

GO SALES

Grow others. Grow together.

Code of Conduct and Ethics



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Our Code of Conduct & Ethics

Message from GO SALES' President

At Go Sales, we put people first, that is why our fantastic team is as diverse as our communities, and why we strive to make our work environment rewarding and a great place to be. We strive to interact with our many stakeholders and each other in a way that is authentic, transparent and fair. Our Code of Conduct & Ethics (“**Code**”) ensures that every Go Sales team member is guided by the same values and understands what is expected, regardless of work location or role in our organization.

- Maciej Galazka, President (“**President**”)

Living Our Core Values

Our Core Values unite us as a company and as a community of individuals. They are the foundation of our success, and a reason for our employees to be proud to work for Go Sales.

- **GRATITUDE only** – We are grateful for our opportunities
- **GROWTH oriented** – We seek growth in everything we do
- **SUCCESS formula** – We grow others, and we share success
- **BRAND alignment** – We always do the right thing

We act in a manner that reflects our Company's high ethical standards.

The Heart of the Matter

This Code and our Core Values outline the behaviours that all members of the Go Sales family must exhibit to meet and uphold Go Sales' ethical and conduct standards. This Code is intended to set the tone for how we work together at Go Sales and

to help us recognize ethical and compliance issues before they arise and guide our response should they arise.

This Code Applies to All of Us

This Code applies to all directors, officers and employees (referred to as “**team members**”) of Go Sales Corporation and its subsidiaries (collectively “**Go Sales**”).

Every Go Sales team member is expected to read, understand and comply with this Code. Compliance with this Code is a condition of employment and any violation of this Code or any applicable law will be subject to disciplinary action, up to and including termination of employment.

We reserve the right to revoke or amend any term of this Code. No provisions of this Code will be waived, unless the waiver has been approved in advance by Go Sales' President.

Dealing with Suppliers

We value our contractors, agents and consultants (collectively, “**Suppliers**”) and their contribution to the success of our business. We strive to ensure our business dealings with our Suppliers are ethical and expect our Suppliers to meet or exceed the requirements set forth in the Supplier Code of Conduct <http://www.gosales.co/supplier-code-of-conduct> and to cause their employees and contractors to perform obligations for Go Sales consistent with the standards set out in the Suppliers Code of Conduct.

Resources and Reporting

This Code contains resources for Go Sales team members who have ethical questions or want to report a violation or concern.

Your Obligation

Ethical behaviour is an individual responsibility, and we are all required to act in a manner consistent with high ethical and conduct standards. If you have reason to believe that someone has violated or may violate a law, this Code, or any other Go Sales' policies, you have an obligation to raise issues or concerns with your leader, Human Resources representative, or Go Sales' leadership.

Our Commitment

We take all reports of violations of this Code seriously. This Code protects those who raise a concern or report misconduct in good faith. Whenever you are in doubt, seek advice from your leader.

Seeking Guidance

We encourage you to seek guidance if you have any questions about any issues related to ethics, safety, quality and our work environment. The same resources for reporting compliance issues (under “Your Obligation” above), are available to you for seeking guidance.

Ethics sometimes comes down to good personal judgment.

Is it the Right Thing to Do?

This Code cannot address every possible ethical scenario we might face. Provinces where Go Sales operates have differing laws with which Go Sales must comply, so it is up to Go Sales team members to use good judgement and seek guidance from their leader when they have questions. The questions below may help clarify your situation and ethical action:

- Is it legal? Is it also the “right thing to do”?
- Is it consistent with our Core Values?
- Would it embarrass you or Go Sales?
- Is it in the best interests of Go Sales, your co-workers, customers and other stakeholders?
- How would you feel if it appeared in the media, including social media?

Guiding Principles

1. We are committed to a respectful workplace free from harassment and discrimination.

- We treat each other with respect and act with honesty and integrity. We will not tolerate offensive, dishonest, bullying,

harassing or other unacceptable communication or behavior.

- We embrace an inclusive workforce that represents the diversity of our communities and believe that all employees have the right to pursue their careers at Go Sales free from discrimination based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, political convictions, marital status, family status, language, disability, or any other grounds prohibited by law. For more guidance, see the *Respectful Workplace Policy* <http://www.qosales.co/respectful-workplace> which outlines unacceptable behaviours (including discrimination and harassment) and expectations of all Go Sales team members. It applies to behaviours that have the potential to negatively impact the workplace, adversely affect employee relationships or lead to adverse job-related consequences for the impacted individual(s), and the *Hiring Processes and Guidelines*.
- We compensate employees in compliance with all applicable employment standards. For more information, see the *Compensation Policy*.

