



## **GIVEX INFORMATION TECHNOLOGY GROUP LIMITED**

### **CODE OF CONDUCT**

**(Adopted and approved by the Board on November 30, 2021)**

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Givex Information Technology Group Limited (“Givex”) is committed to conducting business in accordance with applicable laws and regulations of the countries in which we conduct business and to operating ethically and maintaining a culture of integrity at every level of our organization. Givex’s Code of Conduct (the “Code”) outlines the guiding principles by which we fulfill these commitments in our business practices and dealings.

#### **1. OUR COMMITMENT TO OUR EMPLOYEES**

Givex strives to maintain a diverse, inclusive and positive workplace by treating all employees fairly and with respect.

##### **1.1. Workplace Discrimination and Harassment**

Givex prohibits behaviour that is discriminatory or harassing. Givex does not make employment-related decisions on the basis of a person’s age, race, national or ethnic origin, gender, religion, sexual orientation, mental or physical disability. We also ensure that our workplaces are free from harassment, including from any form of unwanted, hostile or offensive conduct that creates a harmful or hostile work environment.

##### **1.2. Health and Safety**

Givex maintains a safe and healthy work environment for all Givex employees, and does not permit or engage in any forced, exploitative or unsafe labour, work conditions or activities on any of its premises, and encourages the protection of human rights, including workers’ rights, and the promotion of worker health and safety by parties with whom Givex does business.

#### **2. OUR COMMITMENT TO OUR EXTERNAL STAKEHOLDERS**

Givex is committed to maintaining our reputation for excellence in all spheres of our work, including in our relationship with external stakeholders.

##### **2.1. Our Partners, Suppliers and Third Parties**

Givex deals fairly with our business partners, suppliers and third parties, while seeking to ensure that such entities share, respect and act in a manner that is consistent with the principles established in this

Code. Givex engages in fair competitive business practices and does not improperly seek competitive advantage through illegal, dishonest or unethical conduct, such as bribes, kickbacks or extortion.

## **2.2. Our Clients**

Givex is dedicated to the success of our clients and meeting their needs through providing outstanding client service and delivering on our promises. A key aspect of maintaining our clients' trust is demonstrating the highest level of ethics and integrity in all our business dealings with current and potential clients.

## **3. OUR COMMITMENT TO THE ENVIRONMENT**

Givex conducts its business in a sustainable and environmentally responsible manner. We strive to positively impact the environment by integrating environmental considerations into our business, including by supporting environmentally sound practices in manufacturing.

## **4. OUR COMMITMENT TO PRIVACY**

We are committed to respecting the confidentiality, security and integrity of all information obtained by Givex in confidence and to ensuring that such information will only be used for the purposes for which it was obtained.

### **4.1. Individual Privacy Rights**

Givex respects the privacy rights of individuals regarding their personal information disclosed to or collected by Givex in the course of a business or employment relationship. We take great care to ensure that such information remains private and confidential and have put in place appropriate safeguards to ensure the accuracy, security, and proper handling of personal information that is collected, exchanged, stored or processed by Givex. All personal information is used and disclosed in accordance with the Givex Privacy Policy found at <http://web1.givex.com/corporate/privacy> and as permitted by applicable privacy laws.

### **4.2. Confidential Information**

Givex prohibits the unauthorized use or disclosure of confidential information in its possession. Such information can include proprietary, confidential and non-publicly available information obtained under written confidentiality obligations from clients or third parties. Access to confidential information is strictly controlled on a "need to know" basis and such information is used by Givex only for the intended purposes.

## **5. CHANGES TO THIS CODE**

Givex is committed to continuously reviewing and updating its policies and procedures, therefore this Code is subject to modification by Givex.

## **6. REPORTING SUSPECTED VIOLATIONS OF THIS CODE**

Please contact us should you suspect any violation of this Code:

- For suspected privacy violations, please write to us at [privacy-officer@givex.com](mailto:privacy-officer@givex.com) or Attention: Privacy Officer, Givex, c/o 134 Peter Street, Suite 1400, Toronto, Ontario M5V 2H2.
- For all other suspected violations, please write to us at Attention: Legal Services, Givex, c/o 134 Peter Street, Suite 1400, Toronto, Ontario M5V 2H2.