



CODE OF CONDUCT

JG-I Group of Companies

Effective : JULY 29, 2022

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Program Impacted: Employee Experience and Safety

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Why do we have a Code of Conduct?

The Code of Conduct explains what is expected by JG-I Group's employees. It presents our values in a clear manner while providing guidance and giving recommendations regarding our practices.

JG-I Group provides an Open-Door Policy in which employees are encouraged to take problems to the next level of management if they are unable to come to a resolution with their direct/reporting manager/supervisor.

The Code of Conduct creates a guide that promotes definitive standards of behaviour that we expect to be carried out by all JG-I employees. By utilizing these guidelines, we strive to lesson potential miscommunications as well as establish a safe, comfortable, and respectful workplace environment for all.

Any form of harassment and/or discrimination will not be tolerated in the JG-I workplace or job sites. Every employee has the right to a respectful workplace, free of harassment and discrimination.

As an employee, you are encouraged to bring attention to any concerning behaviours without fear of threat, retaliation, discrimination, or discipline. If you are unable to address the unacceptable behaviour with your

coworkers, ask your supervisor for help. If you are not able to do this either, consider contacting the Labour Relations Consultant for your area.

When all employees are treated fairly – with dignity, respect, and trust – they feel valued, are more likely to perform their best, and typically enjoy their jobs more. This, in turn, enhances our effectiveness as JG-I employees, and promotes client confidence in the integrity of JG-I's services.

The Code of Conduct is critical to both our success and our reputation. JG-I Group values the talents and abilities of our employees and seeks to foster an open, cooperative, and dynamic environment in which employees and the Company alike can thrive.

In addition to this Code of Conduct, all JG-I employees are governed by and required to follow all JG-I policies.

How Does the Code Affect You?

JG-I Group acknowledges it is only through the commitment and dedication of our employees that we can deliver quality service and maintain client trust. We are accountable to our clients. It is with this in mind that every JG-I employee is expected to be aware of, and comply with, the Code of Conduct, Respectful Workplace Policy, and other policies that govern employee behaviour.

Ethical Questions

It is impossible for the Code of Conduct to outline every example of inappropriate employee behaviour or every situation that could create an actual, potential, or perceived conflict of interest. We all must understand and apply basic ethical standards to ensure our behaviours and actions do not violate an employee's basic duty of loyalty to the JG-I Group. Employees are also obligated to adhere to JG-I Group's existing policies and procedures.

All of us, at some point, are faced with ethical dilemmas and are challenged to find an answer to the question, "What is the right thing to do?" When in doubt, talk to your supervisor(s), **and ask yourself these questions:**

Will this result in a personal gain or benefit?

Could this action lead to fraud?

Could an outside person, co-worker or the media perceive this action as unethical?

Will I owe somebody something because of this action?

Was this gift/action intended to influence my decision?

Would I hesitate to take this action or to allow my employees to take this action in my own company?

Could this action put someone's health and safety at risk?

Could my comments on social media or in a public forum be considered negative, derogatory, discriminatory or be taken as a criticism of JG-I Group or a fellow JG-I employee or reflect poorly on the JG-I Group of Companies?

If you answered "**yes**" to any of these questions, **you may have an ethical dilemma.**

Change your actions or seek advice. If you're still not sure, ASK again and keep ASKING until you get an answer. A simple rule may help - "**if in doubt, don't.**"

If you can't arrive at an answer or if your issue is too sensitive to discuss with a peer, feel free to access the following JG-I Group resources for advice:

Your direct supervisor/reporting manager

Executive Assistant

CEO

If it is a safety concern:

Your direct supervisor/reporting manager

Safety Officer

Executive Assistant

CEO

Employees are always encouraged to speak to any of the supervisors, managers, or

leaders in the organization to get advice and guidance on the Code of Conduct. Find someone you are most comfortable speaking with to get the information you need.

Professional Codes of Conduct

Employees with professional affiliations – accountants, lawyers, engineers, auditors, safety officers, and social workers – may be subject to more than one code of conduct. If a situation arises that may cause conflict or confusion between the applicable codes, please inform your supervisor. If additional support is required, please consult with one of JG-I Group’s resources listed above.