We are committed to providing a safe and healthy work environment.

2. Workplace safety is the uncompromised right and responsibility of all employees.

- We are committed to providing a safe and healthy work environment in all of our locations. We operate our facilities in compliance with applicable health and safety laws and regulations.

- We carry out our day-to-day roles and responsibilities with safety as our overriding priority.
- We will not enter the workplace if we are under the influence of alcohol, prescription/over-the-counter drugs that impair safety and performance, or any legal or illegal drugs, including cannabis.

3. We are a good community partner.

- We understand the interconnectedness between our business and the communities where we work and live. Contributing to a healthy economy and environment is a key part of our business philosophy and practice.
- We are responsible stewards of the environment and comply with all applicable environmental laws and regulations in carrying out our business activities.
- We support cultural and charitable organizations and events in the communities in which we operate. All donations must be approved by the President.
- We encourage team members to give back to their local communities by volunteering and participating in charitable activities. Activities that may conflict with day-to-day business responsibilities must be approved by your leader.
- We do not engage in activities or speak publicly on matters where this could be perceived as an official act or representation of Go Sales, unless authorized by the President.

We comply with the law and conduct business activities in a manner that protects and enhances our Company's reputation.

4. We maintain a high level of ethical and lawful conduct in everything we do.

- We consciously apply high standards of courtesy, professionalism, fairness and honesty when dealing with our clients, Suppliers, customers and competitors.
- We conduct our business activities in a manner that protects and enhances Go Sales' reputation. The risk of damage to our reputation is a key consideration in assessing or engaging in any business relationship, transaction or activity.
- We ensure compliance with applicable laws, rules and regulations that relate to our work, including the Charter of the French Language, which sets out certain obligations relating to the use of the French language in Quebec. We will not commit or condone illegal acts or instruct anyone else to do so on behalf of Go Sales.
- We do not use bribes, kickbacks, or any other illegal or unethical practices to obtain a business advantage.
- The giving or receiving of gifts of nominal value and hospitality are generally an acceptable part of doing business. Nominal value generally refers to gifts that are relatively inexpensive, given openly and transparently, do not involve cash or negotiable instruments, and are unlikely to be perceived as unduly influencing the recipient. We and our immediate family members do not accept gifts or entertainment of greater than nominal value from any Go Sales' partner, Supplier and customer unless:
 - the exchange is consistent with accepted local business practices;
 - a clear and legitimate business purpose has been identified for the exchange; and

- prior approval has been obtained from the President.
- We are subject to antitrust and competition laws in many jurisdictions. Generally, these laws prohibit discussions, agreements or understandings between competitors that relate to pricing, customers, products, services, markets or other competitively sensitive matters. If sensitive information is raised by a competitor in your presence, you must terminate the conversation and promptly report the incident to the President. Before participating in any exchange of information with competitors, including any statistical survey, seek advice from the President.
- We immediately inform our leader if we are involved in a legal matter, whether of a civil, criminal or regulatory nature, that has the potential to affect our ability to perform our job or harm the reputation or interests of Go Sales.
- We respect the proprietary rights and assets of Go Sales, its clients and Suppliers, including both tangible properties and intangible assets such as those protected by intellectual property rights. We respect licences and conditions of use that apply to the intellectual property of others.

5. We avoid conflicts of interest.

- A conflict of interest arises when Go Sales' best interests and our personal interests are not aligned e.g. any transactions or agreements by Go Sales in which we receive a benefit or have some other personal interest. Conflicts of interest damage the trust between us, Go Sales and its clients, Suppliers and customers.
- We avoid all interactions, relationships or situations that can potentially give rise to a conflict of interest or the appearance of a conflict of interest.
- We will not have an investment or ownership interest in any Supplier, customer,

competitor or other company that may impair our ability to make objective decisions on behalf of Go Sales.

- We will not: (a) benefit from opportunities that are discovered using Company or its client's property, information or position; (b) use Go Sales or its client's or Supplier's property, information or position for personal gain; or (c) compete with Go Sales. We owe a duty to Go Sales to advance its legitimate business interests when the opportunity to do so arises.
- If a conflict of interest arises, you will disclose it to the President and, where appropriate, the conflicted individuals will recuse themselves and otherwise take appropriate action to remedy the conflict of interest.
- We are committed to Go Sales and dedicate all appropriate efforts to Go Sales, based on the nature of our positions with Go Sales. We avoid assuming additional obligations, such as taking a second job, running a business or serving as an officer or director of another organization, if those obligations would interfere with our ability to fully and effectively perform our duties with Go Sales.

