment or transaction that may breach the company's anti-bribery and corruption policies.
- **Minimize Risky Interactions:** Whenever possible, use electronic communications, e-government platforms, or other digital solutions for processes such as licensing, procurement, taxation, and brand protection to limit face-to-face interactions with public officials and reduce the risk of bribery solicitation.

### Prohibited Activities

Employees must never, directly or indirectly (e.g., through suppliers, agents, distributors, consultants, lawyers, intermediaries, or others):

- **Offer or Give Bribes:** Provide bribes or improper advantages, including facilitation payments, to any public official, individual, or third party. This prohibition applies to actions that are intended—or could be perceived as intended—to improperly influence decisions related to the company.
- **Request or Receive Bribes:** Solicit or accept bribes or improper advantages from any third party. This includes actions that are intended—or could be perceived as intended—to improperly influence decisions made by the company regarding that third party.

By adhering to these principles, the organization reinforces its commitment to ethical conduct and ensures transparency in all business dealings

## Avoiding Conflicts of Interest

All employees, directors, and officers ("Covered Persons") must take great care to avoid actual, potential, or perceived conflicts of interest at all times. A conflict of interest arises or may arise when a Covered Person has, or appears to have, a financial or personal interest—beyond their role within the company—that differs from or conflicts with the company's interests.

Conflicts may occur in situations where:

- A Covered Person's actions or interests interfere with their ability to perform their duties impartially and objectively.
- Personal interests could improperly influence business decisions or create the appearance of bias.

Given the diverse circumstances that could lead to an actual, potential, or perceived conflict of interest, all Covered Persons are expected to regularly evaluate their actions and relationships to ensure no conflicts exist or may arise. If in doubt, they should seek guidance to address the matter appropriately.

## Gifts and Entertainment Policy

At Jamieson Wellness all relationships must reflect our unwavering commitment to conduct business with integrity.

- **The Role of Hospitality:** Hospitality can contribute positively to fostering relationships with customers, suppliers, and other third parties. Similarly, offering reasonable gifts, such as during promotional events or product launches, may be appropriate in certain contexts (e.g. when hosting partners from other markets).
- **Avoiding Abuse and Conflicts:** Since giving or receiving gifts and hospitality can potentially be misused or create actual or perceived conflicts of interest, such practices should be exercised sparingly. They must always be legitimate and proportionate within the context of the company's business activities.

Employees must:

- **Adhere to Monetary Limits:** Ensure that any gifts offered or received (excluding company-branded merchandise) do not exceed \$25 USD, are infrequent, and comply with the company's policy on avoiding conflicts of interest.
- **Handle Excessive Gifts Appropriately:** Politely decline any gift exceeding the monetary limit, explaining the company's rules. In exceptional cases where refusing a gift may cause serious offense or returning it is not feasible:
  - Obtain clearance from the Corporate Ethics office.
  - Consider donating the gift to charity if appropriate.
- **Branded Merchandise:** Ensure all gifts in the form of branded merchandise are legitimate and proportionate.

### Guidelines for Hospitality for Employees:

- **Offer or Accept Hospitality Only When Legitimate:** Hospitality should only be provided or accepted if:
  - It serves a legitimate business interest.
  - Its value does not exceed monetary limits and is infrequent.
  - It involves locally hosted activities such as business meals, team-building events, cultural or sporting events, industry ceremonies, or site visits where usual business contacts are present.
  - All associated expenses are processed through the company's standard local expense system.
- **Seek Approval for Exceptions:** If hospitality exceeds monetary limits, employees must:

- Obtain their manager's support.
- Secure clearance from a Corporate Ethics officer.
- Confirm the third party's compliance with their equivalent policy.
- **Decline Non-Compliant Offers:** Politely refuse hospitality that exceeds monetary limits, citing company policy.

### Prohibited Activities

Employees must not:

- Discuss, offer, or accept any gifts or hospitality involving public officials or their family members without prior clearance from the Corporate Ethics officer or their SLT member.
- Offer or accept gifts, hospitality, or favors intended to influence business decisions or create obligations.
- Offer or accept cash or cash-equivalent gifts, such as vouchers, loans, shares, or lottery tickets.
- Offer or accept hospitality involving overnight stays or foreign travel without prior written clearance from the employee's manager.
- Participate in any hospitality that is inconsistent with the company's human rights policy or that may offend local norms or customs.

