

OFGO STUDIO – Code of Conduct

Our Commitment

OFGO Studio is committed to conducting business in an ethical, lawful, safe, respectful, and socially responsible manner. This Code of Conduct sets out the standards of conduct expected from all employees, managers, supervisors, officers, and representatives of OFGO Studio.

All employees are expected to act professionally, ethically, lawfully, and respectfully, and to support a safe, healthy, inclusive, productive, and compliant workplace.

Scope

This Code of Conduct applies to all employees of OFGO Studio, including full-time, part-time, temporary, casual, seasonal, contract, supervisory, and management employees.

This Code applies while employees are working, on Company premises, representing the Company, using Company property or systems, travelling for Company business, attending Company events, or engaging in conduct that may affect the workplace, the Company's operations, or the Company's reputation.

Relationship to Other Policies

This Code of Conduct should be read together with OFGO Studio's other workplace policies, procedures, and training materials, including policies relating to health and safety, workplace violence and harassment, conflicts of interest, confidentiality, information security, and discipline.

Employees are expected to comply with both this Code of Conduct and all applicable Company policies and procedures.

Legal and Regulatory Compliance

OFGO Studio and its employees must comply with all applicable laws, regulations, Company policies, workplace procedures, and lawful and reasonable directions from management.

This includes, but is not limited to, requirements relating to employment standards, human rights, occupational health and safety, workplace violence and harassment, privacy, accessibility, environmental protection, product safety, anti-corruption, taxation, customs, trade, and other regulatory obligations applicable to the Company's operations.

Employees must not knowingly participate in, conceal, authorize, or ignore unlawful, unethical, unsafe, fraudulent, or non-compliant conduct.

Core Employment and Human Rights Standards

OFGO Studio is committed to maintaining employment practices that comply with applicable employment, human rights, health and safety, and workplace legislation.

Child Labour

OFGO Studio does not permit the use of child labour. The Company will comply with all applicable minimum age, employment standards, education, health and safety, and workplace restrictions relating to young workers.

Forced Labour and Human Trafficking

OFGO Studio prohibits all forms of forced labour, bonded labour, involuntary labour, human trafficking, slavery, servitude, coercion, or employment obtained through threats, force, deception, intimidation, restriction of movement, or abuse of vulnerability.

Employment with OFGO Studio must be voluntary. Employees must not be required to surrender personal identification documents, pay improper recruitment fees, or be subject to threats, coercion, or unreasonable restrictions as a condition of employment.

Working Hours

OFGO Studio will comply with applicable employment standards and workplace requirements regarding hours of work, eating periods, rest periods, overtime, public holidays, vacation, leaves of absence, and scheduling.

Hourly employees are expected to accurately record all hours worked using the Company's timekeeping system. Employees must not falsify time records, work unauthorized hours, alter another employee's time record, or ask another employee to record time on their behalf.

Salaried employees are expected to comply with their approved work schedules, attendance expectations, reporting obligations, leave approval requirements, and any other Company procedures applicable to their position. OFGO Studio will administer salaried employment in accordance with applicable employment standards, employment agreements, and Company policy.

Supervisors and managers must not direct or permit employees to work in a manner that violates applicable working time, overtime, rest period, scheduling, leave, or approval requirements.

Compensation

OFGO Studio is committed to compensating employees in accordance with applicable employment standards, wage, overtime, vacation pay, public holiday, statutory deduction, and payroll requirements.

Employees must be paid for work performed in accordance with applicable law and Company policy. Employees must promptly report any concern about inaccurate time records, unpaid wages, improper deductions, payroll errors, or compensation-related non-compliance.

Freedom of Association and Employee Rights

OFGO Studio respects employees' right to associate, communicate, raise workplace concerns, and exercise rights protected by applicable workplace legislation.

OFGO Studio prohibits reprisal, intimidation, discipline, threats, or adverse treatment against an employee for exercising a legal workplace right in good faith.

Discrimination and Equal Treatment

OFGO Studio prohibits discrimination and unfair treatment based on any ground protected by the Ontario Human Rights Code, including but not limited to race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status, or disability.

Employment-related decisions must be based on legitimate business, operational, performance, conduct, qualification, safety, and legal considerations, and must not be based on prohibited grounds of discrimination.

Respectful Workplace, Harassment, and Violence

OFGO Studio is committed to maintaining a workplace that is respectful, professional, and free from harassment, workplace violence, discrimination, bullying, intimidation, and reprisal.

Employees must treat coworkers, supervisors, managers, customers, suppliers, visitors, and other workplace participants with dignity and respect, and must comply with the Company's Workplace Violence, Harassment and Sexual Harassment Policy and related complaint, reporting, and investigation procedures.