We do not allow outside obligations to interfere with the ability to perform our Company's duties fully and effectively.

6. We protect Company assets and information.

- Unless otherwise published for external use, all corporate records, information, intellectual property, reports, data, plans, processes and methods and information posted on internal websites, are considered Go Sales information. Access should be limited to those team members with a legitimate business reason to know the information.

- We do not disclose Go Sales trade secrets competitive information or other confidential and/or proprietary information to benefit ourselves personally or others or for the purpose of competing with Go Sales. Go Sales information can only be shared with the President’s authorization and the entering into a confidentiality agreement. Go Sales team members departing Go Sales must not copy, download, forward or share Go Sales’ information, whether confidential or not.
- We use discretion when discussing Go Sales business in public places such as restaurants and airplanes, or when using cellular phones and the internet.
- Go Sales collects and uses a substantial amount of personal information about our employees, job applicants, customers, service providers and representatives. We keep this information securely and in confidence, and we use it only for the specific business purposes for which it was collected. It may only be disclosed to those who have a right to the information or when the law requires disclosure.
- **Financial assets** include money and other financial instruments;
- **Tangible or physical assets** include material things that enable us to do our job, like computers, mobile phone, supplies, tools, Go Sales facilities, information and office supplies; or
- **Intangible assets** include non-physical things like ideas, trademarks, patents, time and Go Sales reputation.
- We work together to protect Go Sales intellectual property just as we protect other Go Sales assets and information as noted above. Examples of Go Sales intellectual property include brands and logos (trademarks); software, artwork and marketing material (copyright) and inventions and business innovations (patents).
- Social media includes any digital communication channels that allow individuals to create and share content and post comments. We encourage communication among our team members, clients, Suppliers and customers through social media. However, we must use good judgement and be polite, respectful and mindful of the content created, shared and posted, remembering that the internet is a public place.
- We have a zero-tolerance stance with regards to instances of confirmed fraud. As Go Sales team members, we will not engage directly or indirectly in fraud, including account falsification, abusive sales practices, expense fraud, time fraud, or any other fraudulent practices or reporting.
- We ensure that our records, systems and practices, and financial communications are accurate, complete and conform to International Financial Reporting Standards, as well as applicable laws and regulations. All Go Sales’ books, financial reports, expense accounts, time sheets, administrative records and similar

We use discretion when discussing Company business in public places.

- We will not record conversations or take photographs or videos in the workplace unless we have obtained the prior consent from all parties involved or prior authorization from your leader or other Go Sales leadership team.
- We protect Go Sales assets against loss, theft, damage, vandalism, neglect, unauthorized use and unauthorized disposal. We will not take any Go Sales assets with us after the end of our employment. Assets include, but are not limited to:
 - **Information assets** include data related to our business, like a database of customer names and contact details;

documents are completed accurately, honestly and in accordance with Go Sales' policies and procedures.

Annual Certification of Code

As a term and condition of your employment, you are required to sign the acknowledgement form in Appendix 1 at the start of your employment and annually thereafter confirming that you have read and understand this Code and that you will comply with it.

Consequences of Violations

Non-compliance with this Code and related policies may without limitation to any legal action result in disciplinary action, up to and including termination of employment.

Reporting a Concern

The following is in place to enable us to resolve issues within Go Sales rather than outside it. This Code protects those who raise a concern or report misconduct in good faith.

We provide a confidential whistleblower email address for employees, contractors, vendors and the general public to raise concerns related to potential violations of this Code, any Company policy or the law. Our President has sole access to both the whistleblower email address and may follow up on communications received.

How to Report

If you have reason to believe that someone has violated or may violate a law, this Code, or any other Company policy, you should report that information immediately to any one of the following:

- your leader or Human Resources representative;
- Go Sales leadership team, including the President; or
- by sending an email to whistlerblower@GoSales.co

When to Report

Ideally, you should raise concerns before problems develop. Stepping forward and raising ethical concerns fulfills one of your responsibilities as an employee. It is also the right thing to do.

