



ERM

Global Code of Business Conduct and Ethics

Version: 26 March 2024

ERM believes in supporting human rights and international standards of business conduct and ethics in all of our operations. The purpose of this Global Code of Business Conduct and Ethics (“Code of Conduct” or “Code”) is to provide guidance on what is expected from each of us and applies to everyone who works for ERM.

If you have questions or concerns regarding any aspect of this Code of Conduct, please contact the Chief Compliance Officer or the ERM [Compliance and Ethics Helpline](#) (“Helpline”).



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A MESSAGE FROM OUR GLOBAL CEO

At ERM we are united behind our purpose of shaping a sustainable future with the world's leading organizations. Our purpose provides a guiding star for our business and I am constantly amazed at the passion that all of you bring every day to your work. We are lucky enough to have created a culture that is ignited by our positive impact on the world, powered by our deep sustainability expertise and collaborative in the way we work with others to inspire change.

Nurturing and strengthening our culture is an ongoing priority. We may have shared values, but we must ensure that everyone at ERM understands the shared behaviors that are expected of them. Within that context, our Code of Conduct provides a practical, common reference point on the professional standards and norms at ERM, regardless of where you are based or the role that you perform.

As the world's largest specialist sustainability consultancy, it is imperative that we walk the talk as far as our ethical conduct is concerned. Our company and the business environment in which we operate continues to change, but our Code of Conduct provides an ongoing source of advice and guidance on the values, principles and expectations that underpin our operations. Please do make sure you read, understand and champion its contents in your daily business conduct and conversations. It is up to all of us to lead by example, share best practice and call out issues when we see them.

Thank you in advance for your engagement on this critical topic.



Tom Reichert

ERM Group CEO, 26 March 2024

1. OUR CODE IS OUR RESPONSIBILITY

1.1 WHO MUST FOLLOW OUR CODE?

This Code of Conduct is a guide to the business conduct expected of all of us at ERM. Our Code explains how we are to behave when dealing with each other and all our stakeholders, including our clients, contractors, consultants, investors, other third parties, and all the communities where we work. Our Code is also designed to guide you in your decision-making. Our Code works in conjunction with international standards and company policies and procedures. Our policies and procedures are published on the company's internal website (Minerva), so do not hesitate to refer to them when you need a fuller explanation.

As a global organization, ERM relies on many third parties to provide it with the materials or services it requires to conduct its business. To make our Code a reality of how we do business, we have made acting in accordance with our principles and international standards a required part of our supply chain. A substantial proportion of the work which ERM performs for its clients is carried out by sub-contractors, whose skills are essential in helping us carry out our work safely and responsibly. In selecting suppliers, ERM is committed to choose reputable business partners who share our commitment to ethical standards and business practices. Our Supplier Code of Business Conduct and Ethics ("Supplier Code") sets out the principles and standards of conduct that ERM expects of any person or entity who provides goods or services ("Supplier") to ERM. Just as our Code applies to all personnel in the ERM Group companies, our Supplier Code applies to all persons and entities in our supply chain.

We commit to maintaining high ethical and legal standards in our business conduct, and we must conduct the business of ERM with uncompromising honesty and integrity. ERM's reputation for adherence to laws, regulations, and our written Code is more important than the personal advancement of any one employee. We will be honest and ethical in dealing with each other, with clients, suppliers, and all other third parties. We will understand and abide by all legal requirements governing our business and operations.

Complying with the law, however, is just part of what we must do. We must make decisions based on our values. We should continually try to avoid even the appearance of impropriety in matters involving legal obligations, our values, this Code of Conduct, or ERM's policies and procedures.

The standards contained in this Code of Conduct are not intended to address every specific situation. If you encounter situations or areas not specifically addressed by this Code of Conduct, you are expected to ask for guidance so you can perform your activities on behalf of ERM in accordance with this Code.

What does our Code of Conduct mean for you in practice?

- Be honest
- Do what is right
- If it feels wrong, stop and seek advice
- Speak up
- Be open and transparent
- Work in partnership
- Place clients at the center of your activities
- Always honor your commitments

1.2 SPEAK UP

Your conduct can reinforce an ethical atmosphere and positively influence the conduct of your co-workers. If you suspect a violation of our policies or Code of Conduct has occurred or may occur, you have the responsibility to speak up about it through one of the many channels available to you. This is true regardless of who is involved – every person at ERM should conduct themselves in accordance with this Code of Conduct, no exceptions.

