



SGF Code of Conduct

The **SGF** code of conduct (the “Code”) is one of the ways we hold ourselves accountable to the highest ethical standards as an organization. The Code should be used as a benchmark against which our day-to-day interactions are measured. Every **SGF** employee should understand and uphold the Code and its values. The Code should be used as the ultimate reference point for any employee who witnesses behaviour that makes them uncomfortable or raises concerns.

Who must follow our code?

Every single employee at **SGF** is expected to follow the code of conduct, including our senior leadership and boards. Every employee, no matter their role or position, plays an integral part in building an inclusive company culture where all feel welcome and empowered regardless of gender, race, ethnicity, sexual orientation, disability, or any other facet of identity. As such, every employee is responsible for adopting and upholding the principles outlined in the Code. The Code also applies to **SGF** suppliers. Failure to comply with the values outlined in the Code can result in termination of the relationship between the service provider and our company.

What should I do if I have a question or concern pertaining to the code?

If you have a question about the Code or witnessed something that you think violates the Code—**speak up!**

We are relying on you to help us uphold our values and principles, which sometimes means calling attention to questionable or totally unethical behaviour. We cannot expect that challenges will not arise, but we can commit to approaching every situation by being ready to listen, take ownership and adopt meaningful solutions.

If you have a concern, you can approach **your manager**, your **HR representative**, or the **General Manager**. If you are concerned about the General Manager, please report it to our **President**.

While you are encouraged to voice your concern with your name and contact information attached, you can do so **fully anonymously** as well. If you wish to go this



route, you can do so by providing your concern via our Whistleblower Channel:
<https://sgf.personiowhistleblowing.com/>

No retaliation

SGF prohibits any retaliation against any employee who comes forward with a concern. Retaliation refers to a negative reaction felt by an employee after they draw attention to inappropriate or unethical behaviour. Retaliation includes but is not limited to termination, demotion, reduction of work hours, reassignment, third-party reprisals (e.g., terminating someone with a close relationship to an employee) and more.

Not only are you protected from this by our Code, but you are also protected from this by law. If you suspect you are facing retaliation, please contact **Ethics Committee**.

I. Our principles

At **SGF** we are governed by a core set of principles that contribute to a diverse and inclusive culture. We believe that every **SGF** employee should feel welcome and empowered to do their best work regardless of gender, race, ethnicity, sexual orientation, cognitive style, disability, age, or any other piece of their identity. We do not tolerate harassment, discrimination, or exclusionary behaviour in any form, and we are committed to continuously dismantling systemic racism, sexism, homophobia and other unconscious prejudices in the workplace.

Diversity: At **SGF**, our goal is to build a workforce representative of the communities we serve. Commonly, diversity refers to the prevalence of visible minorities in the workplace but can also be expanded to include variety in backgrounds, experience, places of origin, sexual identities, gender, ages and more.

Inclusion: Getting talent through the door is just the beginning; ensuring that every employee feels heard and valued by their team is the ultimate goal. Diversity is about the variety of people at **SGF**. Inclusion is about creating a sense of belonging for all people working here. We are committed to both.

Transparency: Openness and communication are essential to our success. We



want you to feel like you understand the decisions that are being made and the reasons behind them. We commit to being transparent with you and ask that you do the same in return.

Accountability: We take ownership of our mistakes. Situations will arise where we may fall short of our Code. When this happens, we will take accountability for what occurred and treat the situation to the best of our ability. We will take concrete steps to ensure the same mistakes do not happen again.

Growth: **SGF** is dedicated to ongoing growth and development. We understand that inclusion is a journey and will continue to explore ways we can become a better employer. While growth is sometimes difficult, it is also necessary, and we ask all employees to adopt a growth mindset and ask themselves how they can personally contribute to building a more diverse and inclusive environment.

II. Actions

All **SGF** employees are expected to act in accordance with the principles outlined in the Code. Every employee has the right to feel included at **SGF** as well as the responsibility to include others.

Equality and fairness:

Employment and advancement at **SGF** is based strictly on merit, accomplishment and professional qualifications. **SGF** strictly prohibits any discrimination based on gender, race, ethnicity, sexual orientation, cognitive style, age, nationality, disability, mental health, religion, pregnancy status, or any other demographic characteristic or identity factor. We understand that many barriers faced by under-represented communities occur as a result of unconscious unfairness (v. conscious discrimination) and commit to

regular training with managers and standardising feedback and reviews.



Harassment and discrimination:

SGF will not tolerate harassment or discrimination of any employee or group of employees by team-members, managers, or leaders. If you have personally experienced discrimination, you are strongly encouraged to speak to your manager or your HR representative or report your experience anonymously by **filing it here on our Whistleblower Channel.**

<https://sgf.personiowhistleblowing.com/>

If you have witnessed or have been a bystander to harassment or discrimination, it is your duty and responsibility to report the incident(s). Every employee at **SGF** should be an active ally (and not a passive bystander).

Allyship:

SGF encourages all employees to learn from and listen to colleagues from under-represented backgrounds. You are expected to be an ally to your peers by using your voice to speak up for (without speaking over) marginalized groups, breakdown barriers and promote equity.

What is harassment?

Harassment occurs when an individual makes jokes or unwelcome comments; threatens you; or makes unwanted physical contact with you of *any* kind. There are many types of harassment including sexual, physical, verbal, mental and emotional.

Individuals can be harassed because of their appearance, perceived demographic traits, personal preferences or any other reason that has little to do with character.

What is discrimination?

Discrimination occurs when an action takes place that disadvantages or treats a person or group of people unfairly based on a set of external characteristics such as gender, race, religion, sexual orientation and more.

Discrimination can be overt, meaning an outright and purposeful action, or institutional, meaning an underlying process or set of rules that lead to an unfair outcome.



III. Conclusion

It is impossible to predict every scenario we will encounter on our journey. But the values and principles outlined in the Code should serve as a strong reference point for what we stand for. We ask you to challenge yourselves and those around you to strive daily to uphold these values and contribute to a culture of inclusion from which we will all benefit.

In case of any questions:

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