2025

POLARIS TRANSPORTATION GROUP

ETHICAL CODE OF CONDUCT

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SCOPE OF THE CODE:

The CODE is applicable to all employees and workers, including members of Management. In certain instances, it may also be extended to individuals with whom interactions occur in the course of business.

Compliance with the CODE is required and forms an integral part of each individual's relationship with the Company.

Responsibility is placed on everyone to not only read the CODE but also to understand and adhere to its provisions.

Concerns—including known or suspected violations of the CODE—are expected to be reported. Retaliation or retribution against any employee or worker who raises a concern in good faith is strictly prohibited by the Company.

However, any allegation made with malicious intent or in a mischievous manner may itself be considered a violation of the CODE.

INTENT OF THE CODE:

The CODE of Conduct has been established to define the standards we strive to uphold, both within our organization and in our dealings with vendor partners, customers, and the public.

The principles of inclusion have been reflected in the language of this communication to ensure all genders are respectfully acknowledged.

The standards and expectations detailed in the CODE of Conduct are not intended to be exhaustive and must be interpreted in conjunction with the Company's Policy Handbook.

All policies and procedures are designed to be in compliance with applicable laws. This CODE of Conduct is to be applied across all Polaris business units, functional areas, controlled subsidiaries, and managed affiliates.

If clarification is needed, a manager or a member of the Human Resources team should be consulted.

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CONFIDENTIALITY

Through employment at Polaris, access is granted to confidential information concerning business plans, products, new services, pricing, promotions, and technology. This information, relating to Polaris and its operating companies, is to be treated as confidential.

The confidential information of customers and partners must also be protected against theft, loss, unauthorized access, disclosure, or misuse.

No company information is to be disclosed outside of Polaris without prior written authorization. Efforts must be made to safeguard Polaris' interests by exercising sound judgment and ensuring that confidential information is not shared inappropriately.

PRIVACY

The protection of personal information is taken seriously. Discussion or disclosure of personal details—such as compensation (wages, salaries, bonuses, increases), employment matters (terminations, performance), or customer data (customer lists, order information)—is not permitted, as it may contribute to a negative work environment.

This commitment to privacy also extends to information belonging to partners and suppliers.

All individuals are expected to contribute to the protection of personal information and to safeguard any sensitive data necessary to maintain Polaris' competitive position.

EQUITY

Workplace decisions are made solely on the basis of merit, skills, and qualifications relevant to professional competence.

Unlawful discrimination or harassment of any kind is strictly prohibited in the workplace on the basis of race, colour, ancestry, place of origin, ethnic origin, citizenship, gender identity, gender expression, sexual orientation, physical or mental ability, age, marital status, family status, disability, or any other grounds protected under Federal and Provincial human rights legislation in Canada.

It will be ensured that all policies and decisions regarding recruitment, hiring, promotion, termination, compensation, and other terms and conditions of employment are designed to uphold equal rights and opportunities for all individuals.

RESPECTING OTHERS

In order for a respectful workplace to be achieved, the work environment must be shaped by the demonstration of respect, dignity, equity, and safety for all team members. Diversity and inclusion are recognized as essential, as they allow for a range of perspectives and ideas to be brought forward—ultimately benefiting not only the Company, but also customers, partners, the communities served, and the public at large.

While many were raised to treat others as they themselves would wish to be treated, a more inclusive and equitable principle is now followed: individuals are to be treated in the way they wish to be treated—not according to personal preferences or assumptions. Their dignity must be preserved, and every effort should be made to ensure that all individuals feel valued upon arriving at work and when leaving at the end of the day.

The fair treatment of customers, partners, and suppliers is upheld as part of Polaris' ethical culture, in which respect for others is embedded. Consideration of their interests is prioritized in all business practices.

HUMAN RIGHTS

We are committed to respecting and promoting internationally recognized human rights throughout our operations and business relationships. Our approach is guided by the *United Nations Guiding Principles on Business and Human Rights* and applies across our activities, regardless of geography, business structure, or role in the value chain.

We treat all employees with dignity and fairness, and do not tolerate any form of discrimination, harassment, forced labor, or child labor. Should they not comply with our standards and expectations, we reserve the right to end our business relationship with any partner, supplier, or third party. Our commitment to human rights goes beyond compliance with applicable laws—we strive to proactively identify and address potential risks, and to prevent and mitigate adverse human rights impacts wherever possible.

