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**OUR CODE – OUR RESPONSIBILITY****Guiding you to make the right decisions**

Our values and behavior are the foundation of our Code. Our Code is a public statement that **ALLCOT** is committed to doing the right thing.

It serves as a valuable resource to help employees and others make informed, ethical decisions.

Our Code includes references to relevant **ALLCOT** Requirements (**ALLCOT** Policies, **ALLCOT** Procedures and **ALLCOT** Practices) and other helpful tools and resources. Because no code of conduct can cover every possible situation **ALLCOT** relies on you to use good judgement and to speak up when you have questions or concerns.

Operating in over many countries, as we do, means there may be times when local laws, regulations or customs conflict with our Code. Whenever there is a conflict or a difference between an applicable legal requirement and our Code, you must apply the strictest standard. Do not follow customs that violate our Code.

Our Code applies to all **ALLCOT** employees, officers, and members of the Board.

Business partners, including operated joint ventures and third parties, can have a direct impact on our reputation through their behavior. For this reason, we want to work with business partners that share our commitment to safety and ethics and compliance.

We expect and encourage all our counterparts, contractors and their employees to act in a way that is consistent with our Code. We will take appropriate measures where we believe they have not met our expectations or their contractual obligations.

**A NOTE FROM ALEXIS L. LEROY****Dear Colleague,**

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We live in a time when public confidence in companies is among the lowest levels in history. However, those of us who are part of **ALLCOT**, with a reputation that has been enhanced and safeguarded over these 10 years, through a broad culture of integrity and ethical conduct.

Our company was created based on this trust and reputation. This influences how our counterparts, partners and clients appreciate our products and how stakeholders perceive us as an investment.

**ALLCOT's** success is so closely linked to our reputation, it is our responsibility to protect that reputation. Acting with integrity is more than protecting the image and reputation of our Company or avoiding legal problems.

It is also to maintain a place where we are all proud to work. Ultimately, it is about each of us being aware that we are doing the right thing. This means acting honestly and treating each of us, our counterparts, partners and clients, fairly and with dignity.

We realize that the Code will not cover every possible circumstance, especially when issues arise with contracts or local laws. So, our Company may special circumstances modify the Code, as necessary. Any waivers of the Code, however, must be approved in special circumstances by the Board of Directors or the Board's designees. In the extremely rare situation that a waiver is approved, we will quickly and properly disclose it where required by law.

The new **ALLCOT's** new Code of Conduct is our guide to proper conduct. Together with other guidelines of the Company, for doing the right thing in business. It is a must-read and a must-follow for all of us. For example, our **ALLCOT** Requirements (**ALLCOT** Policies, **ALLCOT** Procedures and **ALLCOT** Practices), we have established standards to ensure that we all do the right thing. Keep the Code with you and check it frequently. Keep up with ethics training. When you have questions, seek guidance.

Please have the courage to speak up if you see anything that appears to breach this Code. Your concerns will be considered seriously – and **ALLCOT** will not tolerate retaliation against anyone.

Our values and behavior are the foundation for our Code. They define how each of us must act to ensure that **ALLCOT** sustains its reputation and continues to earn the trust that allows us to prosper as a company. As you read this Code, be guided by its expectations and continue to live out our values in your work every day.

With your help, I am sure that **ALLCOT** will continue to deserve the trust that we all have. Our reputation for integrity will last. I thank you for joining me in this effort.

Sincerely,

**Alexis L. Leroy**

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**EMPLOYEE RESPONSIBILITIES**

- Read and be familiar with the information in our Code.
- Certify annually that you have acted in accordance with our Code.
- Act in a manner that is safe, ethical, and consistent with applicable laws and regulations, **ALLCOT** Requirements, **ALLCOT** values and behavior and our HSSE goals.
- Raise questions and concerns if you become aware of possible violations of laws, regulations, our Code or **ALLCOT** Requirements.
- Co-operate fully when responding to an investigation or audit.

