



CODE OF ETHICS
Adopted, as amended, as of May 11, 2022

1 GENERAL BUSINESS PRINCIPLES

1.1 Overview – Tenet Fintech Group Inc. (depending on the context used, “we”, “our”, or “Tenet”) understands that retaining the confidence of its employees, shareholders, customers, suppliers, partners, and other stakeholders is very important to the growth of its business.

This Code of Ethics (the “Code”) forms the foundation of how we at Tenet conduct business and work together to achieve our goals. Tenet is committed to achieving the highest level of ethical conduct and standards and we believe this is extremely important to the success of our Tenet.

1.2 Objectives – Tenet follows ethical and responsible business practices when conducting its operations. Tenet has set a standard of high performance in its research and development activities and in the delivery of its products and services to customers to allow them to create and maintain a competitive position in the marketplace.

1.3 Responsibilities – The responsibilities of Tenet and its employees are:

- (a) **To Our Employees** - To respect each other and to provide employees with a safe place to work, satisfying and rewarding employment, on-going professional development, an open team environment; a work place without any discrimination of any type, and free of any harassment whatsoever, including sexual harassment; Tenet do not tolerate any unwelcome conduct that has the purpose or effect of creating an intimidating, offensive, or hostile work environment.
- (b) **To Our Customers:** To provide products and services with high value and excellent quality, delivered on time;
- (c) **To Our Suppliers:** To create long-term supply chain relationships to ensure continued product and service excellence;
- (d) **To Our Shareholders:** To steward our resources in a manner that will provide a very attractive return on investment;
- (e) **To Third-Party Information:** We obtain competitive information legally and ethically; We safeguard sensitive information obtained from business partners and suppliers, and honor all contractual commitments in their regard; If we are not using illegal or unethical means, it is entirely proper for us to gather information about our marketplace, including information about our competitors and their products and services; We must not attempt to obtain confidential information from competitors’ current or former employees, suppliers, customers, or partners; If you receive by mistake information marked “confidential”, do not open or review it, and return to its legal owner; and
- (e) **To Our Community:** To honour environmental and regulatory obligations and to develop our technologies so that they will contribute to the long-term environmental health of our planet.

1.4 Business Integrity - Our core values are based on honesty and integrity in carrying out our business activities. Employees must avoid conflicts of interest between their private financial affairs and their business conduct with Tenet. All business activities must be accurately and fairly reflected in our financial statements, in accordance with applicable accounting principles, and shall be subject to audit.

1.5 Political Activities - Tenet does not make contributions to political parties, organizations or their representatives or take part in party politics. However, it does have dealings with governments and is interested in keeping itself informed of political issues that have the potential to impact its business. In the course of pursuing its commercial interests, it may be necessary for Tenet to attend various governmental events and some payment may be required to attend these events.

1.6 Health, Safety, Environment and Community – Tenet is committed to promoting and providing a safe working environment for all employees and to complying with all applicable environmental regulations. Tenet takes a proactive approach to health, safety, and environmental matters, including providing training to employees to minimize the risk of any such incidents.

We also actively participate in contributing to the betterment of society. To the extent practical, Tenet will be involved in community, education, or donations programs.

1.7 Communications - Tenet recognizes that open communication and a team environment have a positive impact on Tenet’s operations. To this end, we provide information about our business operations to interested parties, to the extent that: (i) is allowable within the bounds of securities regulations or other applicable rules and regulations, confidentiality arrangements and business practicality; and (ii) complies with all disclosure of information policies of Tenet.

2 CODE OF ETHICS

2.1 Introduction - The preceding general business principles have been integrated into this Section 2 of the Code of Ethics (“Code”) to provide guidance on what type of conduct we expect from our employees to support our fundamental business principles.

This Code applies to all directors, officers, and employees of Tenet as well those of its subsidiaries. For simplicity, all such persons are referred to as “employees” in this Code. The Code will be amended and updated from time-to-time as the situation warrants. Employees will be notified of changes and will be bound by them.

2.2 Expectations of Conduct – Tenet expects that all business should be conducted in accordance with the Code. All employees are expected, in good faith, to report any violations of the Code to their immediate supervisor and this will be met with the full support of Tenet. See also Section 2.13 below on this matter. All reports will be investigated promptly, thoroughly, and fairly, and Tenet will take appropriate measures whenever necessary to safeguard your confidentiality. If your report is made in good faith, you will be protected from retaliation, whether the issue turns out to be valid or not. Tenet does not tolerate acts of retaliation.

