

L2.HUR-GL-POL-0004-GB

BUSINESS ETHICS & CONDUCT POLICY

Revision : 1.0, May 01, 2024

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ALL	1	0	May 01, 2024	Change back to SRG from Centurion	S.Pilgrim	S.Pilgrim

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1.0 INTRODUCTION

How we conduct business defines us in the eyes of our people, our customers, and our wider stakeholders. The Site Resource Group Inc. (SRG) is committed to building a reputation for honesty, transparency, and integrity and without the use of corrupt practices.

We are committed to compliance with all laws controlling the way in which we conduct our business worldwide. This Policy is designed to provide a guide to the areas you need to consider when working for or on behalf of SRG and to remove uncertainty in your everyday business dealings.

Ethics and compliance can be complex area and senior management of SRG welcome questions about this Policy and its application.

2.0 POLICY APPROVAL AND GOVERNANCE

This Policy has been approved by the President and no part of this document may be amended without the written approval of the President. This policy is to be reviewed by CHRO and approved by the President on a regular basis.

3.0 SCOPE OF POLICY

This Policy applies to all:

- SRG companies and their subsidiaries, joint venture partners, partnerships under the day-to-day management of SRG, its and their contractors, agents, consultants and other third party providers acting on their behalf (“**SRG Companies**”); and
- SRG group directors, officers, employees and DSPs (direct service providers / independent contractors) (“**SRG Personnel**”).

4.0 RESPONSIBILITIES

We are all accountable and must comply with this Policy by applying high ethical standards as well as common sense to all situations.

Supervisors are responsible for implementing this Policy and related training within their operations and all SRG Personnel are individually responsible and accountable for complying with SRG policies, processes and procedures.

5.0 BASIC STANDARDS OF CONDUCT & RESPONSIBILITIES

All SRG Companies and SRG Personnel are expected to adhere to all parts of this Business Ethics and Conduct Policy at all times.

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The basic standards of conduct are that all of the above, shall:

- a) Maintain a safe and healthy workplace and protect all SRG Personnel, the general public and the environment through rigorous Health, Safety and Environmental procedures.
- b) Ensure quality projects, products and provide excellent customer service.
- c) Maintain honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.
- d) Provide customers with information that is accurate, complete, objective, relevant, timely and understandable.
- e) Comply with all applicable laws, rules and regulations of all national, federal, provincial and local governments and other applicable regulatory agencies wherever SRG operates.
- f) Act in good faith, responsibly, and with due care, competence and diligence.
- g) Protect SRG’s confidential information, all personal data, third party confidential information, and respect the intellectual property rights of third parties.
- h) Conform to all sanctions and export control requirements when conducting business internationally.
- i) Strive to promote a diverse working environment through respect for different cultures and applicable laws.
- j) Never pay, offer or receive money or give, offer or receive anything of value in order to:
 - Secure business or the chance of business;
 - Secure favourable treatment;
 - Influence any act or decision; or
 - Induce any act or decision.
- k) Not discuss or disclose information about its tender or bid activity with or to any third party.

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- l) Not discuss or disclose pricing or other commercially sensitive information with or to any third party.
- m) Not discriminate in the selection, hiring, retention, promotion or transfer of qualified individuals on the basis of race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, gender, age, or other ground specified by law or other regulation.

6.0 REPORTING BREACHES

If any member of SRG Personnel wishes to report an incident or speak about an issue that is causing concern they can contact their supervisor or the HR department.

Alternatively, SRG has a Whistleblowing Policy to facilitate the reporting of breaches of this Policy. Genuine reports that are made in good faith are encouraged and will be treated as such without fear of retaliation. Anyone making reports for any other reasons may be subject to disciplinary action.

The Whistleblowing Policy is available on the Quality Management System (“QMS”) and on SRG’s internal website or directly on the NAVEX International website.

