

CODE OF CONDUCT



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01.

**WHY WE DO
WHAT WE DO**



A NOTE FROM THE DIRECTORS

Alberta is more than a company. It is more than the projects and services we fulfill. It is more than the highly recognized brand that dots homes and businesses and is seen on the roads and on the uniforms we wear.

Alberta is synonymous with a sense of trust. A feeling of assuredness.

We are a community, a team that is trusted to protect what matters most to our personal and business customers and to help prevent disaster from striking. Every single day of the year.

The trust that we receive from our customers is not placed in the name, but in the people. In you. And that is why we consider our biggest strength to be you and why extending our protection to your working life is a vital part of our success.

Our Code of Conduct is a commitment from our leaders to every member of staff. That you understand the standards we need to achieve and why. What is expected from every one of us, from the regulations we must follow to our day-to-day behaviour. How to manage difficult situations and where to go for guidance.

We invite you to familiarize yourself with this document.

Together we have built a brand that is valued and appreciated by the outside world. If we work together to continue to foster a culture of acceptance, transparency and integrity, then we will continue to grow from strength to strength – together.

Here's to another 50 years of success!

A CODE FOR EVERYONE

Every team member is expected to read, understand and comply with this Code of Conduct. Suppliers and sub-contractors are expected to act in accordance with the principles outlined in this document.

**If you feel you still have questions,
reach out to us on hr@alberta.com.mt**



02.

TRUST — JUSTIFIED

WE HAVE AN IMPORTANT ROLE IN SOCIETY.

That role is earning our customers' trust that we will deliver what we promise. That we will help to protect what matters most to them and prevent disaster wherever we can.

Our values underpin how we deliver and play this role with each other, our suppliers and our customers.



IMPACT.

Delivering the right impression through our courtesy, appearance, professionalism and incredible attention to detail.



DARING TO THINK DIFFERENTLY.

Just because it's been done the same way before, doesn't mean it can't be enhanced or improved. We challenge ourselves to try and think outside the box to find new solutions.



DOING THE RIGHT THING.

Taking the right, ethical, respectful and honest approach comes naturally to us. There are no cutting corners when it comes to our customers' safety.



BELIEVING IN PEOPLE.

We work together for a recognized and loved brand. But we know it's the people that make Alberta what it is. That's why we respect each other every day. Together we are stronger.

WE HAVE AN IMPORTANT ROLE IN SOCIETY.

That role is earning our customers' trust that we will deliver what we promise. That we will help to protect what matters most to them. That we will help them prevent disaster wherever we can.

Our values underpin how we deliver and play this role with each other, our suppliers and with our customers.



DOING MORE WITH LESS.

Hard work is nothing new to us. Sometimes we need to go the extra mile to be able to complete a project, double check an installation or provide a customer with an answer. Exceeding clients' expectations comes naturally to us.



FUN.

We're passionate about what we do, engaged in our everyday tasks and we want to walk with an air of positivity.



HONEST RELATIONSHIPS.

Honest relationships build strong foundations for growth. That's why we have such fantastic relationships with our suppliers, customers and with each other.



POSITIVITY, PASSION AND PERSEVERANCE.

The right kind of company culture gives us all a happier environment to work within. We celebrate our diversity and how each one of us brings different expertise, experience and insight to the mix. We know we're on the same path, even if we're not identical as people.



GROWTH.

We don't have a status quo business and nor do we want one. We need to grow, personally and as a company. Why deliver just enough, when with a little push you can deliver excellence instead.

03.

**OUR
INDUSTRY**



LEADERS SET THE STANDARDS

Alberta has not, and never will, win business by taking shortcuts. The work we do for our customers, be they government or enforcement entities, businesses, events or individuals is won through fair competition. Our ethical approach sets the standard for the industry because we are transparent and open to competition. Competition does not scare us. It makes us better at what we do and pushes us to keep offering better services and products.

04.

**OUR SOCIETY
AND NATION**

WE ARE INVOLVED

Protection of our customers' lives and valuables extends to the community that we live in. We encourage team members to become actively involved in community initiatives that work towards improving our collective quality of life. From time to time as a group we will also organize initiatives that help support various NGOs and charities. We do not consider ourselves a stand-alone entity but an involved, invested participant in our community, working towards a better future. It is our responsibility as an industry leader to show others how it can be done effectively.



05.