Disclosure and Compliance Obligations

Each employee must read and understand the Code of Conduct and complete all mandatory training.

If you think you may be in violation of the Code of Conduct, address the situation and make full and prompt disclosure to your direct supervisor or reporting manager. In addition, if you have an actual, potential, or perceived conflict of interest you must disclose that to the executive assistant. More detail on conflicts of interest is provided in Part 3.

Any suspected non-compliance with the Code of Conduct by another employee must also be promptly reported. Reports should be made to your direct supervisor or

reporting manager. In situations where that is not possible or comfortable, employees may report non-compliance to the Executive Assistant.

Any employee that suspects a fraud or theft may have occurred within JG-I premises or job sites must report the incident to their direct supervisor. Concerns regarding harassment or discrimination, or other respectful workplace issues, should be reported to your supervisor, or if you are not able, contact the **Executive Assistant**.

Whenever something doesn’t seem right, the most important thing is to report it through the avenue you feel most comfortable. Recipients of reports that are more appropriately handled by another area have an obligation to ensure that it is redirected in a timely manner.

Anyone who knowingly makes a false accusation about non-compliance, and anyone found to be in violation of the Code of Conduct may be subject to disciplinary action, up to and including dismissal.

Role of Leaders

Leaders set the tone and expectations across our organization. In addition to adhering to the Code of Conduct as employees, leaders have an additional obligation to promote awareness of the Code of Conduct and be available to provide guidance regarding behaviour.

Any leader that receives a complaint or becomes aware of a potential violation of the Code of Conduct must report it to the appropriate JG-I resource and take appropriate action based on the advice provided to them. Leaders must not independently investigate complaints or take disciplinary or retaliatory action in any circumstance.

Potential violations should be reported to:

- Direct/Reporting Manager
- Executive Assistant
- CEO

When in doubt, report wherever you feel most comfortable. Each of the areas listed above has a responsibility to redirect complaints to a more appropriate area if necessary.

If you as a leader become aware of a conflict of interest that has not been disclosed, ensure the employee is aware of their reporting obligations and assist them to complete the Conflict of Interest Disclosure form. Completed forms must be submitted to the employee's Supervisor to ensure awareness of the conflict and support for the proposed mitigations, and then forwarded to the Executive Assistant for retention.

Leaders involved in onboarding employees moving from one JG-I position to another should ask employees about disclosure

forms provided in their previous role and ensure copies are provided to their current Supervisor and support the employee to implement any required mitigations in relation to their new role.

Guiding Principles and Themes

There are nine key guiding principles, reflected in three themes, that guide different aspects of our conduct as JG-I employees. They are:

Employee Behaviour

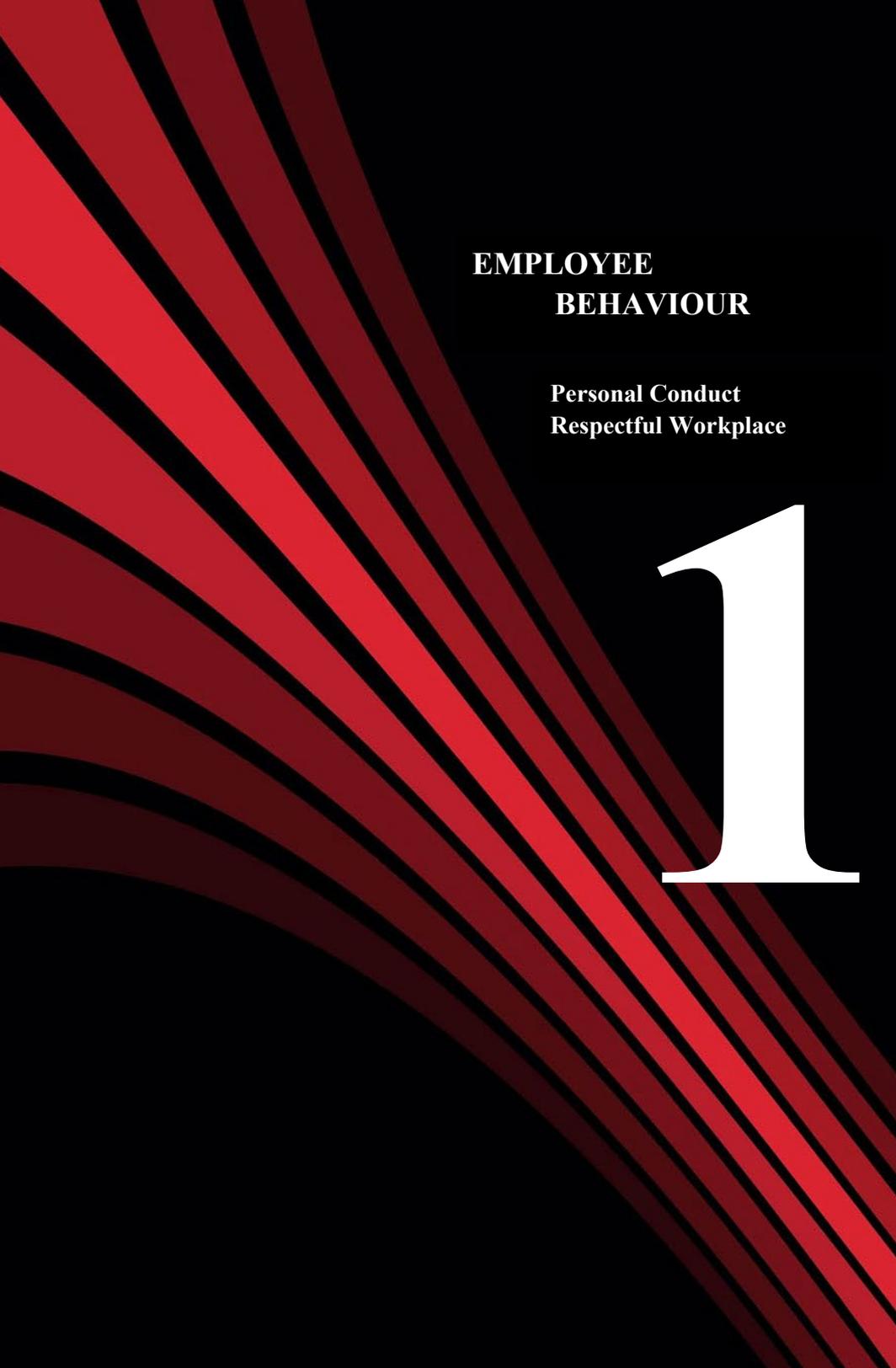
- Personal Conduct
- Respectful Workplace

JG-I Assets

JG-I Time and Assets
Access to Information and
Protection of Privacy

Conflicts of Interest

- Gifts and Entertainment
- + Personal Gain, Benefit, or Favouritism
- + Other Employment
- + Political Activity
- + Appearances Before Council



**EMPLOYEE
BEHAVIOUR**

**Personal Conduct
Respectful Workplace**

1

Personal Conduct

Guiding Principle: We will handle all dealings with integrity in a manner that is helpful, responsive, and courteous.

What Does This Mean?

Employees will do their jobs to the best of their ability, conduct themselves appropriately and will be considerate and helpful to all people, both internally and externally.

Things To Do

Practice professional employee behaviour that contributes to a respectful workplace, and that models our developmental Commitments of being Safe and Transparent.

Respectful Workplace

Guiding Principle: We will all do our part to ensure our workplaces are free from harassment and discrimination, and our fellow employees and those whom we serve are treated fairly.

If you have a respectful workplace concern, you are encouraged to talk to the person with whom you have a concern, or with your supervisor. If you aren't able to speak with the individual or your supervisor about your concern, you can make an appoint with the executive assistant.

2

JG-I GROUP ASSETS

JG-I Group Time and Assets

Access to Information and Protection of Privacy

JG-I Group Time and Assets

Guiding Principle: Protecting JG-I's assets, and only using information collected by JG-I Group for purposes consistent with the use for which it was collected. We will not use any JG-I asset, including e-mail, internet services, or any other electronic communication devices, if the use could be offensive or inappropriate.

Employees must devote themselves exclusively to the performance of their employment duties during paid working hours. We will use and permit the use of JG-I time and assets only for the performance of JG-I duties or as approved by our supervisors.