## WE TREAT ACCOUNTING AND FINANCIAL RECORDS WITH CARE

Proper handling of our financial records is critical for our company. This is why we are all committed to complying with national and international accounting rules. Local accounting and reporting in the affiliates are performed in accordance with local GAAP (Generally Accepted Accounting Principles). Group accounting and reporting, both external and internal, uses the International Financial Reporting Standards. Our financial records serve as the basis for managing our business. They give stakeholders an accurate, timely picture of our business performance and the relevant facts.

At Jamieson Wellness maintaining accurate and complete financial records is essential for effective decision-making and fostering trust with shareholders, regulators, and other stakeholders.

Our internal records serve as critical evidence of our actions, decisions, and obligations, as well as providing valuable business insights. To ensure accuracy and integrity:

- **Transactions:** All transactions must be properly authorized and precisely recorded.
- **Compliance:** Processes and procedures should be in place to maintain compliance with financial reporting standards and regulatory requirements.

Failing to record transactions accurately, falsifying records, or creating misleading information—or influencing others to do so—may constitute fraud. Such actions can lead to serious consequences, including legal penalties for both individuals and the organization.

### Financial Integrity and Responsibilities

Employees at Jamieson Wellness are essential to ensuring the accuracy, transparency, and compliance of our financial records. The following responsibilities and guidelines are critical for maintaining our commitment to ethical financial practices:

#### Employee Responsibilities

- **Accurate Recording:** Record all transactions fully, accurately, and promptly.
- **Authorized Transactions:** Only engage in transactions such as buying, selling, or transferring goods or assets if authorized to do so.

- **Legitimacy and Documentation:** Ensure all approved transactions are legitimate and supported by valid documentation.
- **Reporting Concerns:** Report any suspected fraud, tax evasion arrangements, misrepresentation, or unauthorized facilitation payments to the Corporate Ethics officer and Head of Finance.
- **Legal Holds:** Retain records in accordance with the company's Data Retention Policy or as required by local laws and legal holds.
- **Audit and Investigation Cooperation:** Fully cooperate with internal and external audits, tax authorities, and regulatory investigations, providing honest and comprehensive information.
- **Awareness:** Remain informed of all relevant details affecting your role or reporting obligations.

### Specific Guidelines for Financial Reporting

Employees responsible for financial reporting must:

- Comply with applicable laws, such as those governing financial statements, taxation, and environmental reporting.
- Adhere to external reporting standards, including accounting standards, corporate governance codes, and stock market regulations.
- Follow internal financial protocols and reporting standards.

### Accounting-Specific Responsibilities

Employees involved in accounting must:

- Accurately record sales, profits, assets, and liabilities within the correct reporting period.
- Maintain thorough documentation for assumptions underpinning accounting records, including provisions, journal entries, and contingent liabilities.

### Prohibited Activities

Employees must never:

- Artificially inflate or shift sales or profits between reporting periods.
- Create or maintain undisclosed or unrecorded accounts, funds, or assets.
- Conceal, alter, or falsify company records, accounts, or documentation.

Related policies [Financial Integrity policy](#)

## Protection and Proper Use of Corporate Assets

### Physical Assets

Employees and leaders at Jamieson Wellness are responsible for ensuring that the company's physical assets are used responsibly and protected from harm. The following guidelines outline responsibilities for employees and site leadership:

#### Employee Responsibilities

Employees must:

- **Proper Care:** Ensure all physical assets and property encountered during work are handled responsibly, avoiding damage, misuse, or waste.

- **Asset Categories:** This includes equipment (e.g., machinery, laboratory tools), products or components, buildings, computers, and company vehicles.

### **Site Leadership Responsibilities**

The leader of each site must:

- **Hazard Identification:** Assess potential hazards related to activities and services conducted on-site.
- **Risk Evaluation:** Analyze the risks these hazards pose to physical assets, including the potential for business interruption or liability.
- **Risk Mitigation:** Implement measures to reduce risks to acceptable levels, ensuring asset protection and continuity of operations.

By maintaining vigilance and care, employees and leaders contribute to the longevity and efficiency of company resources, supporting a sustainable and secure working environment.