**A BETTER CUSTOMER
EXPERIENCE**



A CUSTOMER CENTRIC BUSINESS

The core of our business model is prevention and protection. For a customer to place their trust in our brand to protect what matters most to them, means that they trust us. But trust is a delicate value and must be earned every day. By delivering an excellent customer experience at every touch point, be it on the phone, in person, on location or at our offices, we are ensuring that trust is extended. The more positive their interaction with our team, the more they can sleep at night knowing a professional company is giving them real peace of mind.

06.

HEALTH, SAFETY AND THE ENVIRONMENT

CONSCIOUS OF THE BIGGER PICTURE

The protection we offer our customers is always extended to the environment. No matter the project's size or client's request, we are continuously striving to do better when it comes to matters related to health, safety and minimizing our overall environmental footprint. We do this by ensuring we follow all stipulated requirements and regulations, we lead by example and provide a safe place to work in, and never leave any opportunity for mistakes which might cause injury to our team, customers or the public. Whatever we can do to improve our carbon footprint, we take action, whether by reducing our greenhouse gas emissions, our waste, our energy consumption or the use of water. We do this because we genuinely care. Because we are designed to protect and help to prevent disasters of any kind.



07.

SUSTAINABILITY

A PROACTIVE NOT REACTIVE APPROACH

We do not believe it is enough to watch the continued destruction of our planet and country from the sidelines. Alberta and its team know the importance of protecting the environment in every way possible. That is why we take such a proactive approach to ensure our own impact is minimal and that we identify ways in which we can improve what we do. Our social responsibility is taken very seriously, which is why every effort is being taken to grow the business in a more sustainable manner. Across the entire organization, we promote the concept of reducing, recycling and reusing what we can. Our ambition is to minimize our impact on air, land and water pollution. No matter how small a positive action is, we expect our team members to be involved and play their part. We believe that together we can make a difference. From reducing our plastic waste to identifying suppliers who are more environmentally conscious, every little helps in working towards a safer future for us all.



08.

CHARITABLE CONTRIBUTIONS



**THE POWER OF
A CARING BRAND**

Alberta continuously identifies NGOs and charitable institutions to support. We invite staff to get involved in any planned activities which are designed to support the community. However, no group funds can be committed to a charitable cause without prior consent provided in writing to you beforehand by hr@alberta.com.mt.

If you have an idea that you would like to discuss with the management team, please send your suggestion by email to: hr@alberta.com.mt so that it can be looked into in detail.

09.

**YOU ARE
VALUED**



YOU ARE VALUED

YOU ARE THE A-TEAM

Our commitment to you is to offer a work environment that is safe to grow within, where you feel valued and respected. Where opportunity is available to all, irrespective of position or background. We believe potential isn't just a word, but is something that must be realized.

10.

**YOUR VOICE
MATTERS**

YOUR VOICE MATTERS

SPEAKING UP WHEN IT MATTERS

What to do if something feels, looks or sounds wrong at the workplace.

Help us to ensure that we operate a transparent, respectful and cooperative environment. If you see something that feels out of place, that could be a potential violation of our Code of Conduct; it is your responsibility to speak up. We have an open-door policy. Please make use of this by alerting your direct line manager or speaking to a member of the HR team about your concerns. If you are not sure or would like to clarify whether what you witnessed was against our operational Code of Conduct, we can discuss this with you and decide the best course of action to take. All discussions are treated with the highest level of confidentiality. Our zero tolerance for retaliation should give you the courage to speak up. If you are facing any form of abuse or bullying because you have spoken up, speak to us immediately.

Alerting the team to unethical, improper behaviour helps us to stop problems earlier and create a better workplace for everyone to enjoy.



Q&A

Q: My manager has asked me to do something I believe conflicts with the Code of Conduct. What should I do?

A: No one at Alberta has the right to ask you to do anything unethical – not even your manager. Speak to your HR department if you are in doubt and we can work through this together.

11.

DIVERSITY AND INCLUSION

CELEBRATING OUR DIFFERENCES

We find joy in our differences. Whether it's our race, religion, gender or culture, our diversity creates the zest of an interesting life and workplace. Alberta is an equal opportunity employer, so it is crucial that we offer all team members a work environment that helps them feel valued, heard, included and recognized.

We have a zero-tolerance policy for any discrimination based on the following list.

This list is not exhaustive.

