



Code of Conduct

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I. Summary

The Code of Conduct ("Code") is aligned with Arclin's World Class Leadership model and Adult Behavior expectations. The Company issued this Code to:

- Promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Prevent conflicts of interest, including the provision of guidelines on how to disclose a material transaction or relationship which could reasonably be expected to give rise to such a conflict;
- Protect the confidentiality of corporate information;
- Ensure the protection and proper use of corporate assets;
- Comply with applicable laws, rules and regulations;
- Ensure the prompt internal reporting of any violations of this Code to an appropriate person or persons identified in the Code, and;
- Define accountability for adherence to the Code.

II. Our Commitment

At Arclin, how we conduct business is as important as the products and services we provide. Our reputation is built on the trust of our customers, employees, business partners, suppliers, and communities. As part of our commitment to sustainable and responsible business practices, Arclin has embedded the Ten Principles of the United Nations Global Compact into our strategies and operations since 2026.

The Code of Conduct brings together the principles, policies, and commitments that define how we operate and the standards we expect throughout our organization.

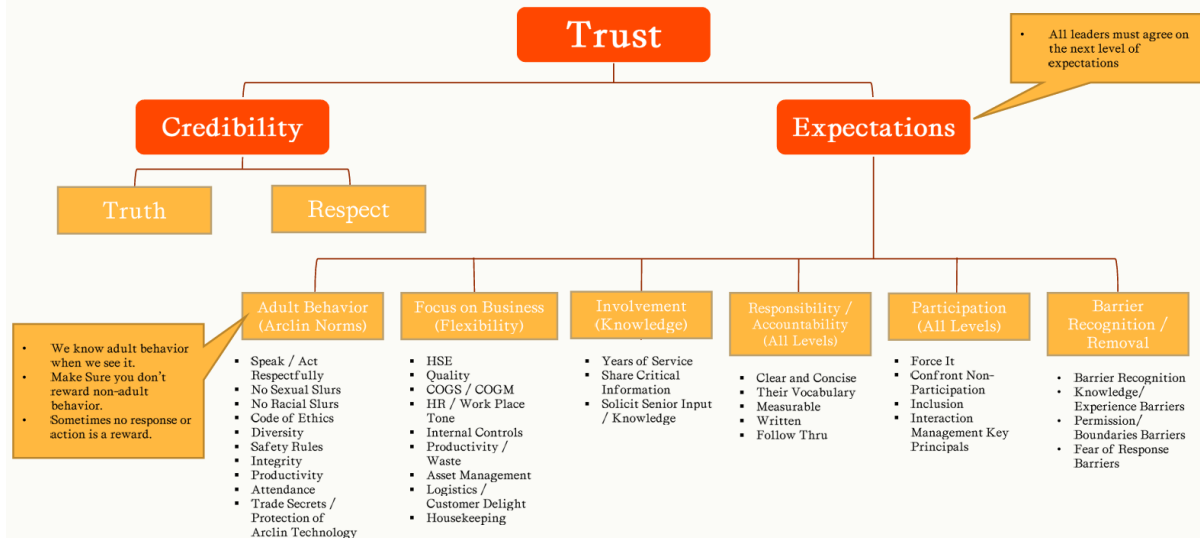
III. Our Values

Our ***World Class Leadership Model*** is built on trust, which is presented as the foundation of effective leadership. Trust is achieved through a combination of Credibility and Expectations.

Our leaders have a particular responsibility to model our values, make ethical decisions, create environments of trust and accountability, and reinforce the standards established by this Code.



World Class Leadership



IV. Our Ethics in Practice

Respecting People & Human Rights

Arclin is committed to the protection and advancement of human rights and to operating our business in accordance with our core mission and values.

Arclin strives to foster safe, inclusive workplaces where we do business, and to always respect the fundamental rights of our employees, which are: equal opportunity; anti-harassment and discrimination; freedom from slavery and forced labor; freedom from child labor; a safe, accessible, and healthy workplace; fair wages; fair working conditions; and freedom to associate.

Equal Opportunity

Arclin provides equal employment opportunities to all employees and applicants without regard to race, color, religion, gender, sexual orientation, national origin, age, disability, military status, veteran status, genetic information, gender identity, pregnancy, childbirth, related medical conditions or any other classification protected by applicable law.

This policy applies to all terms and conditions of employment.

Anti-Harassment and Discrimination

Arclin is committed to providing a workplace free of harassment and discrimination. Arclin will not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity, creed, national origin, legally protected leave, veteran status, ethnicity, disability, pregnancy, religion, political affiliation, union membership, medical condition,



religious observances, or civil status in recruitment, hiring, and employment practices such as promotions, rewards, and access to training.