What Does This Mean?

JG-I employees are required to care for JG-I assets which includes all property, equipment, software, information, and

time. JG-I assets may only be used for JG-I purposes or as approved by your supervisor.

Why is this important?

JG-I Group, like any organization, cannot afford to waste time, money, or resources. We serve clients Canada wide. To do our jobs properly, we need to always have all resources available. Whether the asset in question is work time, a JG-I vehicle, or a computer, it must be ready and available to do the assigned task.

Things To Do

- + Respect JG-I assets and take proper care of them, whether using them at a JG-I work site or at home for JG-I purposes
- + Use JG-I assets only for JG-I work + Reimburse JG-I promptly for any approved personal use that incurs costs (long distance calls, photocopying)

Things Not To Do

- + Take home JG-I assets for personal use without prior approval
- + Use a JG-I vehicle for personal business
- + Install personal software or connect personal hardware to computers without permission from your supervisor
- + Download software on JG-I equipment without prior approval
- + Use JG-I assets for storing or sharing non-work related or personal information, or grant personal accounts access to JG-I assets
- + Abuse email, Internet connections, or any other electronic communication devices that could be used for content deemed as offensive or harassing, such as hate material, slurs based on someone's identity (e.g., race, ethnicity, gender, or sexual orientation), gambling and sexually explicit material.
- + Accessing, creating, viewing, sending or downloading of inappropriate material will be dealt with severely.

Any violation may result in discipline up to and including termination of employment.

Tips to Secure and Protect JG-I Assets

Security is everyone's business, and we all have a role to play.

- + Safely engage strangers and visitors not wearing ID cards.
 - + Use customer service skills to engage unknown persons, such as "How may I help you?" or "Let me take you to that person."
- + Prevent unauthorized access.
- + Escort visitors to and from entry points.
- + Do not prop secured doors open.
- + Protect and secure all sensitive information. Devices and records should never be left unattended.
- + Do not download JG-I information to your personal phone or other device or grant access to your JG-I accounts to external accounts.
- + Lock filing cabinets, portable devices, documents and computers before you leave.
- + Do not respond to spam or phishing attempts.
- + Have a good, strong password.
- + Report crimes in progress to 911.

Frequently Asked Questions

Q Can I photocopy my son's hockey schedule for him and his teammates?

A One or two copies is not an abuse of JG-I assets. Multiple copies, or repeated use of JG-I equipment, require supervisor approval and reimbursement to JG-I Group.

Q Can I help myself to things the office is throwing away or declaring surplus?

A No. Articles in the garbage are still considered JG-I assets. If you are interested in purchasing an item that has been declared surplus, please ask permission from your supervisor beforehand.

Q Can I use the Internet at work to plan my vacation and book my airline tickets?

A Yes, provided you do it on your own time (i.e. lunch, coffee breaks), there are no costs to JG-I, and your activity does not place JG-I computer systems at risk.

Q Is it appropriate to sell chocolates or raffle tickets or collect money for charitable associations at my work site during normal working hours?

A This is acceptable, subject to approval by your immediate supervisor or any branch specific procedures.

Q Can I access JG-I assets for occasional personal use? What about infrequent phone calls? Can I call my child's daycare or make a medical appointment?

A Yes. Infrequent and incidental use of JG-I assets for personal reasons is allowed as long as there is no negative impact on your performance, no abuse of paid work time or no added cost to JG-I Group. This includes telephone and cellular phone use.

Q I have to take a JG-I vehicle home at night. If the grocery store is not out of my way, can I stop in the JG-I vehicle?

A No. Employees who are provided with a vehicle for JG-I work are expected to use the shortest route between their assigned work location and their residence, without stopping for private purposes.

Q Can I do personal work at my workstation during lunch hour?

A Incidental use of your work station is permissible as long as you are doing the work on your own time and there is no cost to JG-I Group.

Q What should I do if I receive chain letters or offensive jokes and pictures at my work email address?

A Delete them immediately and tell the sender to stop sending them to your JG-I address. You should also consider

informing your supervisor depending on the frequency or content of the emails. We are all responsible for ensuring JG-I's email and systems are used appropriately.