- Gender
- Gender identity
- Gender expression
- Sexual orientation
- Marital status
- Race
- Age
- Family responsibilities
- Nationality
- Ethnic origin
- Colour
- Religion or belief
- Ability or disability
- All aspects of unacceptable discrimination as stipulated by law

Our commitment to ensuring no discrimination takes place extends throughout our entire business process. From recruitment stage, to compensation, promotions, benefits, training/education, termination and all social activities. All levels of our management team are expected to lead by example and reinforce this message of equality, respect and acceptance.





Alberta does not employ and will never condone child labour. The company is committed to protecting children's lives and often conducts community outreach programmes through the support of charities and groups which specialize in the protection of children - be it their health, lives or day-to-day improvement in their quality of life.

12.

ANTI-HARASSMENT AND BULLYING

UNACCEPTABLE BEHAVIOUR



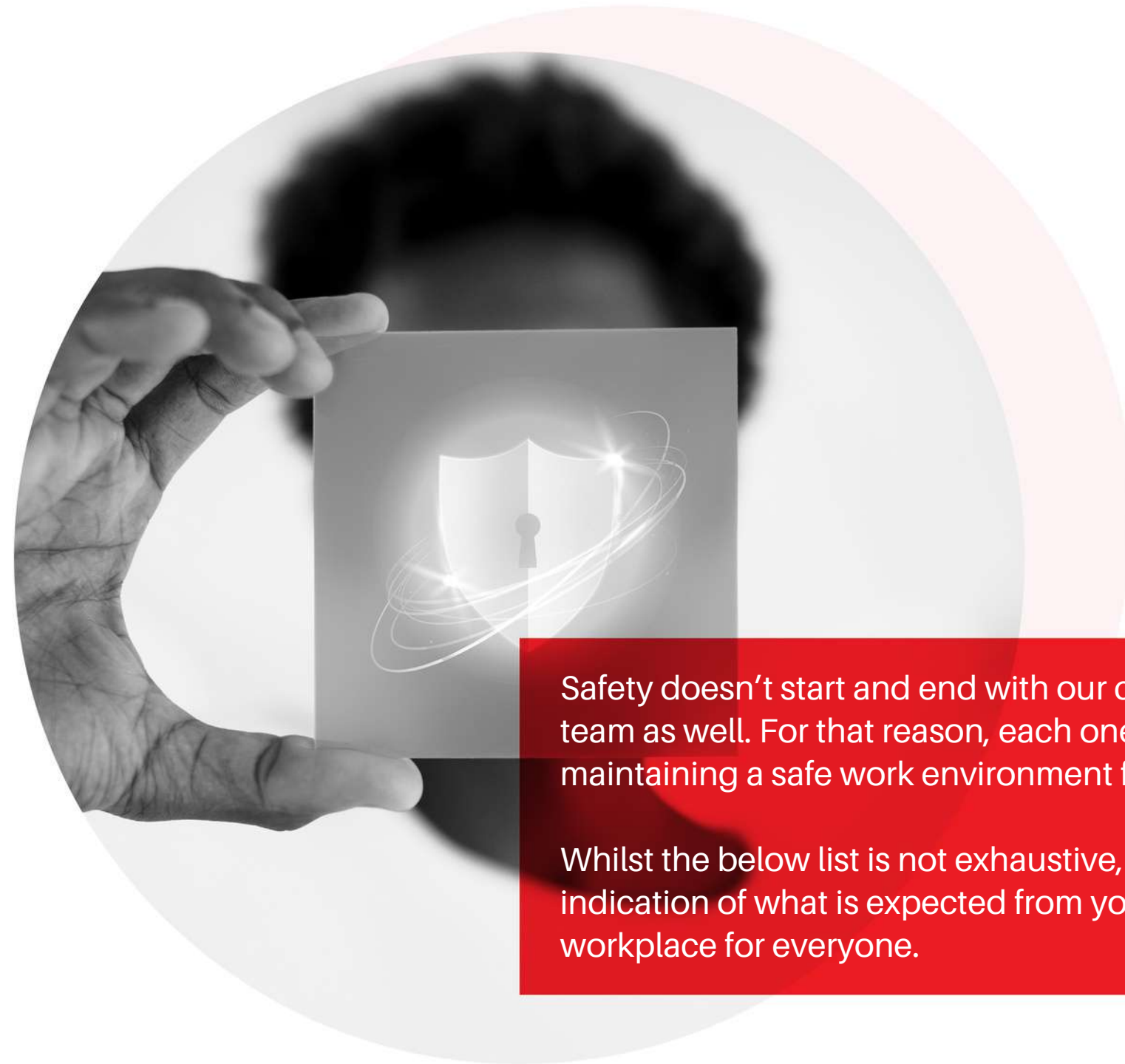
Harassment and bullying of any kind are strictly prohibited within Alberta. Any behaviour which can be considered intimidating, undermining, hostile or offensive will not be tolerated in any way.