Freedom from Slavery and Forced Labor

All forms of forced labor, as defined by the International Labour Organization's 11 indicators of forced labor, are prohibited. This includes the use of any form of forced labor and all forms of incarcerated labor. Arclin will not threaten workers with the use of physical punishment, restriction of movement, confinement, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse as a method of discipline or control. Arclin will conduct appropriate human rights due diligence of its suppliers and third-party partners to mitigate the risk of human trafficking and slavery in its supply chain.

Freedom from Child Labor

The use of child labor is strictly prohibited, and Arclin will not use underage workers. An underage worker is any person under the minimum employment age according to the laws of the facility's jurisdiction, or, in the absence of law, under the minimum age for completing required education. Arclin will not employ anyone younger than 14-years-old, regardless of the jurisdiction's minimum working age. Minors may only be employed to work and only be permitted to work during periods of time when they are not required by law to attend school except as may be permitted under apprenticeship or other similar programs in which the minor is lawfully participating.

Safe, Accessible, and Healthy Workplace

Arclin trains employees on a regular basis regarding health and safety in the workplace, including fire evacuation drills involving all workers on all shifts, at least once every 12 months, unless required more frequently by law. Arclin has a system for workers to report health and safety incidents and near-misses, as well as a system to investigate, track, and manage such reports. Arclin ensures that the workplace is safe, clean, accessible, and not harmful to the health of its employees and independent contractors, including workers with special requirements. Any working conditions at the workplace or on Arclin's premises that violate applicable law and/or regulation are prohibited.

Fair Wages

All employees are fairly compensated and provided with wages and benefits that comply with applicable national and local laws. This includes appropriate compensation for overtime work and other premium pay situations required by applicable national and local laws. All wages and



other payments by Arclin must meet applicable statutory provisions and/or mandatory local standards.

Fair Working Conditions

All employees are to be in compliance with all applicable national and local labor laws and with published industry standards pertaining to the number of hours and days worked. Employees will not be required to work more than the limits on regular and overtime hours allowed by local law.

Freedom to Associate

Arclin will not restrict the right of workers to freely associate with others, establish and join (or refrain from joining) workers' associations. Arclin will neither restrict the right to carry out collective negotiations in accordance with national laws and regulations nor discriminate against workers for exercising their rights and movement. In the absence of formal representation, Arclin must ensure that workers have a mechanism to report grievances and that facilitates open communication between management and workers.

Governance

If any employee believes that someone is violating this policy or the law, they are asked to report it immediately through the ethics hotline, to their supervisor, or a human resources representative. Arclin strongly supports all employees' right to report any violations of this policy and will protect all employees that make good faith reports against retaliation by any person. Please refer to Arclin's whistleblower policy for more information.

Arclin will regularly review the progress on our efforts to uphold this policy. Where we identify that we have caused or directly contributed to adverse human rights impacts, we will engage in appropriate remediation processes by ourselves or in cooperation with other stakeholders. We will regularly review this policy and enhance it as required. Arclin adheres to the laws and regulations of each jurisdiction in which it operates. Where those laws and the standards outlined in this policy conflict, the law controls. When such a conflict is identified, Arclin will work to promote the adoption of principles that form the foundation of these standards within the bounds of the law.

V. Serving Our Customers

Our customers are central to our success, and customer delight is at the core of how we operate our business. We seek to earn their trust through quality, honesty, transparency, and responsible business practices.

Quality



We are committed to delivering products and services that consistently meet or exceed our customers' expectations. We uphold rigorous quality standards, take ownership of our processes to ensure reliability, safety, and excellence in all that we do.

Fair Dealing with Customers, Suppliers, Competitors, Shareholders and other Employees

All employees are required to conduct themselves in a fair and consistent manner in their day-to-day business dealings to ensure that all business partners, including customers, suppliers, shareholders, and fellow employees, are treated with high standards of honesty, fairness and courtesy.

VI. Conducting Business with Integrity

Environmental Pledge

We recognize our responsibility to conduct business in a manner that considers our environmental impact and supports responsible stewardship of natural resources. All employees are expected to conduct the Company's business in an environmentally responsible manner.

Compliance with Laws, Rules and Regulations

Arclin shall comply with all laws and regulations which apply wherever the Company conducts business. No employee shall, at any time, take any action which he or she knows, or reasonably should know, to be in violation of any applicable law or regulation.

