



Standards of Conduct

Siebel Institute of Technology

The following Standards of Conduct is applicable to Siebel Institute of Technology (the "Institute") employees, instructors, consultants, and students ("Covered Persons"). Questions or clarifications should be directed to the Director of Education via phone at 1-312-255-0705x4104, or in person or via email to jhannafan@siebelinstitute.com

All Covered Persons must submit the last page of these Standards of Conduct, signed, before beginning their employment, work, or studies on the day one.

General Responsibility: *Where violations of these Standards of Conduct or other disciplinary violations occur, any Covered Persons found to be knowingly in the presence of, or directly responsible for, such violation will be subject to disciplinary actions up to and including removal from the Institute premises with the inability to return to their designated work, program and/or activity or termination of employment or contract, as the case may be.*

Alcohol

As a school and facility that focuses on the production, serving, and responsible consumption and enjoyment of alcoholic beverages, Siebel Institute allows for the consumption of alcohol on its premises under the following conditions:

- Any Covered Persons consuming alcohol must be of minimum drinking age (21 years old).
- Alcohol consumption may be part of a school-sanctioned tasting session or event, but students or attendees are not *required* to consume alcohol as part of their successful participation in classes or events.
- Students, staff, faculty, and those attending events within the Institute are permitted to consume alcoholic beverages during lunch and after class but are asked to drink responsibly and not to intoxication. Those judged by staff and/or management of the Institute to be abusing this privilege will be denied further alcoholic beverages and will lose their privilege to partake in consuming or tasting alcoholic beverages while at Siebel.
- Students, faculty, and staff may bring alcoholic beverages into the Institute for the purposes of personal consumption and sharing with others. However, Institute representatives retain the right to prohibit alcohol consumption among students and faculty for any reason.
- Disorderly conduct due to alcohol consumption will result in the immediate physical removal of the Covered Persons from Institute premises and may be cause for expulsion from a course or program. Students found to be disorderly may be allowed to return to class but may be restricted from consuming alcohol from that point forward at the discretion of Institute staff or management.
- Disorderly conduct by an instructor or staff member is cause for termination of employment or contract. Open containers of alcohol may not be removed from the Institute premises, such as into the lobby or outside of the building.

Assault and Battery

Actions or behavior, including threats, which endanger the safety and/or well-being of others, or which cause injury to another person on Institute property are prohibited. This prohibition is intended to cover assaults on Institute property or fighting among Covered Persons. This prohibition includes any harassment and/or intimidation based on race, gender, ethnicity, religion, color, national origin, sexual orientation, age, or disability. This also includes hazing, intimidation, or harassment (including phone harassment).



Breach of Security/Safety

Covered Persons are prohibited from entering or providing entry into restricted rooms, offices, and other areas of the Institute building during and after normal closing hours. Such areas are designated by posted signs, locked doors, and/or gates.

Covered Persons are not allowed to possess or use restricted keys without the permission of the appropriate Institute staff member.

Disorderly Conduct

Lewd, obscene, or disorderly conduct on Institute property or at Institute-sponsored functions is prohibited.

Failure to Comply

Failure to comply with the instructions of any authorized Institute representative acting lawfully in the performance of their duty by any Covered Persons is considered noncompliance and is prohibited and may result in disciplinary actions.

Fire Alarms

Tampering with or misusing fire alarms or fire equipment is an offense that jeopardizes the safety of other Covered Persons and Institute guests at the Institute premises or at Institute sponsored functions is strictly prohibited.

Firearms, Explosives, and Other Weapons

Possession of a firearm, explosive, or other weapons at Institute premises or at Institute -sponsored functions will result in disciplinary actions, which may include, but is not limited to suspension or expulsion from the Institute or termination of employment or contract. Furthermore, any item or object used to threaten or inflict bodily harm on another individual will be considered, at the time of its use, to be a weapon.