### **Financial Assets**

#### **Intellectual Property:**

(a) Each Covered Person must act in a manner which protects Jamieson Wellness assets and resources and ensures their responsible and efficient use. All assets and resources of Jamieson Wellness must be used for legitimate business purposes. Examples of inappropriate use include but are not limited by the access, storage or transmission of religious or political, or offensive material, or for any discriminatory, defamatory or harassment purpose(s), crypto mining, pornography, child trafficking.

(b) The obligation to protect Jamieson Wellness assets includes its proprietary information. Proprietary information includes, without limitation, intellectual property, such as trade secrets, patents, trademarks and copyrights, business marketing and service plans, manufacturing or service ideas, designs, databases, records, remuneration information, and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of this Code. It may also be illegal and may result in civil or criminal penalties.

#### **Confidentiality of Corporate Information**

- a) Each Covered Person must maintain the confidentiality of all non-public information relating to Jamieson Wellness, or provided by others to Jamieson Wellness, except when disclosure is properly authorized or legally required. Non-public information that is of no materiality and the disclosure of which would have no impact on Jamieson Wellness or anyone else need not be maintained in confidence, subject to applicable privacy laws. The obligation to preserve the confidentiality of non-public information continues even after employment ends.
- b) Each Covered Person is prohibited from using or attempting to use non-public information for his or her own, or anyone else's, personal use, gain or advantage.
- c) Security regarding access to the email system is of paramount importance. User identities and personal passwords must not be shared with others and staff should be wary of providing their email addresses to external parties, especially mailing lists.
- d) All material contained on the email system belongs to Jamieson and staff should not consider messages produced/received by them on Jamieson equipment/software (owned or licensed) to be secure or have an expectation of privacy. The confidentiality of email cannot be assured, and staff should be aware of the possibilities of intended or accidental onward transmission to others beyond the original addressee(s). Furthermore, it is possible to retrieve deleted emails from back-up files intended to assure system integrity and reliability.

## Employees must not:

- **Unauthorized Removal or Misuse:** Remove the company's physical assets or property from premises without proper authorization or use them for purposes that are inappropriate or unrelated to business activities.
- **Intellectual Property Violations:** Deliberately infringe upon valid patents, design rights, trademarks, copyrights, or other intellectual property rights belonging to any third party.

## INSPIRING OUR PEOPLE

At Jamieson, everything starts with people. Wellbeing is an essential element of our humanity, and the pursuit of wellbeing is something we all have in common—no matter where we are in the world. We know business can be a force for good and that's why we are committed to making decisions and using our influence to improve the lives of everyone connected to our global presence.

### Protecting Human Rights

At Jamieson, we firmly believe in the fundamental dignity and equality of all people, and we're committed to upholding and promoting human rights across all facets of our operations.

As a participant of the United Nations Global Compact, the principles of our Human Rights **policy** are rooted in internationally recognized standards and are designed using a global lens that aligns with:

- The United Nations Guiding Principles on Business and Human Rights
  - The United Nations Universal Declaration of Human Rights
  - The International Labour Organizations 1998 Declaration on Fundamental Principles and Rights at Work
  - OECD Guidelines for Multinational Enterprises
- Alongside our new Sustainable Partner Policy the Board of Directors of the company has adopted a Code of Business Conduct and Ethics Policy to elaborate on these principles.

## EMBRACING DIVERSITY AND PROMOTING EQUAL OPPORTUNITIES

At Jamieson Wellness we are committed to fostering a culture of Diversity, Equity, Inclusion & Belonging (DEIB) where everyone feels empowered to thrive. As a leader in health and wellness, we understand that diversity drives innovation and enriches our ability to support the diverse communities we serve.

We are dedicated to creating an environment where every individual feels a sense of belonging and has equitable opportunities to succeed. By embracing the differences that make each of us unique—whether in race, gender, age, religion, sexual orientation, gender identity, ability, political opinion, social origin, economic condition or cultural background—we aim to reflect the vibrant diversity of our consumers and communities.

We stand firmly against all forms of discrimination and harassment. Every employee, customer, and stakeholder have the right to feel safe, respected, and valued. Offensive or harmful behaviours have no place in our organization, and we take decisive action against any violations of our policy.

At Jamieson Wellness, compliance with anti-discrimination laws is fundamental, but our commitment goes beyond mere compliance. It is embedded in our values, guiding our decisions, and shaping our workplace culture. Employees found in violation of our DEI policies will be subject to appropriate disciplinary action, up to and including termination, depending on the severity of the offense.

