

Code of Ethics

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Axel Johnson International is a privately owned Swedish industrial group of more than 100 companies in 25 countries, with combined annual sales of EUR 790 million. We drive business development and growth through a long-term approach to ownership in strategic niche markets, primarily technical components and solutions for industrial processes. Axel Johnson International is organised in four business groups: Fluid Handling Solutions, Industrial Solutions, Lifting Solutions and Transport Solutions.
www.axinter.com

Preface



Dear colleagues

I am proud of Axel Johnson International, a group of companies founded on entrepreneurship and respect for the people at the heart of our operations. Being part of our group requires us to ensure that we continue to be a trustworthy and ethical company. That means acting lawfully and with the highest level of integrity in everything we do.

The Code of Ethics is your guide to understanding what is expected of you. The code provides clear instructions for behaving in accordance with our ethical standards and for where to turn when in doubt. In addition, it is meant to give you the confidence to speak up when you witness or learn about any activity that could contradict our values.

The world is constantly evolving and so is our group, but the requirement for ethical behavior and professionalism in everything we do will never change. We all have the responsibility to uphold and comply with this Code of Ethics and the spirit of integrity and ethical values.

Kind regards

A handwritten signature in black ink, which appears to read "Martin Malmvik".

Martin Malmvik
CEO
Axel Johnson International

Code of Ethics



The basics

- What is it?** This is a centralized document clarifying the areas of business ethics that are important to all of us, both as individuals and as being a part of Axel Johnson International. This compliance documentation should serve as a guideline of how we should act in our everyday work.
- For who?** It applies to all employees, including contracted employees and members of the Board, in all companies controlled by Axel Johnson International.
- How?** It has been conceived and will be applied centrally. It will be managed by each company and its appointed Managing Directors to ensure awareness and close communication routes.



Questions?

If you have any questions concerning the content or the use of this Code of Ethics, please contact your immediate Manager, HR representative or your Managing Director in the first instance. Reporting procedures are established to encourage speaking up about observations in your workplace – read more on page 18 about this.

This Code of Ethics is a guideline for ethically sound behavior for all employees – both socially and environmentally. It is an extension of our core values, a simple map to what the company expects from you in various contexts of your everyday work.

To us, striving towards sustainable business progress means not only minimizing the environmental impact of our Groups' businesses, but also to exercising our influence as a major player in the global community to achieve social and environmental benefits. We want you to lead by example – and by doing the right thing you influence people around you to do the same.

When in doubt, a simple sanity check might do the trick!

If you are ever in doubt about a course of conduct, ask yourself the following:

- Is it consistent with the Code of Ethics?
- Is it ethical?
- Is it legal?
- Will it reflect well on me and the company?
- Would I want to read about it in the newspaper?

Your commitment

As an employee with Axel Johnson International, you are asked to sign a compliance declaration to verify that you have understood and are willing to use these behavioral guidelines as part of your daily work. Put simply; when you work for Axel Johnson International you agree to respect these ethical standards and follow applicable laws. Employees who fail to do so, put both themselves and our Group at risk. They can also be subject to disciplinary actions.

If the answer is “No” to any of these questions, don't do it.

If you are still uncertain, ask for guidance. The Code of Ethics tries to capture many of the situations that employees will encounter, but it can't cover everything. Seek further advice from your immediate Manager who should be able to help you establish the accurate course of action.

Our core values

Our core values set us apart and make us unique. They are an important part of our identity and should differentiate us from the competition.

You are probably already familiar with our core values. Nevertheless it's important to help new employees to the same knowledge as well as reminding ourselves from time to time.



This Code of Ethics policy documentation is based on international legislation, UN Global Compact Ten Principles and a large portion of common sense. Find out more on UN Global Compact's mission and content on <https://www.unglobalcompact.org/what-is-gc/mission/principles>

Your rights & responsibilities



Good to work with

We see the diversity within our Group as a strength. We focus on a few common behavioral guidelines that apply to us all, regardless which company we work in. View these basic principles as a common ground for a positive work environment. This makes us good to work with.

Acting in accordance with laws and regulations

As a general rule and under all circumstances, all employees must observe international and local regulations, as well as relevant ethical and professional codes of practice.

