



# INTERNAL CODE OF CONDUCT

## PURPOSE

This Internal Code of Conduct aims to establish detailed guidelines and expectations for all employees within our organization, SNF. This code sets forth specific standards of behavior that we consider essential for maintaining a productive and respectful work environment. Adhering to this Code ensures that our actions align with our company values and principles.

## PROFESSIONALISM AND RESPECT


### Respectful Behavior

- Treat all SNF colleagues, clients, and stakeholders with respect, fairness, and dignity, regardless of race, gender, age, religion, disability, sensitive medical conditions, trade union membership, ethnicity, nationality, social background, sexual orientation, family responsibilities, political opinion, or any other protected characteristic.
- Avoid making derogatory comments, engaging in offensive jokes, or using discriminatory language.
- Be mindful of cultural differences and demonstrate sensitivity in interactions.

### Professional Conduct

- Maintain professionalism in all interactions, both within the SNF workplace and externally.
- Use appropriate language, tone, and demeanor in all forms of communication, including in-person, written, and online.
- Avoid engaging in aggressive, confrontational, or disrespectful behavior.

### Collaboration and Teamwork

- Foster a positive, inclusive environment that encourages teamwork, collaboration, and constructive feedback.
  - Respect and value diverse perspectives, ideas, and contributions.
  - Avoid gossiping, spreading rumors, or engaging in behaviors that may create a hostile or divisive atmosphere.
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## INTEGRITY AND ETHICS

### Honesty and Transparency

- Act with honesty, integrity, and transparency in all business dealings and interactions.
- Avoid engaging in dishonest or deceptive practices, including theft, fraud, bribery, or corruption.
- Provide accurate and reliable information to colleagues, clients, and stakeholders.

### Confidentiality and Privacy

- Safeguard and respect confidential information, both of SNF organization and individuals associated with it.
- Refrain from unauthorized disclosure, misuse, or sharing of sensitive data, trade secrets, or personal information.
- Adhere to data protection and privacy laws and regulations.

### Conflicts of Interest

- Avoid conflicts of interest that compromise judgment or impartiality in decision-making processes.
- Disclose any potential conflicts promptly to the appropriate channels.
- Act in the organization's best interests and avoid personal gain or advantage at the company's expense.

## COMPLIANCE WITH LAWS AND REGULATIONS

### Legal Compliance

- Comply with all applicable laws, regulations, and industry standards in the countries where we operate.
- Adhere to employment, health and safety laws, data protection, competition, intellectual property, and any other relevant legislation.

### Organizational Policies and Procedures

- Understand and adhere to SNF organization's policies and procedures.
- Follow the guidelines outlined in the employee handbook, code of conduct, and other relevant documents.
- Seek guidance when unsure about the compliance requirements of a particular situation.

### Reporting Violations

Report any suspected violations of laws, regulations, or policies promptly and responsibly to the designated authority or through the established reporting mechanisms.

Cooperate fully in any investigations related to reported violations.



## **WORKPLACE ENVIRONMENT AND SAFETY**

### **Safety and Health**

- Maintain a safe and healthy work environment by following all safety protocols, guidelines, and procedures.
- Report any safety hazards, accidents, or near-miss incidents immediately to the designated authority.
- Use appropriate safety equipment and tools as required.

### **Inclusion and Diversity**

- Promote a diversity, inclusion, and equal opportunity culture where everyone feels valued and respected.
- Avoid harassment, discrimination, or bullying based on protected characteristics.
- Foster an environment that embraces different perspectives and backgrounds.

### **Conflict Resolution**

Seek to resolve conflicts or disagreements professionally and constructively.

Utilize appropriate communication channels and escalate issues when necessary.

Respect confidentiality during conflict resolution processes.

## **USE OF COMPANY RESOURCES**

### **Responsible Resource Management**

- Use SNF resources, including but not limited to equipment, software, and facilities, responsibly and solely for business-related purposes.
- Minimize wastage and avoid excessive consumption of resources.
- Report any issues or concerns related to the misuse, loss, or theft of SNF resources.

### **Information and Data Security**

- Protect and preserve SNF assets, intellectual property, and information by following appropriate security measures and protocols.
- Safeguard SNF confidential and proprietary information from unauthorized disclosure or use.
- Adhere to data protection policies and procedures to ensure the privacy and security of personal and sensitive data.

## **SOCIAL RESPONSIBILITY**

### **Environmental Stewardship**

- Act environmentally responsible, promoting sustainable practices, and minimizing waste and pollution.
- Conserve resources, recycle when possible, and follow the organization's environmental policies and initiatives.
- Encourage environmentally friendly practices among colleagues and stakeholders.

### **Community Engagement**

- Encourage volunteering and community engagement.
- Support initiatives that positively impact society and the environment.
- Seek opportunities to contribute to social causes and make a positive difference in the communities we serve.

## **CONSEQUENCES OF VIOLATIONS**

### **Violation Determination**

- Failure to adhere to this code may result in disciplinary actions, up to and including verbal/written warnings, suspension, and termination of employment, depending on the severity and frequency of the violation.
- Each violation will be evaluated case-by-case, considering the nature, impact, and intent.

### **Reporting and Investigation**

- The appropriate authority will thoroughly investigate all reported violations.
- Employees are expected to cooperate fully during the investigation process.
- Confidentiality will be maintained to the extent possible during the investigation.
- Reporting conditions and modalities are detailed in the whistleblowing procedure

### **Fairness and Due Process**

- SNF employees involved in reported violations can present their side of the story.
- Decisions regarding disciplinary actions will be made based on objective evidence and applicable laws and policies.
- SNF employees will be informed of the outcome of the investigation and any resulting disciplinary actions.

### **Continuous Improvement**

- Regularly review and update this Internal Code of Conduct to ensure its relevance and effectiveness.
- Seek feedback from employees and stakeholders to identify areas for improvement.
- Provide training and educational resources to promote understanding and compliance with the code.

## ACKNOWLEDGMENT AND COMPLIANCE

### Acknowledgment

- All SNF employees are required to read, understand, and acknowledge this Internal Code of Conduct.
- New SNF employees will receive a copy of the code during onboarding, and existing employees will be notified of any updates.

### Compliance

- Compliance with this code is a condition of employment.
- SNF employees are expected to raise concerns or questions regarding the code to their supervisors or the appropriate authority.
- Failure to comply with this code may result in disciplinary action, up to and including termination of employment.

## CONCLUSION

Following this Internal Code of Conduct ensures that the SNF organization maintains a culture of respect, integrity, and professionalism. Each SNF employee is responsible for upholding these principles and contributing to a positive work environment that fosters growth, innovation, and success. We can create a workplace that promotes fairness, equality, and ethical conduct through our collective commitment to this code.