For more information about our DEI initiatives, see our [DEIB policy](#), our [Accessibility policy](#) and [Sustainability Impact report](#).

## Harassment-Free Workplace at Jamieson Wellness

At Jamieson Wellness, we are committed to fostering a safe, respectful, and inclusive environment for everyone. Harassment is defined as unwelcome conduct that creates an intimidating, hostile, or offensive environment by targeting legally protected characteristics such as race, gender, disability, and more. Harassment can take many forms, including physical actions, verbal remarks (such as insults or offensive jokes), written communication, electronic messages, and social media behavior.

We have zero tolerance for harassment in any form—whether it occurs between colleagues, in interactions with customers, or in business relationships. Every member of our team is expected to uphold our values and act in alignment with our purpose of Inspiring Better Lives Every Day.

If you experience or witness harassment, report it immediately to a manager or Human Resources. You can also submit a confidential and anonymous report through our Whistleblower Hotline, as outlined in our Code of Ethical Conduct.

At Jamieson Wellness, we believe that everyone deserves to work in a positive and respectful environment, and we are dedicated to ensuring that our workplace reflects these principles.

## Our Commitment to Health & Safety

Protecting the health and safety of our team members is the number one priority at Jamieson. All our facilities have established joint health safety committees that meet monthly or quarterly. All team members, including senior leaders, line management and worker representation, are in attendance for each meeting. Additionally, 100% of our workforce takes safety, health, and environment training.

### OUR HEALTH & SAFETY POLICY

Over the last few years, we've made the following advancements:

- Invested in top health and safety talent with a continuous improvement mindset to integrate health and safety across the organization.
- The adoption of an advanced reporting and material safety data management system working with Contractor Compliance Inc. to give us greater visibility into our contractor's health and safety performance.
- Joining the Workplace Safety and Insurance Board (WSIB)'s Ontario Safety Excellence program to expand our internal programs.
- Working with our Joint Health and Safety Committees in each of our facilities on initiatives to prevent incidents before they happen.

## PROTECTING JAMIESON WELLNESS INFORMATION

### Safeguarding and Managing Information

Information is one of the most valuable assets of a company, and safeguarding it is critical to maintaining trust and ensuring business success. Jamieson Wellness is committed to protecting its information and any information entrusted to us by others.

Information exists in various formats—on paper, in electronic documents, or within IT systems and applications. Regardless of the format, our standards for handling and protecting information apply uniformly.

### Responsibilities for Handling Information

Employees must:

- **Understand Classification and Handling Requirements:** Familiarize yourself with the nature and classification of information as defined in the **Data Classification policy** and adhere to the **Home Office Record Retention policy**. Take personal responsibility for its proper use, storage, circulation, protection, and disposal.
- **Restrict Access:** Share information only on a need-to-know basis. Ensure that only authorized employees, contractors, or third parties with a legitimate business purpose can access sensitive information.
- **Exercise Caution in Public Spaces:** Avoid disclosing information in public settings and take precautions to secure documents and IT devices when working outside the office.
- **Use Approved Technology:** Handle and share company information only through approved IT systems; devices are limited to corporate applications.
- **Report Security Incidents:** Immediately report any suspected information security events, such as unauthorized access, phishing attempts, or suspicious activity, in accordance with the **Cyber Awareness Policy**.

Employees must not:

- **Disclose Information Without Authorization:** Avoid sharing company information with third parties unless you have completed an NDA (Non-disclosure agreement).
- **Misuse Company Information:** Do not use information for non-business purposes or outside the scope of legal or company requirements.

### Handling Personal Data

Personal data, including sensitive information about employees, consumers, and other individuals, is subject to strict legal and regulatory requirements.

If uncertain about how to handle any company information, employees must seek guidance from their manager, our Cyber security lead/IT department or Jamieson Wellness general counsel.

## PREVENTING INSIDER TRADING

### Insider Trading and Securities Dealing

Employees must never use non-public, material information—referred to as **inside information**—to buy or sell securities of the company or any publicly traded entity. This includes shares, equities, derivatives, and related financial instruments.

#### What is Insider Trading?

Insider trading refers to the use of information that is not available to the public and that a reasonable investor would consider important when making a decision to buy or sell securities. Misusing inside information or sharing it with unauthorized parties is illegal and can lead to severe consequences, including fines and imprisonment.