Harassment or bullying can be based on various issues including a person's gender identity, gender expression, sexual orientation, marital status, race, age, family responsibilities, nationality, ethnic origin, colour, religion/belief, ability or disability, or any other protected characteristic. This list is not exhaustive.

Unwelcome sexual advances, requests for sexual favours and other verbal or physical actions of a sexual nature are prohibited across the group. If bad sexual conduct is observed or reported the employment contract of the harasser will be reviewed.

13.

**PROMOTING A
SAFE WORKPLACE**



PROTECTING EACH OTHER

Safety doesn't start and end with our clients. It's essential for our team as well. For that reason, each one of us is responsible for maintaining a safe work environment for everyone to enjoy.

Whilst the below list is not exhaustive, this provides you with a good indication of what is expected from you to help us maintain a safer workplace for everyone.



PROTECTING EACH OTHER

- Ensure that you understand the safety requirements for your specific role. If you are in doubt speak to your direct line manager or the HR Department.
- Team members must comply with health and safety procedures while on duty, whether at the office or at a client's premises/ on site. You are required to attend all provided training, whether related to health and safety or to any other work-related aspect deemed necessary by the company.
- Ensure that you follow company procedures and comply with local laws. Know your job and your tools and analyse what is involved in advance. Preparation is key before starting: ensure that you familiarise yourself with any on site hazards/risks and with how to operate/use tools, equipment and machinery required for the job. Do not operate tools, equipment or machinery unless you are permitted to do so and unless you know how to use them. Ask your supervisor or line manager if in doubt. Do not drive company vehicles unless you have a valid driving license which is recognised in Malta.

14.

**AN ALCOHOL AND
DRUG FREE WORKPLACE**

BEING SOBER MATTERS IN OUR INDUSTRY

The very nature of what we do demands that we are at our very best from the beginning to the end of our workdays. For this reason, Alberta has a zero-tolerance policy when it comes to alcohol and drugs of any kind. It is critical that you report to work free from the influence of alcohol and drugs. Reporting to work under the influence of any illegal drug or alcohol or using, possessing, or selling illegal drugs while on company time or property is strictly prohibited. No alcoholic drink, or any drugs can be brought into either company premises or vehicles or on location when providing a service to a client. It also cannot be consumed during any breaks, including your lunch break. If you are caught driving under the influence at any time further; immediate, and strong action will be taken. The only exceptions are pre-planned company functions. If you are taking prescribed medication, you must seek advice from your GP about its possible effect on your ability to carry out your job and whether your duties should be modified. If this is the case, you must contact the HR Department.

Q&A

Q: My co-worker is going through a hard time personally and I have started to notice the smell of alcohol on them during the day. What should I do?

A: Whilst we understand your concern your colleague's actions could put him/herself and others in danger. Talk to HR Department and let people with experience in these matters handle it discreetly and efficiently.

15.

**ZERO TOLERANCE
OF VIOLENCE**



NO TO VIOLENCE. FULL STOP.

Alberta has an excellent and positive team ethic and spirit. This has been forged through the years by ensuring all team members have mutual respect towards each other. The company does not tolerate threats or physical acts of violence in any way. No person is allowed to bring any weapon of any kind into the premises, inside any vehicle or taken onsite to a client or project. The following are construed to be violent behaviour and will not be tolerated or excused and will be dealt with strictly, immediately and appropriately to safeguard any member of our team. Please do let us know if you come across any such behaviour, whether in your regard or in that of your colleagues.

- Verbal abuse: use of words to assault, dominate, ridicule, manipulate and/or degrade another person and negatively impact the person's psychological health. Types of verbal abuse include name calling, condescension, humiliating, threatening or withholding.
- Physical interaction of any nature, especially any which can be seen as being violent.
- Threatening to, or indeed causing any damage to the company's property or an external party's property.
- Damage to someone's personal property.
- Creating an atmosphere of stress and fear.
- Inciting fear into any individual's life.
- Invasive behaviour.

