

BMV Optical Technologies Inc.
Code of Ethics and Conduct Policy

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Approved By: Terry Vineham, Vice President

Version: 2.0

1. Purpose and Scope

BMV Optical Technologies Inc. (“BMV”) is committed to operating with honesty, fairness, and respect for people and the environment.

This Code of Ethics and Conduct (the “Code”) defines the values and standards that guide our decisions and actions every day.

This Code applies to all BMV employees, officers, directors, contractors, consultants, suppliers, and any third party representing the company in Canada or abroad.

2. Our Ethical Principles

At BMV, we:

- Act with **integrity** in every business decision.
 - Treat all individuals with **respect and fairness**.
 - Operate responsibly to protect the **health, safety, and environment** of our communities.
 - Uphold **human and labour rights** in all operations.
 - Foster a culture of **transparency and accountability**.
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3. Human Rights

BMV upholds the **Universal Declaration of Human Rights** and the **Canadian Charter of Rights and Freedoms**.

- We prohibit all forms of discrimination, harassment, intimidation, or abuse.
 - We promote diversity, equity, and inclusion at all levels.
 - We respect the dignity, privacy, and personal freedoms of every individual.
 - We actively identify and address any potential human rights impacts in our business and supply chain.
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4. Labour Rights

BMV supports the **International Labour Organization (ILO)** core conventions.

4.1 Fair Employment

We hire and promote based on merit, qualifications, and performance. All workers are treated with dignity and respect.

4.2 Prohibition of Child and Forced Labour

We do not use or support child labour or forced labour. All work is voluntary and freely chosen.

4.3 Working Conditions and Compensation

We comply with all applicable labour standards regarding wages, benefits, working hours, and overtime.

Compensation is fair and competitive.

5. Health and Safety

BMV provides a safe and healthy workplace, complying with the **Canada Labour Code** and **provincial occupational health and safety laws**.

- Employees share responsibility for maintaining a safe environment.
- Hazards, injuries, or unsafe conditions must be reported immediately.
- We provide appropriate safety training, protective equipment, and emergency preparedness resources.
- Substance abuse or reckless behaviour that endangers others is strictly prohibited.

6. Environmental Responsibility

We are committed to environmental stewardship and sustainable operations.

- BMV complies with all environmental laws and regulations.
 - We strive to reduce waste, energy use, and greenhouse gas emissions.
 - Materials, chemicals, and waste are handled and disposed of responsibly.
 - We innovate to improve energy efficiency and sustainable product design.
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7. Responsible Minerals Sourcing

We are committed to responsible minerals sourcing in accordance with the principles set out in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We seek to ensure that the extraction, trade, handling, and export of minerals used in our products do not contribute to conflict, human rights abuses, or environmental harm.

We implement a risk-based due diligence framework consistent with the OECD's five-step model, including:

- Establishing strong internal management systems for supply chain oversight;
- Identifying and assessing risks in our mineral supply chains;
- Designing and implementing strategies to respond to identified risks;
- Supporting independent third-party audits of supply chain due diligence, where appropriate; and
- Publicly reporting on our due diligence policies and practices.

We expect our suppliers to adopt similar due diligence practices, provide transparency regarding the origin of minerals (including tin, tungsten, tantalum, gold, and other high-risk materials), and cooperate with our information requests and audits. Suppliers must take timely corrective actions to address identified risks and align with internationally recognized human rights standards.



Suppliers are required, where applicable, to source minerals from smelters and refiners that have been validated as conformant through recognized independent third-party audit programs. We expect suppliers to exercise due diligence in verifying smelter and refiner status and to transition away from non-conformant sources where risks are identified.

We will not knowingly source from, or support, supply chains that contribute to conflict financing, serious human rights abuses (including forced or child labor), or significant environmental degradation. We are committed to continuous improvement, stakeholder engagement, and transparent reporting to promote responsible sourcing and sustainable development.

8. Business Ethics and Integrity

8.1 Anti-Corruption and Bribery

BMV strictly prohibits all forms of bribery, corruption, and improper payments. We comply with the **Canadian Corruption of Foreign Public Officials Act (CFPOA)**.

8.2 Conflicts of Interest

Employees must avoid activities that create—or appear to create—a conflict between personal interests and BMV’s interests.

Potential conflicts must be disclosed immediately.

8.3 Fair Competition

We compete fairly and comply with all **competition and antitrust laws**.

We do not engage in price-fixing, market allocation, or collusion.

8.4 Confidentiality and Data Protection

We safeguard all company, customer, and partner information.

Personal and confidential data are managed in accordance with the Canadian **Personal Information Protection and Electronic Documents Act (PIPEDA)** and relevant privacy regulations.

8.5 Accurate Records and Reporting

All company records must be truthful, complete, and maintained per BMV’s accounting standards and legal requirements.

9. Implementation and Compliance

- All employees receive Code of Ethics training upon hire and periodically thereafter.
 - Managers are responsible for modelling ethical conduct and ensuring compliance.
 - Suppliers and business partners must comply with equivalent ethical standards.
 - Breaches of this Code may result in disciplinary action, up to and including termination of employment or contracts.
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10. Reporting Concerns and Whistleblower Protection

BMV encourages everyone to speak up if they witness or suspect unethical behaviour.

- Concerns can be reported confidentially to Management.
 - Reports made in good faith will be taken seriously and investigated promptly.
 - Retaliation against anyone who reports a concern honestly is strictly prohibited.
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11. Continuous Improvement

BMV will regularly review and update this Code to reflect evolving laws, standards, and best practices.

Continuous improvement in ethical behaviour, sustainability, and responsibility is part of our culture.

12. Document Control

| Revision | Date | Description | Approved By |
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| 1.0 | November 18, 2025 | Initial Release | Terry Vineham |
| 2.0 | March 24, 2026 | Added responsible minerals sourcing section | Terry Vineham |

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