

Code of Conduct

Hi-Tech Grain Mills Ltd



CONTENTS

Introduction	3
Ethical Principles and Core Values	3
Decision Making and the Code of Conduct	3
Reporting/Speaking Up	3
No Retaliation	4
Equal Opportunity	4
Harassment	4
Bullying	4
Conflicts of Interest	4
Confidentiality	5
Competition, Fair Dealings and Antitrust	5
Political Contributions	5
Record Keeping	5
Protection and Proper Use of Company Assets	6
Money Laundering	6
Insider Trading	6
Health and Safety	6
Environment	6
Information Technology	6
Use of Social Media	6
Corporate Social Responsibility	7
Code of Conduct Acknowledgement	7

Introduction

→ This code of conduct applies to all employees and executives.

Ethical Principles and Core Values

Our Core Values which are the pillars of the Hi-Tech grain Mills organization.

Honesty

Integrity

Trustworthiness

Courage

Respect for others

Responsibility

Accountability

Obedience to the law

Empathy

Teamwork

Commitment to the code

Decision Making and the Code of Conduct

When making a decision, ask yourself the following:

- Is it legal?
- Does it comply with the code?
- Does it reflect our company values and ethics?
- Does it respect the rights of others?
- If you are unsure about any of the answers, ask.

Reporting/Speaking Up

Hitech Grain Mills encourages all employees to ask questions and raise issues without fear of retaliation and is committed to treating reports seriously and investigating them thoroughly.

Employees must report suspected unethical, illegal or suspicious behavior immediately. Hitech Grain Mills does not tolerate retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation or audit.

To report a concern:

- Talk to your manager
- Contact Human Resources

No Retaliation

Employees who report a concern in good faith cannot be subjected to any adverse employment action including:

- Unfair dismissal, demotion or suspension
- Unfair denial of a promotion, transfer or other employment benefit
- Bullying and harassment, either in person or online
- Exclusionary behavior
- Any other behavior that singles out the person unfairly

Equal Opportunity

Hitech Grain Mills will not tolerate discrimination based on race, color, religion, gender, age, national origin, sexual orientation, marital status, disability or any other protected class.

Harassment

Treat all fellow employees, customers, business partners and other stakeholders with dignity and respect at all times.

Any type of harassment, including physical, sexual, verbal or other, is prohibited and can result in disciplinary action up to, and including, termination.

Harassment can include actions, language, written words or objects that create an intimidating or hostile work environment, such as:

- Yelling at or humiliating someone
- Physical violence or intimidation
- Unwanted sexual advances, invitations or comments
- Visual displays such as derogatory or sexually-oriented pictures or gestures
- Physical conduct including assault or unwanted touching
- Threats or demands to submit to sexual requests as a condition of employment or to avoid negative consequences

Bullying

We are committed to ensuring that our employees, our contractors and our customers work in safe and respectful environment that is free of bullying. Bullying can include:

- Spreading malicious rumor or gossip
- Excluding or isolating someone socially
- Establishing impossible deliverables
- Withholding necessary information or purposefully giving the wrong information
- Intimidating someone
- Impeding someone's work
- Unfairly denying training, leave or promotion
- Constantly changing work guidelines
- Sending offensive jokes or emails
- Criticizing or belittling someone constantly
- Tampering with a person's personal belongings or work equipment

Conflicts of Interest

A conflict of interest can occur when an employee's personal activities, investments or associations compromises their judgment or ability to act in Hitech Grain Mills' best interests. Employees should avoid the types of situations that can give rise to conflicts of interest.

It's important for employees to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to their manager or the Human Resources Department.

Confidentiality

Hitech Grain Mills and its employees maintain the confidentiality of all proprietary information. Proprietary information includes all non-public information that might be harmful to Hitech Grain Mills and its customers and business partners if disclosed.

Confidential information can include:

- Customer lists
- Supplier lists
- Pricing information
- Terms of contracts
- Company policies and procedures
- Financial statements
- Marketing plans and strategies
- Trade secrets
- Any other information that could damage Hitech Grain Mills or its customers or suppliers if it was disclosed

Competition, Fair Dealings and Antitrust

While Hitech Grain Mills competes aggressively for new business, relationships with business partners are built upon trust and mutual benefits and compliant with competition/antitrust laws.

