

CODE OF CONDUCT FOR BERTLING SUPPLIERS AND THIRD-PARTY INTERMEDIARIES (Rev 1)

This Code of Conduct defines the basic requirements expected of Bertling's suppliers and third-party intermediaries concerning their responsibilities towards their stakeholders and the environment. Bertling's reserves the right to reasonably change the requirements of this Code of Conduct due to changes of the Bertling's Compliance Program. In such event Bertling's expects the supplier to accept such reasonable changes.

Suppliers are expected to make a commitment to operate in line with Bertling's social, ethical and environmental values and principles

Any material breach of Bertling's Values and Code of Conduct could lead to sanctions and the possible termination of the contractual relationship.

The supplier and/or third party intermediary is expected the following core values:

LEGAL COMPLIANCE

To strictly comply and cause its shareholders, representatives, officers, directors, managers, employees agents and subcontracts to comply with the Applicable Laws*.

PROHIBITION OF CORRUPTION AND BRIBERY

To reject bribery and corruption in any form. Not offer, give or receive bribes or inducements for any purpose, whether directly or through a third party including agents, intermediaries or consultants. Not to offer or accept sponsorship, charitable donations, gifts or hospitality which could affect, or be seen to affect, impartial decision making.

To prohibit the payment of commissions or fees that could be considered to be improper payments. Agreements with consultants, bankers, sponsors, agents or other intermediaries shall not be used to channel any form of improper or undue payments to anyone.

To reject any form of fraud or false claims, including misrepresenting time spent on a job, fabrication of evidence or the concealing of problems

To reject money laundering and always comply with all anti-money laundering laws and regulations

FAIR COMPETITION, ANTI-TRUST LAWS AND INTELLECTUAL PROPERTY RIGHTS

To act in accordance with national and international competition laws and not to participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors;

To prohibit all forms of anti-competitive behaviour, including price fixing with competitors, swapping sensitive information about Bertling or its clients and abusing any positions of market dominance.

Neither disclose nor allow to be disclosed or used any confidential information concerning the business dealings, affairs or conduct of Bertling or any of its employees, clients, suppliers or business partners

To prohibit purchasing decisions to be made on the basis of personal relationships or the potential for personal gain.

To respect the intellectual property rights of others.

CONFLICT OF INTEREST

To avoid all conflicts of interest that may adversely influence business relationships.

A FAIR WORKING ENVIRONMENT AND RESPECT FOR THE BASIC HUMAN RIGHTS OF EMPLOYEES

To promote equal opportunities for and treatment of its employees irrespective of skin colour, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;

To respect the personal dignity, privacy and rights of each individual;

To refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;

To recognize, as far as legally possible, the right of free association of employees and to neither favour nor discriminate against members of employee organizations or trade unions.

To reject the use of child, forced or bonded labour

HEALTH AND SAFETY OF EMPLOYEES

To take responsibility for the health and safety of its employees;

To control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;

To reject violence and threatening behaviour in the workplace

To prohibit working under the influence of alcohol or other legal and illegal drugs and substances

To protect the security of employees

To provide training and ensure that employees are educated in health and safety issues;

ENVIRONMENTAL PROTECTION

To act in accordance with the applicable statutory and international standards regarding environmental protection;

To minimize environmental pollution and make continuous improvements in environmental protection;

SUPPLY CHAIN

To use reasonable efforts to promote among its suppliers compliance with this Code of Conduct;

To comply with the principles of non-discrimination with regard to supplier selection and treatment

If you have any concerns, or would like some further information, please use any of the following means to contact Bertling's compliance team.

GROUP HEAD OF ETHICS AND COMPLIANCE

Chris Brooks | London | Phone: +44 20 8782 7263 | chris.brooks@bertling.com

COMPLIANCE HELPLINE

The Bertling Global Compliance Helpline allows a report to be submitted by either a web-based form at <http://www.bertling.ethicspoint.com/>, or by calling collect a dedicated telephone line +1 704-552-8684 where you will be connected to a Helpline interviewer who does not work for Bertling.

For this Helpline number you can speak in English, French, Russia, Arabic or Portuguese.

From within North America please call: 855-216-6141 to speak to an operator in either English, Spanish or French Canadian.

When using the Bertling Global Compliance Helpline you do not have to give your name unless you are calling from Spain.

Compliance email

compliance@bertling.com

Compliance on the Internet

www.bertling.com/about-us/ethics-and-compliance/

* "Applicable Laws" mean any and all applicable statute, law, regulation, Anti-Corruption Laws, ordinance, rule, judgment, rule of law, order, decree, permit, approval, concession, grant, franchise, license, agreement, requirement, or other governmental restriction or any similar form of decision of, or any provision or condition of any permit, license or other operating authorization issued under any of the foregoing by, or any determination by, any governmental authority having or asserting jurisdiction over the matter or matters in question, whether now or hereafter in effect and in each case as amended (including all of the terms and provisions of the applicable law of such governmental authority), as interpreted and enforced at the time in question;

"Anti-Corruption Laws" mean the US Foreign Corrupt Practices Act, as amended, the UK Bribery Act 2010, as amended, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and any other applicable anti-corruption provisions contained in any applicable national laws and laws for the prevention of fraud, racketeering, money laundering, terrorism, bribery, or corruption