

## Policy brief & purpose

Our professional code of ethics policy aims to give our employees guidelines on our business ethics and stance on various controversial matters. We trust you to use your better judgment, but we want to provide you with a concrete guide you can fall back on if you're unsure about how you should act (e.g., in cases of conflict of interest). We will also use this policy to outline the consequences of violating our business code of ethics.

## Scope

This policy applies to everyone we employ or have business relations with. This includes individual people such as employees, interns, volunteers, but also business entities, such as vendors, contractors and suppliers.

## Policy elements

### The components of our code of professional ethics:

We base our business code of ethics on common principles of ethics, fairness and compliance.

- **Respect for others.** Treat people as you want to be treated.
- **Integrity and honesty.** Tell the truth and avoid any wrongdoing to the best of your ability.
- **Justice.** Make sure you're objective and fair and don't disadvantage others.
- **Lawfulness.** Know and follow the law – always.
- **Competence and accountability.** Work hard and be responsible for your work.

Our Code in Detail

### Respect for others

It is mandatory to respect everyone you interact with. Be kind, polite and understanding. You must respect others' personal space, opinions and privacy. Any kind of violence is strictly prohibited and will result in immediate termination. You are also not allowed to harass or victimize others. Our sexual harassment policy can be found at the end of this code. If someone, be it customer, colleague or stakeholder, is offensive, demeaning or threatening toward you or someone you know, report them immediately to HR or your manager. You can also report rudeness and dismissiveness if they become excessive or frequent.

### Integrity and honesty

First, always keep in mind our organization's mission. We all work together to achieve specific outcomes. Your behavior should contribute to our goals, whether financial or organizational.

Be honest and transparent when you act in ways that impact other people (e.g., taking strategic decisions or deciding on layoffs). We don't tolerate malicious, deceitful or petty conduct. Lies and cheating are huge red flags and, if you're discovered, you may face progressive discipline or immediate termination depending on the damage you did.

Stealing from the company or other people is illegal. If you're caught, you will face repercussions depending on the severity of your actions. For example, if you steal office supplies, you may receive a reprimand or demotion (at a minimum), while if you steal money or data (e.g., engaging in fraud or embezzlement), you will get fired and face legal consequences. The decision is at HR's discretion on a case-by-case basis.

### **Conflict of interest**

Conflict of interest may occur whenever your interest in a particular subject leads you to actions, activities or relationships that undermine our company. This includes situations like using your position's authority for your own personal gain or exploiting company resources to support a personal money-making business. Even when you seemingly act to the company's advantage, you may actually disadvantage it. For example, if an employee uses dubious methods to get competitor intel and raise their sales record, their action will have a positive impact on the company's revenue, but it will put us at a legal risk and promote unhealthy business practices.

If it turns out you have created a conflict of interest for yourself, you will be terminated. If the conflict of interest was involuntary (e.g., buying stocks from a company without knowing they're a competitor), we will take actions to rectify the situation. If you repeat the offence, you may be terminated.

### **Justice**

Green peridot emphasizes on Freedom of religion, thought and association for all its employees and enforces a zero-tolerance policy for any act that may be categorized as oppressive. Employees are required to treat each other justly and fairly and in no case, less than the standards herein provided.

Don't act in a way that exploits others, their hard work or their mistakes. Give everyone equal opportunity and speak up when someone else doesn't.

Be objective when making decisions that can impact other people, including when you're deciding to hire, promote or fire someone. Be sure that you can justify any decision with written records or examples. Seek and use the most objective methods in any case; for example, when interviewing candidates, ask the same interview questions to all of them and avoid judging non-job-related criteria, like dress, appearance, etc.

When exercising authority, be fair. Don't show favoritism toward specific employees and be transparent when you decide to praise or reward an employee. You're also obliged to follow our employment of relatives' policy, which forbids you from having a reporting relationship with a relative.

If you need to discipline an employee, be sure to have prepared a case that you can present to HR. You must not retaliate against employees or applicants (such as in cases when they've filed complaints) as this is forbidden by law.