Employees are expected to make reasonable inquiries to determine whether their activities are in compliance with applicable laws and regulations, and to refer the matter to their supervisor or the Compliance Officer prior to taking further action, if in question.

Preventing Misinterpretations and Anti-Competitive Behavior

All employees must be careful not to mislead customers, investors or other stakeholders about the financial status, products or services of the Company or its competitors. No employee should take unfair advantage of anyone, including customers, investors, suppliers or competitors. All employees are expected to behave in a manner which sustains the dignity of and conveys respect for others.

Choosing Suppliers

Arclin is committed to fair competition in all its dealings with suppliers. It is important to communicate requirements clearly and uniformly to all



potential suppliers. Choose suppliers solely upon the basis of merit, competitiveness, price, reliability and reputation.

Record Keeping

Arclin needs full and accurate records to meet its legal and financial obligations and to manage its business properly. All Arclin books, financial reports, expense accounts, time sheets, administrative records and other similar documents must be completed accurately, honestly and in accordance with Arclin procedures. Making false, fictitious or inappropriate entries with respect to any transaction or the disposition of any assets is prohibited. No employee may engage in any transaction that requires or contemplates the making of false, fictitious or inappropriate entries.

VII. Whistle Blowing Policy

The Company takes all reports of potential Code violations seriously and is committed to confidentiality and thorough investigation of all allegations. The Whistle Blower Committee, which consists of the Chief Financial Officer, Chief Human Resources Officer, Chief Legal Officer and the Chief Operating Officer, will conduct or manage Code investigations. Individuals being investigated for a potential Code violation will have an opportunity to be heard and to provide any additional facts relevant to the situation prior to any final determination.

VIII. Conflict of Interest

A conflict of interest is any situation where the ability of an employee to perform his or her duties or exercise independent judgment in the best interests of Arclin is impaired or influenced by personal considerations, interests or relationships. The governing principle is to avoid situations that give rise to an actual or perceived conflict of interest.

Anti-corruption, Bribery & Kickbacks

Unfair business practices, such as rebating, bribery, or kickbacks, are strictly prohibited without exception in all circumstances. This applies in all places where Arclin does business.

Gifts

Offers of small gifts and entertainment are courtesies common in business dealings. However, offering or accepting gifts, entertainment, or other benefits can be mistaken for improper payments. In general, this Code does not intend to prohibit the acceptance of gifts of nominal value or business meals and/or entertainment in furtherance of a business relationship provided that the value is appropriate to the business purpose served, and if acceptance is consistent with accepted business practices.



Unacceptable benefits include money, goods, or services solely for personal use, personal discounts, loans, gifts of non-business related travel or accommodations, personal favors, or any other benefit which could be perceived to impair the employee's impartiality when dealing with a supplier or customer, whether received directly or indirectly by an employee or a family member. In no circumstances should a gift or personal benefit (of any value) be accepted in return for giving favorable or preferential treatment to any customer or supplier.

IX. Protecting Information & Intellectual Property [IP]

Confidentiality

If you have access to Confidential Information, you must use every precaution to keep it confidential. Use discretion when discussing Arclin business in public places such as restaurants and airplanes, or when using public or cellular phones, the Internet, and fax machines. If you are required for legitimate business purposes to disclose Confidential Information to any person outside Arclin, whether it is information related to Arclin or to a customer or supplier of Arclin, a written confidentiality agreement must be in place.

Information & Cyber Security: Confidential & Proprietary Information

Unless expressly authorized by the CEO, President, Chief Legal Officer, Chief Operating Officer, Chief Financial Officer or a Senior Vice President, sending, transmitting, or otherwise disseminating Arclin's proprietary information, trade secrets, or other confidential information to any non-Arclin individual or organization is strictly prohibited. Unauthorized dissemination of this information may result in discipline up to and including termination and substantial civil liability as well as severe criminal penalties under any local or regional statutes.

X. Social Media & External Communications

General Expectations

- Exercise sound judgment and professionalism in all online activity.
- Protect confidential and proprietary information; never share company intellectual property, internal information, or customer/supplier details.
- Ensure social media use does not interfere with safety, productivity, or work responsibilities.
- Follow company policies and standards of conduct when engaging online.



- Help protect the company's reputation by communicating responsibly and respectfully.

XI. A Word from Arclin's CEO

As a company, we're defined by the performance of our products and the character of our people.

The Arclin Code of Conduct provides a framework for the decisions we make and the standards we uphold across our organization.

You can count on us to lead with integrity, earn trust through action, and hold ourselves to a higher standard.

-Bradley Bolduc, Chief Executive Officer