7.0 IMPLICATIONS OF NON-COMPLIANCE

Non-compliance with this Policy, whether knowingly or not, may result in severe fines and irreparable reputational damage for SRG, SRG Companies and potential personal liability for SRG Personnel.

Failure to comply with the standards set out in this Policy may result in disciplinary action for SRG Personnel.

8.0 GROUP POLICIES

8.1 ANTI BRIBERY AND CORRUPTION

SRG prohibits bribery and corruption in any form whether or not it conflicts directly or indirectly with the business principles on which we operate. SRG prohibits the payment of any form of facilitation, grease or enabling payments.

We will seek to create and maintain a trust-based and inclusive internal culture in which bribery and corruption are not tolerated and SRG will apply this Policy in our dealings with all parties with whom we have business relationships.

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For more information and guidance please refer to the SRG Anti-Bribery and Corruption Policy (L2.HUR-GL-POL-0022-GB).

8.2 AGENTS, REPRESENTATIVES & OTHER THIRD PARTY SERVICE PROVIDERS

The use of third party service providers may potentially pose a serious risk to SRG and therefore SRG will only engage intermediaries (such as agents, consultants, and other representatives) who comply with applicable laws and have been approved in accordance with SRG’s Agents and Other Representatives Policy.

For more information and guidance please refer to the SRG Agents and Other Representatives Policy (L2.PRO-GL-POL-0001-GB).

8.3 PERSONAL CONFLICTS OF INTEREST

SRG is judged on the collective and individual actions of its SRG Personnel and SRG Companies. The abuse of position or of SRG property is prohibited and must never be used, directly or indirectly, for private gain, to advance personal interest, or to obtain favours or benefits for themselves or others. SRG Personnel should endeavour to manage their personal and business affairs to avoid situations that might lead to a conflict of interest or suspicion of a conflict of interest.

A personal conflict of interest occurs whenever the interests of SRG Personnel are inconsistent with the responsibilities of his or her employment. All SRG Personnel must be aware of such situations.

SRG Personnel are required to disclose all potential conflicts of interest, including those in which they have been inadvertently placed due to either company or personal relationships. If anyone suspects a situation may give rise to a conflict of interest then they should seek guidance from their supervisor or the HR department.

8.4 PROFESSIONAL CONFLICTS OF INTERESTS

Direct or indirect (in any form) employment, consulting, or other business relationship between SRG Personnel and a competitor, customer or supplier of SRG or any of its subsidiaries is prohibited.

Any exception to this practice requires the prior written approval of the CHRO and President.

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SRG Personnel must not do business on behalf of SRG with a relative or personal partner unless prior written authorization has been given by the President or CHRO, including under SRG’s Related Party Transactions Policy where applicable.

SRG Personnel should avoid participating in outside activities that could reasonably be expected to interfere with work time commitments to SRG, compete with SRG, or negatively impact the reputation of SRG.

For more information and guidance please refer to the SRG Related Party Transaction Policy (L2.COR-GL-POL-0017 -CC).

8.5 PROCUREMENT

SRG Personnel and SRG Companies are prohibited from accepting from a supplier any payments, materials or services of value such as an inducement for award of a purchase order.

We must adhere to the same standards when purchasing material or services from others as when selling our services to our customers.

Procurement staff and other personnel who may influence supplier selection and ongoing relationships with suppliers must be particularly careful to ensure that situations which may rise to a conflict of interest do not arise.

More information and guidance can be found in the SRG Anti-Bribery & Corruption Policy (L2.HUR-GL-POL-0022-GB).

8.6 ACCURATE BOOKS AND ACCOUNTS

All payments, receipts and other transactions must be properly authorized and be accurately and completely recorded in the records of the business unit or department in accordance with the SRG’s accounting principles, policies and procedures.