Employees are required to:

- Communicate Hitech Grain Mills' products and services in a manner that is fair and accurate, and that discloses all relevant information
- Familiarize themselves with Hitech Grain Mills' fair competition policies and remain aware of the consequences of any violation of policies or laws governing fair competition
- Consult Hitech Grain Mills' legal department before engaging in any new practice that may affect fair competition
- Refrain from price fixing, bid rigging, and any other anti-competitive activities
- Use only publicly available information to understand business, customers, competitors, business partners, technology trends, and regulatory proposals and developments
- Advise their manager immediately of possible violations of fair competition practices

When in doubt, employees should check with the ethics and compliance officer before giving or receiving anything of value.

Political Contributions

Employees are free to support any political party or entity on a personal level. However this must be kept separate from company business.

Record Keeping

Employees are required to:

- maintain records and protect their integrity for as long as possible
- maintain official record keeping systems to retain and file records required for business, legal, financial, research or archival purposes
- dispose of your records according to Hitech Grain Mills' records retention and disposition schedule

Protection and Proper Use of Company Assets

Hitech Grain Mills requires all employees to protect its assets. All assets should be used for legitimate purposes, efficiently, and for company business only.

Assets include facilities, equipment, computers and information systems, telephones, employee time, confidential and proprietary information, corporate opportunities and company funds.

Suspected incidents of fraud, theft, negligence, and waste should be reported to the VP Operations.

Money Laundering

Employees must never knowingly facilitate money laundering or terrorist financing, and must take steps to prevent inadvertent use of Hitech Grain Mills' business activities for these purposes

Insider Trading

Employees may learn information about Hitech Grain Mills, associates, clients, business partners or other companies that is not publicly available. It is illegal for any individual to use information obtained in this way for personal gain or to share it with others.

Employees are required to report suspected insider trading immediately

Health and Safety

Hitech Grain Mills conducts business in accordance with applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures.

All employees are expected to perform their work in compliance with applicable health and safety laws, regulations, policies and procedures and apply safe work practices at all times in all locations.

Applicable safety and health requirements must be communicated to visitors, customers or contractors at any company location.

Employees are required to immediately report workplace injuries, illnesses or unsafe conditions, including "near-misses."

Hitech Grain Mills will not be liable for any workplace injuries caused by non-compliance of health and safety protocols

Environment

Hitech Grain Mills is committed to operating in an environmentally responsible manner, from the provision of products and services, to the operation of its offices and facilities.

Hitech Grain Mills strives to comply with all applicable environmental laws and regulations as well as self-directed commitments to sustainable practices and environmental protection.

Information Technology

Hitech Grain Mills expects its employees to help it safeguard all computer equipment and data against intentional malicious acts by individuals inside or outside Hitech Grain Mills

Use of Social Media

Hitech Grain Mills respects the right of employees to use social media for personal and professional purposes.



Employees are responsible for complying with company policies and procedures when communicating on social media. Employees are accountable for any information they publish online.

Employees are required to:

- Reveal their relationship with Hitech Grain Mills when commenting online on issues related to Hitech Grain Mills
- Respect the privacy of other employees and refrain from publishing photos of them without their consent
- Ensure any information they post related to Hitech Grain Mills is accurate
- Comply with the rules of the social media sites they use

Employees must not:

- "Pretext", or pretend to be someone they are not online
- Speak on behalf of Hitech Grain Mills if they are not expressly authorized to do so
- Share confidential information about Hitech Grain Mills, its clients, stakeholders or suppliers
- Post comments or pictures that could harm Hitech Grain Mills' brand, reputation or commercial interests

Corporate Social Responsibility

Forced Labor: Hitech Grain Mills shall employ all employees under their own free will with no one being subjected to bonded or forced labor.

Responsible Environmental Impact: Hitech Grain Mills shall conduct ongoing efforts to reduce environmental pollution while increasing sustainability.

Hitech Grain Mills encourages and supports involvement in the community that has supported it.

Charitable involvement is important to Hitech Grain Mills and a charity committee meets once a year to discuss and execute potential and ongoing charitable projects.

Code of Conduct Acknowledgement

By certifying to Hitech Grain Mills code of conduct, you acknowledge that:

- You have read the entire code of conduct and understand your responsibilities related to it.
- You have had the opportunity to ask questions to clarify any unclear aspects of the code.
- You agree to abide by its principles.
- You agree to report to Hitech Grain Mills any violations of the code.
- You agree to cooperate in any investigations of violations of the code.