



AXIUM INFRASTRUCTURE INC.

AXIUM INFRASTRUCTURE US INC.

POLICIES / POLITIQUES

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Anti-Corruption Compliance Policy
Anti-Money Laundering and Economic Sanctions Policy
Books and Records Policy
Business Continuity Plan
Cash Management Policy
Code of Conduct and Code of Ethics
Compliance Policy
Custody Policy
Distribution Policy
Diversity and Inclusion Policy
Employment Law Policies – US Manager
Environmental, Social and Governance (ESG) Policy
External Network Users – Code of Conduct
Information Systems and Cyber Security Policy
Marketing Policy
Pay-to-Play Compliance Policy
Portfolio Management Policy
Principal Transactions Policy
Privacy Policy
Regulatory Filings Policy
Responsible Contractor Policy
Valuation Policy