We expect our business partners to uphold similar standards by fostering fair labor practices and maintaining safe and respectful working conditions. All workers—whether internal or external to our organization—should have access to effective, transparent, and confidential grievance mechanisms. Any employee who experiences or witnesses a potential violation is encouraged to report it to their manager or the HR team. External grievances can be reported to the relevant account manager or escalated to our executive management team.

DIVERSITY AND INCLUSION

Difference and diversity are valued at Polaris by ensuring that all team members are respected for their individuality, abilities, and aspirations.

As part of Polaris' ongoing commitment to inclusion, accommodations must be provided where needed, and efforts must be made to remove any barriers that may prevent full participation.

It is recognized that the world is composed of individuals with varied backgrounds, beliefs, and origins, and this diversity is fully embraced.

This commitment must be upheld by all, with respect, appreciation, and celebration shown for one another's unique differences.

VIOLENCE AND HARASSMENT

We uphold a zero-tolerance policy at Polaris for any form of violence or harassment—whether verbal, physical, or visual—committed in the workplace or in any related setting.

Harassment is defined as any comment, conduct, or physical contact that is, or ought reasonably to be, known to be unwelcome. It may take various forms, including but not limited to jokes, threats, insults, or unwanted sexual solicitations or advances.

The display of offensive pictures—even within one's own workspace or vehicle—wearing clothing with offensive language, or circulating emails containing inappropriate jokes or other offensive materials is considered unacceptable and inappropriate.

If harassment is experienced or witnessed—whether committed by a team member, partner, or customer—such incidents should be reported immediately to the Human Resources team or the President. All reports will be treated seriously, and investigations will be conducted as required. Appropriate action will be taken based on the findings. Investigations can only be carried out with the cooperation and information provided by those involved.

DRUGS AND ALCOHOL

It is well recognized that drugs—including, in some cases, prescription drugs—can negatively impact job performance and pose safety risks. Impairment in the workplace due to drugs or alcohol is not permitted and will be addressed with seriousness.

If an individual is found to be in possession of, or under the influence of, drugs or alcohol while at work, disciplinary action may be taken.

A separate Drug and Alcohol Policy has been issued by the Company, which applies specifically to drivers and those in safety-sensitive positions. For all other employees, workers, or contractors, it is expected that alcohol or drugs—excluding prescription medications that do not impair job performance—will not be brought into or consumed within the workplace.

The presence of drugs, drug paraphernalia, or alcohol is not permitted at Polaris offices, in Company vehicles, or at Company-sponsored events.

SPECIAL FAVOURS/BRIBES/FRAUDLUENT ACTIVITY

It is understood that people may wish to express gratitude for a job well done. However, the offering or acceptance of gifts, hospitality, rewards, benefits, or other incentives from external parties is not to be permitted under any circumstances. Such actions could create, or be perceived as creating, a bribe or a situation that compromises impartiality, influences a business decision, or results in the improper performance of an official or contractual duty.

In alignment with our Company values, all anti-corruption and anti-bribery laws are strictly adhered to. Accordingly, the following are prohibited:
i. The giving or offering of anything of value intended to improperly influence business decisions or secure an improper business advantage.
ii. The use of any form of bribery, including kickbacks, payoffs, or other corrupt or unlawful practices.

If a bribe—regardless of its size—is offered or requested, it must be refused. All such incidents are required to be reported.

Fraud is defined as an act—either intentional or by omission—intended to deceive or mislead for personal gain. Examples include forgery, bribery, misuse of confidential information, or false claims for goods or services not received.

It must be ensured that all expense documentation is accurate and related to business activity. Company requirements for expense reimbursement are to be followed at all times.

Any need for clarification should be addressed with the appropriate direct manager.

CONFLICTS OF INTEREST

An obligation is placed on all employees to act in the best interests of the Company, its partners, and its customers. When a situation arises in which competing loyalties may lead to the pursuit of personal benefit—for oneself, friends, or family—at the expense of Polaris, its vendor partners, or its customers, a conflict of interest may exist, or circumstances may reasonably give the appearance of one.

