

**THE SUPREME CANNABIS COMPANY, INC.**  
**Code of Business Conduct for Suppliers and Business Customers**  
**(“Code of Business Conduct”)**

**1. INTRODUCTION**

**The Supreme Cannabis Company, Inc.** (“**Supreme Cannabis**”) is committed to turning its passion for cannabis into a lasting business enterprise that will shape the legal cannabis industry while providing sustainable value for our shareholders and stakeholders. Supreme Cannabis’s mission is to be a market leader focused on excellence across all aspects of its business with a commitment to its core values of passion, transparency, integrity, analytics and innovation. It is important that Supreme Cannabis’ supply chain partners, including suppliers, vendors, service providers, distribution partners, wholesale partners and retail partners (collectively, “**Partners**”) share in Supreme Cannabis’ commitment to corporate social responsibility and good corporate citizenship. This Code of Business Conduct is intended to provide our Partners with a clear understanding of how Supreme Cannabis expects to conduct its business with them. This Code of Business Conduct applies to all Partners – and their sub-suppliers or sub-partners and distribution partners. Supreme Cannabis expects full compliance with all principles and processes related to this Code of Business Conduct. All Partners must carefully review the commitments in this Code of Business Conduct and agree to abide by the commitments as a condition of doing business with Supreme Cannabis.

**2. PARTNER CERTIFICATION**

Upon execution of an agreement with Supreme Cannabis, Partner certifies that it has read and will abide by this Code of Business Conduct.

**3. EXPECTATIONS OF PARTNER**

Partner will, at all times, conduct its business in compliance with ethical business practices which include the following:

- Compliance with Laws - Partners will comply with the laws and regulations, whether domestic or foreign, which govern the conduct of their businesses.
- Discrimination/Human Rights - Partners must not discriminate against their employees in hiring practices or any other term or condition of work (other than legitimate occupational requirements allowed by law) on the basis of race, ancestry, place of origin, colour, ethnic origin, citizenship, religion, faith, political opinion, sex, sexual orientation, age, marital status, same-sex partnership status, family status or disability.
- Disciplinary Practices - Partners will not use corporal punishment or other forms of mental or physical coercion.
- Employment Standards - Partners will employ employees who are, in all cases: (i) present voluntarily, (ii) not put at risk of physical harm due to their work environment, (iii) fairly compensated and (iv) allowed the lawful right of free association.
- Wages and Benefits - Partners will, at a minimum, provide wages and benefits that comply with the laws of their country of operation.
- Working Hours - Partners will not exceed prevailing local work hours except where workers are appropriately compensated for overtime. Supreme will favour business partners who use less than sixty-hour work weeks and allow employees at least one day off in seven days, or equivalent leave privileges.

- Child Labour - Partners will not employ child labour in any of their facilities. Employees of Partner will be of legal age of employment and can be no younger than the age at which compulsory schooling has ended (with the exception of legal student employment).
- Forced or Slave Labour - Partners will not use forced or slave labour.
- Workplace Environment - Partners will provide workers with a safe and healthy working environment consistent with all applicable laws and regulations.
- Environmental Protection - Partners will comply with all applicable environmental laws and regulations in their country and laws that govern the importation and sale of products in Canada, as well as all applicable Supreme policies
- Products and Services - Partners will supply only products and/or services that comply with Supreme Cannabis' specifications and comply with all applicable legal requirements. Partners will supply only products and/or services that, when used as intended, are safe for employees, consumers, and the environment. Partners will cooperate fully with Supreme and take appropriate steps, including notification of Supreme Cannabis' customers and public product recalls, to address any health, safety, environmental or regulatory issues associated with their products and/or services.
- Confidentiality and Privacy - Partners will not disclose to others or use for their own purposes or the purposes of others any trade secrets, confidential information, knowledge, designs, data, skill, or any other information which Supreme Cannabis identifies to the Partner as confidential.
- Unlawful Payments - Partners will not offer or accept unlawful payments.
- Sub-suppliers and distribution partners - Partners certify that their distribution partners and sub-suppliers of products used in Supreme Cannabis products comply with a set of ethical standards compatible with this Code of Business Conduct. Partner will provide proof of certification upon request of Supreme.
- All confidentiality agreements that are entered into by Partners, must be in writing and contain, at a minimum, the provisions confidentiality protections, requirements and safeguards set out in Partner's agreement with Supreme Cannabis.
- Partners will respect the privacy of personal information they collect, use or disclose as a consequence of their business relationship with Supreme Cannabis, and will handle such personal information in compliance with applicable privacy laws.

