



Sustained Value Advisors **Business Code of Conduct**

April 01, 2025

1. Purpose

This Code of Business Conduct and Ethics sets forth the principles and standards of behavior that guide our work at Sustained Value Advisors. As a purpose-driven consulting firm, we are committed to conducting our business with integrity, professionalism, and respect for all our stakeholders. We hold ourselves to the highest ethical standards in our engagements, relationships, and decision-making, including responsible, and sustainable business practices. These standards are intended to promote mutual respect, transparency, and shared values.

2. Scope

This policy applies to all members, employees, service providers, contractors, and operations of Sustained Value Advisors (hereinafter “the consortium member(s)”).

3. Core Guiding Principles

We are guided by the following core principles in how we conduct our business:

- 3.1 **Ethical Conduct:** We adhere to the highest standards of ethical conduct, abiding by our values:
 - Integrity – We act with honesty, independence, and accountability.
 - Collaboration – We co-create with clients and leverage the strength of our consortium.
 - Accountability: We take responsibility for our actions, decisions, and commitments.
 - Pragmatism – We deliver solutions that balance ambition with practicality.
 - Excellence – We apply rigor, depth and leading practices to our engagements.
 - Innovation – We bring forward new approaches, tools, and perspectives to deliver with impact.
 - Respect – We foster diversity, inclusion, and fairness in every interaction.
 - Objectivity: We provide impartial advice and avoid conflicts of interest.
 - Transparency: We communicate clearly, truthfully, and openly in all professional interactions.
- 3.2 **Compliance with Laws and Regulations:** We are committed to complying with applicable local, national, and international laws, including those related to anti-corruption and bribery, data protection and privacy, employment and labor standards, tax, financial reporting, and business registration, and human rights and non-discrimination.
- 3.3 **Respectful and Inclusive Conduct:** We are committed to a working environment free of harassment, discrimination, or intimidation. We work with clients and collaborators who share a commitment to diversity, equity, and ethical behavior. We actively seek to include underrepresented voices and perspectives in our work when possible.
- 3.4 **Conflicts of Interest:** We avoid situations in which personal or financial interests could interfere with professional judgment. Any potential conflict must be disclosed promptly to affected parties and appropriately managed or avoided.
- 3.5 **Use of Firm Resources:** Resources of Sustained Value Advisors — including time, technology, finances, and brand—are used responsibly and only for legitimate business purposes. We maintain accurate records and ensure fair, transparent billing and reporting.
- 3.6 **Health and Safety:** We are committed to providing our consortium with a safe and healthy work environment. We take reasonable steps to prevent workplace accidents, injuries, and illnesses. We strive to follow all relevant occupational health and safety laws and continuously improve.

