



Workplace Investigations Policy

Introduction

This policy applies equally across all Supreme Group businesses (hereafter, "the Company").

Scope and Purpose

This policy applies to all Company employees and all 3rd party suppliers acting on behalf of the Company.

Policy

The Company takes all reports of misconduct and policy violations seriously and seeks to address any misconduct as early as possible and prevent the recurrence of future situations. The Company will appropriately review or investigate all claims of misconduct or wrongdoing brought to its attention, regardless of the reporting channel, and will take appropriate steps (disciplinary or otherwise) to review or investigate and address policy or procedural violations.

Investigation Process

Once a complaint has been received by the Company, it will be evaluated to determine the appropriate next steps. In general, the matter will be referred to subject matter experts for any additional investigation as needed. The Company will investigate the facts to determine objectively what happened and whether such an occurrence violated Company policy. If an investigation is deemed appropriate, no one will be judged to have engaged in wrongdoing or misconduct until the investigation is complete and they have had a chance to respond to the allegations. All investigators will treat witnesses in a professional manner, with dignity and respect.

Handling Claims of Misconduct or Policy Violations

All claims received from external sources reporting misconduct or Company policy violations, such as claims from or on behalf of former employees, claims by a 4rd party agency, or claims received from a legal practice must be referred to the Managing Director without delay.

Interviews and Cooperation

Employees are expected to fully cooperate with any questions or requests of Company investigators. Failure to cooperate or providing false or misleading information in a Company investigation may result in disciplinary action, up to and including the termination of employment. Generally, employees will not be allowed to bring third party representatives with them to Company investigation interviews and the Company does not consent to the recording of any investigatory interviews.

Document Classification		External	
Document Number	Issue Number	Last Review Date	Next Review Date
SG-0028	SG-HR-0028	Jan-2026	Jan-2027



Company investigators will respect confidentiality at all stages during an investigation. Investigation reports will only be shared with and viewed by those Company senior managers and Directors with a need to know.

Disciplinary Action for Policy Violations

Any employee, regardless of position or title, whom the Company determines has engaged in conduct that violates the Code of Business Conduct or a Company policy may be subject to disciplinary action, up to and including termination of employment at the discretion of the Company.

Policy Review

This policy will be reviewed at least annually and any amendments will be communicated throughout the Company.

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