We require our employees to observe the following general guidelines:

- (a) Act with honesty, integrity, and openness in dealings with our customers, suppliers, shareholders and others with whom Tenet does business;
- (b) Treat others with fairness, dignity, and respect to create a trusting environment in which all of our employees can excel; and
- (c) Strive for excellence in individual work and that of our peers to support the achievement of corporate goals and objectives.

Toward its employees, Tenet is committed to:

- (a) Respect their human rights, culture, and environment;
- (b) Treat them with dignity and respect;
- (c) Provide safe work conditions;
- (d) Provide career development and advancement opportunities; and
- (e) Respect the confidentiality of employee records.

Toward its customers and suppliers, Tenet is committed to dealing openly and honestly.

Toward its Shareholders, Tenet is committed to accurately and fairly report material information to its shareholders on a timely basis so that they can make informed decisions.

2.3 Board of Directors and Management Responsibility – The Chief Executive Officer and management at all levels of Tenet are responsible for ensuring adherence to this Code. The Board of Directors of Tenet (the “Board”) has a general oversight function. Any significant deviation from the standards of conduct in this Code, whether actual or apparent, will be reported by management to the Board along with actual or proposed remedial actions.

Amendments to this Code will be reviewed and approved by the Board. Only the Board may grant a waiver of any provision of the Code. A request for such a waiver should be submitted in writing to the Corporate Governance and Nominating Committee for consideration. Any amendment to or waiver of this Code will be publicly disclosed to the extent required by applicable laws and regulations.

2.4 Business Integrity and Controls – Tenet expects that all of its employees will work honestly and fairly when conducting their business affairs. The direct or indirect solicitation, offer, payment or acceptance of bribes is prohibited. All employees must avoid conflicts of interest between their private financial affairs and the activities of Tenet. All business transactions must be accurately and fairly reflected in our financial statements, in accordance with applicable accounting principles, and shall be subject to audit.

The employees must also ensure that business transactions are conducted within their level of authority and in accordance with prescribed policies and procedures. If one employee is not certain that he or she has the authority to conduct a transaction, or he or she believes that the posted procedures or authorities to be inappropriate or outdated, he or she must discuss these issues with his or her supervisor prior to conducting a transaction.

2.5 Conflict of Interest – An employee must conduct his or her employment activities objectively. Anyone that finds himself or herself in a situation where he or she may be placing their own or others' interests ahead of the interests of Tenet must seek advice from his or her direct supervisor. As well, employees must also avoid the appearance of a conflict of interest; that is, one where a reasonable individual may assume that there is a conflict of interest.

The examples below indicate only a few conflicts that commonly arise and that the employees should be aware of. These examples are not exhaustive, and employees must be aware that there are several other potential situations in which conflicts may arise.

- (a) **Accepting Gifts and Invitations** - In general, Tenet allows the acceptance of token gifts, business meals and entertainment provided their value is appropriate to the business purpose served; and accepting is consistent with local business norms and practices. Employees are not prohibited from accepting social invitations which are customary and proper under the circumstances and are in keeping with good business ethics, where there is no reciprocal obligation involved in such acceptance. In the case of a gift, it must be of sufficiently limited value and in a form that cannot be construed as a bribe.

In some cases, an employee may feel that refusal of a gift would be construed as discourteous by the host. In these cases, employees must accept the gift on behalf of Tenet (rather than personally) and must report it to their manager, who will consult with senior management to determine how best to treat it.

Employees must use their best judgment when deciding whether to accept a gift or invitation. When in doubt, an employee should consult his or her supervisor.

- (b) **Choosing Suppliers** - Tenet employees must undertake a selection process that is fair and ethical. Employees should weigh facts impartially and objectively when choosing a supplier among competitors for any goods or service. Employees should choose a supplier who offers the best value for product or service in accordance with Tenet's needs. Tenet employees must not accept personal or inappropriate consideration such as gifts, personal favours, kickbacks, and bribes.

Tenet employees must disclose to their supervisor any personal relationships which could influence the selection of a supplier and they should abstain from the decision-making process.