- 3.7 **Client Relationships:** We are committed to building and maintaining relationships with our clients that are founded on trust, integrity, and transparency. We act in the best interest of our clients, providing objective, evidence-based recommendations. We are committed to delivering services with professionalism, objectivity, and respect. We safeguard confidential information, avoid conflicts of interest, and ensure that our advice and actions reflect the highest ethical standards. We avoid overpromising or misrepresenting our capabilities, scope, or expected outcomes. By fostering open communication and accountability, we aim to create long-term partnerships that deliver meaningful value and strengthen our clients' confidence in our work.
- 3.8 **Work Quality:** We are dedicated to delivering services of the highest quality, guided by professionalism, accuracy, and consistency. Every assignment is carried out with diligence and care, ensuring that deliverables meet client expectations, industry standards, and regulatory requirements. Our consortium applies robust quality assurance processes and peer review mechanisms to ensure reliability, while fostering a culture of continuous improvement so that our work not only meets but exceeds client needs. Please see the **Quality Assurance Procedure / Manual** for more information.
- 3.9 **Confidentiality, Intellectual Property and Data Privacy:** We are committed to safeguarding all client and stakeholder information, ensuring data is handled with the highest standards of confidentiality, integrity, and privacy in compliance with applicable laws and contractual obligations. We respect intellectual property. We do not share or reuse client materials without explicit consent. We implement appropriate security practices in the event of a data privacy breach. Please refer to the **Data Privacy Procedure** for more information.
- 3.10 **Information Technology and Data Security:** We are committed to protecting client and organizational information by following established IT and data security practices. This includes using secure systems, safeguarding passwords, encrypting sensitive data, and complying with clear desk and clear screen procedures. Please see the **IT and Data Security Policy / Procedures** for more information.
- 3.11 **Labor and Human Rights:** We respect international human rights in accordance with the Universal Declaration of Human Rights and the International Labour Organization (ILO) conventions. We treat all workers fairly, ethically, dignity and respect; prohibit the use of forced labor, child labor, and any form of modern slavery; provide a safe and inclusive work environment, free of discrimination or harassment; uphold fair wages and working hours in line with applicable labor laws; and respect workers' rights to freedom of association and collective bargaining. Please see the **Sustainability Policy Statement** for more information.
- 3.12 **Equity, Diversity, and Inclusion:** We value partnerships with organizations that foster inclusion, equity, and representation within their teams. We respect cultural differences and human rights and are committed to ethical supply chains and equitable economic participation.
- 3.13 **Accessibility:** We are committed to ensuring equal access to our services and opportunities for persons of all abilities. We provide accessible information in line with legislation and international standards, design inclusive workplaces and deliverables, and accommodate individual needs in a timely way. Accessibility is also embedded into our procurement decisions, ensuring our members share this commitment. Please refer to the **Accessibility Policy Statement** for more information.

- 3.14 **Indigenous People:** We recognize the unique culture and connection of Indigenous peoples to the land. We aim to develop mutually beneficial relationships based on recognition of rights, respect, and trust.
- 3.15 **Anti-Corruption and Fair Dealing:** We do not engage in or tolerate bribery, kickbacks, facilitation payments, or other forms of corruption. We compete fairly and ethically, avoiding unethical competitive practices or insider advantages. Please see the **Sustainability Policy Statement** for more information.
- 3.16 **Environmental Responsibility:** We strive to comply with all environmental laws and regulation. We are committed to minimizing waste, emissions, and energy consumption. We will use environmentally friendly products, packaging, and practices, where possible, and seek to continuously improve our performance. Please see the **Sustainability Policy Statement** and the **Environmental Policy** for more information.
- 3.17 **Sustainable Procurement:** We are committed to integrating sustainability into our procurement practices by selecting, engaging and building the capacity of our suppliers to uphold high standards of environmental stewardship, social responsibility, and ethical business conduct. In line with our values, we expect our suppliers to comply with applicable laws and regulations, respect human rights, and adopt responsible practices that minimize environmental impact and contribute to positive societal outcomes. Please see our **Supplier Code of Conduct, Sustainability Policy Statement, and the Environmental Policy Statement.**

4. Reporting Concerns

We take concerns seriously. Any member, employee, client, or collaborator is encouraged to raise ethical concerns or suspected violations of this Code confidentially. We are committed to responding respectfully, promptly, and without retaliation.

5. Review and Commitment

This Code is reviewed annually and updated as needed. All consortium members are expected to read, understand, and uphold its principles. All documents referred to in this document are provided to our consortium members. By adhering to this Code, we affirm our shared commitment to responsible business advice.

6. Monitoring and Enforcement

Sustained Value Advisors reserves the right to assess a consortium member's compliance with this Code, including through self-assessment or dialogue. We expect consortium members to promptly correct any non-compliance and maintain transparent communication. Failure to comply with this Code may result in review, suspension, or termination of the consortium member's relationship.

7. Acknowledgment and Acceptance

By signing below, the consortium member acknowledges that they have read, understood, and agree to comply with the Sustained Value Advisors' Code of Conduct. The consortium member further agrees to communicate these standards to their employees, members, contractors, and relevant third parties involved in fulfilling obligations to Sustained Value Advisors.



Consortium Member Name: _____

Authorized Representative: _____

Title: _____

Signature: _____

Date: _____