

DIVERSITY AND INCLUSION POLICY

ADENTRA Inc. and all our subsidiaries (collectively “ADENTRA” or the “Company”) believes in diversity and values the benefits diversity and inclusion can bring to its Board of Directors (the “Board”), senior management and the Company as a whole. We recognize the importance of diversity and inclusion in fostering a supportive organization free of bias and discrimination that ultimately strengthens the Company and helps ensure that everyone who works for ADENTRA feels safe and valued.

I. Definitions

“Diversity” includes gender, sexual orientation, disability, religion, age, ethnicity, race, and gender identification. Diversity can also extend to business experience, functional expertise, geographic background, socio-economic background and diversity of political thought. ADENTRA seeks to maintain a Board and workforce comprised of talented and dedicated individuals whose skills and backgrounds reflect the diverse nature of the business environment in which ADENTRA operates.

“Inclusion” is the practice of leveraging diversity to create a fair, equitable, healthy and high-performing work culture where all employees feel respected and valued, have a sense of belonging and are able to achieve their full potential.

II. Board and Senior Management Diversity

ADENTRA believes that a diverse Board and senior management help broaden the Company’s range of perspectives, experiences and expertise. Accordingly, the composition of the Board and senior management is intended to reflect a diverse mix of skills, experience, knowledge and backgrounds, including an appropriate number of women.

Board and senior management diversity promotes the inclusion of different perspectives and ideas, and ensures that the Company has the opportunity to benefit from all available talent. The promotion of a diverse Board and senior management makes prudent business sense, helps maintain a competitive advantage and makes for better corporate governance.

Board Diversity

The Company will periodically assess the skills, experience, knowledge and backgrounds of its directors in light of the needs of the Board, including the extent to which the current composition of the Board reflects a diverse mix of skills, experience, knowledge and backgrounds, including an appropriate number of directors who are women, Indigenous peoples (First Nations, Inuit and Métis), persons with disabilities and members of visible minorities (collectively, the “Designated Groups”).

The Company is committed to a merit based system for Board composition, which requires a diverse and inclusive culture where directors believe that their views are heard, their concerns are attended to and they serve in an environment where bias, discrimination and harassment on any matter are not tolerated. When identifying suitable candidates for appointment to the Board, the Company will

consider candidates on merit against objective criteria having due regard to the benefits of diversity and the needs of the Board. Any search firm engaged to assist the Board or the Compensation, Nominating and Corporate Governance Committee (the “Committee”) in identifying candidates for appointment to the Board shall be directed to include diverse candidates generally, and candidates who are members of the Designated Groups in particular and such candidates will be included in the Board’s evergreen list of potential Board nominees.

In furtherance of Board diversity, the Company has confirmed the importance of maintaining a Board composition in which at least 30% of the directors are women. The Committee will consider whether to adopt further targets for specific Board diversity characteristics in furtherance of the objectives of this policy.

Annually, the Committee will review this policy and assess its effectiveness in promoting a diverse Board, which includes an appropriate number of directors who are members of the Designated Groups.

Senior Management Diversity

The Committee and the President and Chief Executive Officer (“CEO”) are responsible for (a) periodically reviewing and making recommendations to the Board with respect to succession planning matters concerning the CEO and other key senior management of the Company, and (b) reviewing the recommendations of the CEO respecting the appointment of all senior management reporting directly to the CEO.

When reviewing and considering the appointment of candidates for senior management positions, the Committee and the CEO will consider only candidates who are highly qualified based on their experience, education, expertise, personal skills and qualities, and general and sector specific knowledge.

It is an objective of this Policy that diversity also be considered in connection with succession planning and the appointment of members of the Company’s senior management. ADENTRA believes that having individuals in senior management positions from diverse backgrounds promotes, among other things, better innovation, performance and effective decision-making.