

Business Ethics & Conduct

Corporate Message

Northern Technologies enjoys a well respected reputation as an ethical and moral company.

As you all know, these values have been a key factor in Northern Technologies success.

This Business Ethics and Conduct Policy defines our commitment to ethical business practices and the responsibilities of all our employees.

To continue our success, it is important to taking an active role and follow these guidelines as they are part of our commitment to ensure we deal in an honorable manner.

Should you find yourself faced in a difficult choice or in unfamiliar territory, I urge you to discuss your circumstance with your supervisor. They will discuss the matter with our Management Team to ensure we provide an ethical approach.

It is our working together that Northern Technologies reputation remains well established as a company committed to ethical and moral practice.

John DiPietro
Northern Technologies

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Credibility

When doing business, you must consider the effects of your business relationships. You are expected to conduct all dealings in a moral and honorable method. This must also be extended to all employees, suppliers, competitors, government bodies and all other people you have dealings with.

Conflicts of Interest

Northern Technologies encourages employees to take active roles in their communities and that they have interests outside their employment. Employees must also be aware that some of their activities may conflict with their duties at Northern Technologies.

Certain conflicts of interest may not be easily identified so here are some examples of potential conflicts of interest:

Any outside employment you do must be completely separate from your employment at Northern Technologies and cannot affect your performance. You may not work for any company in any capacity that competes with, is a customer or supplier of Northern Technologies. If a relative or friend works for a customer, supplier or competitor, advise your supervisor so a conflict of interest can be avoided.

Northern Technologies does not make any political contributions. Northern Technologies name must not be used for political parties or their candidates.

Charitable donations must be directed to the department responsible for overseeing such requests.

Laws – Domestic and Foreign

Northern Technologies operates under local laws in which it resides but may also be subject to the laws in countries in which we do business. If you discover a conflict between these laws, are unsure or have any questions, contact a representative from the Management Team for guidance.

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Laws – Copyright

Some of the materials you may use from day to day may be protected by copyright laws. Some examples of copyrighted material may be software, books, specifications, video files, tapes, printed manuals and journals, etc. It is illegal for you to copy or download any copyrighted material without the permission of the owner.

Gifts, Favours & Entertainment

With regard to the treatment of customers, limited business related entertainment, favours or gifts may be offered to customers if the following criteria are met:

- the items offered are legal;
- the value of the item would not be viewed as improper by others;
- such favours would not be embarrassing to Northern Technologies or the recipient;
- the favours or gifts honour any guidelines of the customer.

Under any circumstances we must not provide nor accept any gifts, favours or entertainments that may make anyone feel obliged to provide preferential treatment.

Refer to SPP 2.08.ON of our Human resources Employment Policy Manual for additional guidelines.

Fair Competition

Northern Technologies is committed to conduct its business in compliance with all applicable competition and antitrust laws both domestic and foreign. Employees must always conduct themselves in an honest and ethical manner. Employees must not discuss with a competitor any prices, terms, bids, capacities, sales related strategies, private company information or any other details deemed unfair. Employees will not use any negative selling techniques or spread any rumors to win business from a competitor. Employees shall not release any potential weaknesses of a supplier to another supplier outside of Northern Technologies. Suppliers shall be selected on the

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basis of price, delivery, flexibility, terms, sustainability, financial stability and customer service.

Employee Relations

Northern Technologies is committed to the fundamental principles of equal employment opportunity. We are committed to treating people fairly, with respect and dignity and to offer equal employment opportunities based upon an individual's qualifications and performance - free from discrimination, workplace harassment, sexual harassment and violence because of race, ancestry, place of origin, ethnic origin, colour, citizenship, creed, sex, sexual orientation, age, marital or same-sex partnership status, family status and handicap. Employees are expected to treat each other and all individuals with whom they have business dealings with honesty, respect and courtesy. Northern Technologies does not allow weapons of any nature in the workplace.

Child Labour and Forced Labour

Northern Technologies will not tolerate the use of unlawful child labour or forced labour in the manufacture of our products and will not accept products or services from suppliers, subcontractors or businesses of any sort that employ or utilize the use of child labour or forced labour in any manner whatsoever. Northern Technologies shall not employ or utilize in any manner whatsoever any individual below the minimum age as set by a national law or by the ILO Convention 138, whichever is higher. ILO Convention 138 provides that the minimum employment age should be not less than the mandatory schooling age of the country in which the individual is employed and, in any case, not less than 15 years. However, we do comply with the local laws when they are more restrictive.

Health & Safety

Northern Technologies strives to create and maintain a safe workplace in order to minimize and/or prevent occupational injuries and illnesses. Consistent and continuous efforts by all employees shall be directed to preventing workplace accidents and maintaining the workplace and equipment in a safe condition. At all times, Northern

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Technologies and its employees are required to observe and comply with the requirements of the applicable laws and regulations. Everyone who undertakes, or has the authority, to direct how another person does work or performs a task is under a legal duty, or as set by law, to take reasonable steps to prevent bodily harm to that person, or any other person, arising from the work or task. Contact your local Health & Safety committee for further details.

Environment

Northern Technologies is committed to minimizing its impact on the natural environment. We place emphasis on meeting all regulatory and industry standards by taking the appropriate actions for the prevention of potential environmental effects. All employees are expected to be familiar with the environmental standards that apply to your workplace and you are to comply with these standards at all times. When in doubt, always discuss with your supervisor so we may take reasonable measures of prevention.

Employee Helpline & Information

It is the responsibility of each of us to report any violation of this guide to your supervisor, manager or Human Resource representative. All correspondence whether written or spoken shall be held in strict confidence to protect your anonymity if desired.

In Canada & USA call: 1 800-456-1875

All other countries: 905-475-9320