You are expected to report anything that you see or hear or have heard about to your line manager or HR Department. Failure to do so could result in repercussions for yourself, even if you were not the party involved in making the threats.

16.

**A RESPECTFUL
WORKPLACE**

FEEL RESPECTED. BE RESPECTED.

Respect is a two-way behaviour. If you want to be respected in the workplace you must also earn the respect of the people around you, be they clients or colleagues. This goes beyond general politeness, attentiveness and courtesy. It is a culture which should be imbedded into your day-to-day behaviour. Respect is paramount to a productive and positive environment. For this reason, we do not accept any of the following behaviour:

- **Recurring bullying or threats**
- **Undermining the victim's dignity or psychological or physical integrity**
- **Hostile and overly serious behaviour**
- **Any behaviour that creates a harmful work environment**

Q&A

Q: How can you spot disrespectful behaviour?

- Someone belittling others.
- Someone causing any other person the need to isolate themselves or forcing someone to be isolated.
- Someone taunting others or making fun of their convictions, tastes, or political choices.
- Someone discrediting, spreading rumours, ridiculing or humiliating others.
- Someone making unwelcome sexual advances, physically or verbally.
- Someone deliberately undermining a competent worker with constant criticism.
- Someone who is making another person feel excluded.
- Someone who is generally causing unfair treatment of another person.

17.

DRESS CODE AND GROOMING

LOOKING AND FEELING YOUR BEST

Whilst we live in an age of diversity and freedom of expression, we still believe that maintaining an appropriate appearance creates a brand which is deemed professional, approachable and respectable. For this reason, we expect anyone who is wearing our uniforms to be appropriately dressed. This includes being clean, neat and tidy and dressing according to your role. Whoever you are, when you join Alberta, you are sharing our image in the public's eye. Whilst our body language and verbal language matter, do not underestimate the importance of also looking the part. You are our representatives, and the Alberta brand is one that should always be worn with pride.



18.

**USE OF
SOCIAL MEDIA**



Social media networks are extensions of the Alberta brand. They are like our 24/7 window into our company where potential and existing customers can learn about who we are, what we do and offer and from which they can form opinions about our company and brand. They are our digital connections to the world, bringing us closer than ever.

It is important to ensure that all our team members use social media the right way. In much the same manner that certain in-person behaviours are unacceptable, so too are they not expected to occur in the digital world. Please read the below carefully and if you have any questions or concerns, please do contact our HR Department so we can help clarify for you.

At some point or another, you might feel upset, annoyed or aggrieved about something that happened at work, with your colleague, your supervisor/ manager, your team etc. We all do, just like we get upset at family members and friends from time to time. But resorting to social media will not solve your problem- please do not post out of anger and frustration: give us a chance: speak to us so we can help to resolve things together. We genuinely care about your happiness and well being, and we can guarantee to give you the time and attention to explain to us what is upsetting you and to help sort things out. There are many people on our team who you can reach out to, from your supervisor or line manager, to various members of the HR team. Venting out on social media will possibly give you a sense of satisfaction at the time, but it will not feel as good later and will not solve your problem at work.

- Always be professional in all online communities. Don't post content that is discriminatory, that can be construed as harassment, bullying, physically threatening, defamatory, similarly inappropriate or unlawful in any way.
- Protect Alberta and yourself. Respect Alberta's logos, trademarks, and photos of others. Do not post any images of people, products, projects or anything related to the company without full prior approval.
- Do not disclose Alberta's confidential business information, such as trade secrets, copyrights, and intellectual property.
- Please remember that anything you post online may be permanent. Search engines can find almost anything you post and it is likely impossible to erase your words after the fact. Even if you try to delete a photo or comment, someone could have taken screengrabs or downloaded images already.

MANAGING YOUR DIGITAL FOOTPRINT

- Be certain you are following applicable policies and laws that govern social media platforms.
- Use your gut instinct. If something feels wrong, do not post or share or comment on it.
- Always be honest and disclose who you are online. Always identify yourself as a team member when discussing topics related to Alberta.
- Your opinions are your own and not those of Alberta Group. If you refer to Alberta or your employment at Alberta when participating in social media for personal use, write in the first person, use a personal email address, and include this profile disclaimer: "The views expressed are my own and not the views of my employer."
- When in doubt, ask for guidance. If you are not sure if you should post something or see questionable information about Alberta online, talk to your line manager or a human resources representative.

