

Diversity & Inclusion Policy

NiCAN Limited and all its subsidiaries, joint ventures or affiliated companies (“NiCAN” or the “Corporation”), are committed to workplace diversity and fostering a culture of inclusion, across all aspects of our business, and all operations and offices.

At NiCAN, diversity and inclusion means to respect and value difference. We recognize the benefits arising from employee and Board diversity, including a broader pool of high quality employees, improving employee retention, accessing different perspectives and ideas and benefiting from all available talent.

We understand that diversity and inclusion are defined in various ways globally. At NiCAN, “Diversity” refers to any dimension that can be used to differentiate groups and people from one another, such as but not limited to sex, gender, age, ethnic origin, religion, education, sexual orientation, political belief, disability and family status. “Inclusion” refers to a culture of respect and appreciation of these differences.

This Diversity and Inclusion Policy (the “Policy”) sets out the principles and requirements by which NiCAN will enhance diversity and inclusion throughout the organization. This Policy is to be read concurrently with NiCAN’s Code of Conduct.

Scope and Applicability

The Policy applies to all employees, Board members and anyone conducting work for NiCAN. This Policy does not purport to condone engagement in actions that would violate any anti-discrimination, equal employment or other laws and regulations. Employees and Directors will be recruited and promoted based upon their ability and contributions.

This Policy is subject to change from time to time as necessary or if required by law. Questions regarding this Policy should be directed to the Chief Executive Officer or Chief Financial Officer.

Roles and Responsibilities

Everyone covered by this Policy, is expected to foster a culture of diversity and inclusion, where different perspectives, experiences and skillsets are respected and valued. Including:

1. Working to become aware of biases. For example, making decisions based on preference or tradition in favour of or against one thing, person or group compared with another, which can be unfair;
2. Recognizing that inclusion is an attitude and approach that embraces all people – no matter their differences or similarities, allowing all people working with and for NiCAN to be their full, authentic selves;
3. Endeavoring to ensure everyone feels respected, welcomed, supported and encouraged to achieve their full potential; and
4. Reporting instances of non-compliance with this Policy using the reporting channels outlined in our Code of Conduct.

Board of Directors’ Responsibilities

The Board of Directors commits to fostering a diverse and inclusive culture where:

1. Individual differences are respected;

2. The ability to contribute and access employment opportunities is based on performance, skill and merit, while recognizing the benefits of and actively promoting greater diversity in leadership positions throughout the organization, including at the Board and in executive officer positions; and
3. Inappropriate attitudes, behaviours and stereotypes are confronted and eliminated.

The Board of Directors responsibilities include:

1. Formally assigning the responsibility to facilitate the implementation of this Policy to a senior officer of the Corporation;
2. Regularly monitoring of Corporation performance in compliance with this Policy; and
3. Considering diversity in the selection criteria of new Board members and executive officer appointments.

NiCAN supports goals to increase the average percentage of women on boards and women in executive positions in corporate Canada.

Management Responsibilities

Management is charged with the responsibility of implementing this Policy by:

1. Ensuring sufficient and reasonable resources are allocated to implement and manage this Policy and support the diversity and inclusion strategy;
2. Including diversity and inclusion in the Corporation's strategic objectives;
3. Providing regular updates to the Board of Directors on the progress made towards enhancing diversity and inclusion; and,
4. Reporting progress on enhancing diversity and inclusion at NiCAN through disclosure in the Corporation's regulatory disclosure filings and other relevant public reporting channels.

Approved by the Board on January 1, 2023.