Be just toward customers or vendors, too. If you think our company was in the wrong in a specific instance, don't try to cover it up or accuse the other side. Discuss with your manager to find solutions that can benefit both sides.

## **Lawfulness**

You are obliged to follow all laws which apply to our organization. Depending on your role and profession, there might be various laws you need to observe. For example, accountants and medical professionals have their own legal restrictions and they must be fully aware of them.

When you're preparing contracts, clauses, disclaimers or online copy that may be governed by law (such as consent forms), please ask verification from [our legal department] before finalizing anything.

Following laws regarding fraud, bribery, corruption and any kind of assault is a given. You are also obliged to follow laws on Modern Slavery and refer to the Green Peridot Modern Slavery (Anti-Slavery and Human Trafficking) Policy. Green Peridot does not condone any act or acts of War Crimes, Genocide, Support to Armed Groups or terrorist financing in any form. Our employees are mandated to pay all lawful taxes and charges imposed by state or local governments as well as to comply with any anti-money laundering prohibitions applicable in our regions of business.

If you're not sure what the law is in a specific instance, don't hesitate to ask HR or our legal counsel.

## **Competence and accountability**

We all need to put a healthy amount of effort in our work. Not just because we're all responsible for the organization's success, but also because slacking off affects our colleagues. Incomplete or slow working might hinder other people's work or cause them to shoulder the burden themselves. This comes in direct conflict with our respect and integrity principles.

We also expect you to take up opportunities for learning and development, either on-the-job or via educational material or training. If you are unsure how you can achieve this, have an open discussion with your manager.

Also, take responsibility for your actions. We all make mistakes or need to make tough decisions and it's important we own up to them. Failing to be accountable on a regular basis or in important situations (e.g., a crucial mistake in our financial records) will result in termination. If you take responsibility and come up with ways to fix your mistakes where possible, you will be in a far better position.

## **Teamwork**

Working well with others is a virtue, rather than an obligation. You will certainly get to work autonomously and be focused on your own projects and responsibilities. But you should also be ready to collaborate with and help others.

Be generous with your expertise and knowledge. Be open to learning and evolving. If days go by without you consulting or brainstorming with anyone, you are missing out on opportunities for excellence. Instead, work with others and don't hesitate to ask for help when you need it.

## **HARASSMENT POLICY**

This Company is devoted to providing a conducive work environment for all employees free from any sexual or unlawful harassment or discrimination. This company does not tolerate harassment of any form and is devoted to maintaining a courteous work environment where each employee is duly respected and dignity not tampered with. Any ill-suited behavior and character and unlawful harassment are not consistent with this commitment.

No employee, contract worker, customer, vendor or any other who does business with this company is exempted from the provisions of this policy.

Molestation or persecution based on race, ethnicity, age, marital status, physical or mental disability, citizenship, military or veteran status, genetic information, Colour, Gender, Sex, religion, Sexual orientation, or any other protected class, characteristics or consideration made unlawful under any applicable law is illegal and prohibited by company policy.

Such conduct toward or by any employee, contract staff, customer, vendor or anyone else who does business with the company will not be tolerated.

## **PROHIBITED / FORBIDDEN CONDUCT**

Sexual or other unconstitutional harassment or discrimination shall include any oral, physical or visual conduct based on sex, ethnicity, age, national origin, disability or any other legally protected basis, if:

