



Canada's Anti-Spam Legislation (CASL)

Direct On Demands Private Limited and/or its related corporations (collectively “DOD”)

Policy Statement

This document sets forth the policy of DOD and is designed to provide reasonable assurance that (i) a consistent process is followed with respect to the dissemination of commercial electronic messages to DOD clients and prospective clients in Canada, and (ii) DOD employees sending commercial electronic messages from and/or to a computer system(s) in Canada comply with the requirements of CASL.

The DOD Anti-Spam Policy (“Anti-Spam Policy”) and related procedures (the “CASL Procedures”) require that all DOD employees sending CEMs (Commercial Electronic Messages) from and/or to a computer system(s) in Canada or to an electronic address that will be accessed from a computer system in Canada comply with CASL, and seeks to ensure that all CEMs sent by or on behalf of DOD, or using a DOD email address or using a device owned or provided by DOD, comply with CASL.

Policy Details

The Anti-Spam Policy describes the DOD’s commitments relating to the provisions of CASL and electronic messages of a commercial nature sent to DOD clients, prospective clients, and others, as applicable. From time to time, DOD may implement additional policies, procedures and/or practices as it relates to anti-spam measures.

Application

This Policy applies to DOD employees who may be sending CEMs from and/or to a computer system(s) in Canada or to an electronic address that will be accessed from a computer system in Canada.

With respect to DOD’s operations, the Anti-Spam Policy has been adopted in compliance with the requirements of CASL, and DOD is committed to complying with CASL. All other DOD policies and procedures will be interpreted in a manner that is consistent with the Anti-Spam Policy and that promotes compliance with CASL to seek to deter damaging and deceptive forms of spam from occurring in Canada.



Consent

DOD obtains express, opt-in consent, unless a verifiable basis for implied consent or an exception to consent exists, before sending a CEM to anyone who has not had an existing business relationship with DOD within two years before the date on which the CEM is sent. Unless a valid documented basis for implied consent or an exception to consent exists, DOD also obtains express, opt-in consent for the sending of CEMs to DOD prospects.

The request for consent cannot be in an electronic message unless there exists a basis for implied consent to send the message. The request for consent must be sought separately within a communication (e.g. through a separate action such as affirmatively checking a checkbox) and cannot be bundled as a term of acceptance of an agreement. Verbal consent is acceptable where a record of the details of the consent is maintained in a database.

Form and Content of CEMs

All CEMs are required to comply with the form and content requirements of CASL, generally described as follows:

- identifies the sender;
- the sender's mailing address;
- the sender's telephone number or email address or link to a webpage; and
- an unsubscribe mechanism or withdrawal of consent from receiving CEMs from DOD and its subsidiaries and affiliates.

DOD takes steps to require that any third-party service provider who sends CEMs on behalf of the DOD complies with CASL.

Storage of Relationship Details

A key component of complying with CASL involves maintaining records of the DOD's relationships with clients and prospective clients.

Each business unit of DOD is required to create and maintain in the business unit's Client Relationship Management (CRM) system (including, but not limited to, Benchmark, Salesforce, and Hubspot),



verifiable records documenting the relationships giving rise to implied consent, and verifiable records of express, opt-in consents obtained from DOD clients and prospective clients. “Clients” are defined as those organizations or individuals who have at least one open account or a contractual relationship with DOD at the relevant time. Organizations or individuals who have closed their last remaining account or terminated their contract with DOD are not considered DOD clients for purposes of this Policy.

Implied consent or express, opt-in consent is obtained in accordance with the CASL Procedures and recorded in the applicable CRM system in order to track the client and prospect relationships.

Records of express, opt-in consent and records documenting the relationships giving rise to implied consent are retained for a minimum of three years after DOD ceases sending CEMs to the DOD client or prospect.

Commercial Electronic Messages

All DOD employees sending CEMs from and/or to a computer system(s) in Canada are required to comply with this Policy and related CASL procedures and processes.

A “CEM” is defined as an electronic message that includes content (for instance, text, hyperlinks, images or attachments) that:

- a. promotes, offers, or advertises DOD or DOD’s products or services, or employees, or contacts;
- b. solicits business for DOD or DOD’s employees or contacts; and
- c. any other similar message that encourages participation in commercial activity.

Examples include promotional event invitations (e.g., webcasts or DOD events), marketing newsletters, etc.

The following messages do not have to comply with the requirements applicable to CEMs:

- messages sent to DOD clients about their business;
- internal communications about DOD’s business (including communications with DOD offices outside Canada);
- legally required notices, such as messages that are sent to comply with a regulatory requirement (e.g., material changes, required account activity information, etc.); and



- responses to requests, inquiries or complaints.

Messages that DOD employees email each other internally using a device that DOD owns or provides, or using a DOD email address, should be related to DOD. DOD employees may not internally email each other offers, promotions, advertisements, or referrals unrelated to DOD business without the internal recipient's verbal consent.

Compliance by Third Parties

All third-party contracts with service providers who may send CEMs on behalf of DOD must contain contractual clauses obligating the service provider to comply with CASL including the form and content requirements of CEMs.

Unsubscribe Mechanism

CEMs that are not exempt from requirements applicable to CEMs noted above are required to include a form of unsubscribe mechanism to facilitate the withdrawal of consent or do-not-contact requests within a period of time and in a manner that would allow DOD to process that request within 10 days of the date on which the unsubscribe, withdrawal of consent or do-not-contact request was made. This information should be maintained in the applicable database that tracks the client and prospect relationships.

All emails sent by Direct On Demands and its subsidiaries, and employees will be compliant with CASL and will include the option to 'unsubscribe.'

You can 'unsubscribe' from our Commercial Electronic Messages at any time by visiting <https://www.dodtechalerts.com/unsubscribe-here> or by emailing dpo@directondemands.com with 'Unsubscribe' in the subject line.

Policy Administration

The Anti-Spam Policy is maintained by the Compliance department of each XpertLync legal entity and will be reviewed and updated, where necessary, and approved on an annual basis. Any changes to, or exceptions from this Policy require the approval of the respective XpertLync Board or equivalent.

Review and Approvals

XpertLync Compliance is responsible for the review and revision of this Policy, subject to the approval of the respective XpertLync Board or equivalent. This Policy is subject to review on an annual basis, or otherwise as needed.



Enforcement and Audit

Compliance with this Policy, and any related procedure, may be reviewed by XpertLync at any time.

Failure to comply with this Policy, as well as any associated procedures, may result in disciplinary action in accordance with the applicable Global Human Resources Disciplinary policy or procedure.