



## Code of Conduct

### Overview

We foster a fun and casual environment – but one that has boundaries. One of our fundamental principles is an expectation that all individuals and property be treated with respect.

Our Code of Conduct is a set of guidelines intended to support ethical behaviour and decision making for all employees at AcuityAds Inc., and outlines related policies and behavioural expectations.

Everyone is expected to know, understand, and adhere to the Code of Conduct guidelines and policies in this document in order to protect the best interests and safety of the Company and staff members. You are expected to respect the rights and feelings of others and demonstrate personal integrity and professionalism at all times. You are expected to refrain from doing anything that would be considered improper conduct.

Not every situation you'll encounter is covered; some guidelines are black and white while others may have shades of grey. You are entrusted to use good judgment in your day-to-day activities, and to seek further information or assistance when you need it.

If you spend a fraction of a second questioning the appropriateness of your actions, carefully reconsider the action, proceed with caution, or back away until you have considered and understand all possible consequences.

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<b>Document Owner:</b>	Human Resources
<b>Practice Applies to:</b>	Everyone
<b>Process Responsibility:</b>	Individuals
<b>Final Accountability:</b>	Individuals

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### Guidelines

#### *What AcuityAds Expects from You*

AcuityAds expects all individuals in the workplace to:

- Act with integrity at all times
- Be present and productive during working hours
- Operate within the law
- Follow the policies included in our “Core Company Policies” and guidelines
- Take personal accountability for your workplace actions
- Demonstrate a sense of respect, loyalty, good faith and responsibility toward one another and the Company
- Exercise sound judgment in decision making
- Report violations of the Code of Conduct and corporate policies and practices.



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### ***Improper Conduct***

By "improper conduct" we mean conduct that involves illegal, fraudulent, dishonest, unethical behavior, or serious negligence in the performance of your duties.

The following are some examples of activities that are deemed improper conduct while in the Company workplace or continuing from the Company workplace. A workplace is not necessarily a building or structure, it is a "place" where a staff member is engaged in "work" for the Company ("Workplace").

We expect everyone to exercise good and reasonable judgment at all times, and the following list of examples of improper conduct is by no means an exhaustive list:

#### **General**

- Theft
- Abuse of Company property or equipment
- Habitual tardiness or absences
- Breaking the law
- Solicitation or acceptance of personal gifts or gratuities in exchange for preferential business treatment
- Falsifying Company records
- Disclosing confidential or proprietary Company information to unauthorized persons
- Engaging in activity that is determined to be a serious conflict of interest with the Company
- Possession, use or sale of illegal substances on Company premises
- Being under the influence of alcohol or illegal substances at any time on Company premises or while on Company business
- Insubordination or failure to carry out instructions
- Job abandonment
- Failure to comply with our Health and Safety policies
- Failure to comply with any policies outlined in our 'Core Company Policies'.

#### **Harassment and Workplace Violence**

- Failure to comply with our Harassment or Discrimination Policies

#### **Acts of Violence**

Violence is defined as any act or behavior, as well as all incidents in which an individual is assaulted, abused or threatened in the workplace or continuing from the Workplace. It includes but is not limited to:

- Beatings, stabbings, suicides, shootings, rapes and any physical contact with intent to harm;



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- Acts causing psychological trauma such as threats, obscene phone calls, mental cruelty and intimidation and threatening hand gestures or body language;
- Behavior which gives a person reason to believe that he or she or any other person is at risk of injury;
- Verbal, written, or telephone threats, including:
  - Direct: Direct threats to the victim from the perpetrator, e.g. "I'll hurt you"
  - Conditional: Threats of violence to the victim by the perpetrator, if the victim does or doesn't do something, e.g., "If you blow the whistle, I know where you live"
  - Veiled: Non-specific threats from the perpetrator, e.g., "I hope you don't get hurt".

## Failure to Comply with Code of Conduct Policy

In the case of non-compliance with our Code of Conduct policy, and depending on the seriousness of the situation, the Company will proceed with the following actions:

- Discuss the situation with you and/or;
- Proceed with an investigation and/or;
- Take immediate action which may include disciplinary action or dismissal.

## Additional Information

If you have questions, comments or suggestions regarding this document, contact Human Resources.