SGTM'S CODE OF CONDUCT

THE "WHY" BEHIND THE MISSION OF SGTM - We bring the power of the earth and mother nature to our loyal customers and stakeholders. That's our Why!

This purpose aligns our focus on making "sustainability" with our food our #1 priority each day. Our efforts to be amazing stewards in how we handle our waste to create earth's greatest soil product brings urgency and meaning to the work we do every day. At the same time, it promotes a feeling of peace and "making a difference" to each of our shoppers.

OUR CUSTOMER FOCUS IS OUR #1 PRIORITY EACH DAY - SGTM works hard each day to stay 100% aligned with our CORE VALUES. Our values make us who we are as a company. They are what we believe, what we stand for, and how we show up. If our purpose is the Why that motivates action each day, our CORE VALUES are the How. Recognizing that how we do things is as important as what we do makes all the difference in the minds of our customers and communities. Our Code reflects and reinforces NRG's values, showing us how we can put them into action and lead by example.

<u>We are committed to ethical conduct</u> - As a part of our deep commitment to delivering exceptional customer experiences, it is important that we regularly remind ourselves of the SGTM Code of Conduct, which holds us all to the highest ethical standards.

Our Responsibilities - At SGTM, we all take responsibility for doing the right thing and helping others do the same. In our day-to-day work this means: a. Upholding our values and using them to guide our decisions and actions b. Being familiar with company policies and rules that apply to our jobs c. Prioritizing our own well-being while looking out for colleagues d. Asking questions when we're unsure about the best course of action and expressing concerns, especially when they relate to matters covered in the code e. Cooperating when requested to support a company priorities, f. Recognizing the worth of every person, g. Creating an environment that drives high levels of engagement with our team and customers by speaking honestly, but always being thoughtful about how our words and actions could make others feel, h. Having zero tolerance for bullying, harassment, intimidation, or any other kind of abusive conduct, i. Actively listening to concerns and suggestions, and j. being open to differing points of view, and approaching disagreements respectfully.

<u>Making Good Choices</u> – As we make good choices we will have significant impact. Our customers will benefit from our collective experience and the great service we deliver. The choices we make every day, as individuals and teams, can either increase or decrease the positive impact we have through our work. The best choices are always guided by our

values and based on: a. an appreciation of the facts, b. an awareness of who will be affected by our decision, and c. an understanding of our legal and ethical obligations.