Unacceptable conduct includes, but is not limited to:

- Physical violence or assault against any person;
 - Threatening, intimidating, or aggressive behaviour that creates a reasonable fear of harm;
 - Workplace harassment, bullying, verbal abuse, or conduct that causes psychological harm;
 - Sexual harassment or unwelcome conduct of a sexual nature;
 - Discrimination, harassment, or offensive conduct based on any ground protected under the Ontario Human Rights Code;
 - Reprisal or retaliation against any individual who has exercised rights, raised concerns in good faith, or participated in an investigation;
 - Malicious, humiliating, abusive, degrading, or intimidating conduct directed toward another person.
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Discipline and Corrective Action

Corrective or disciplinary action may be taken where an employee violates this Code of Conduct, Company policy, workplace procedures, or applicable law.

The nature of any corrective or disciplinary action will depend on the seriousness of the conduct, the surrounding circumstances, the employee's role and responsibilities, prior conduct, whether the conduct was intentional or repeated, the impact on the workplace or Company, and any other relevant factors.

Corrective or disciplinary action may include coaching, counselling, retraining, verbal warning, written warning, suspension, termination of employment, or other action determined appropriate by the Company, subject to applicable law.

OFGO Studio will not impose discipline in a discriminatory, retaliatory, arbitrary, or unlawful manner.

Health and Safety

OFGO Studio is committed to providing and maintaining a safe and healthy workplace. Employees must comply with the Occupational Health and Safety Act, applicable regulations, the Company's Health and Safety Policy, safe work procedures, training requirements, posted rules, supervisor instructions, and all applicable hazard controls.

Unacceptable conduct includes, but is not limited to:

- Violating health and safety practices, policies, procedures, or training requirements;
- Failing to wear required personal protective equipment;
- Operating machinery, equipment, tools, or vehicles without proper training or authorization;
- Creating unsafe or unsanitary working conditions;
- Failing to immediately report workplace accidents, injuries, illnesses, near misses, hazards, spills, leaks, damaged equipment, or unsafe conditions to a supervisor or manager;
- Possessing weapons on Company premises or while conducting Company business, except as permitted by law and with prior written authorization from management;
- Reporting to work impaired by alcohol, cannabis, medication, or any other substance in a manner that compromises safety or job performance;
- Possessing, using, selling, or distributing illegal drugs on Company premises or during working hours;

- Using alcohol on Company premises or during working hours, except where expressly approved in writing by Senior Management for a Company event;
 - Failing to disclose functional limitations or safety-related restrictions where such limitations may affect the employee's ability to safely perform their job duties.
 - Employees are not required to disclose the name of any medication or medical diagnosis. Employees will only be asked to provide information related to functional limitations or safety concerns. Any disclosures related to medical conditions will be handled confidentially and assessed in an accommodation-focused manner in accordance with applicable legislation.
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Ethical Business Conduct

OFGO Studio is committed to conducting business honestly, ethically, transparently, and in compliance with applicable laws and Company standards.

Corruption and Bribery

OFGO Studio prohibits bribery, corruption, kickbacks, extortion, facilitation payments, improper inducements, secret commissions, fraud, and any other improper payment or benefit.

Employees must not offer, promise, give, request, accept, or authorize anything of value for the purpose of improperly influencing a business decision, obtaining or retaining business, securing an improper advantage, avoiding a legal obligation, or affecting the actions of a customer, supplier, public official, regulator, auditor, or other third party.

Gifts, meals, hospitality, entertainment, discounts, favours, or other benefits must be modest, lawful, infrequent, transparent, properly approved where required, and never intended to improperly influence a business decision.

Employees must promptly disclose any request for a bribe, kickback, improper payment, unusual gift, or other benefit that may create a real, potential, or perceived conflict of interest.

Conflicts of Interest

Employees must avoid real, potential, or perceived conflicts between their personal interests and the interests of OFGO Studio.

Employees must not use their position, Company property, Company information, business relationships, or influence for personal gain or for the improper benefit of another person or organization.

Employees must disclose real, potential, or perceived conflicts of interest to management or Human Resources as soon as they become aware of them.

Dishonesty, Fraud, and Misconduct

Employees must act honestly, ethically, and in the best interests of the Company.

Unacceptable conduct includes theft, fraud, dishonesty, misrepresentation, falsification of records, misuse of Company, customer, supplier, or employee property, unauthorized disclosure of confidential information, intentional or reckless damage to property, insubordination, or knowingly concealing errors, defects, safety risks, quality issues, regulatory concerns, or other matters that should be reported.

Confidential Information and Company Property

Employees must protect Company property, records, equipment, systems, data, confidential information, intellectual property, and business information.

Company property and systems must be used responsibly, lawfully, and primarily for legitimate business purposes. Employees must not access, use, copy, disclose, remove, alter, or destroy

Company information or property without authorization.

Employees must return Company property and confidential information upon request or at the end of employment.

Performance, Quality, and Operational Conduct

Employees are expected to perform their duties competently, safely, professionally, and in accordance with Company standards, procedures, training, and instructions.

