
CODE OF CONDUCT AND ETHICS

At JA Tech, we are committed to fostering a culture of trust, responsibility, and respect for all our employees, clients, stakeholders, and the communities in which we operate. Our Code of Conduct and Ethics serves as a guiding framework for our actions and decisions, ensuring that we uphold our core values:

- **Quality:** Delivering excellence by doing the job right the first time, followed by thorough verification and a commitment to continuous improvement.
- **Commitment:** Following through on our promises and completing tasks with dedication, while supporting each other in achieving our goals.
- **Integrity:** We uphold honesty and transparency by doing what is right and consistently doing what we say we will do, honoring our promises.

This Code outlines our expectations for behavior and ethical conduct for everyone associated with JA Tech, including employees, subcontractors, and suppliers. It covers essential areas such as ethics and legal compliance, human rights, safety and health, environmental stewardship, and quality control and assurance.

By adhering to this Code, we not only fulfill our responsibilities to our stakeholders but also contribute to the overall success and sustainability of our business. We believe that a strong ethical foundation is key to fostering a positive workplace and achieving our collective goals.

We expect all employees, subcontractors, and suppliers to comply with this Code and to promote a common understanding of our Values and how we expect people to behave.

We are dedicated to continuous improvement and actively seek opportunities to enhance our business practices, ethical standards, and sustainability initiatives. We encourage everyone to share feedback and suggestions for improvement on the Code and require reporting of any violations or concerns related to the Code to JA Tech management. Please note that retaliation against anyone who reports violations in good faith is strictly prohibited.

ETHICS AND LEGAL COMPLIANCE

JA Tech prides itself on doing business with honesty, transparency, and integrity and expects its employees, subcontractors, and suppliers to uphold the highest ethical standards and to always act in the best interest of JA Tech and its stakeholders.

Obey the Law

JA Tech is a Canadian company. We expect employees to comply with the laws, rules and regulations of Canada and the province of Saskatchewan. We expect suppliers to conduct business in compliance with the applicable laws, rules and regulations of the jurisdictions in which they operate.

Be Ethical

We expect all employees, subcontractors and suppliers to behave in an ethical manner. Therefore, all forms of bribery, corruption, extortion, collusion or unethical business practices are strictly prohibited.

Avoid Conflicts of Interest

We expect all employees, subcontractors and suppliers to avoid conflicts of interest. A conflict of interest refers to situations where an individual or entity's personal interests may interfere with their

ability to act impartially in a professional context. All potential conflicts of interest must be reported to JA Tech management.

Limit Gifts and Entertainment

We discourage the exchange of gifts or entertainment exceeding nominal value. The nature of any gifts or entertainment offered or accepted must be modest and consistent with customary business practices. Any such gifts must not, by their quality, quantity or timing, be used by employees, subcontractors or suppliers to gain improper advantage or preferential treatment.

Respect Confidential Information

We expect employees, subcontractors and suppliers to only use JA Tech and client information, that is received in the course of working for JA Tech, for the purpose of fulfilling their obligations to JA Tech or our clients. None of this information may be communicated to a third party without written consent from JA Tech and/or its clients. Confidential information must be managed, stored and used according to the laws of Canada and the Province of Saskatchewan.

Be Honest and Transparent in Record Keeping and Reporting

We expect employees, subcontractors and suppliers to maintain books and records that reflect all transactions with accuracy and honesty. We expect employees, subcontractors and suppliers to commit to ongoing reporting of data and information across all elements of the Code of Conduct and Ethics, including human rights, labour, health and safety, environment and quality.

HUMAN RIGHTS AND LABOUR CONDITIONS

JA Tech is committed to upholding human rights and the labour standards in the places that we work.

Obey the Law

We expect our employees, subcontractors and suppliers to ensure that applicable Canadian labour laws are being followed at all times, including those related to wages and hours worked. This also includes ensuring that there are no forms of human trafficking, forced or compulsory labour, or child labour and we expect that the right to freedom of association and the right to collective bargaining are upheld.