Professionalism

Always act professionally and treat others with respect. Simply put; treat others the way **you** want to be treated.

Honesty

We promote honesty in all situations. It's better for us all.

Responsibility

Take responsibility for your actions and the **quality of your work**, and expect the same from your fellow colleagues. Make sure you know what is expected of you and then follow through. As a Manager, you have an additional responsibility to empower and guide your team towards making the right decisions.

Respect

We see diversity as a strength. Treat people with dignity, respect and compassion. We have a strict **zero tolerance** of harassment, intimidation or discrimination of any form at the work place.

Creating diversity & equality

Being an equal opportunities employer is a key ambition. It creates more openness and has a proven positive effect not only on areas such as health and morale, but also on productivity and innovative climate.

Furthermore, Axel Johnson International has adopted the following policy to emphasize and encourage equality in practice

- Equal pay for equal work
- Competence development and opportunities given based on performance and potential
- When recruiting, all applicants are to be assessed on their competence, including not only formal merits but practical experience and interpersonal/leadership skills
- Actively work for ethnic diversity and gender balance
- Strive to increase the Group's diversity in leading positions – both with regard to female representation and competence with various ethnical background

- Provide working conditions that make it possible to combine parenthood with working life.



An Equal Opportunities Act applies to all countries and includes specific paragraphs on employment rights with the aim to promote equality in working life. The main principle to always remember is that it is strictly forbidden to discriminate against a person's religion, political conviction, age, color, gender, sexual orientation, background, ethnic origin or other personal characteristics such as function disability. Any employee experiencing harassment should report it immediately to her/his immediate Manager, HR representative or Managing Director, Axel Johnson International Manager or use our whistleblower service.



General guidelines

Recruitment, salaries and expenses

In recruitment and dismissal situations as well as when deciding remuneration, the “Grandparent principle” should be followed, meaning that the decision must be approved by the closest superior and documented.

Travel and Entertainment

The most cost-efficient and sustainable alternative is to be used when traveling. Choosing environmentally sustainable options, such as traveling by train rather than by air or car is encouraged.

Entertainment activities call for good judgment and are only justified when clearly relevant to business objectives. Internal and external entertainment activities shall be chosen wisely in order not to put any participant in an uncomfortable situation and/or cause involuntary exclusion.

Entertainment and treatment going beyond appropriate boundaries shall naturally be discouraged and rejected.

The most senior Manager shall always be the person paying for both internal and external representation.

Payment may not be delegated to subordinate staff.

Last but not least, no one may attest his/her own expenses.

Violating these policies can be grounds for disciplinary actions including termination.

Drugs and alcohol

Axel Johnson International has a zero tolerance for working under the influence of alcohol, illegal drugs and comparable substances.

We acknowledge that there are some circumstances where during a meal or while entertaining clients, the consumption of an alcoholic beverage is appropriate. Bear in mind however that representation should be kept at a moderate level and that you as a Manager have an extended responsibility to practice sound judgment in such situations.

We strive to offer support and rehabilitation to co-workers who experience problems with drugs, alcohol or unmoral behavior. If you or a colleague needs help – don't hesitate to contact your Manager or HR representative.

As a Manager or Team leader you are a spokesperson and therefore need to be extra attentive to your colleagues and lead by example. As such, you should:

- Ensure that you and your colleagues understand your responsibilities under the Code of Ethics and other company policies
- Foster a positive work environment based on our core values [page 7]
- Take the lead in discussing the Code of Ethics with your colleagues and reinforce the importance of ethics and compliance during evaluations or other more public forums

- Create an environment where colleagues feel comfortable raising concerns without fear of retaliation
- Never encourage or direct colleagues to achieve business results at the expense of ethical conduct or compliance with the Code of ethics or the law
- Take responsibility. Always act to stop violations of this Code of Ethics or the law

As a Manager or in any other position involving leading others, you should also be aware of existing policies and where to go for further information.



Respond to questions and concerns If approached with a question or concern, listen carefully and give your complete attention. If a colleague raises a concern that may require investigation under the Code of Ethics, contact your Managing Director, HR representative or ultimately Axel Johnson International Manager for further guidance.

Communication

Professional and appropriate language is a basic requirement when it comes to business communication. Be objective, stick to facts and use a professional vocabulary.