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**Additional responsibilities of managers**

- Be a positive role model and support your team members by:
  - Creating an environment that is respectful and inclusive.
  - Encouraging them to speak up.
  - Listening and responding to concerns when they are raised.
  - Doing your part to make sure that no one experiences retaliation for speaking up or co-operating in an investigation.
- Help your team members understand the principles and expectations of our Code, **ALLCOT** Requirements and applicable laws.
- Be consistent when enforcing our requirements and holding people accountable for their behaviour at work.

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**HOW TO MAKE GOOD DECISIONS**

**Doing what is right is our goal. If the right thing to do is not clear, ask yourself:**

- Is it consistent with our Code?
- Is it legal?
- Does it follow our policies?
- Does it benefit the Company as a whole – not just a certain individual or group?
- Would I be comfortable if my actions were made public?

If you can answer “YES” to all of these questions, the action is probably okay. But any “no” or even “maybe” answers are a signal to stop and get advice or ask questions. After all, it is always better to ask before you act, especially when you are not sure. Contact any of these resources:

- Your Manager
- Ethics email ([ethics@allcot.com](mailto:ethics@allcot.com))

Maybe you sense that something is not right at work. Maybe you saw something or heard about an act that may violate our Code, our policies or the law. If so, you have a responsibility to share your concerns by reporting right away – even if you are not sure that a Code violation has occurred.

When you report concerns, you help us handle issues properly, fix problems before they occur and remedy situations that have already happened. You also help build trust with each other and with our counterparts, partners and clients.

### What Happens When You Report a Code Concern?

- You may choose to remain anonymous, where permitted by law.
- If you do give your name, we will do all we can to protect your identity consistent with conducting a thorough investigation.
- We take every report seriously and our Corporate Audit Department Code investigation team (or a delegate for locally managed or other matters) will investigate it thoroughly and as confidentially as possible.
- We expect everyone involved to cooperate fully and honestly.
- To ensure consistency in analyzing matters that arise all over the globe, outcomes from the investigation are presented to the Ethics & Compliance Committee (or its delegate for locally-managed matters) who will determine, based on the investigatory facts presented, if there has been a violation of the Code.
- If the Ethics & Compliance Committee determines that the Code has been violated, it will determine a fair and consistent disciplinary action in accordance with applicable law.
- Those found to have violated the Code can seek reconsideration in accordance with our Guidelines for Handling Code of Business Conduct Matters.
- For more information on the Code investigation and decision-making process, consult our Guidelines for Handling Code of Business Conduct Matters.

**Zero tolerance on Retaliation**

You are the eyes and ears of our Company, and we value your help in avoiding and uncovering possible misconduct. We strictly prohibit retaliation of any kind against anyone who shares a good-faith concern or participates in a Code investigation. Sharing a good-faith concern about the Code honestly, even if it turns out to be unfounded – is never an excuse for any kind of retaliation.

**What is Retaliation?**

We define retaliation under our Code as any action that would likely deter someone from reporting a Code concern or participating in a Code investigation. Retaliation can take many forms, for example: threats, intimidation, exclusion, humiliation, demotion, firing, a reduced salary, job reassignment, harassment, raising issues maliciously or in bad faith, participated in a Code investigation.

If you think that you or someone you know has experienced retaliation, contact any Ethics resources.

While we take the anti-retaliation provisions of our Code very seriously, these provisions do not protect you from disciplinary action for your own misconduct, meaning you should not report a Code concern simply to avoid discipline for your own violation of the Code or other Company policy.

**No False Accusations**

As much as we encourage honest reporting, we do not tolerate knowingly false reports. Making a false accusation can divert investigatory resources away from credible good-faith concerns and damage morale.

Report what you have a reasonable, good-faith belief be true, but never knowingly make a false accusation, lie to investigators or refuse to cooperate in an investigation, as these actions may also violate our Code.

## Whistle-Blowing Policy

### Introduction

**ALLCOT** is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the company to voice concerns in a responsible and effective manner. It is a fundamental value of the company that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs.

Nevertheless where information is discovered, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation, then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by **ALLCOT** nor should it be used to reconsider any matters which have already been addressed under other procedures.

Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside the company.

