

Business Code of Conduct

At the Minnesota Advisory Group, ethical business conduct isn't just a part of what we do—it's at the very core of how we operate. Doing the right thing for our employees, customers, stakeholders and communities has helped us earn trust and build partnerships that will drive us forward in our next years, and beyond.

We have a responsibility to conduct ourselves with the highest levels of integrity in everything we do. This helps us sustain the credibility of our brand, maintain our strong reputation, and build on our track record of growth and performance. From the bottom-up, all Minnesota Advisory Group employees and representatives are held to the highest standard—and we cultivate a culture of not just meeting, but exceeding all laws and regulations in the countries where we do business.

The Minnesota Advisory employees are trained in our Code of Business Conduct, which is designed to provide guidance on the company's standards of Integrity and Compliance. Our Code is an integral element of the Minnesota Advisory Group Behaviors. It describes the basic rules of conduct that we are expected to follow. Speaking up is a cornerstone for building an open and accountable workplace culture. At the Minnesota Advisory Group, we believe that creating an environment where employees are comfortable raising issues and concerns without fear of retaliation enables openness which can lead to improved business performance and inspire greater innovation.

Employees will not engage in conduct or activity that may raise questions as to the company's honesty, impartiality, reputation or otherwise cause embarrassment to the company. Employees will demonstrate their commitment to the enduring values, will treat each other with respect and will refrain from any type of harassment, including sexual harassment.

As an employee of the Minnesota Advisory Group, I will ensure that:

- I will not engage in any activity that might create a conflict of interest for me or the company.
- I will not take advantage of my position to seek personal gain through the inappropriate use of Minnesota Advisory group or non-public information or abuse my position.
- I will follow all restrictions on use and disclosure of information. This includes following all requirements for protecting company information and ensuring that non-Minnesota Advisory Group proprietary information is used and disclosed only as authorized by the owner of the information or as otherwise permitted by law. I will observe fair dealing in all of my transactions and interactions.
- I will protect all company, customer and supplier assets and use them only for appropriate company approved activities. Without exception, I will comply with all applicable laws, rules and regulations.
- I will promptly report any illegal or unethical conduct to management or other appropriate company leadership team (i.e., Ethics, Law, Security, EEO).

Equal Employment Opportunity and Affirmative Action

The Minnesota Advisory Group is committed to providing a workplace free of discrimination, harassment and retaliation. The Minnesota Advisory Group is also a federal contractor subject to Executive Order 11246, Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("VEVRAA") and Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503").

As such, The Minnesota Advisory Group is committed to taking affirmative steps to promote the employment and advancement of minorities, women, persons with disabilities, and protected veterans. The Minnesota Advisory Group has developed and implemented Affirmative Action programs to further support its commitment to the principle of equal employment opportunity. The Minnesota Advisory Group provides reasonable accommodation to the known physical or mental limitations of an otherwise qualified employee or applicant for employment, unless the accommodation would impose undue hardship on the operation of the company's business.

The Minnesota Advisory Group expects all of its employees to comply with the principles and spirit of our Equal Employment Opportunity (EEO) and Affirmative Action commitments. To ensure these principles are fully understood and applied with consistency throughout our global enterprise, The Minnesota Advisory Group adopted nondiscrimination policy, which applies to applicants as well as employees, mandates that all terms and conditions of employment (including recruiting, training, hiring, transfers, promotions, terminations, compensation, and benefits in all job titles) be administered without regard to race, color, religion, national origin, gender, sexual orientation, gender identity, age, physical or mental disability, genetic factors, or military/veteran status. Discrimination against or intimidation of any person based on any of these factors is strictly prohibited. Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

- Filing a complaint.
- Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended (Section 503), or its implementing regulations, the Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA), as amended, or its implementing regulations, or any other federal, state, or local law requiring equal opportunity for individuals with disabilities or protected veterans.
- Opposing any act or practice made unlawful by Section 503, VEVRAA, their implementing regulations, or any other federal, state, or local law requiring equal opportunity for individuals with disabilities or protected veterans.
- Exercising any other right protected by Section 503, VEVRAA, or their implementing regulations.

The Minnesota Advisory Group expects all leaders to comply with the company's EEO and Affirmative Action policies. Leaders are required to understand POL-5 and immediately report any discrimination issues that arise. All complaints will be thoroughly investigated and appropriate corrective action—up to and in-

cluding discharge—will be taken where indicated. Retaliation or harassment against any employee (or applicant) involved in the filing, investigation, or resolution of a discrimination complaint will not be tolerated.

The Minnesota Advisory Group 'Corporate Diversity and Inclusion (DI) office has oversight of the development and implementation of the company's EEO and Affirmative Action (AA) programs. DI, which is responsible for ensuring the implementation of affirmative action program activities, continually monitors progress and takes steps to ensure success. The Minnesota Advisory Group AA programs for individuals with disabilities and protected veterans are available for review by any employee or applicant for employment any time. If you have questions about these policies and their implementation, or believe that the company's Equal Employment Opportunity and Affirmative Action policies have been violated, you should immediately contact a manager, site EEO focal, the Regional EEO office, or Human Resources representative.

Pay Transparency Policy Statement

The Minnesota Advisory Group will not discharge or in any other manner discriminate against current employees because they have inquired about, discussed, or disclosed their own pay or the pay of other current employees.

It is prohibited for current employees to disclose current salaries and compensation structure to third parties, unless it is legally-required. It is against the Minnesota Advisory Group, policies to disclose current employees, salaries and compensation structures unless it is related to Child support determinations, to confirm eligibility in a government program, Loans, or a conditional pending job offer from an another employer. The Minnesota Advisory group won't release any information about current employees at it relates to a pre Job offer, as an organization we have a moral obligations to protect our current employees confidential information.

Current employees as a part of their Essential job functions cannot disclose the pay of other employees to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the company, or (c) consistent with the company's legal duty to furnish information.

Maintaining an Environment Free from Workplace and Sexual Harassment

The Minnesota Advisory Group is committed to creating a harassment-free work environment to ensure all Minnesota employees work in an atmosphere free of abuse or intimidation.

The Minnesota Advisory Group has established policies and procedures mandating a work environment free from discrimination and harassment). These policies prohibit harassment including sexual or sex (gender) – based harassment or discrimination based on the race, color, religion, national origin, gender, sexual orientation, gender identity, age, disability, genetic factors or military/veteran status of employees or applicants. Discrimination or harassment based on any of the above factors is prohibited, as is retaliation against a person who has made a complaint or given information regarding possible violations of these policies.

Harassment can include offensive language, graffiti, slurs, jokes, threats or intimidation directed toward members of a particular group. Sexual harassment—which is one type of harassment—can include inappropriate touching, unwelcomed sexual advances, provocative posters and pictures, and e-mail jokes or pictures with gender-based content.

Employees who engage in behavior that violates these policies will be subject to corrective action, up to and including discharge. Every employee is responsible for maintaining a harassment-free work environment. Employees are expected and encouraged to immediately report any possible violations of these policies or complaints of discrimination to a manager, Equal Employment Opportunity focal, Regional EEO office or Human Resources representative. All complaints regarding violations of these policies will be thoroughly investigated, and appropriate corrective action will be taken.

Retaliation for filing a complaint or cooperating with an investigation is strictly prohibited and will not be tolerated. All leaders are required to support our commitment to a harassment-free work environment by preventing and addressing discrimination and harassment. Leaders should understand and communicate policies and procedures, identify potential problems, and implement effective corrective action when indicated. 