If you are contacted by the media or any other external party asking for information, refer them directly to the Managing Director or the person responsible for Corporate Communication.

Social media usage

Social media has blurred the lines between people's personal and professional lives. Use social media carefully and avoid posting anything that can have negative effect on work relations or business interests. Never give the impression that you are speaking on behalf of the company in any personal communication or social media, including user forums, blogs and chat rooms.

Content posted about Axel Johnson International products and services using social media is to be viewed as marketing or advertising and must be approved following agreed routines.



Rule of thumb

Always start with the assumption that anything you state or post can be read or seen by anyone, anywhere, at any time.

Confidential and Proprietary information

All of us get access to confidential information regarding our business in our daily work from time to time. Do not disclose information that could have a harmful effect on the business or negative implications for a co-worker. For example information about strategies, research, product development, business partners and financial results should be treated confidentially.

Information about staff members and salaries may also be sensitive.

For example information about strategies, research, product development, business partners and financial results should be treated confidentially. Information about staff members and salaries may also be sensitive and should therefore be treated carefully.

Lets take an example

You are on a business trip with colleagues, a potential/existing client or after hours with a supplier representative. The work day is finished and you have decided to have an off-duty drink together. A funny event occurs in the bar and you take some pictures and post them on your Instagram flow.

Bear in mind that confidentiality policies are still valid after an employment with the Group has ended.

Managers and others are always expected to treat potentially sensitive information confidentially.

The only exemptions to these general confidentiality guidelines are:

- If you, in a separate case, have been given explicit permission to disclose the information; or
- the information is already generally known within the public domain; or
- a disclosure of the information is required to perform your duties or is otherwise prescribed under mandatory law.

Unacceptable e-mail & communications behavior

A few examples of strictly prohibited activities, with no exceptions:

- Sending unsolicited e-mail messages to respondents not having requested such material; often referred to as e-spam. Aimed advertising material with a relationship to the recipients is considered ok.
- Any form of harassment via e-mail, telephone or texting.
- Use of another colleague's e-mail account for any reason unless compensating control is in place and it is specifically authorized by management.
- Creating, storing, transmitting, or viewing illegal, offensive or inappropriate material, including pornography.

Monitoring

Axel Johnson International retains the right to monitor use of its systems and equipment used for online social media postings, Internet usage, e-mail use, and other forms of online social media, and may take disciplinary action where violations occur.

Conclusion: as the audience seldom can grasp the full context of a sudden situation, you risk conveying a potential source for favouring that party in a future evaluation process. Regardless if it has any basis in reality or not, the possibility that your judgment could be influenced could result in an adverse rumour or even a legal investigation.

Business Ethics & Policies



Bribery & corruption

Axel Johnson International has a zero tolerance policy regarding any kind of corruption, bribery and extortion. Bribery occurs when there is a risk that the recipient of the incentive exhibits favouritism for the donor in any way (even if this was not intended). Always remember that bribery is a criminal offence, both in terms of offering a bribe or incentive AND receiving a bribe or incentive. Both sides are equally guilty of wrongful

behavior and by doing so, exposing his or hers company to risk. Strictly speaking, a bribe can comprise of anything that may be viewed as an incentive for the recipient or their relatives and close colleagues, such as objects, trips, meals, money, various services and individual loans. There are, of

course, legitimate incentives within the framework for what can be named “normal business fraternization”. This may take the form of occasional meals for official purposes within respectable limits, modest birthday gifts, etc. Read more on how to determine what is considered legitimate and what is not further down this chapter.

World corruption – an important Index

Do you know the most corrupt countries worldwide, according to Corruption Perception index?

Find out on www.transparency.org/research/cpi/overview

A few typical examples of transactions and how they are interpreted:

Facilitating payments

- Paying government taxes, fees and other legally required charges is not be considered a facilitating payment
- Making small payments to government officials to expedite or secure a nondiscretionary, routine government action

Bribes

- A supplier or client offering a small gift of low monetary value is not seen as a bribe, as long as it is infrequent and nothing is expected in return
- A client providing cash or other consideration to a company employee to get the employee to fulfill the customer's order ahead of other customers

Kickbacks

- Providing a discount on product price based on increased order volume or other product specs is not considered a kickback
- Paying an employee a percentage of the supplier's sales to the company in return for the employee's assistance in steering business to the supplier

Green symbol indicates acceptable behavior, red symbol indicates unacceptable behavior.