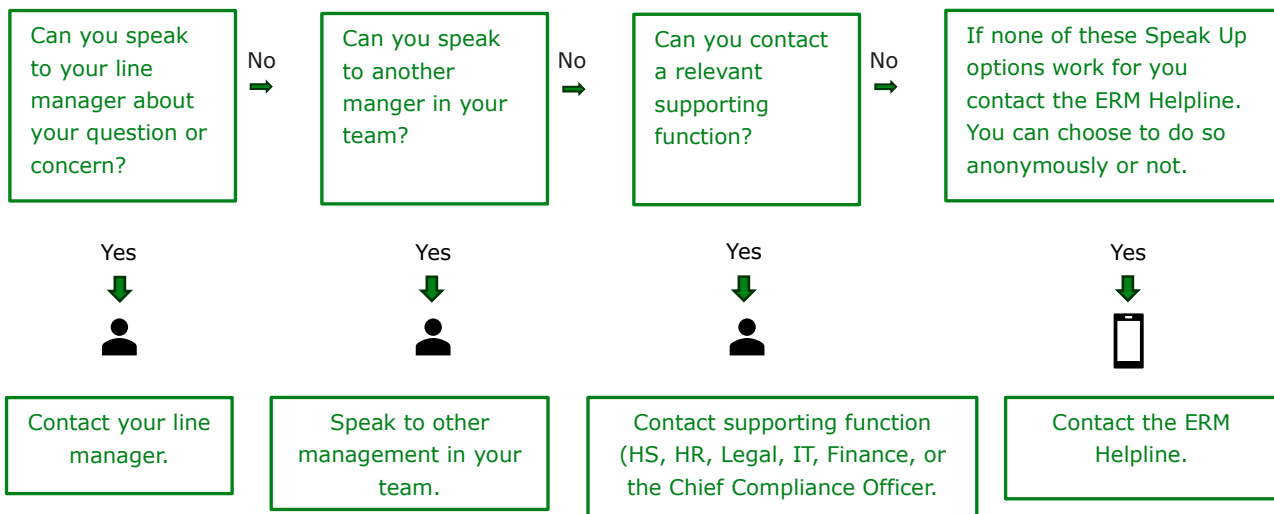
If you have questions about this Code of Conduct or concerns about someone’s workplace conduct, first contact your line manager. If you do not feel comfortable doing this, or if you know the concern is in the remit of a specific ERM function, consult with ERM resources available to you:

- Human Resources
- Health & Safety
- Chief Compliance Officer
- Legal Department
- Group Tax & Treasury Department
- Group Finance

Not sure what part of ERM to contact? Send an email to businessconduct@erm.com in order to get directed to the right resource.

If you do not want to disclose your identity, concerns can be raised anonymously either by phone or web portal using the [ERM Speak Up Helpline](#).

How can you speak up?



*In France, the anonymous feature on our Speak-Up Helpline can only be used to report any irregularities or fraud in accounting, internal controls, audit or financial areas – or if you suspect any act of corruption has occurred or may occur.

1.3 DUTY TO REPORT MATERIAL MATTERS

Every ERM employee has the duty of “upstream” communication so that ERM management is appropriately informed of material matters. ERM management then has the duty to inform the Board of Directors for each ERM entity as to material matters.

“Material” matters are any matters:

- (1) Impacting a significant client;
- (2) involving a governmental investigation, hearing, proceeding, notice of violation, or other interaction between ERM and regulators that could adversely impact ERM;
- (3) valued as a contingent liability of \$100,000 USD or more;
- (4) potentially causing a significant impact on operations (loss of license, halt to ongoing operations, loss of substantial profit, loss of key personnel, loss of reputation);
- (5) pertaining to sensitive internal matters such as an employee claim; and/or
- (6) evidencing compliance issues, operational trend; or repeated risks/exposure.

You have a duty to report a possible violation regardless of the identity of the suspected offender, and failure to report knowledge of wrongdoing may result in disciplinary action against those who fail to report. Even if you are unable to stop suspected misconduct, or you witness the conduct or discover it after it has occurred, you should report it immediately. Employees who report a problem in good faith and believe it to be true will not be reprimanded. The only time employees will be disciplined for reporting a suspected violation of this Code of Conduct by another ERM employee is when they deliberately report something that they know is false or misleading.

You are the guardian of ERM’s business conduct and ethics. While there are no universal rules, when in doubt ask yourself:

- Do I understand the risks and applicable laws and regulations?
- Will my actions comply with ERM policies, procedures, and Code of Conduct?
- Am I authorized to do it?
- Am I leading by example?
- Will my actions cause even the appearance of impropriety to any of the following: managers, co-workers, business partners, clients, competitors, the government, or the general public?

If you are uncomfortable with your answer to any of the above, you should not take the contemplated actions without first discussing them with your line manager. If you are still uncomfortable, please consider the Speak Up flowchart and the other resources available to you.