Unacceptable conduct includes, but is not limited to:

- Failure to meet reasonable performance standards, objectives, or expectations after being provided with appropriate training, feedback, and an opportunity to improve;
- Failure to properly care for Company tools, equipment, materials, products, or property;
- Failure to follow quality standards, inspection requirements, work instructions, or production procedures;
- Knowingly producing, passing, concealing, or failing to report defective or non-conforming work;
- Failing to cooperate with corrective action, quality, safety, or compliance processes;
- Malicious gossip, rumour-spreading, or conduct that undermines workplace morale or professionalism;
- Restricting production or interfering with another employee's ability to perform their work;
- Disorderly, disruptive, or unprofessional conduct;
- Excessive absenteeism or tardiness without proper notice or reasonable cause;
- Failure to report absences in accordance with Company policy;
- Job abandonment, defined as failure to report to work or communicate with the Company for three consecutive scheduled shifts without authorization;
- Misuse of Company communication systems, devices, internet access, software, or electronic records

Manufacturing employees are also expected to:

- Maintain high quality standards in all work performed;
- Report to workstations ready to work at scheduled start times;
- Accurately record work hours where required by Company timekeeping procedures;
- Avoid buddy-punching, altering another employee's time records, or permitting another employee to alter their time records;
- Properly maintain and care for all tools, equipment, materials, and assigned property;
- Work at a reasonable and safe pace that meets production expectations;
- Operate only machinery or equipment for which they have received proper training and authorization;
- Follow applicable production sheets, labels, work instructions, safety procedures, and quality requirements;
- Promptly report production, quality, equipment, material, safety, or workflow concerns.

Environmental and Sustainability Responsibility

OFGO Studio is committed to conducting operations in a manner that supports environmental responsibility, pollution prevention, waste reduction, efficient use of resources, and compliance with applicable environmental laws, regulations, permits, and Company procedures.

Employees are expected to use materials, energy, water, equipment, packaging, chemicals, and other resources responsibly and efficiently. Employees must follow Company procedures relating to waste management, recycling, reuse, chemical handling, spill prevention, emissions, storage, labelling, transportation, and disposal.

Employees must not knowingly dispose of materials, chemicals, waste, or other substances in a manner that violates Company procedures or applicable legal requirements.

Employees are expected to support reasonable sustainability efforts, including reducing unnecessary waste, conserving energy and water where practical, preventing contamination, keeping work areas clean and organized, and reporting opportunities for improvement where appropriate.

Employees must promptly report spills, leaks, improper disposal, unsafe storage, damaged containers, environmental concerns, or potential non-compliance to a supervisor or manager.

Reporting Concerns and Investigations

Employees who experience, observe, or become aware of conduct that may violate this Code of Conduct, Company policy, or applicable law are expected to report the concern promptly.

Reports may be made to a supervisor, manager, Human Resources, or another designated Company contact. Employees should also follow any specific reporting procedure set out in the applicable detailed policy, including the Health and Safety Policy and Workplace Violence, Harassment and Sexual Harassment Policy.

Reportable concerns include health and safety hazards, workplace violence, harassment, discrimination, bullying, reprisal, wage or working hours concerns, forced labour, child labour, bribery, corruption, fraud, theft, conflicts of interest, environmental or regulatory compliance concerns, quality concerns, product safety concerns, recordkeeping concerns, or misuse of Company property or confidential information.

All reports will be taken seriously and reviewed or investigated as appropriate in the circumstances. Employees are expected to cooperate honestly and fully in workplace investigations, audits, inspections, corrective action processes, and compliance reviews.

Employees must not interfere with an investigation, withhold relevant information, destroy or alter records, provide false information, discourage reporting, or retaliate against any person involved in a concern or investigation. The Company will handle reports and investigations as confidentially as reasonably possible, recognizing that information may need to be disclosed in order to investigate, take corrective action, comply with legal obligations, or protect workplace safety.

Protection Against Retaliation

OFGO Studio strictly prohibits retaliation or reprisal against any individual who, in good faith:

- Reports a concern;
- Participates in an investigation;
- Exercises rights under applicable legislation;
- Refuses unsafe work in accordance with the Occupational Health and Safety Act;
- Raises a health and safety, human rights, employment standards, environmental, ethical, or compliance concern.

Any form of retaliation is itself a violation of this Code of Conduct and may result in corrective or disciplinary action, up to and including termination of employment.

Accountability and Acknowledgement

Employees are responsible for understanding and following this Code of Conduct, Company policies, workplace procedures, training requirements, and applicable legal obligations.

Supervisors and managers are expected to lead by example, communicate expectations, support compliance, respond appropriately to concerns, and take reasonable steps to prevent, identify, and address misconduct or non-compliance. Violations of this Code of Conduct may result in corrective or disciplinary action, up to and including termination of employment, subject to applicable law. Serious misconduct may also result in reporting to law enforcement, regulators, customers, or other appropriate parties where required or appropriate.

Employees may be required to confirm that they have received, read, understood, and agree to comply with this Code of Conduct. Failure to sign an acknowledgement does not remove an employee's obligation to comply with this Code of Conduct, Company policies, workplace procedures, or applicable law.