Conflict of interest

A conflict of interest occurs when external circumstances or personal interests interfere, or appear to interfere with an employee's ability to objectively perform his or her job. As a general rule, you are always required to act in the best interest of Axel Johnson International when in a position to be influenced by personal gain, a third party or both.

Conflicts of interest may not always be clear-cut. Below are a few examples of potential situations that are not considered acceptable anywhere throughout Axel Johnson International.

- Having a significant interest in, or working for, a supplier or a competitor's business
- Serving as a board member or consultant on behalf of a competitor or supplier
- Hiring, managing, retaining services or purchasing products from a company managed by a family member, relative or close friend
- Conducting personal business on company time or using company facilities and equipment to conduct other business related matters not linked to your employment with Axel Johnson International
- Using funds of Axel Johnson International or its name, assets or property for political purposes or endorsement. Active political participation is the personal choice of each employee and should be conducted on your own time in your role as a private citizen and not on behalf of the company
- Receiving gifts or entertainment not reasonable and customary in nature

Gifts & hospitality

Offering or accepting any kind of personal advantage from/to a supplier or business partner in connection with Axel Johnson International business is a violation of our Code of Ethics. This includes all business dealings.

There are however certain situations that can motivate a small gesture. Do bear in mind that the perception your gift creates with the receiving party is the relevant measurement in this context. Also make sure you and your fellow workers

- never accept or give courtesies that involves cash or cash equivalents, as it is generally viewed as a bribe
- never accept or offer courtesies involving others than persons with a professional interest in the relationship (i.e. no spouses or relatives)

To avoid having gifts, hospitality and entertainment that could potentially influence decisions, the maximum amount for gifts, hospitality and entertainment must be defined by management in accordance with local regulations.

So, for example, what should I think about?

Guidelines for accepting gifts/incentives

You may accept gifts, hospitality and expenses provided they will not motivate favouritism, swing a purchasing decision and/or create any type of obligation. A few guidelines on acceptance of gifts or incentives:

- Gifts and other incentives must not be accepted if this in any way could impact the business relationship between Axel Johnson International and the giving company
- Occasional meals, birthday gifts and the like offered by established business contacts can be accepted on condition that the incentive has a limited value and does not fall under the point above. Inform your nearest superior
- Instead of gifts, Axel Johnson International encourages its business partners to make contributions to charity
- Trips and overnight stays should always occur at the expense of your company
- Samples offered by suppliers with the purpose to allow sales people, Managers, purchasers, etc., the opportunity to test the product can be accepted. Samples are the property of the employer

Guidelines for offering gifts & sponsorships

Axel Johnson International must display restraint and good judgement regarding entertainment hospitality for our customers and other business contacts. A few guidelines:

- You can give an item of smaller value; where small is defined as small in terms of monetary value and this is a known custom of the receiving party
- Sponsoring may be considered when there is an obvious business advantage. All sponsorships need clear targets and partners shall be selected carefully and represent company values
- All sponsoring and charity activities are to be approved by the Managing Director of your company
- All financial transactions must be fairly recorded in the accounts
- Inter-company gifts should be avoided
- Offering or receiving gifts or similar in situations connected to supplier evaluations and purchasing decision making or negotiations is strictly prohibited
- Gift certificates for a donation to a charity organisation are encouraged as an option to gifts

Promoting fair play

Axel Johnson International is committed to promoting fair competition and complying with competition laws. We believe that fair competition is the foundation for any progressive and innovative business and that it will benefit us as a Group. This requires your integrity by:

- Maintaining a basic familiarity with the principles and purposes of regulating laws as they apply to Axel Johnson International's business
- Refraining from any activities that might violate or give appearance of intention to violate such laws
- Seeking guidance from legal counsel in any circumstances

where doubt exists as to the appropriateness of proposed activities. Remember that failure to comply with the competition rules can imply an extreme financial cost for Axel Johnson International and your company.



If you receive any proposals that may be prohibited, always make sure to reply and to clarify that Axel Johnson International will not participate in any anti-competitive actions. Also make sure to keep a copy of your response as evidence.