- (c) **Financial conflicts of interest** - Tenet employees must avoid any activity or arrangement that could compromise, or appear to compromise, their ability to objectively perform their employment duties. This ability is compromised if employees have personal interests or obligations that conflict or compete with Tenet's business interests.

As an example, Tenet employees should avoid acquiring or holding a significant financial interest in commercial entities where it may give rise to a conflict between the employee's financial interest and Tenet's interests. A financial interest generally will be considered "**significant**" if it does or could be viewed as being important enough to influence how a Tenet employee carries out his or her employment duties. If a Tenet employee holds a significant interest in another business entity which does business or is negotiating to do business with Tenet, Tenet employee must disclose the potential conflict to his or her supervisor and refrain from all decision making related to and from all interaction with that other business entity during the course of his or her employment.

Another example relates to a Tenet employee having direct business dealings with a personal friend who is employed by a business entity that has or is attempting to close a business relationship with Tenet.

Again, Tenet employee must disclose the potential conflict to his or her supervisor and refrain from all decision making related to and from all interaction with that business entity during the course of his or her employment.

2.6 Insider Trading - Insider trading legislation imposes obligations on all employees in possession of confidential material information. Penalties for breaching this legislation are severe. Employees should refer to Tenet's *Insider Trading Policy* for further guidance on this subject.

2.7 Confidentiality - Confidentiality provisions are contained in Tenet employee contracts and Tenet's *Insider Trading Policy*. Employees should refer to their employment contracts and the *Insider Trading Policy* for further guidance on this subject.

2.8 Protection and Use of Property - Tenet has valuable property, both physical (e.g., computers and their peripheral equipment) and intangible (e.g., Intellectual property, copyrights, trademarks, trade secrets, patents, business information such as customer lists or strategic or business plans, personal information of employees or customers or of their clients) and it is the responsibility of every employee to take reasonable steps to prevent the theft, misuse, or damage to this property. Additionally, this property shall only be used for Tenet's legitimate business interests. The purchase, sale, lease or borrowing of such property must be approved by senior management of Tenet.

2.9 Health, Safety and Environment – Tenet is committed to managing health, safety and environmental issues as one of our critical business activities. To this end, our employees and contractors are required to observe our health, safety and environmental guidelines and report any material issues to his or her supervisor and to our senior management team for further review and action. In addition, we encourage our employees to continuously monitor their activities so that they can make improvements in the way in which they conduct themselves to minimize any health, safety, and environmental issues.

2.10 Compliance with Applicable Laws – Tenet expects all its employees to adhere to its policies and guidelines, as well as to all laws and regulations that apply to our business. Orientation program for new employees, training sessions for all employees and a private web site to ensure they are aware of the applicable laws, regulations, policies, and guidelines that apply to them are or will be available.

If an employee violates a policy, law or regulation, Tenet's senior management must be informed in a timely manner so that issues can be investigated.

2.11 Termination of Employment – At the end of employment with Tenet, all employees must abide by certain obligations set out in their employment agreements. Employees should refer to their employment agreements for further guidance.

2.12 General Guidance - Individuals are responsible for using their best judgment when assessing whether a situation might contravene the Code.

To help individuals understand if their actions would contravene the Code, they should consider whether:

- (a) The conduct is legal;
- (b) The conduct is a violation of Tenet's policies and procedures;
- (c) The conduct would be authorized by their supervisor;
- (d) The conduct would not harm fellow employees, our customers, suppliers, shareholders, other stakeholders and our community;
- (e) The disclosure of this conduct would not be a concern to internal or external parties; and
- (f) The conduct would be considered to be honest and ethical.

If, having considered the above, the individual still has questions regarding whether the conduct would be a violation of the Code, they are encouraged to seek the advice of their supervisor.

2.13 Reporting Violations - Any director, officer or employee of Tenet who has knowledge of a potential or suspected violation of this Code has an obligation to report relevant information to, at the employee's sole discretion, their supervisor, human resource manager, the General Counsel, the CEO, or the Chairman of the Board.

Generally, your supervisor will be in the best position to resolve any issue quickly. However, you are welcome to raise any specific or general question or concern with any of the contacts listed above. Reports will be treated confidentially to the extent possible and consistent with Tenet's responsibility to address the issue. No employee will be subject to retaliation by Tenet for reporting in good faith a violation of this Code.