

Code of Ethics Policy

Introduction

Ethics is about making judgments concerned with moral right and wrong. It provides the ground rules that determine how people think about what is right and wrong and then how they act. The Broadline Group abide by a code of ethics which reflects our core values, goals, behaviours and culture. We are committed to being consistent with and improving upon our business ethos and best practices within our business and acting to change to the benefit of our staff, customers and business.

Purpose

The Broadline Group and its subsidiary companies requires all staff to conform to the highest standards of business ethics. It is the individual's responsibility to aspire to the highest possible standards of conduct and must not knowingly participate in or condone unfair discriminatory practices or disreputable business situations. You must not accept gifts or favours which could compromise you and / or the company.

You may not engage in any outside activities which would conflict with the interests of the company, be inconsistent with your official role, or impair your ability to give satisfactory service.

Outline of Responsibilities

Staff members are responsible for ensuring that they carry out their work in line with the organisations core values, goals, behaviours and culture.

• Be inclusive

We welcome and support people of all backgrounds and identities. This includes but is not limited tomembers of any sexual orientation, gender identity and expression, race, ethnicity,

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culture, national origin, social and economic class, educational level, colour, immigration status, sex, age, size, family status, political belief, religion, and mental and physical ability.

• Be considerate

We all depend on each other to produce the best work we can as a company. Your decisions will affect clients and colleagues, and you should take those consequences into account when making decisions.

• Be respectful

We won't all agree all the time, but disagreement is no excuse for disrespectful behaviour. We will all experience frustration from time to time, but we cannot allow that frustration become personalattacks. An environment where people feel uncomfortable or threatened is not a productive or creative one.

• Choose your words carefully

Always conduct yourself professionally. Be kind to others. Do not insult or put down others. Harassment and exclusionary behaviour is never acceptable. This includes, but is not limited to:

- o Threats of violence
- \circ Insubordination
- oDiscriminatory jokes and language
- o Sharing sexually explicit or violent material via electronic devices or other means
- oPersonal insults, especially those using racist or sexist term
- oUnwelcome sexual attention
- oAdvocating for, or encouraging, any of the above behaviour
- Don't harass

In general, if someone asks you to stop something, then stop. When we disagree, try to understand why. Differences of opinion and disagreements are mostly unavoidable. What is important is that were solve disagreements and differing views constructively.



• Make differences into strengths

We can find strength in diversity. Different people have different perspectives on issues, and that can be valuable for solving problems or generating new ideas. Being unable to understand why someone holds a viewpoint doesn't mean that they're wrong. Don't forget that we all make mistakes and blaming each other doesn't get us anywhere.

Instead, focus on resolving issues and learning from mistakes.

Policy Review Procedure

Human Resources has a responsibility to establish and review the policy and to ensure that staffmembers have access to the policy. Human Resources also has a responsibility to investigate irregularities and to take action as appropriate.

This policy will be reviewed annually. In addition, the policy may be reviewed as a consequence of the following:

- A change in legislation
- Significant changes in the workplace