### Scope of Policy

This policy is designed to enable employees of **ALLCOT** to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour



- Attempts to conceal any of these

## Safeguards

### i. Protection

This policy is designed to offer protection to those employees of the company who disclose such concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety.

### ii. Confidentiality

**ALLCOT** will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation shall be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

### iii. Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the company.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

### iv. Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

### Procedures for Making a Disclosure

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by the appropriate Department Manager unless the complaint is against the Manager or is in any way related to the actions of the Manager. In such cases, the complaint should be passed to the Ethical Committee for referral.
- In the case of a complaint, which is any way connected with but not against a Director, the CEO and the Ethical Committee will nominate a Senior Manager to act as the alternative investigating officer.
- The complainant has the right to bypass the line management structure and take their complaint direct to the Ethical Committee or other executive management. The executive management has the right to refer the complaint back to the Director or Department Manager if it is felt that the management without any conflict of interest can more appropriately investigate the complaint.

If there is evidence of criminal activity, then the investigating officer should inform the police. **ALLCOT** will ensure that any internal investigation does not hinder a formal police investigation.

### Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address.

## Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Managing Director as appropriate.
- The Managing Director will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Managing Director.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, **ALLCOT** recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons or, where justified, elsewhere.

## NON-PUBLIC INFORMATION PROTECTION

**Protecting the non-public information about our Company helps us maintain our competitive advantage and preserve our reputation as the industry leader.**

**Our responsibility when it comes to information is knowing the kinds of information considered confidential and knowing the ways to protect it.**

**We consider any non-public information about the Company as well as certain information about our customers, suppliers, other business partners or consumers that you may have (or access) as part of your job, to be confidential information. It can be written, spoken or electronic.**

## Cyber Security and Digital Devices

### Introduction

This section deals with all things digital at work. We want to set some guidelines for using computers, phones, our internet connection and social media to ensure security and protect our assets.

### Internet usage

Our corporate internet connection is primarily for business. But you can occasionally use our connection for personal purposes as long as they don't interfere with your job responsibilities. Also, we expect you to temporarily halt personal activities that slow down our internet connection (e.g. uploading photos) if you're asked to.

You must not use our internet connection to:

- Download or upload obscene, offensive or illegal material.
- Send confidential information to unauthorized recipients.
- Invade another person's privacy and gain access to sensitive information.
- Download or upload pirated movies, music, material or software.
- Visit potentially dangerous websites that can compromise our network and computers' safety.
- Perform unauthorized or illegal actions, like hacking, fraud or buying/selling illegal goods.

**Corporate email** – Email is essential to our work. You should use your company email primarily for work, but we allow some uses of your company email for personal reasons.

**Work-related use** – You can use your corporate email for work-related purposes without limitations. For example, you can sign up for newsletters and online services that will help you in your job or professional growth.

**Personal use** – You can use your email for personal reasons as long as you keep it safe and avoid spamming and disclosing confidential information. For example, you can send emails to friends and family and download e-books, guides and other safe content for your personal use.

Our general expectations, no matter how you use your corporate email, we expect you to avoid:

- Signing up for illegal, unreliable, disreputable or suspect websites and services.
- Sending unauthorized marketing content or emails.
- Registering for a competitor's services, unless authorized.
- Sending insulting or discriminatory messages and content.
- Spamming other people's emails, including your coworkers.
- In general, use strong passwords and be vigilant in catching emails that carry malware or phishing attempts. If you are not sure that an email you received is safe, ask our IT Department.

**Social media** – We want to provide practical advice to prevent careless use of social media in our workplace. We address two types of social media uses: using personal social media at work and representing our company through social media.