No Retribution or Retaliation

If you make a report in good faith, you can do so without fear of retribution, retaliation or negative effects on your job. Go Sales will not tolerate retaliation — this is our promise to you. Anyone who retaliates against an individual who has reported a violation or suspected violation of this Code will be subject to disciplinary action up to and including termination.

Confidentiality

Violations or suspected violations of this Code may be submitted on a confidential basis or anonymously. Go Sales will treat all communications in a confidential manner, except to the extent necessary to conduct a complete and fair investigation.

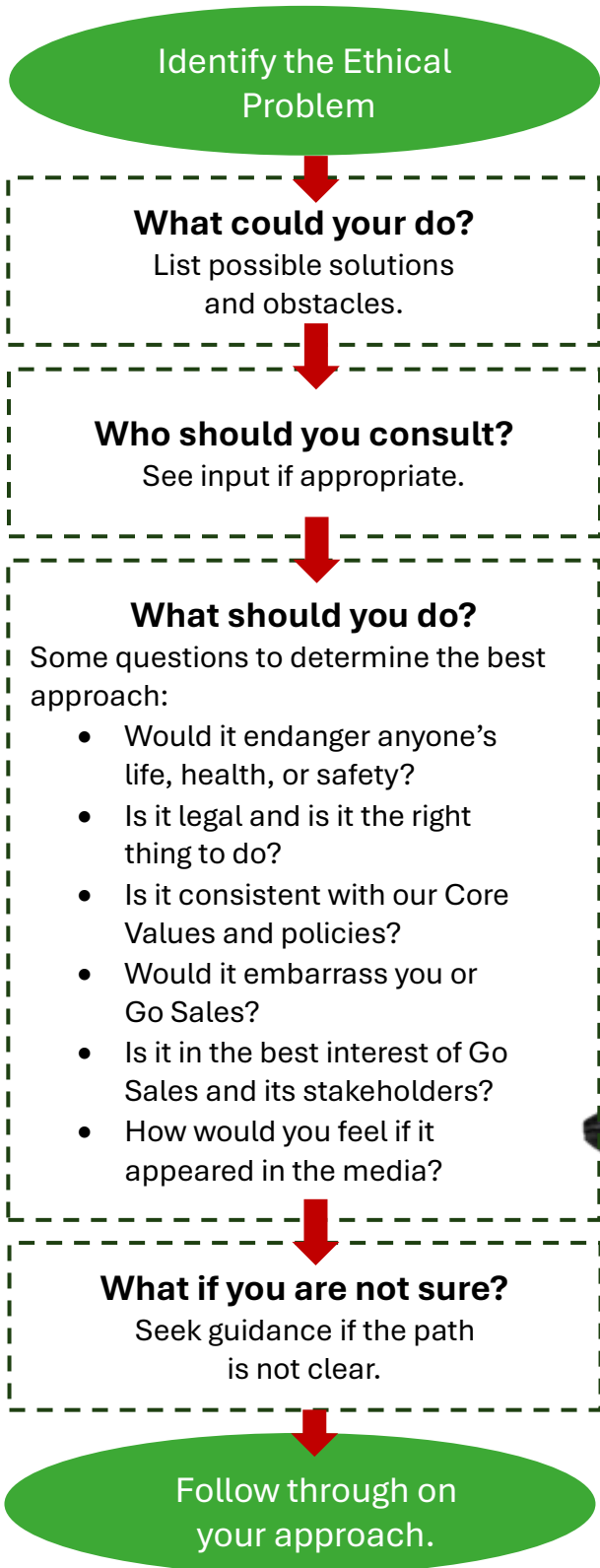
Acting in Good Faith

Anyone filing a report concerning a violation or suspected violation of this Code must act in good faith and have reasonable grounds for believing that the information disclosed indicates a violation. Any allegations which prove to have been made maliciously or knowingly to be false, may result in disciplinary action.

Advice and Counselling

We encourage you to seek guidance if you have any questions or concerns that you may have about any of the topics covered in this Code or any other company policies. The same resources for reporting compliance issues (under “How to Report” above), are available to you for seeking guidance.

Making Decisions



You Are Empowered

You can deliver on our promises, knowing that Go Sales supports you in doing the right thing and conducting business with integrity.

You Have Responsibility

You play a critical role in ensuring that Go Sales offers a great work environment and in protecting our culture, our reputation and our brand.

You Have a Voice

When you believe something isn't right, you can speak up, knowing that we will protect you.

You're Not Alone

We have resources that can help if you are unsure of what to do in a situation, including this Code.