1.4 ISSUES REQUIRING MANDATORY REPORTING

For certain issues, reporting is mandatory and a presumption exists that the issue may be a material matter. For any of the issues listed below, the Chief Compliance Officer should be notified immediately when possible, and at the outside no later than 24 hours after discovery of a potential issue. A failure to notify the Chief Compliance Officer in a timely matter may result in disciplinary action, including termination. The Chief Compliance Officer must be contacted and involved in all matters relating to:

- Violations and potential violations of law or regulation that expose ERM to criminal or civil liability or to administrative sanctions;
- Initiation of a criminal, civil, or other governmental investigation by a law enforcement or regulatory agency or legislative body against ERM or any employee of ERM.
- Allegations of misconduct or potential misconduct by an officer or member of the Board of Directors of ERM;
- Violation of the Code of Conduct that could cause harm to ERM, its reputation, business interests, or employees;
- Conformity with international compliance laws and regulations);
- Requests for approval of outside board memberships;
- Requests for ERM sponsored travel by government officials;
- Concerns around ERM’s accounting and application of accounting principles, especially if you think a material misstatement in relation to profit or loss (including sales recognition), might occur;
- Concerns about ERM’s internal controls or application of those internal controls, especially if a fraud may have occurred or a reputational or financial loss could occur; and
- Concerns about the accuracy or integrity of any ERM system or process, regardless of whether or not you perceive a risk of financial loss.

If you become aware of any investigation, potential proceedings, or litigation against ERM, the Legal Department should be notified immediately. Additionally, all subpoenas, notices of violation, or any other legal notices should be forwarded to the Legal Department at litigationandemployment@erm.com within 24 hours of receipt.

In our fast-paced and inherently innovative industry, we can’t predict every situation that an ERM employee at every career level might face. That is why this Code and our other policies are the baseline expectations for thinking about issues, solving challenges, and going about our daily work.

1.5 DUTY TO DISCLOSE PAST, CURRENT AND FUTURE CONFLICTS

an employee becomes aware of any If business relationship that is about to be created, exists, or has existed within the previous three years between the employee of ERM and an employee of a client, subcontractor, supplier, or competitor of ERM, then the employee must disclose it to their line manager. For more information on personal conflicts, see [Section 3.9](#).

Additionally, each employee must disclose in writing to their line manager and HR representative if ERM has a business relationship of any kind with a relative, close family member, or member of the household of the employee. ERM does not allow an employee to make business decisions for ERM regarding a situation where an actual or apparent conflict of interest exists, and ERM will take steps to make sure that relatives do not report to each other in a chain of command or have any supervisory influence over each other. Additional internal controls regarding segregation of duties may be required if one of the relatives has financial duties. Employee candor in relation to relatives, close family and household members, along with written disclosure, is required at ERM.

1.6 NO RETALIATION

ERM will not tolerate retaliation in any manner against anyone for raising issues and concerns honestly. Also, it is unacceptable for anyone to make an allegation of misconduct knowing that it is not accurate. ERM will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in their terms and conditions of employment based upon any lawful actions by that employee with respect to good faith reporting of complaints.

If it feels wrong, stop and seek advice.

While it may be easier to say nothing when faced with potential or actual misconduct, doing the right thing means raising your concerns or questions about the conduct. If something feels unethical or improper to you, speak up.

2. OPERATING SAFELY, RESPONSIBLY AND RELIABLY

2.1 COMPLYING WITH LAWS

ERM does business globally, and that means that our projects and employees are subject to the laws and regulations of different countries. By way of example, operations outside of the US are still subject to certain US laws, while US operations are subject to certain UK laws. Accordingly, this Code of Conduct establishes principles for business conduct for all of ERM's operations, regardless of location.

Where differences exist as the result of local customs, norms, laws, or regulations, you must conduct business in accordance with the highest standard of conduct required. Sometimes what the correct standard is may not be immediately apparent, so you will need to seek help. If you have questions, you should see advice from the appropriate ERM internal resource related to the issue, such as the Legal Department for legal and compliance matters.

2.2 HEALTH & SAFETY

The health and safety – of the public, employees, our subcontractors and clients – is more than just a priority at ERM, it is a fundamental tenet of how we do business and how we care for our people. ERM expects everyone involved in our work to understand the health and safety risks of their activities and seek clarification if they are uncertain about how to proceed safely. All

employees and subcontractors have the authority and the responsibility to Stop Work if they become aware of a condition or situation that could lead to a serious injury or illness.

All employees are required to follow health and safety procedures that have been approved or adopted, as well as any laws or regulations applicable to their work location. In addition, all ERMers are required to ensure that any incident, injury, illness, or unsafe condition that they become aware of is promptly communicated to their line manager and through the Event Communication System (ECS), available on Minerva.

