



# **Corporate Ethics**

guard.me International Insurance

June 28, 2023

# Table of Contents

- Corporate Ethics ..... 3
- 1. Purpose ..... 3
- 2. Scope ..... 3
- 3. Policy ..... 3
  - 3.1 Executive Commitment to Ethics ..... 3
  - 3.2 Employee Commitment to Ethics ..... 3
  - 3.3 Maintaining Ethical Practices ..... 4
  - 3.4 Unethical Behavior ..... 4
- 4. Conflicts of Interest ..... 5
  - 4.1 Holding a Significant Interest in Suppliers, Customers or Competitors ..... 5
  - 4.2 Outside Work ..... 5
  - 4.3 Conduct with Customers and Vendors - Gifts and Gratuities ..... 5
  - 4.4 Conduct of Personnel Involved in the Purchasing Process - Unlawful Use of Company Funds ..... 5
- 5. Enforcement ..... 6

# Corporate Ethics

*Details of activities deemed illegal, unethical or against the best interests of guard.me*

**Information Classification: Public**

## 1. Purpose

guard.me International Insurance is committed to protecting employees, customers, partners, vendors and the company from illegal or damaging actions by individuals, either knowingly or unknowingly. This policy establishes behavioral and ethical standards for guard.me International Insurance's employees, vendors and the company and serves to guide business behavior to ensure ethical conduct.

## 2. Scope

This policy applies to all employees, contractors and third parties who are directly involved in the business of guard.me (collectively referred to as "personnel" in this policy).

## 3. Policy

guard.me International Insurance is committed to operating all of its activities within the spirit and letter of all laws and regulations affecting its businesses and personnel. All personnel must exercise the highest level of integrity, ethics and objectivity in their actions and relationships which may affect guard.me International Insurance. Employees must not misuse their authority or influence of their positions in these relationships. Moreover, personnel have the duty to always act in the best interests of guard.me International Insurance.

### 3.1 Executive Commitment to Ethics

Executives must have an open-door policy and welcome suggestions or concerns from personnel. This allows for a comfortable discussion of issues or concerns within the organization. Executives must disclose any conflicts of interest regarding their position within guard.me International Insurance.

### 3.2 Employee Commitment to Ethics

- guard.me International Insurance personnel shall treat everyone fairly, with mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.
- Personnel shall acquaint themselves with and abide by guard.me International Insurance's mission, values, vision, operating principles and policies.
- All personnel shall apply effort and intelligence in maintaining ethical values.

- Personnel shall refrain from condoning as well as participating in or engaging in dishonesty, fraud, deceit or misrepresentation.
- All personnel shall comply with all applicable legal regulations, legal statutes and standards of equity and justice.
- Personnel shall strive to meet and exceed the requirements of their designated position.
- Personnel shall respect differences in people; this includes (but is not limited to) age, colour, race, citizenship, place of origin, disability, gender, family status, etc.
- Personnel shall refrain from the use of profanity, verbal abuse or violence.
- Personnel shall maintain complete confidentiality regarding guard.me International Insurance affairs and decisions, during and after their tenure with guard.me International Insurance.
- Personnel shall respect and abide by management decisions.
- Personnel shall refrain from engaging in public criticism that would jeopardize the reputation of guard.me International Insurance and its employees or appointees.

### **3.3 Maintaining Ethical Practices**

- guard.me International Insurance shall reinforce the importance of integrity and ethical practices. All personnel of guard.me International Insurance shall consistently maintain an ethical stance and support ethical behavior.
- Personnel of guard.me International Insurance must notify their supervisor if they have a conflict of interest or potential conflict of interest.
- Prohibited activities for personnel include, but are not limited to: using their position to directly or indirectly benefit themselves, their spouse or their children; giving preferential treatment or creating the appearance of giving any preferential treatment; or making personal use of guard.me International Insurance resources including its premises, equipment or supplies.

### **3.4 Unethical Behavior**

- guard.me International Insurance shall avoid the intent and appearance of unethical or compromising practices in relationships, actions and communications. Personnel shall not participate in any acts of corruption, bribery or other illegal behaviour.
- Unauthorized use of guard.me International Insurance's trade secrets, marketing, operational, personnel, financial, source code and technical information integral to the success of guard.me International Insurance is not permitted in any form.
- guard.me International Insurance personnel shall not use corporate assets or business relationships for personal use or gain.
- Any bribery for the benefit of any external or internal party is prohibited.
- Employees shall not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits that the company offers.

## **4. Conflicts of Interest**

While guard.me has no wish to interfere in any personnel's outside activities, guard.me prohibits conflicts of interest.

### **4.1 Holding a Significant Interest in Suppliers, Customers or Competitors**

guard.me's policies require that personnel and their immediate family not have any ownership interests in, or own property with, any of guard.me's vendors, suppliers, contractors, agencies, customers, or competitors (or their office employees) unless guard.me determines that such ownership interests do not conflict with the personnel's obligations to guard.me. These restrictions do not apply to ownership of stock of a public company.

### **4.2 Outside Work**

guard.me requires that personnel not work for or conduct any outside business with a competitor. Personnel may not be engaged in any manner by a competitor of guard.me.

### **4.3 Conduct with Customers and Vendors - Gifts and Gratuities**

To ensure the highest level of objectivity in dealing with guard.me's vendors, suppliers, contractors and agencies, and to avoid the appearance of impropriety, personnel and their immediate family are not permitted to accept personal benefits, solicited or unsolicited, of any kind. This includes free services, discounts, loans, entertainment or other special favors. Infrequent gifts valuing not more than \$100 may be accepted when they have not been solicited and are not being made in return for a special consideration or decision.

### **4.4 Conduct of Personnel Involved in the Purchasing Process - Unlawful Use of Company Funds**

Personnel may not use corporate assets or funds for any unlawful or improper purpose. guard.me International Insurance does not authorize and will not condone any payment by any personnel that is a bribe, kickback, or disclosed commission or a commission more than those required in the ordinary course of business to a third party for obtaining any business or otherwise bestowing a special favour on guard.me International Insurance or its personnel. Gifts or payments may not be offered or given to foreign officials, political parties or candidates. While certain nominal payments or gifts to administrative personnel, who do not exercise discretionary authority, may be customary, any such payments or gifts must be disclosed to senior management in advance to ensure that they are appropriate. Records of any such payment or gift must also be maintained.

Any violation of the Code of Conduct or the Corporate Ethics Policy must be reported to Human Resources immediately.

## **5. Enforcement**

Any employee found to have violated this policy may be subject to disciplinary action in line with the Disciplinary Policy.