#### Examples of Inside Information:

- Financial results or forecasts for the company or a listed subsidiary.
- Details of significant acquisitions, mergers, or divestments.
- Information about new product launches or issues.
- Major litigation or regulatory developments.
- Dividend policy changes or executive leadership changes.

## Company Oversight:

The Company has established a Disclosure and Insider Trading Policy (the “**Disclosure and Insider Trading Policy**”). Under this policy, the Directors and officers and certain others are prohibited from (i) buying or selling securities of the Company with knowledge of a material fact or material change that has not generally been disclosed; and (ii) informing others of a material fact or material change that has not generally been disclosed. The Chief Executive Officer and the Chief Financial Officer are responsible for the implementation of the Disclosure and Insider Trading Policy (the “**Disclosure Committee**”). In addition, outside legal counsel will participate in meetings of the Disclosure Committee in an advisory capacity where deemed appropriate by the Disclosure Committee.

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## Responsibilities for Employees

Employees must:

- Consult the **Disclosure and Insider Trading Policy** or contact the Finance Department to confirm whether information is considered inside information.
- Notify a member of the Disclosure Committee and/or whistleblower hotline (as outlined in the Code of Ethical Conduct) if they suspect inside information is not being managed appropriately.

Employees must not:

- **Buy or sell securities** of any listed company while in possession of inside information, even if they believe they are not relying on that information.
  - **Encourage others to trade** securities based on inside information, regardless of personal profit.
  - **Share inside information** with unauthorized individuals inside or outside the company, including family and friends.
  - **Spread false information** or manipulate securities prices in any manner.
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## Special Rules for Insider List Employees

Employees designated as insiders—those with authorized access to inside information—are notified and listed by the Finance Department. These individuals have additional obligations under the **Disclosure and Insider Trading Policy** and must exercise heightened diligence to comply with all regulations and internal policies.

By adhering to these policies, employees contribute to the integrity and legal compliance of Jamieson Wellness operations.

## RESPECTING DATA AND PERSONAL PRIVACY

At Jamieson Wellness, we value the privacy of all individuals, including employees, consumers, and others whose personal data we process. Personal data is treated as a human right, and we handle it responsibly, ethically, and in compliance with applicable laws.

The Code of Ethical Conduct outlines the steps employees must take to ensure personal data is collected, used, and stored appropriately and transparently.

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## Responsibilities for Employees

When collecting, using, or storing personal data, employees must:

- **Collect data responsibly:** Gather only the data that is necessary and relevant and use it solely for the intended purpose.

- **Be transparent:** Clearly inform individuals how their personal data will be used, in alignment with privacy notices.
  - **Obtain consent:** Ensure proper consent is obtained in accordance with local laws.
  - **Maintain accuracy:** Keep personal data up-to-date, promptly correcting any inaccuracies upon request and respecting individual legal rights.
  - **Protect confidentiality:** Safeguard personal data by keeping it secure and confidential.
  - **Act ethically:** Always consider potential risks to individuals when using their personal data and take measures to mitigate such risks, reflecting the company's core values.
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## Prohibited Actions

### When handling personal data, employees must not:

- **Retain data unnecessarily:** Keep personal data longer than required to meet business objectives or legal obligations.
  - **Transfer data improperly:** Move personal data across borders without consulting the Legal team, as there may be specific restrictions or requirements.
  - **Use data for unexpected purposes:** Collect or use personal data for purposes beyond what individuals would reasonably anticipate.
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## Seeking Guidance

If employees are uncertain about handling personal data, they must consult their manager or the legal council of Jamieson Wellness to ensure compliance with laws and company standards.

## POLICY ON SYSTEM & EQUIPMENT USAGE

This code outlines how employees should responsibly and securely use company-provided systems and equipment or personal devices to access company information, ensuring compliance with all relevant laws and regulations.

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## Permitted Use

Employees are granted access to company systems and equipment to fulfill their job responsibilities. Limited personal use of company equipment is allowed, provided it does not have a material impact on company resources or performance.

**Material impact** includes excessive:

- Storage or network usage
  - Mobile data consumption
  - Voice or system utilization
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## Monitoring and Privacy

All company information processed or stored on company systems, equipment, or personal devices is considered non-private. The company reserves the right to monitor, inspect, or remove such information, whether it is work-related or personal, to the extent permitted by law.