Pricing

- Offering customers discounts related to the volume of their individual orders
- Suggesting that you and a competitor increase leverage with a supplier of non-essential items by purchasing jointly
- Contacting a competitor to ask whether, if you were to raise your prices, he would do the same

Trade associations

- Attending trade association meetings generally
- Providing to a trade association any business data if it is not thought to be commercially sensitive
- Discussing at a trade association meeting product prices, terms of sale, product or marketing plans, or business relations with suppliers or customers or any other information that is commercially sensitive

Information collection

- Participating in activities approved by Axel Johnson International in which sales volumes are supplied to an independent third party which aggregates the figures and distributes the aggregated industry-wide sales figures to participants
- Exchanging information on current or future sales, prices, discounts, customers, terms of business, marketing plans, directly with a competitor. Contacting a competitor to ask whether, if you were to raise your prices, he would do the same.

Dealing with competitors

- Discussion of legitimate industry concerns in trade associations (e.g. proposed legislation)
- Entering into an agreement with a competitor concerning joint marketing, joint purchasing of raw materials, joint manufacturing or joint research and development, or any other form of joint venture or strategic alliance
- Dividing up different projects between you and a competitor, for example by agreeing to bid for different contracts

Technological co-operation

- Undertaking joint R&D, where all parties participating are free to exploit the results
- Discussing the possibility of carrying out joint R&D with a competitor (including the possibility of jointly manufacturing and distributing the results)
- Agreeing with a competitor not to introduce or delay new technology or products which you are each developing independently or agreeing the exact introduction time of new technology or products

Environment & safety



Environmental Responsibilities

At Axel Johnson International we have an ambition to lead the way towards sustainable business. For us it means minimizing the negative impact of our operations and businesses across the globe, and to contribute to sustainable commerce and societies where we are active.

To be successful in our efforts it is necessary to work systematically with all areas of sustainability, covering both social and environmental aspects. Our commitment to make a difference requires long-term ambitious targets and a structured process with milestones and continuous improvements.

Resource efficiency

Efficient use of all resources is essential for responsible businesses. Hence we need to analyse resource flows and identify possible improvements in daily routines as well as systems and infrastructure. Pay extra attention to use of energy, materials, transportation, water and waste.



A friendly reminder

Evaluate each business decision from an environmental and social impact perspective.

Examples of how you can make a difference:

- Minimise use of energy. Ensure that lights and machinery are turned off when not in use. Evaluate the building's energy performance (electricity, cooling, heating and ventilation) on a regular basis and always make improvements when possible. Only use energy from renewable sources.
- Consider all waste as a resource. Re-use of products and materials is often the best option from an environmental perspective. Maintenance and repair are the means to prolong product life.
- Make sure practical arrangements to support reuse and materials recycling are in place and used by all employees in their daily work. In cases when recycling is not possible waste can be a resource for energy production but may never end up in landfills.
- Hazardous waste needs to be handled with care and be disposed of with respect for the environment
- Purchase of materials, products and services shall be evaluated from a sustainability perspective including both social and environmental aspects. Strive to minimize material-use.
- Transportation shall be chosen wisely in regards to sustainability. Use your influence whenever possible to make improvements in the logistics chain and provide your suppliers with environmental and social requirements.
- In order to minimize negative impact from business travel, consider telephone and videoconferences as an option to face-to-face meetings
- Always consider sustainable alternatives when choosing business travel
- Promote and encourage sustainability initiatives within the organisation and from partners

Health & Safety

All our employees should have a safe and healthy working environment. We believe in a systematic and preventive approach to safety, as it is the only real ethical standpoint to take. As such, the awareness of safety should always be considered as first priority in your daily work when decisions are weighed. We strive to promote an open dialogue where we encourage employees to raise their voices regarding identified potential risks.

All employees have the responsibility to follow safe operating procedures and company-specific policies to care for own and colleagues' health and safety. If you do observe a potentially unsafe situation or have a proactive proposal towards improving working conditions in your workplace, speak up and alert your immediate Manager to ensure proper evaluation.

Offering healthy and safety working conditions is a basic requirement and we exert our influence to ensure this is met within the whole Group as well as down streams in the supply chain. Our Code of Conduct outlines clearly what we expect from our suppliers and consequently the absolute minimum for ourselves.