MANAGING YOUR DIGITAL FOOTPRINT

19.

**PRODUCT AND
SERVICE QUALITY**

QUALITY ASSURANCE

Our team are highly trained and certified to do what we do. Part of the certification involves the products we offer our customers and install for them. Whether it's burglar alarms or firefighting equipment, all the way to security installations on larger scale projects, the products we use matter just as much as the team setting them up. We are legally bound to ensure what we are offering is of the best quality with no faults or issues.



If you notice an issue, we expect you to identify it, and record everything accurately and completely so that the next steps can be taken. If you have any concerns in this area, please speak up. Our customers' lives and well being could be directly impacted by your actions, or inaction.

20.

**DATA
PROTECTION**

PRIVACY MATTERS

Just like our team's privacy matters, so does our client's. No client data or information should ever be shared with an external party or left unattended inside the offices, or even in any of our fleet of vehicles. We are bound by law, and as part of our contract with customers, to never share their details. This must be respected by all members of Alberta Group, irrespective of their position within the company.

Q&A

Q: I was about to photocopy some paperwork when I noticed that a customer record, detailing their names, credit card and banking information was left inside the machine. I picked it up and started looking for the person who might have left the data there. Is that the right thing to do?

A: All team members have a duty to protect the confidentiality of customer and employee data. Please contact your manager so that they can handle the situation immediately.

21.

RELATIONS

RELATED EMPLOYEES & PERSONAL RELATIONSHIPS



- 1- Please always disclose to management any close relationships that you have within the Group, be they family members or close personal contacts of yours. Employees involved in recruitment who have a personal relationship with a job candidate (internal or external) should not be involved in the selection process.
- 2- While we love that our team members get on really well with each other, we must safeguard our business from situations where conflicts of interest, favouritism, bias and affected productivity could result from having a personal (romantic or sexual/intimate) relationship with a colleague. Employees are expected to declare any such personal relationships to their line manager or to HR. Such 'personal relationships' can be between an existing team member and an existing or prospective employee, a contractor or supplier, or employee of a related organisation with whom an employee interacts regularly as a result of their employment. Where the persons involved are in a close working relationship in the same workplace, the potential for conflict between personal loyalty and work responsibilities may arise. For this reason, whilst it is not the company's intention to infringe upon the private lives of its team members, personal relationships with other employees of the companies within the Group are to be avoided."

Honesty is the best policy.

22.

CONFLICTS OF INTEREST

IN ALBERTA'S BEST INTEREST

All team members at Alberta are expected to act ethically and with integrity and honesty. This means that no one should place their own interests before the company's interests. A team member might put themselves in a position where a situation or relationship makes it harder for them to make a clear judgement, take the right decision or action and they might inadvertently or intentionally put the company, the team and possibly Alberta's clients at risk.

We are all expected and required to observe the highest standards of business integrity, honesty and professionalism and avoid any situation that involves, or is reasonably expected to result in, a conflict of interest between their personal interests and the interests of Alberta. Every member of the team is required to disclose an existing or potential conflict of interest. Sometimes it might be hard for us to realise that this conflict exists, but other team members may be able to identify it.

Always seek guidance from your line manager or a human resources representative if you think there is a possible conflict of interest occurring. We will work with you to find the appropriate solution and take the right steps.

Team members should not invest interest, be it by means of employment, or consultancy, with customers, competitors, or suppliers. If you wish to take on another job whilst still employed with Alberta, you are bound to advise our HR department and seek the necessary approval.

Q&A

Q: Sometimes after work or at the weekend I install burglar alarms for people in my network. I do not use company property for this in any way. Am I within my rights to do so?

A: Even if you are doing this in your own time and with your own materials, in this instance you are acting as a direct competitor to Alberta outside of your company working hours, which is prohibited. There may be one off instances where this could be permitted, but please always seek approval from your line manager and possibly the HR Department before doing so.

23.

**COST SAVINGS AND
HEALTHY COMPETITION**

IDENTIFY SUPPLIER OPPORTUNITIES

All of Alberta's business practices uphold the principle of fair competition. This should feed into every interaction and action the company takes, and at every level. Part of promoting fair competition means that we should also identify opportunities for the company when sourcing and procuring products. We expect every team member to help Alberta obtain value for money by promoting supplier competition and undertaking ethical behaviour in the supplier selection process.