**Using personal social media at work** – You are permitted to access your personal accounts at work. But we expect you to act responsibly, according to our policies and ensure that you stay productive. Specifically, we ask you to:

- Discipline yourself. Avoid getting sidetracked by your social platforms.
- Ensure others know that your personal account or statements don't represent our company. For example, use a disclaimer such as "opinions are my own."
- Avoid sharing intellectual property (e.g. trademarks) or confidential information. Ask your manager or PR first before you share company news that's not officially announced.
- Avoid any defamatory, offensive or derogatory content. You may violate our company's anti-harassment policy if you direct such content towards colleagues, clients or partners.
- Representing our company through social media

If you handle our social media accounts or speak on our company's behalf, we expect you to protect our company's image and reputation. Specifically, you should:

- Be respectful, polite and patient.
- Avoid speaking on matters outside your field of expertise when possible.
- Follow our confidentiality and data protection policies and observe laws governing copyrights, trademarks, plagiarism and fair use.
- Coordinate with our [PR/Marketing department] when you're about to share any major-impact content.
- Avoid deleting or ignoring comments for no reason.
- Correct or remove any misleading or false content as quickly as possible.



## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

### Introduction

**ALLCOT** is committed to conducting our business in accordance with all applicable laws, rules and regulations and the highest ethical standards.

### Compliance and Reporting

This Policy applies to every **ALLCOT** employee, including the CEO, Executive Management and Department Managers.

**ALLCOT** expects all personnel to take all responsible steps to prevent a violation of this Policy, to identify and raise potential issues before they lead to problems, and to seek additional guidance when necessary. If you have any questions about this Policy, please contact the CEO or any of the other Directors or the Ethical Committee members. If you wish to report a suspected violation of this Policy, please contact your Department Manager.

### What are Bribery and Corruption?

Corruption is the misuse of public power for private profit, or the misuse of entrusted power for private gain. Bribery is the offer, promise, or payment of cash, gifts, or even excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person's views or conduct or to obtain an improper advantage. Bribery and corruption can take many forms, including the provision or acceptance of:

- Cash payments;
- Phony jobs or "consulting" relationships;
- Kickbacks;
- Political contributions;
- Charitable contributions;
- Social benefits; or
- Gifts, hospitality, and reimbursement of expenses.

**ALLCOT** will conduct its business in compliance with applicable anti-bribery and anti-corruption legislation and requires all **ALLCOT** personnel to avoid any activity that could implicate the company in any unlawful practice.

**ALLCOT** personnel are strictly prohibited from offering, paying, promising or authorizing any bribe, kickback or other thing of value to any government official or government employee, directly, or indirectly through a third party, to secure any contract or other improper advantage for **ALLCOT**. Personnel who make such payments are subject to appropriate disciplinary action by the company, including termination, as well as the legal consequences of applicable laws.

Any payment to a government official, directly or indirectly through a third party, including extravagant entertainment or gifts, for the purpose of obtaining or retaining business or improperly influencing some matter in favour of **ALLCOT**, may be considered to be a bribe and may result in violation of applicable law. Accordingly, all **ALLCOT** personnel shall comply with the company's policies on the provision of and reimbursement for gifts, entertainment, meals, and travel, and with relevant company accounting, recordkeeping and internal control provisions to ensure that such expenses are properly recorded.

### What are my obligations?

There are two main obligations that apply to all **ALLCOT** personnel: you must not pay any bribes, and you must accurately reflect transactions in the Company's books and records.

You must not offer, promise, authorize, or give or acquiesce in giving, to a government official, either directly or indirectly:

1. Payments of cash or in kind; or
2. Inducements of any kind, including but not limited to excessive entertaining, if in so doing there might be even an appearance that the payment or inducement would create an obligation on any recipient or improperly influence the recipient to act or refrain from acting in a way that would influence an official exercise or discretionary authority.

You should avoid placing yourself in a position where a bribe could be requested, if at all possible. If you believe that you may have been solicited for a bribe, contact either the Department Manager or the Works Director as soon as possible for assistance.

**Maintaining Accurate Books and Records**

**ALLCOT** personnel must ensure that the company's books are kept complete and accurate, both quantitatively and qualitatively. All expense reports must be complete and accurate. You should never accede to requests for false invoices or for payment of expenses that are unusual, excessive, inadequately or improperly described, or otherwise raise questions under this Policy or related company guidelines on accounts and recordkeeping.

Your commitment to compliance with this Policy is essential to **ALLCOT's** efforts to conduct its business with honesty and integrity.

CEO (*signature and date*)