The company may log, diagnose, and evaluate activity on its systems and equipment to:

- Ensure compliance with this policy
- Optimize and protect the technical environment

To ensure security, compliance, and efficiency, employees must adhere to the following rules when using company systems and equipment.

Applicable policy electronic monitoring

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## Responsibilities

When using company systems or equipment, employees must:

- **Protect devices:** Use and handle company equipment responsibly to prevent damage, loss, or theft.
- **Secure devices:** Lock unattended devices with a password or PIN, including personal devices used to access company information.
- **Report incidents promptly:** Notify the IT Service Desk immediately if company equipment, or a personal device used for company work, is lost or stolen.
- **Ensure safety of portable equipment:**
  - Lock or secure equipment left in the office overnight.
  - Store it out of sight when unattended at home, in hotels, or in vehicles.
  - Keep it with you while traveling.
- **Respect intellectual property:** Follow copyright laws and applicable licenses for materials stored or accessed via company systems.
- **Use approved software:** Install software or applications on company equipment only through authorized IT processes.

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## Prohibited Actions

### Security Violations

- Attempt to bypass company security measures, such as firewalls, browser configurations, antivirus software, or system logs.

### Inappropriate Content

- Use company systems to access, store, send, or publish content that is:
  - Pornographic, explicit, or obscene
  - Promoting violence, hatred, terrorism, or unlawful activities
  - Defamatory, slanderous, or damaging to any person or entity

### Misuse of Information

- Expose company information by:
  - Using it for non-business purposes.

- Forwarding emails with confidential content to personal accounts.
- Storing or syncing company information on personal devices.
- Sharing access credentials with anyone (including colleagues, friends, or family) unless formally authorized.
- Using company passwords for non-company systems.
- Using company email addresses for personal online activities.
- Accessing systems or information not intended for them.

### **Unapproved Activities**

- Operate or engage in private business using company IT resources.
- Access company systems or information after employment ends.

### **Engaging Externally**

Across our value chain, from innovation to consumer interactions, we uphold the same high ethical standards when engaging with external partners to generate demand for our brands as we do in our internal collaborations.

### **RESPONSIBLE MARKETING**

Jamieson Wellness is dedicated to developing, producing, marketing, and selling all products and services responsibly, ensuring alignment with societal expectations. This code outlines the global minimum standards that govern all our marketing activities.

These standards apply to brand names, packaging, labeling, consumer research, trade advertising, sales materials, sponsorships, all forms of advertising (including television, radio, print, digital media, and promotional events), product placements, and other marketing initiatives, whether created internally or through third parties.

### **Responsibilities**

#### **Employees involved in marketing activities must:**

- Comply with laws: Adhere to all applicable local marketing laws and regulations.
- Truthful representation: Present products and services transparently and truthfully, including appropriate factual and nutritional information where relevant.
- Consumer understanding: Develop and provide sufficient information to enable consumers to use and customers to sell our products and services effectively.
- Substantiated claims: Ensure marketing claims are based on adequate evidence per local requirements.
- Respect principles: Uphold standards and principles regarding responsible marketing to children, women, and accounts social media platforms.
- Environmental consideration: Consider environmental implications in marketing, including product development, activation plans, and content recycling.

### **Quality Marketing Content**

Marketing materials must:

- Reflect contemporary standards of relevant and quality content delivered in keeping with our brand(s) tone.
- Respect societal norms while being sensitive to cultural, social, ethical, and religious diversity.

## Prohibited Practices

### Employees must not:

- **Mislead:** Alter images or use scientific terminology in ways that misrepresent facts or claims.
- **Cause offense:** Associate products with themes, figures, or images likely to offend any religion, culture, nationality, gender, race, sexual orientation, age, disability, or minority group.
- **Support inappropriate media:** Advertise in outlets known for promoting violence, pornography, or offensive behavior.
- **Market to children** under the age of twelve.

By adhering to these principles, we ensure our marketing practices are ethical, responsible, and aligned with our core values.

## RESPONSIBLE SOURCING & ETHICAL BUSINESS PARTNERSHIPS

At Jamieson Wellness, we are purpose-driven and committed to conducting business in a way that inspires workers, supports communities, and protects the environment throughout our value chain. We expect our business partners to align with our values and principles.

