

TFG Code of Conduct

Effective Date: March 1st, 2021

Conduct

Acceptable Conduct

The company expects all employees to conduct themselves as professionals. They should report to work as scheduled and obtain advance approval for planned absences. They should perform work properly, with care and as instructed. They should follow safe practices and report any impediments to safety for themselves and others. They should develop and maintain harmonious and cooperative working relationships with other staff and clients. They should dress appropriately. They should observe established rules, procedures, and policies. They should report any inappropriate behavior observed in others and offer suggestions for improvements to the work, service, and work environment itself.

Such conduct is essential for the professional and effective performance of work assignments, teamwork, good public and customer relations, quality service and client trust.

Unacceptable Conduct

Some conduct is unacceptable and will not be tolerated. This includes conduct that interferes with business or discredits the company and conduct that is unsafe to clients or other staff. Some examples of unacceptable conduct include, but are not limited to, negligence in the performance of duties, working under the influence of intoxicants or drugs, use of inappropriate language or behavior, insubordination or refusal to follow reasonable work assignments, sexual or racial harassment, illegal discrimination, unauthorized disclosure of corporate secrets or confidential information, taking corporate property without permission, illegal acts, falsification of records and misrepresentation of information, unsafe work practices, engaging in conflicts of interest and excessive absenteeism.

Conduct Guidelines

Communication in the Workplace

All employees must be open for communication with their colleagues, managers, or team members. All employees should be respectful and transparent when communicating. We encourage employees to challenge what they think is wrong, and to accept being challenged by others.

Offering or Accepting Gifts and Gratuities

No employee, regardless of position, will offer or give any gift or "kickback" or other improper payment or consideration for assistance or influence concerning any transaction affecting TFG or its Funds. No employee will ask for or accept any gift or favor or other improper payment or consideration from a customer, supplier, government official or employee or from any other person in consideration for assistance or influence concerning any transaction affecting TFG.

Both the giving and receiving of modest gifts or entertainment as a part of normal business courtesy and hospitality are not prohibited. However, the use of expense accounts to deviate from any policy described herein is strictly forbidden.

Harassment

The Company is committed to providing its employees a work environment that is conducive to productive and rewarding work and free of discrimination. Therefore, the Company strictly prohibits all forms of harassment in the workplace on the basis of an employee's age, sex, religion, race, disability, or national origin. The Company will not tolerate harassing conduct that affects tangible job benefits, that interferes unreasonably with an individual's work performance, or that creates an intimidating, hostile,

or offensive working environment. Moreover, we will not tolerate harassment of the Company employees by anyone, including any supervisor, coworker, vendor, or customer.

Definition: Harassment consists of unwelcome conduct whether verbal, physical, or visual that is based on a person's protected status, such as sex, color, race, ancestry, religion, national origin, age, disability, medical condition, citizenship status, or other protected group status.

Sexual harassment deserves special mention. Unwelcome sexual advances, requests for sexual favors, and other verbal, physical, or visual conduct based on sex constitute sexual harassment when (1) submission to the conduct is an explicit or implicit term or condition of employment, (2) submission to or rejection of the conduct is used as the basis for an employment decision, or (3) the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment may include explicit sexual propositions, sexual innuendo, suggestive comments, gender or sexually oriented "kidding" or "teasing," "practical jokes," disparaging remarks or jokes about gender specific traits, foul or vulgar language or gestures, display of foul or vulgar material, and physical contact such as patting, pinching, or brushing up against another's body.

Complaint Procedure: Any person who believes he or she has been subjected to harassment or has witnessed another employee being harassed is encouraged to report the incident to any member of management. The Company forbids retaliation against anyone who in good faith makes a report of harassment or cooperates in an investigation of harassment.

The Company's policy is to investigate all such complaints promptly and thoroughly. The Company will attempt to keep such reports confidential and will disclose reported information only on a need to know basis and to the extent necessary to investigate and resolve the matter.

Discipline: Any employee who is found to have harassed another employee will be subject to disciplinary action, up to and including termination.

Drugs and Alcohol

It is banned to work under the influence of alcohol, intoxicants, drugs, or chemicals which interfere with safety or adversely affect the ability to perform duties assigned. TFG reserves the right to require a new hire or current employee to submit to a drug or alcohol test as a condition of employment subject to the requirements of applicable law. Refusal to submit to such a test will subject an employee to termination of employment.

Electronic Communications, Devices, and Information

The Forestland Group provides computer devices, networks, and other electronic information systems to meet missions, goals, and initiatives and must manage them responsibly to maintain the confidentiality, integrity, and availability of its information assets. All information contained in any of the company electronic communications systems is the property of the Company and cannot be considered personal or private.

For security, compliance, and maintenance purposes, authorized personnel may monitor and audit equipment, systems, and network traffic per this policy. Devices that interfere with other devices or users on The Forestland Group network may be disconnected. Firewalls and other blocking technologies must permit access for the IT department.

The Electronic Communications, Devices, and Information policy applies to information assets owned or leased by The Forestland Group, or to devices that connect to a Forestland Group network or reside at The Forestland Group.



Social Media

At TFG we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends, and co-workers. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media.

Problem Resolution

TFG depends on good working relationships and professionalism to succeed. The company wants to confront and resolve any barriers to success at the earliest possible time.

Employees are encouraged to raise questions and concerns with their supervisor regarding business matters, however insignificant they may seem. This will enable both to determine the impacts on achieving work objectives and begin to work together on mutually beneficial and satisfactory solutions.

Employee communication involving a problem should begin with the immediate supervisor. If the employee and supervisor cannot reach agreement on a remedy acceptable to both, the two are encouraged to jointly bring the matter to the attention of senior management for resolution.

Compliance and Reporting

TFG employees have the obligation to inform the President of TFG of any conduct that violates the law or any TFG policy, including this Code.

TFG proactively promotes ethical behavior by its employees. Toward that end, each person subject to this Code is encouraged to discuss any questions of interpretation or application of this Code to a particular circumstance with the President of TFG.

Disciplinary Action

Unacceptable conduct subjects the employee to disciplinary action, including discharge, as appropriate.

Questions

Employees should contact their Human Resources (HR) lead and/or supervisors if they have any questions.