Siebel Institute Guests

The Institute is closed to non-Covered Persons unless first receiving approval from the Institute authorized staff one day (24 hours) in advance. No Covered Persons may allow non-approved guests into the Bier Stube to consume beer, and if a person has been invited by a Covered Person but has not been approved to do so, the Covered Person will face disciplinary action. It is the responsibility of the Covered Persons to see that their approved guest(s) follows all rules of the Institute. All guests, whether visiting to the school or taking part in an event, must sign-in and be given and wear a guest pass clearly on their person while on Institute property. Guest passes are issued by Cady Sanchez, via phone 312-255-0705 x 4101, or in person, or via email at cadysanchez@siebelinstitute.com and must be returned before leaving the premises.

Identification

Every Covered Person must visibly wear (not under any clothing) the guest pass card. Failure to wear a guest pass is a violation of Institute policy. Upon request, Covered Persons must show their ID card to authorized Institute personnel (faculty, administrative staff, etc.) and comply with the directives of such Institute officials.

Illegal Drugs

Covered Persons are prohibited from the possession, sale, or consumption of any form of narcotics, hallucinogens, amphetamines, controlled substances, or any other form of illegal drug on Institute premises or at Institute-sponsored functions.

Sales and Solicitations

The sale or promotion of commercial products by Covered Persons are restricted to promotional (non-sales) gatherings and must be approved by Institute leadership. All other promotion or sale of products, without approval of Institute leadership is prohibited. Outside vendors are not permitted on the Institute property without prior approval of Institute leadership.

Sexual Harassment

Sexual harassment is prohibited. Sexual harassment is conduct based on sex, whether directed toward a person of the



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opposite or same sex and may include (but is not limited to) kidding or teasing, practical jokes, jokes about obscene printed or visual material, and physical contact such as patting, pinching, grabbing, or brushing against another person's body. This prohibition is not limited to Institute behavior but the entire time a Covered Person is considered as conducting an Institute-sponsored function.

Theft/Vandalism

Theft of or vandalism to property of the Institute or the property of a member of the Institute is a violation of civil law and prohibited by the Institute. The Institute is not responsible for replacing items lost or stolen from Covered Persons' closet space, classroom area, or other public or private areas. Losses should be reported to the Institute's administrative staff.

Disciplinary Actions

Disciplinary action may include verbal or written warning or letter of reprimand that a Covered Person has violated provisions of these Standards of Conduct or other Institute applicable policies, rules, and procedures. Repeated violations or behavioral problems will subject the Covered Person to further disciplinary action. A Covered Person accused of violating these Standards will be given an opportunity to present their version of the events at issue prior to any determination of appropriate disciplinary actions.

Disciplinary Probation

The Institute may implement a disciplinary status which does not interfere with the Covered Person's right to work, enroll in and/or attend classes, but which includes some disciplinary/educational sanctions and restrictions of privileges (i.e.: loss of drinking privileges in the Bier Stube or restricting from attending a field trip for example) for a specified period as determined in each situation. The Institute reserves its right to take any needed action upon policy violations conducted by Covered Persons, up to expulsion from the Institute premises and educational studies, or termination of employment or contract.

Diversity, Equality, and Inclusivity

At the Institute, each of us contributes to inclusion — we all have a role to play (instructors, employees, students, alumni). This means being inclusive, open-minded and being responsible for each other. The collective sum of the individual differences, life experiences, knowledge, innovation, self-expression, and talent of Siebel Institute's team and students represents not only part of our culture, but our reputation and best achievements as well.

We are an Equal Opportunity Employer and School and do not discriminate against any applicant or student for instruction or education because of education, opinions (personal, cultural or political), culture or cultural experiences, ethnicity, race, sex, gender identity and expression, nation of origin, age, of languages spoken, veterans' status, color, religion, disability, sexual orientation, and beliefs (cultural, political, or personal).

We do not just accept different; we thrive on it for the benefit of our community. We are committed to a focus on equitable hiring, training, promotional practices, and fair policies.

Other Criminal Conduct

Commission of an act that would constitute a crime under federal, state, or local law by a Covered Person will be reported by the Institute to the competent jurisdiction.

Building an Ethical Workplace Together

ETHICS HOTLINE POLICY

Scope

This whistleblowing policy (the "Policy") applies to all Siebel Institute instructors, employees, consultants and students worldwide, including part time, web-based, temporary and contract employees (collectively "Covered Persons").



