

DIVERSITY, EQUITY, AND INCLUSION POLICY

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1. INTRODUCTION

At Montrusco Bolton Investments Inc. (“MBI”), we believe that diversity, equity, and inclusion (“DEI”) are essential elements of our organizational culture. We are committed to fostering an inclusive work environment where every employee is treated with fairness and respect, and where the diverse contributions of our team members are valued. We strive to provide equal opportunities for all individuals to thrive, contribute to our success, and reach their full potential. By cultivating a sense of belonging, trust, and collaboration, we can create unrivaled value at all levels of our organization.

At a minimum, this policy is intended to ensure that MBI complies with all applicable regulations regarding DEI. It is a mean to prevent inappropriate behavior and respond effectively to situations of discrimination based on the grounds defined by law.

2. SCOPE

This policy applies to all current employees of MBI and extends to our relationships with all stakeholders, including the companies in which we invest.

3. DEFINITIONS

Diversity: The full spectrum of human attributes, perspectives, identities, and backgrounds.

Equity: Fairness of access, opportunity, and advancement for all within an organization, which requires eliminating barriers and root causes that have prevented underrepresented groups from full participation within the workplace. Equity is distinct from equality. Equality requires that each individual be treated without discrimination, including being given equal opportunities for advancement. Equity goes further and offers those who need it targeted support to reach their full potential.

Inclusion: A dynamic state of operating in which any employee can be and can feel respected, valued, safe, and fully engaged. Inclusion is the process through which MBI builds a sense of community, allowing employees and the organization as a whole to benefit from diversity. Inclusion ensures that everyone has the right to participate in our workplace and creates an environment where all individuals feel accepted, comfortable, and empowered to share their perspectives.

4. COMMITMENTS

MBI is dedicated to the following commitments:

- **Creating a respectful and inclusive work environment**

We are committed to maintaining a work environment that promotes dignity and respect for every employee. We recognize and value the individual differences and contributions of all employees, striving to create an environment that embraces diversity. Given our culture of independent thinking and our values of candor and collaboration, we encourage people to express their diverse points of view with respect for the greater good of the firm.

- **Attracting a skilled and diverse workforce**

We aim to attract and retain a talented and diverse workforce that reflects the available diverse talent within our society.

- **Developing fair and inclusive selection practices**

We ensure that all selection criteria are appropriate, based on diverse skills, experience, and perspectives when hiring new staff and promoting current team members. We aim to give equal opportunities to a diverse pool of talented candidates and ensure a cultural fit between MBI and the candidate. We do not discriminate based on age, ethnicity, colour, national origin, religion, gender, gender identity or expression, sexual orientation, marital status, disability, veteran status, socio-economic background, and any other characteristic that makes people unique individuals.

- **Promoting professional development and training opportunities for all employees**

We are committed to fostering an inclusive environment that prioritizes the professional growth and development of every team member. Through financed training programs and ongoing learning opportunities, we strive to ensure that each individual has the resources and support needed to reach their full potential. Given our culture as a learning organization, MBI believes that education and development are an important investment for the firm.

- **Addressing intimidation and harassment**

We actively discourage and address any forms of intimidation, bullying, victimization, vilification, or harassment that contradict the intentions of this policy. Such behaviors will be met with appropriate disciplinary action.

- **Regular review and update of practices**

We commit to regularly reviewing and updating all employment practices and policies that do not align with the intentions of this policy. This includes areas such as recruitment and selection, compensation and benefits, professional development and training, promotions, transfers, social and recreational programs,

and terminations. Our goal is to foster a work environment built on the principles of diversity, equity, and inclusion.

- **Compliance with legal requirements**

We comply with all applicable legal requirements related to equity, diversity, and inclusion, fostering an environment where respectful communication is encouraged at all times.

5. MBI'S EXPECTATIONS FROM MANAGEMENT

We expect our management team to:

- **Understand their role in promoting diversity, equity, and inclusion**

Managers play a crucial role in promoting diversity, equity, and inclusion within our organization. They are expected to lead by example and actively promote an inclusive work environment.

- **Act in accordance with this policy**

Managers should adhere to this policy at all times and ensure that their actions align with the principles of diversity, equity, and inclusion.

- **Discourage contrary actions**

Managers must actively discourage and address any actions or behaviors that are contrary to this policy.

6. MBI'S EXPECTATIONS FROM EMPLOYEES

We require all employees to:

- **Treat each other with dignity and respect**

Employees should treat one another with dignity and respect at all times, fostering a supportive and inclusive work environment.

- **Act in accordance with this policy**

All employees are expected to adhere to this policy and promote a culture of diversity, equity, and inclusion.

- **Identify and report policy breaches**

If employees witness any breach of this policy, it is their responsibility to promptly and anonymously bring it to the attention of the Compliance Department through this form : [Code of Ethics Violations Form](#).

7. COMPLAINTS

We expect all employees to adhere to the commitments outlined in this policy. In the event of a breach, employees are encouraged to report the incident to the Compliance Department immediately. Violations of this policy may result in disciplinary action, including termination, depending on the nature and severity of the violation following a thorough investigation.

8. REPRISALS

MBI strictly prohibits retaliation, taunts, or threats against employees who report incidents or complaints of discrimination or harassment or participate in related investigations. Any employee found to engage in such behaviors may face disciplinary action, up to and including dismissal for cause. Employees who make good-faith reports or complaints, regardless of the outcome, will not face any form of discipline. However, the company will take appropriate disciplinary action against any employee who brings forth false or malicious complaints.

9. COMMUNICATION

This policy is communicated to our employees, clients and other stakeholders and is available publicly on our website.

10. REVIEW

MBI will periodically review this policy to ensure its effectiveness and make updates as deemed necessary.