Uphold Human Rights

Suppliers must support legislative efforts to protect and enforce human rights. Suppliers should strive to reflect in their work force and supply chain, the communities in which their business operates to grow opportunities for Indigenous Peoples, minority groups and women. Employees, subcontractor and suppliers should comply with any requests for material country of origin of goods and services or supply chain traceability strategies.

Provide Equal Opportunity

We value the diversity of our employees, clients, and suppliers and create an inclusive work environment that respects all individuals. In order to better reflect the communities in which we work, we will look to grow opportunities for Indigenous peoples, minority groups and women. Please see the company OHS&E Manual for our policy on diversity and inclusion.

Treat People with Respect

We expect our employees, subcontractors and suppliers to create and maintain a work environment that is professional and free from discrimination, harassment, bullying, intimidation and micro-aggressions and everyone is treated with respect.

SAFETY AND HEALTH

JA Tech is committed to, and prioritizes, maintaining a safe and healthy work environment for all individuals involved in our business.

Obey the Law

We expect our employees, subcontractors and suppliers to comply with all relevant health and safety laws and regulations and strive for continuous improvement in safety practices. This includes ensuring that all safety protocols are followed, protective equipment is used when required, and any unsafe conditions are reported immediately.

Follow the Safety (OHS&E) Manual

We expect employees to be familiar with our Safety Manual and to follow its processes and procedures in both its written form and its spirit. Subcontractors and suppliers are expected to have safety programs and documentation that meets or exceeds that of JA Tech.

Mental Health

We expect our employees, subcontractors, and suppliers to foster an environment that supports both mental health and psychological safety. Mental health is not just the absence of mental illness; it encompasses overall well-being and the ability to function effectively in daily life. Similarly, psychological safety is not merely the absence of fear or anxiety; it involves creating a space where individuals feel empowered to express their thoughts and contribute openly without fear of negative repercussions. Please see the company OHS&E Manual for our policy on psychological health.

ENVIRONMENTAL STEWARDSHIP

JA Tech works in urban and rural settings across Western Canada and is committed to minimizing its environmental impact and promoting sustainable practices. Please see the company OHS&E Manual for our environmental and waste management policies.

Obey the Law

We expect our employees, subcontractors and suppliers to comply with all relevant environmental laws and regulations and seek opportunities to reduce our collective carbon footprint and promote environmental sustainability.

Prevent Pollution and Minimize Waste

We expect our employees, subcontractors and supplier to follow company standards for pollution prevention and for the minimization of waste.

Be a Reliable Sustainability Partner

We expect our employees, subcontractors and suppliers to engage clients and other stakeholders (including the communities in which we operate) to better understand their sustainability needs. We

will also expect our employees, subcontractors and suppliers to promote the responsible use of resources.

QUALITY CONTROL AND QUALITY ASSURANCE

At JA Tech, we strive for excellence in our work, delivering quality products and services that meet or exceed industry standards and our clients' expectations. Please see the company Quality Manual for our latest procedures.

Follow the System

We expect our employees, subcontractors and suppliers to maintain and continuously improve a quality management system that ensures consistency and improvement in our processes and outcomes.

Control and Assure

JA Tech will ensure that the work supplied (either labour or material / equipment) meets the specifications associated with the work through either the verifiable training of staff or the verifiable manufacturing standard for the material / equipment used. JA Tech will periodically audit the work it performs to ensure that the quality standards that JA Tech has developed are being followed.

MANAGE RISKS AND CONTINUALLY IMPROVE

At JA Tech, we understand that the context in which we operate, and our business are constantly changing and evolving.

Manage Risks

We believe that by understanding the risks and opportunities to our business and our stakeholders, we will be better able to adapt and achieve value. We expect our employees to identify risks and opportunities to our business and everyone to speak up about opportunities to improve the Code of Conduct and Ethics.

Continually Improve

We believe in continuously improving the ways we work. We also believe that successful continuous improvement is built on measuring, trending and reporting of data and information and on setting goals. As a result, we expect our employees, subcontractors and suppliers to measure elements of our collective work (both formally and informally) to identify areas where we can improve our processes and to track progress towards established goals.