24.

**PROTECTING
ALBERTA'S ASSETS**

PROTECTING THE COMPANY'S INVESTMENTS

Alberta Group's assets include its physical properties, financial assets, proprietary information, data, records and all intellectual property such as the brands it owns and promotes, any inventions and all copyrights. When managing or interacting with the company's assets please follow these guidelines, which we also ask you to familiarise yourself with on a regular basis.



- Use logic and your best judgement when sourcing/purchasing assets for the company.
- Act with caution and care when working with/handling and managing company assets.
- Make sure all company assets are protected from misuse or theft. Do not leave any assets in a position to be stolen, seen or misplaced.
- Never share company assets outside the company without prior approval.
- Ensure that you comply with the Group's security requirements to safeguard physical property and other assets.
- Never dispose of company assets without prior approval.
- Ensure that you follow applicable policies for asset protection.
- Speak up immediately if you think company assets are being misused.

25.

INTELLECTUAL PROPERTY

NEVER TO BE SHARED OR DISCLOSED

Q&A

Q: What is intellectual property?

A: Intellectual property is referred to as things such as copyrights, trademarks, trade names, patents, trade secrets, and other intangible assets.

Q: How do I identify intellectual property at Alberta?

A: Alberta's intellectual properties are its most valuable assets. They can be found in a variety of things such as software, hardware and network-based technology, inventions and innovations, confidential business processes, customer lists, and other confidential business ideas and information. Every team member is responsible for protecting our intellectual property. It is also important to respect the valid intellectual property rights of others. Any unauthorized use of someone's intellectual property can expose the company and individual team members to lawsuits and even criminal penalties.

26.

TECHNOLOGY AND COMMUNICATION SYSTEMS

THE DIGITAL SET UP



Alberta's digital assets include the following (please note this list may not be exhaustive):

- **Technology: hardware and communications, related equipment and networks (including internet access)**
- **Software**
- **Telephone and voicemail systems**
- **Personal digital devices**

All team members must ensure that they use these assets appropriately, following company policy. Protecting the private and sensitive information on this listed digital hardware is of the utmost importance. No equipment should ever be left open and/or unattended. Be careful of joining public networks. All data should always be encrypted. It is important to note that all communications and information sent or received using company assets are the company's property and not private communications owned by you. Alberta reserves the right to monitor all such communications.

27.

RECORDKEEPING AND REPORTING

NOTHING BUT THE TRUTH

WHAT IS FRAUD?

Fraud is the act of intentionally cheating, tricking, stealing, deceiving, or lying. Beyond being dishonest, it may be criminal. Intentional acts of fraud are subject to disciplinary action.

Every member of Alberta must follow the company culture and code of conduct. This includes being honest in all actions and communications.

Examples of fraudulent behaviour include:

- Submitting false expense reports.
- Forging or altering cheques.
- Signing contracts on behalf of the customer or falsifying sales in any manner.
- Misappropriating assets or misusing company property.
- Inflating sales numbers in any manner which does not reflect actual sales and services performed.
- Making an entry in company records that is intentionally not in accordance with proper accounting standards.

Q&A

Q: I have a personal one-off expense that I didn't know was coming in, but my personal credit card doesn't have enough balance to cover the cost. Is it ok to use the provided company credit card and then organise to pay it off?

A: No, you may not use any company credit card for your own personal purchases. Alberta's policy prohibits the misuse of a company issued credit card. These cards should only ever be used for legitimate business expenses.

28.

**INSIDER
INFORMATION**

DO THE RIGHT THING

In your position with Alberta, you may be privy to information which is not publicly available and would be considered private and confidential. This kind of information, if shared inappropriately, can impact Alberta's business. It typically involves information which might be:

- Financial
- Strategy Documentation
- Tenders and Contracts Won
- Product Development
- Inventions
- And other general information which does not reside in the public domain



None of the above information should be disclosed to any other parties, including relatives, friends, or co-workers, until the information has been released publicly by Alberta and the public has had time to react to it.

29.

AUDITS AND INVESTIGATIONS

RUNNING A FULLY COMPLIANT BUSINESS

Alberta runs a fully compliant business. All requests from government agencies and external auditors are handled with absolute transparency and accuracy. As a truthful and honest entity, we do not mislead any investigator and do not falsify or alter documents and records when requested by the government or regulatory institution. We do not hinder or delays requests or investigations.