This policy outlines employee responsibilities when engaging with third parties, emphasizing adherence to our **Sustainable Partner Policy (SPP)**. The SPP governs our sourcing and business partner programs, ensuring suppliers, distributors, customers, and other partners meet our standards. Non-compliance by third parties can result in legal and reputational risks for our company.

### Guiding Framework

The SPP establishes fundamental principles and mandatory requirements for third-party partnerships. The governance, compliance and standard setters are managed by the ESG team, Senior Management, our Governance, Compensation, & Nominating committee, as well as the Board of Directors.

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### Employee Responsibilities

Employees engaging with third parties must:

- **Understand the SPP:** Familiarize themselves with its provisions and consult their manager or relevant teams for clarification.
- **Apply SPP standards:** Ensure all third parties are subject to the SPP policy, including timely onboarding, contracting, and monitoring, with verification and remediation as needed.
- **Report concerns:** Notify their manager or relevant team if they suspect or know of any third-party non-compliance or breaches of contractual terms.
- **Assess compliance in selection:** Consider SPP adherence when shortlisting, tendering, or selecting new third parties.

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### Prohibited Actions

Employees must not:

- **Alter contracts without approval:** Make or agree to any changes or exclusions related to the SPP without consulting the Global Sustainability team and obtaining written authorization from the responsible business team.

- **Engage with non-compliant third parties:** Continue transactions with third parties found non-compliant with the SPP unless granted a specific exemption.

By following these guidelines, we ensure that our partnerships reflect our commitment to ethical practices, sustainability, and integrity across all aspects of our business.

## Political Contributions and Engagement Policy

Jamieson Wellness strictly prohibits corporate support or contributions to political parties or candidates. Employees may engage in political support or donations only in a personal capacity, ensuring a clear distinction from the company. This policy outlines how employees must manage interactions and relationships with political groups.

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### Employee Responsibilities

- **Clarify personal contributions:** Ensure any political contributions or support are clearly personal, without implying a connection to the company.
- **Maintain professionalism:** Ensure personal political involvement does not interfere with work performance or objectivity. For more guidance, refer to the **Conflicts of Interest section in this code**.
- **Seek approval for representation:** Obtain prior approval from the Senior Director of Communications before representing the company in social or economic advisory groups set up by governments. Approval will be granted only if:
  - The group publicly declares its non-political nature.
  - The group's work aligns with the company's purpose.
  - The group includes a diverse representation from peer companies, charities, non-political think tanks, academia, and similar bodies.

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### Prohibited Actions

- **Create conflicts of interest:** Avoid situations where participation in advisory groups could result in a conflict of interest. For detailed guidance, refer to the **Conflicts of Interest section in this code**.

By adhering to this policy, we maintain transparency, integrity, and a clear separation between personal political activities and company business.

## Communication Policy for Investment Communities and Media

At Jamieson Wellness, communication with investment communities—such as shareholders, brokers, and analysts—and the media must be handled with precision and care. These communications have critical legal requirements and necessitate specialized skills and training. Only authorized and trained individuals may engage in such communications or respond to related inquiries.

Our Disclosure Committee, on behalf of the Board, ensures that our company adheres to all relevant laws and regulations. This code defines the procedures for interacting with investment communities and the media.

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## Responsibilities

Employees authorized to communicate with investment communities or the media by Investor Relations, Media Relations, or a Board Member must:

- **Adhere to authorizations:** Follow all conditions set forth in their authorization, including limitations on timing and audience.
  - **Consult before communication:** Always seek input from the authorizing team regarding the content of any communication.
  - **Follow established procedures:** Employees within Investor Relations or Media Relations must comply with the company's Share-Dealing and Disclosure Manuals and adhere to internal departmental processes.
  - **Apply rules in all settings:** These rules extend beyond the workplace to external speaking engagements, courses, seminars, trade events, or social occasions.
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## Prohibited Actions

Employees without explicit authorization must not:

- **Engage with investment communities or the media:** Refrain from all communication, whether formal or informal, without prior approval and training.
- **Respond to inquiries:** Redirect all inquiries to the Investor Relations or Media Relations teams.
- **Provide information or opinions:** Avoid being drawn into conversations or answering any questions.
- **Make forward-looking statements:** Never disclose financial projections or share any "inside information." For more details, see our **Insider Trading and Communication Policies**.

By following these guidelines, we ensure clear, consistent, and legally compliant communication, upholding the trust of our stakeholders and the integrity of our business.

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