Q What should I do if I see an employee siphoning gas from a JG-I vehicle?

A Report the incident to your supervisor or to Corporate Security.

Access to Information and Protection of Privacy

Guiding Principle: We will respect our legal and ethical obligation to comply with the provincial *Freedom of Information and Protection of Privacy* (FOIP) Act as a shared responsibility of all JG-I employees. Every employee has a duty to respect the privacy of our clients and fellow employees, to secure personal information, and support access to information.

What Does This Mean?

Personal information (PI) includes, but is not limited to:

- + Name, home address, home telephone number
- + Race, ethnic origin
- + Age, sex, marital or family status
- + Medical history
- + Employment and financial history
- + Personal opinions about other identifiable individuals, such as an employee's opinion about another employee

The FOIP Act governs the purposes for which PI may be collected, used, or disclosed. PI is collected when it is gathered from an individual (such as signing someone up for a JG-I service), PI is used when employees access PI in a JG-I system, and PI is disclosed when JG-I employees send or transmit PI to someone who does not work for JG-I Group

Why is This Important?

Information access and privacy is a means of ensuring the continued preservation of openness, fairness, transparency, and respect for the privacy of our clients and JG-I Group employees.

Things To Do

- + Keep personal information secure.
- + Collect, use and disclose personal information only for work purposes.
- + Access JGI systems only for work purposes.
- + Search for and provide responsive records to requests for access to information.
- + Verify authority for disclosure prior to disclosure of personal information.

Frequently Asked Question

- Q A staff member has gone on medical leave. Can I send out an email to notify the team about this?**
- A** You may communicate that staff members are away from work, but not to identify why they are.

**CONFLICTS
OF INTEREST**

Gifts and Entertainment

**Personal Gain, Benefit,
or Favouritism**

Other Employment

Appearances Before Council

Political Activity



Conflicts of Interest

Guiding Principle: We will avoid or mitigate all conflicts of interest.

What Does This Mean?

A conflict of interest involves a potential, perceived, or actual conflict between employees' duties and their private interests. It may occur in a situation where an employee has private interests that could

improperly influence the performance of their official duties and responsibilities or where an employee uses their office for personal gain or in personal circumstances. Generally, conflicts of interest arise in one of five situations: gifts offered or received in the course of employment; using JG-I employment for personal gain, benefit, or favoritism; other employment that may conflict with JG-I employment; personal political activity; or personal appearances before Council.

Conflicts of interest may be actual, potential, or perceived:

Actual conflict: a situation in which an employee's personal or private interests improperly influence the performance of official duties and responsibilities or where a position is used for personal gain or in personal circumstances.

Potential conflict: a situation where an actual conflict could reasonably exist in

the future if mitigation strategies are not followed.

Perceived conflict: a situation where no actual conflict exists, however, the situation could be perceived by a reasonable observer to be a conflict, whether or not it is the case.

The existence of a potential or perceived conflict is not a breach of this Code of Conduct as long as it is disclosed and mitigation measures are implemented and followed. In some cases, perceived can be a good thing and should be. The existence of a conflict will never automatically be considered to be a bad thing - only a failure to disclose the existence of a conflict or implement appropriate mitigations will be considered a violation of this Code of Conduct.

The appropriate mitigation measures for individual conflicts will vary based on the facts, and may include steps such as removing yourself from certain projects or situations, or having a peer review work before approval. If you need support developing appropriate mitigations you can talk with your supervisor or manager.

Actual conflicts, however, are a serious concern and may result in discipline. Any employee that becomes aware of an actual conflict must disclose it as outlined under Disclosure and Compliance Obligations.

Things To Do

If you believe you have a conflict, whether it be actual, potential, or perceived, you must complete the **conflict of interest and disclosure form**. Completed forms must be submitted to your direct manager or supervisor to ensure awareness of the conflict and support for the proposed mitigations. All disclosing employees will receive a copy of their completed form for their records. If you change positions within JG-I Group after disclosing a conflict of interest, you must provide a copy of the completed form to your new supervisor or direct manager and continue to implement mitigations agreed to in the form.

If new information arises in relation to a declared conflict, you must update the form and resubmit the completed form to your supervisor or direct manager.