The presence of such conflicts may result in fraudulent activity.

If any uncertainty exists regarding a potential conflict of interest, guidance should be sought from a manager or a member of the Human Resources team.

FRIENDS/RELATIVES AND CO-WORKER RELATIONSHIPS

Employment consideration may be given to relatives, significant others, or friends. As with all candidates, hiring decisions are made primarily based on skills, experience, and past performance. These decisions are expected to be made on individual merit and demonstrated performance, free from bias or external influence.

In accordance with company policy, relatives, significant others, or friends are not to be placed in roles where they work in close proximity to the individual who referred or is associated with them, in order to prevent conflicts of interest or the perception of favoritism.

If a significant other relationship is formed between employees during the course of employment, disclosure is to be made immediately to the applicable direct manager(s) to mitigate any appearance of conflict or favoritism.

The same disclosure is expected if a significant other relationship exists or develops between a team member and a supplier or vendor, whether prior to or during employment. A high standard of professionalism must be upheld, and personal relationships must not compromise the ability to act in Polaris' best interest or affect workplace dynamics.

In the event a conflict of interest is identified, appropriate measures will be taken to ensure that personal relationships do not interfere with professional responsibilities.

HEALTH AND SAFETY

The health and safety of team members, workers, and contractors are regarded as matters of vital importance at Polaris. Protection from injury and occupational disease is upheld as a continuous objective. Every effort will be made to ensure that a safe and healthy work environment is provided. A shared dedication is expected toward the ongoing goal of minimizing the risk of injury.

Responsibility for health and safety is ultimately borne by Polaris, and every reasonable precaution will be taken to safeguard all individuals. A commitment is maintained to promote a safe and healthy workplace for team members, workers, contractors, customers, partners, and visitors.

To fulfill this commitment, policies and procedures will be developed, implemented, and enforced to support a safe and healthy work environment. The importance of safety to the well-being and productivity of our people is acknowledged, and every effort is made to protect the workplace from injury and illness.

Compliance with all applicable workplace health and safety legislation will be maintained. While ultimate responsibility rests with the Company, individuals are also expected to take

reasonable care to protect their own health and safety, as well as that of others, by adhering to relevant laws and the Company's established safe work practices and procedures.

As safety is a shared responsibility, all employees are expected to speak up when practices posing health or safety risks are observed.

SOCIAL MEDIA

The way communication, interaction, and business are conducted with customers, vendor partners, and other Polaris stakeholders—as well as within internal company networks—has been transformed by digital and social media platforms (e.g., Instagram, Facebook, YouTube, LinkedIn, Glassdoor, TikTok, WhatsApp, etc.), team spaces, groups, and blogs.

While many benefits are offered by social media use, certain risks are also introduced. It should always be remembered that the Polaris brand is represented by employees both on and off the job, and in both online and offline settings. Guidance for maintaining a responsible social media presence can be found in the policies outlined in the Employee Handbook.

Although social media is recognized as an important tool, all forms of communication must be carried out responsibly and in alignment with the Company's values and its privacy and confidentiality requirements.

COMPANY EQUIPMENT/ASSETS

We entrust our employees with the tools and equipment necessary to perform their roles effectively, and responsibility in the use of Company property is expected. This includes, but is not limited to, computer and laptop equipment, mobile devices, office supplies, and furniture. All items are to be treated with care.

Company assets are to be used solely for legitimate business purposes, and must be protected against theft, damage, loss, or misuse.

Furniture, equipment, supplies, files, or any other information are not to be removed from Company premises unless proper authorization has been granted. If authorization has been provided for remote work, all Company assets must be safeguarded and must not be accessed or used by others, including family members.

Any breach of these expectations must be reported immediately.

In addition, all security, privacy, and internet use policies outlined in the Employee Handbook are to be followed without exception.

INTELLECTUAL PROPERTY

Polaris' intellectual property rights—including trademarks, logos, copyrights, trade secrets, patents, and proprietary "know-how"—are considered valuable assets. Unauthorized use or distribution of this intellectual property may result in loss of value, damage to the Company, and/or a breach of confidentiality.

Any misuse or unauthorized sharing of intellectual property should be reported to a manager or a member of the Human Resources team.