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Purpose

Siebel Institute (the "Institute") is committed to the highest possible standards of ethical, moral, and legal business conduct. In conjunction with this commitment and Institute's commitment to open communication, this Policy aims to provide an avenue for Covered Persons to raise concerns, report any known or suspected violation of the laws, rules, regulations, or policies that apply to the Institute, and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith. Reporting can be done at any time through the hotline for any concerns during class time, events or down time. However, if a Covered Person feels that their anonymity is not required then they should contact the Institute Director of Ethics, Sylvie VanZandycke via phone at +1 702 202 7233, in person, or via email to svanzandycke@lallemand.com

Policy

The Policy is intended to cover the reporting and follow-up of serious concerns that could have a large impact on Institute, such as, without limitation, actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not in line with Institute policies, including the Standards of Conduct; or
- Otherwise amount to serious improper conduct.

"Reporter" shall mean any Covered Persons reporting any such concern in compliance with the terms of this Policy. Regular matters that do not require anonymity should be directed to the Institute Director of Ethics and are not addressed by this Policy.

SAFEGUARDS

Harassment or Victimization

Harassment or victimization of Reporters submitting hotline reports will not be tolerated.

Confidentiality

Every effort will be made to protect the Reporter's identity by the Institute hotline vendor. Please note that the information provided in a hotline report may be the basis of an internal and/or external investigation by the Institute into the issue being reported. It is possible that because of the information provided in a report the Reporter's identity may become known to the Institute hotline vendor during the course of our investigation.

Anonymous Allegations

The Policy allows Reporters and Covered Persons to remain anonymous at their option. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised.
- The credibility
- of the concern; and
- The likelihood of confirming the allegation from other sources.

Malicious Allegations

Malicious allegations may result in disciplinary action.

PROCEDURE

Reporting

The whistleblowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct, should be reported in any of the following ways to the Institute's anonymous reporting hotline, (the "Hotline"):

- Website: <https://www.lighthouse-services.com/siebel>
- English speaking USA and Canada: **833-205-7849**
- Spanish speaking USA and Canada: **800-216-1288**
- Spanish-speaking Mexico: **01-800-681-5340**



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- French-speaking Canada: **855-725-0002**
- E-mail: reports@lighthouse-services.com (must include company name with report)
- Fax: **215-689-3885** (must include company name with report)

Reporters to the Hotline will have the ability to remain anonymous if they choose. Please note that the information provided by a Reporter may be the basis of an internal and/or external investigation into the issue the Reporter is reporting, and its anonymity will be protected to the extent possible by law. However, a Reporter's identity may become known during the investigation because of the information that it has provided. Reports are submitted by the Hotline to Institute or its designee and may or may not be investigated at the sole discretion of the Institute.

A suggestion box is also available at all time:

<https://www.lighthouse-services.com/StandardCustomURL/LHSuggestionBox.asp>

Timing

The earlier a concern is expressed, the easier it is to act.

Evidence

Although Reporters are not expected to prove the truth of an allegation, the Reporter submitting a report needs to demonstrate in their Hotline report that there are sufficient grounds for concern.

HOW THE REPORT WILL BE HANDLED

The action taken following the report will depend on the nature of the concern. The Director of Ethics of the Institute and the General Manager of Lallemand Brewing receives a copy of each report and follow-up reports on actions taken by the company.

Initial Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

Feedback to Reporter

Whether reported directly to the Institute personnel or through the Hotline, the Reporter will be given the opportunity to receive follow-up on their concern:

- * Acknowledging that the concern was received.
- * Indicating how the matter will be dealt with;
- * Giving an estimate of the time that it will take for a final response.
- * Telling them whether initial inquiries have been made.
- * Telling them whether further investigations will follow, and if not, why not.

Further Information

The amount of contact between a Reporter and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the Reporter remains accessible for follow-up. Further information may be sought from the reporter.

Outcome of an Investigation

At the discretion of the Institute and subject to legal and other constraints, the Reporter may be entitled to receive information about the outcome of an investigation.

Siebel Institute reserves the right to modify or amend this Policy at any time as it may deem necessary.