Gifts and Entertainment

Guiding Principle: We will not accept or provide any gift, benefit, or favour in exchange for special consideration or influence, and we will mitigate any perceptions that may arise from courtesy or professional and community relationships.

What Does This Mean?

Employees must not give or receive gifts in exchange for actual special consideration or favours, and if a gift might be perceived as this, it must be disclosed and align with JG-I guidelines.

Why is This Important?

Although most gifts come with no strings attached, there is always the chance that something is expected or perceived to be expected in return.

Things To Do

- + Before accepting any gift or gratuity, consider how the acceptance of the gift would be perceived by the media, Council and a company's competitors.
- + Refuse all cash tips or cash gifts.
- + Decline gifts that are intended as an exchange for a favour.
- + Decline gifts from potential vendors or interested parties during or in anticipation of a purchasing or tendering process that you are involved in.
- + Decline the gift or ask your supervisor if you are unsure.
- + Disclose appropriate gifts in accordance with JG-I guidelines.

Personal Gain, Benefit, or Favouritism

Guiding Principle: We will remove ourselves from any decision process or work duty that may result in an actual, potential or perceived personal gain or benefit. We remove ourselves from situations where there is an actual, potential or perceived risk of favouritism. When we have access to confidential information relating to any competition open to the public, we are ineligible to compete.

What Does This Mean?

Employees must remove themselves from any decision process that may result in actual, potential or perceived personal gain, favouritism, or benefit, and mitigate potential and perceived conflicts of interest by disclosing and mitigating conflict of interest situations.

Employment opportunities, job bidding, and disposal of surplus assets will be carried out impartially – without any advantage or favouritism to themselves or others.

Why is This Important?

All JG-I Group business must be conducted fairly and impartially. A JG-I employee should not benefit from their job beyond the compensation paid for the job.

Things To Do

- + Remove yourself from any decision process that may result in actual, potential or perceived conflict by resulting in personal gain, benefit or favouritism, or that may otherwise affect you personally as an individual

- + Disclose any situation where you have a personal or familial relationship with an external party doing business with or interacting with JG-I Group that may result in an actual, potential or perceived conflict of interest

Frequently Asked Questions

Q My brother-in-law is qualified for a job I directly supervise. Can he be hired for that position?

A No. According to the hiring procedure, immediate family members may not work in the same section, branch or department where direct supervision would create a conflict. Furthermore, no one may be hired, transferred or promoted to a position in which a relative can be perceived to have influence over their promotion or supervision.

Q I have started a romantic relationship with my supervisor. What should I do?

A JG-I Group discourages workplace relationships that can result in conflicts of interest, complaints of favouritism, claims of sexual harassment and other employee morale problems. In this situation, you and your supervisor must promptly disclose this relationship to the manager of your work area. The manager must take steps to address the supervisory-subordinate working relationship in order to remove actual or perceived favouritism along with any other potential conflicts. This may include modifying the reporting relationship and/or a change in position for one or both employees involved.

Other Employment

Guiding Principle: We will only engage in other employment that does not conflict with our duties or the Code of Conduct or put us in competition with services provided by JG-I Group.

What Does This Mean?

Other employment is permitted, but only with organizations not in direct competition with JG-I Group or that could potentially compromise JG-I business, social, political interests and objectives or its reputation to the public.

Why is This Important?

During paid working hours, your priority must be to JG-I service, above all other financial interests. JG-I employees are expected to be loyal to the JG-I Group. You cannot have other employment that undermines your ability to perform your duties effectively or conflicts with those duties at JG-I.

Things To Do

- + Refuse work from JG-I's direct competitors.
- + Get written approval from your Administrator before you accept outside employment during a leave of absence.

Frequently Asked Questions

Q I'm off work and receiving disability benefits. I can't do the heavy, physical labour my JG-I job demands but I can run my home-based bookkeeping business. Is this a violation?

A Yes. Your supervisor must approve all outside employment while you're on disability leave.

Q I work as labourer for JG-I group and would like to get a part-time job as a porter. Is this permissible?

A Yes. You can take the job as long as the service is not in direct competition with JG-I Group and the service is not performed on JG-I time or using JG-I assets.

JG-I
GROUP