All companies shall have a person in charge of safety ensuring that safety routines are put in place and followed and that the appropriate safety equipment is used.

Examples of how to create a safe working environment

- Ensure that necessary safety equipment such as helmets, fall protection, eye and ear protection as well as safety clothing and footwear are provided and used by everyone
- Ensure that all staff has the training needed to safely operate tools and machinery
- Evacuation routes and emergency routines must be known to everyone at the work place
- Safety routines, instructions and procedures must always be followed
- Report and follow up unsafe conditions, all incidents and accidents
- Prevent repetitive strain injuries by ergonomic workplace design and adequate training
- Store and handle chemicals properly and ensure adequate routines are in place
- Keep work areas clean
- Take responsibility for your own safety as well as others by reminding your co-workers to follow safety routines



Code practice & monitoring



Acting in accordance with the code

Compliance with the content of the Code of Ethics is considered a mandatory part of your employment within the Axel Johnson International Group and is subject to review in conjunction with employment evaluations. Repeated and serious misbehaviour will lead to disciplinary action.

Reporting violation of the Code of Ethics

All employees within Axel Johnson International are encouraged to report suspected violations of this Code of Ethics. Always start by contacting a manager or HR representative if you are comfortable with doing so. There is an established procedure to review incoming concerns and yours will be treated accordingly. If you are not comfortable with contacting any of these functions, you can consult the

whistleblower systems established. 'Whistleblower' is a commonly known term in any industry and refers to the whistle a referee uses to indicate an illegal or foul play. In practice, it means a person who exposes any kind of information or activity that is deemed illegal, dishonest or not in line with company values, with the aim of creating awareness among those who have the ability to rectify the situation.

Whistleblowers are protected from retaliation through our internal established systems (read more on next page) as well as through our Code of Conduct, safeguarding anonymous complaints procedures for employees with our business partners.

Reporting concerns

We encourage you to raise your concerns as early as possible, as it will give us the possibility to handle any detected risks promptly. Aside of traditional reporting channels in your organisation, Axel Johnson Internationals whistleblower service offers a possibility to report suspicions of misconduct in confidence – openly or anonymously. Reports submitted will be handled promptly and confidentially.

Escalation routes for reporting concerns

1. A manager at your company
2. Human Resources representative at your company
3. Business group management representative
4. Axel Johnson International Manager
5. The whistleblower service

The whistleblower reporting channel

Turn to <http://report.whistleb.com/axinter> to reach our whistleblower service to file concerns. Please follow the instructions given in the reporting channel. You can report in your preferred language.

A whistleblower does not need to have firm evidence of malpractice before expressing a concern. However, reports should be submitted honestly and in good faith. Abuse of the whistleblower service, such as deliberate reporting of false or malicious information is a serious disciplinary offence.

Anonymous reporting

It is helpful if you identify yourself, as it enables us to follow up and provide feedback when appropriate. But, if you wish, you may report suspected violations anonymously. Anonymous reporting is possible through the external reporting channel, administrated by an external, impartial service provider that safeguards the anonymous handling of whistleblower reports. Neither Axel Johnson International nor the service provider can identify or track the source of a report unless you provide contact details. The service provider does not store meta-data related to a whistleblower report and cannot track the IP address of a whistleblower.

No Retaliation

We value the help of employees to identify potential problems that we need to address. Any employee who raises a concern honestly or participates in an investigation is protected from any form of retaliation or discriminating action such as suspension or threats.

Revisions

This Code of Ethics document is owned by the Axel Johnson International CEO position and subject to yearly revisions to ensure relevance.



Scan this QR code with your mobile device to get to the whistleblower service.

For more information about the whistleblower service, please visit www.axinter.se/whistleblowing.

Code of Ethics Compliance Commitment

- I hereby confirm that I have read and understood the content of Axel Johnson International Code of Ethics and that I will observe these guidelines in my daily work.

I should always strive to assist the company's efforts to prevent bribes and corruption by ensuring that all operations of the company continues to be characterized by honesty, transparency, integrity and fair play. I should report any violation or suspicion of violation of this Code of Ethics to my a manager or follow escalation routes for reporting concerns.

Signature

Company

Printed name

Date