- Submission to such conduct shall be made either explicitly or implicitly, a term or condition of employment or commitment of an individual;
- The acceptance or dismissal by a person of such behaviour is used as a justification for decisions concerning the job or engagement of that individual; or it establishes a hostile or offensive working environment.
- Sexual harassment involves inappropriate sexual advances, sexual preference demands, and lewd, insulting, or pornographic comments, gestures, posters, or cartoons, and any unwelcome brush, pinch or other physical contact. Other forms of illegal harassment or prejudice may include racial epithets, insults, and derogatory remarks, stereotypes, jokes, posters, or cartoons based upon race, national origin, age, disability, marital status, or other categories legally protected.
- Forbidden harassment also involves transmission of materials such as drawings, videos, or links to offensive materials online through the Company's electronic communications network, or through other online actions.
- Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and lewd, vulgar, or obscene remarks, jokes, posters, or cartoons, and any unwelcome touching, pinching, or other physical contact. Other forms of unlawful harassment or discrimination may include racial epithets, slurs, and derogatory remarks, stereotypes, jokes, posters, or cartoons based on race, national origin, age, disability, marital status, or other legally protected categories. Prohibited harassment also includes the transmission of materials such as cartoons, jokes, or links to offensive materials online using the Company's electronic communications system, or through other online conduct.
- It is also forbidden to treat any employee or person differently or unfairly, due to the above-mentioned characteristics. Unlawful discrimination requires behavior based on the assumption

that anyone has any of those traits or is associated with a person who has or is considered to have any of those traits.

It is prohibited for all employees of the Company, other workers, and members to engage in illegal discrimination. This policy applies to all work terms and conditions, including, but not limited to, recruiting, hiring, training, promotion, discipline, pay, benefits, and job termination.

## **COMPLAINT PROCEDURE**

Employees or contract workers who feel harassed or discriminated against, or who experience abuse or discrimination by an employee, contract worker, customer, vendor or anyone else doing business with the Organization should do the following immediately:

- If you feel comfortable enough to do so, inform the threatening and/or insulting behavioral person that his or her acts are not welcome, and they must stop.
- Report the incident orally or in writing to your boss / manager, and/or any supervisor you feel comfortable with (including the Company's CEO), or the Legal Department.
- If your supervisor / manager is committing the incident, report the incident orally or in writing to another supervisor with whom you feel comfortable (including the Company's CEO / or the Legal Department)
- Document and report any further events or retaliations that arise to your boss / manager, and/or any supervisor you feel comfortable with (including the Company's CEO), or the Legal Department.
- Any manager or supervisor who discovers or receives a complaint of any form of improper harassment, prejudice or retribution for actions covered by this policy must report the conduct immediately to Human Resources so that an investigation can be undertaken and remedial action can be taken where appropriate.
- Any reported incident will be investigated by qualified personnel in a fair, unbiased, timely and comprehensive manner that provides an opportunity for all relevant parties to be heard and to provide any information that they think is relevant or appropriate for consideration, and that allows the Company to draw reasonable conclusions based on the information collected.
- The Company will be as careful as reasonably possible in the circumstances in responding to and taking action to address a complaint, and will retain confidentiality of the matter to the extent reasonably possible, subject to its duty to undertake a full and fair inquiry.
- The Company will take appropriate action to halt and correct any and all such behaviour, including temporary measures during an investigation period. The inquiry will be concluded in a timely manner, after which the Company will notify the complaining party of the conclusions on the complaint reached.

- The Company will not allow any person who makes a complaint under this policy to be retaliated. Employees and contract workers are protected by law from retaliation for opposing or disclosing improper abuse or discrimination or for otherwise engaging in proceedings related to an investigation, trial or hearing initiated by the Company or a government agency involving these co-employees.
- The Organization shall take disciplinary action up to and including immediate termination of any employee who is retaliating against another employee or contract worker for participating in any of these covered activities. Contract workers for retribution will be subject to termination of their partnership with the Company.

**POLICY BREACHES / VIOLATIONS OF POLICY**

- Any employee or contract worker who violates this policy will be subject to disciplinary action, including termination of his or her job or engagement. To the degree that a client, vendor or other person with whom the Business is engaged in unlawful harassment or discrimination, the Company shall take appropriate corrective measures to address this situation.
- Any employee who has concerns about this policy or requires additional details on sexual or other abuse or discrimination may contact the Legal Department.

**ACKNOWLEDGEMENT**

I agree that I have read and understood this policy by signing hereunder.

Date: \_\_\_\_\_

Signed: \_\_\_\_\_

Printed Name: \_\_\_\_\_