8.7 CONFIDENTIALITY

SRG Companies and SRG Personnel are prohibited from disclosing to any outside party, except as specifically authorized in writing by the relevant service line Vice President or as required by law, regulation or court of competent jurisdiction, any confidential and commercially sensitive business (e.g. information regarding tender or bid activity) financial, personnel or technical information, plans or data

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that they have acquired during the course of their employment or business relationships. Confidential information acquired in the course of SRG Personnel employment must never be used for personal advantage.

Upon termination of employment, SRG Personnel are required to return any documents or files (electronically readable or otherwise) in their possession and may not copy, take or retain any documents containing information relating to SRG.

8.8 INTELLECTUAL PROPERTY

Employees have a responsibility to protect the corporate identity of SRG.

SRG Companies and SRG Personnel are prohibited from sharing information which is either intellectual property or has the potential to be intellectual property with any outside party. Intellectual property can include patents, copyrights, trademarks, ideas, processes, technical data, etc.

If any member of SRG Personnel creates any intellectual property that is relevant to the business of SRG, then they should inform their supervisor or their service line Vice President and also the CCO at the earliest opportunity.

8.9 COMPETITION

SRG complies with all legislation regarding competition. Among the transactions and practices that are prohibited by law are agreements between competitors to:

- Fix prices or rig bids; or
- Allocate territories, markets or customers; or
- Boycott certain customers or suppliers

Certain types of agreements between suppliers and their customers are also prohibited when they inhibit free and open competition. If any SRG Personnel are approached for the purposes of entering into a relationship for any of the above prohibited practices, then they should inform their supervisor or service line Vice President immediately.

8.10 SANCTIONS AND EXPORT CONTROL

It is SRG’s policy to comply strictly with all applicable trade and financial sanctions and export control regulations. SRG is committed to delivering a quality service to customers worldwide and to do this we may be required to export equipment or services to another country. Some types of equipment and some services may be subject to export controls.

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For more information and guidance please refer to the SRG Sanctions and Export Controls Policy (L2.COR-GL-POL-0024-CC).

8.11 EMPLOYEE SAFETY

All operations must be conducted with the highest regard for the health, safety and welfare of SRG Companies and SRG Personnel and the protection of the general public.

In these practices all SRG Companies and SRG Personnel must comply with local Occupational Health & Safety legislation relevant to the jurisdiction the operation take places and related regulations, other governmental legislation and the SRG’s standards.

For more information and guidance please refer to the SRG HSEQ Policy Statement (L2.COR-GL-POL-0008 -CC).

8.12 DATA PRIVACY

As a global group we are obligated to comply with all data privacy laws around the world, for example the Privacy Act or the Personal Information Protection and Electronic Documents Act in Canada. Keeping personal data safe and ensuring transparency with respect to the way SRG gathers, uses, discloses and manages such data is a fundamental element of maintaining trust of our SRG Personnel, customers and stakeholders.

8.13 ENVIRONMENTAL PROTECTION

All locations and projects must conduct operations with the highest regard for the quality of the environment, including water, air and general land usage.

For more information and guidance please refer to the SRG HSEQ Policy Statement (L2.COR-GL-POL-0008 -CC).

8.14 MANAGING DIVERSITY & EQUAL OPPORTUNITIES

It is SRG’s policy to promote a culturally diverse workforce and, in an effort, to support this SRG endorses and supports applicable laws in the treatment of all employees and prospective employees.

We will recruit, select, train, promote, reward, transfer, discipline and release employees, and take any and all other personnel actions without regard to race,

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colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, age, or other grounds specified by law or other regulation.

8.15 ALCOHOL & SUBSTANCE ABUSE COMPLIANCE

In addition to SRG’s policies on substance abuse, we seek to observe all local and national laws regarding the use of alcohol and substances of abuse and recognize our responsibilities towards misuse and addiction among SRG Personnel.

9.0 FURTHER INFORMATION

This Policy cannot address every situation. If you wish to report an incident, discuss an issue that may be causing you some concern or just have a question about the Policy and its application please contact the HR Department.

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