For the protection of Alberta's rights, if you are approached by a government or regulatory authority for information, first report this request to the compliance department.

The importance of financial data, reporting and accounting.

Every member of the Alberta team is obligated to uphold all relevant financial accounting and reporting standards and regulations.

Our financial records must be:

- Comprehensive, complete and accurate.
- Completed within given timeframes.
- Properly supported and documented.
- Fair and objective.
- Shared externally or internally only once approval has been provided by the department in charge.

Q&A

Q: I was requested to delay including some business-related expenses of mine until the next reporting period. I was advised so long as the expenses get reported during the year, there is nothing wrong with doing this. Is this correct?

A: Absolutely not. Alberta runs regular reports by month and quarter. These reports are just as vital to the company as our annual financial reporting. Intentionally delaying expenses or revenues can generate civil or criminal penalties for both Alberta and for the individual in question.

30.

ANTI-BRIBERY



**SAY
NO**

Any and all forms of bribery, corruption, conflicts of interest are against company policy and will not be tolerated at any level. Our positive reputation has been gained by ensuring full honesty, integrity, quality and compliance with the law across all operations, products, services, prices and deliverables.

Under no circumstance may an Alberta team member, at any level or in any position within the company, offer, pay, or receive a bribe, kickback, or any other kind of inappropriate payment to win business, to influence a business or procurement decision, or to advance our interests with government authorities.

Q&A

Q: What forms can a bribe take?

- Giving or receiving money.
- Giving or receiving unreasonable gifts or entertainment or hospitality.
- Giving or receiving any kickbacks.
- Giving or receiving unwarranted rebates or excessive commissions.
- Taking unwarranted allowances or expenses.
- Any facilitation of payments made so a person performing a normal job should do so more quickly and/or for helping to prioritise a particular customer.
- Giving or receiving political/charitable contributions.
- The uncompensated use of company services or facilities.
- Anything else of value whereby some form of gift, monetary or not, is offered in exchange of an unethical request.

Bribery is prohibited not just for team members, but also for third parties that conduct business on our behalf, such as consultants, distributors, including our suppliers, subcontractors, and others.

If Alberta cannot do something, then neither can our third parties.

Please remember that NO business objective or opportunity, no matter how important or potentially lucrative, is worth the legal liability and financial sanctions, nor the sacrifice of our reputation, or the trust of our stakeholders.

31.

**GIFTS AND BUSINESS
ENTERTAINMENT**



**NOT THE
ALBERTA
WAY**

Our company policy dictates that we should not and do not give or receive inappropriate gifts, be they monetary, or related to hospitality and entertainment.

When you accept certain gifts, it can be interpreted as an attempt to unduly influence the business relationship. If you are offered any form of gift when you are a team member, we expect that you act with discretion, exercise care and execute good judgement.

It is also important to note that a gift made to an immediate family member of yours would also be considered a gift received by you. In short - don't accept anything and always report to your manager should you be aware of such activities taking place.

Q&A

Q: What is it considered acceptable to receive or give a gift or entertainment?

- If it is infrequent and not excessive in value.
- If it is directly related to building customer or supplier relationships.
- If it is tied to promotional and logo items.
- If it is a modest meal when business related, not excessive, and with a customer, supplier, or contractor.
- So long as it is never cash or cash equivalents like gift cards.
- So long as it is not tied to a potential contract or bid.
- So long as it is reported in compliance with Alberta's policies.

32.

**ONE TEAM, ONE VOICE,
ONE CULTURE**



You are a valued and important member of the Alberta Group. This code of conduct document has been written and shared with you to help you understand the company's culture and modus operandi. These are general guidelines that are to be read in conjunction with all the company's policies issued and/or updated. This is not an exhaustive or all-inclusive document. It may also be updated from time to time and shared with you. It is your role to ensure you that you have read the document and kept yourself up to date with any changes.

It is important to all of us to maintain Alberta's extremely positive image and its ethical way of working.

If you identify a possible violation, please report it immediately, whether to your manager, HR Department or a member of the compliance team if appropriate.

We are all responsible for creating a culture of trust and integrity at Alberta.

**Together we are stronger,
better and happier.**

STILL HAVE QUESTIONS? WE HAVE THE ANSWERS.

Please get in touch with your line manager or the HR Department if you have not understood any part of this document or if you still have questions.

We are here to help guide you.



THANK YOU