Supreme Cannabis will seek to identify and engage Partners who conduct their business based on a set of ethical standards compatible with its own. Supreme Cannabis will not knowingly do business with Partners who do not meet the standards outlined in this Code of Business Conduct.

#### **4. PRINCIPLES OF BUSINESS CONDUCT**

Supreme Cannabis employees – and this Code of Business Conduct – are guided by the following principles of ethical business practice:

- comply with applicable laws, regulations, Supreme policies and procedures;
- respect the lives, rights, privacy and property of others;
- avoid conflicts of interest in decisions that we determine or influence;
- conduct duties and business relationships in an honest, fair and responsible manner;
- sustain a culture in which ethical conduct is valued and recognized;
- maintain safe, healthy and secure work environments;
- use resources, material and energy as efficiently and responsibly as possible in the provision of products and services;
- sustain responsible trading practices to promote decent, legal and humane working conditions;

- foster a business environment that encourages open communication and seeks out, listens and responds to the ideas and concerns of stakeholders;
- provide timely, full and true disclosure of material information, both financial and non-financial, concerning the business and affairs of Supreme to the public when and as required through authorized channels and/or spokespersons; and
- manage compliance with this Code of Business Conduct as any other critical business activity.

## **5. ASSESSMENT, MONITORING AND ENFORCEMENT**

Supreme Cannabis reserves the right to assess and monitor on an ongoing basis a Partner's practices regarding this Code of Business Conduct. Supreme Cannabis or a third party designated by Supreme Cannabis may periodically conduct onsite assessments of selected Partner facilities that produce finished goods for Supreme Cannabis. Supreme Cannabis may also periodically conduct on-site assessments of selected sub-supplier or distribution partner facilities that produce materials or finished goods for Supreme Cannabis. Assessments may include a review of relevant Partner records as well as inspection of the facility for compliance with this Code of Business Conduct. Supreme Cannabis will determine the frequency and extent of the assessments and ongoing monitoring. Consistent with standard industry practice, all costs associated with the assessments and ongoing monitoring will be borne solely by the Partner. Partners will allow Supreme Cannabis and/or any of its representatives reasonable and timely access to its facilities and to its relevant records at all times. Partners who do not meet the requirements of this Code of Business Conduct may, where considered appropriate by Supreme Cannabis, be provided with the opportunity to bring their business up to Supreme Cannabis' standards in a reasonable time frame. Supreme Cannabis reserves the right to terminate its business relationship with any Partner who fails to comply with this Code of Business Conduct.

## **6. SUPREME POLICIES**

Supreme Cannabis has adopted policies dealing with, among other things, disclosure and insider trading. In this respect, Partners may from time to time obtain confidential undisclosed information about Supreme, the public disclosure of which could have an effect on the value or price of Supreme Cannabis' publicly traded debt and equity securities. Partners are not permitted to disclose to any person any such information about Supreme Cannabis. In addition, securities laws in most jurisdictions prohibit any person in possession of any such undisclosed information from trading in securities of Supreme Cannabis until such information has been publicly disseminated.

## **7. QUESTIONS AND REPORTING**

Any person who believes that a violation of this Code of Business Conduct has occurred, is asked to report the relevant information in confidence to:

The Supreme Cannabis Company Inc.  
371 Jones Avenue (Coach House)  
Toronto, On M4J 3G5  
416.630.7272  
[info@supreme.ca](mailto:info@supreme.ca)

Supreme Cannabis will make every effort to investigate all reported violations in a discreet, fair and confidential manner and will take appropriate action to maintain the integrity of its business. Partners should direct any questions they may have regarding this Code of Business Conduct to Supreme Cannabis employee with whom they normally deal or to the contact information referenced above.