We see mistakes as an opportunity for improvement.

2.3 ENVIRONMENTAL LEADERSHIP AND SUSTAINABILITY

ERM is committed to sustainability principles for the environment and in all that we do. As a leading global provider of environmental consulting services, ERM is acutely aware of our responsibility to minimize our impact on the environment through the effective management of our business activities and client project work. Environment is a key focus area within the UN Global Compact and, as a signatory, ERM strives to embrace its values and promote these values within our sphere of influence. ERM is committed to being an environmental leader and demonstrating this through our actions, including conducting our business in full compliance with all applicable international environmental laws and regulations and operating in an environmentally sensitive manner consistent with our values.

It is our policy to comply with all laws and regulations that apply to our business. Due to the nature of our business, environmental laws and regulations are of predominant concern. We are committed to environmental protection. Each of us must comply with environmental laws and ERM's environmental policies. As part of how we do business, we assess and minimize our environmental impact with the aim of avoiding damage to the environment and pursuing the most efficient use of sustainable energy and resources. We expect all ERMers to use materials and processes which support sustainability of the environment throughout their supply chain. We report annually on our efforts in our Sustainability Report, published on erm.com.

We all have a role to play in protecting the environment. As you conduct ERM's business, you may encounter a variety of legal and regulatory issues. If you are involved with processes that affect the environment, such as measuring, recording, or reporting discharges and emissions to the environment or handling hazardous wastes, you must be sure to comply with all applicable environmental laws, regulations and permits. You must also maintain our standards and ensure that reports are accurate and complete.

3. OUR BEHAVIORS, PEOPLE AND CULTURE

3.1 RESPECT AND FAIR TREATMENT

ERM is firmly committed to the principles of equality of opportunity in employment and human relationships. Any form of marginalization, exclusion or discrimination against others is expressly prohibited. Each ERM employee is expected to treat fellow employees with respect and dignity.

3.2 HUMAN RIGHTS

ERM has a longstanding commitment to ethical business conduct in our operations and supply chains. We are committed to supporting international human rights, both as part of our commitment to the UN Global Compact and in accordance with the UN Guiding Principles on Business and Human Rights. Wherever ERM works in the world, we seek to respect and uphold the fundamental human rights and freedoms of everyone who works for us or with us, and of the people and communities where we operate. We believe in living and working in accordance with our principles of sustainability, integrity and respect. We support the UN and OECD principles and initiatives on human rights. In accordance with our Values of transparency and accountability, we will routinely assess our operations to determine what we can do as a business and in our supply chain to support international efforts on human rights.

3.3 DIVERSITY, EQUITY, INCLUSION AND BELONGING

We believe our most important strength is our employees. ERM is committed to diversity and to equal opportunity in all aspects of employment. We seek to provide a work environment where all employees have the opportunity to reach their full potential and contribute to ERM's success. Our objective is for the diversity of our employees to reflect the diversity of the communities in which we do business, and for ERM to respect the customs and cultures of those communities. As detailed below, we have zero tolerance for harassment, bullying, victimization, or discrimination. As such, our approach on these topics includes a commitment to respecting our employees' unique characteristics.

Q: Our manager likes to make jokes about how certain people look, what they like to eat, whether they go to church, and who they might date. It makes several of us very uncomfortable, regardless of whether we are the subject of the joke or just observing. What can I do?

A: Talk to your manager about how you feel. If you are uncomfortable talking directly to your manager, you can talk to another manager, Human Resources, or use our Speak Up Helpline resource. The manager cannot engage in harassment or create a hostile work environment in which employees feel bullied or intimidated.

3.4 NO HARASSMENT OR DISCRIMINATION

We believe that all our employees are entitled to fair treatment, courtesy, dignity, and respect. This is true regardless of where they are working – in the office, in the field, or at a client's site. ERM does not tolerate any form of bullying, harassment, victimization or discrimination. Harassment or discrimination includes without limitation, behavior, comments, jokes, slurs, email messages, pictures, photographs, or other conduct that contributes to an intimidating or offensive environment. Prohibited behavior includes but is not limited to bullying or hazing (regardless of the other person's willingness to participate). ERM prohibits conduct or business entertainment that could reasonably be construed as sexual in nature. ERM does not allow discrimination or harassment based on race, color, age, religion or belief, sex, gender or gender identity, expression or reassignment, sexual orientation, national origin, ethnicity, genetic information, disability, parental status, flexibility of working arrangements, pregnancy, political affiliation, medical condition, veteran status, ancestry, union membership or marital or civil partner status. These

factors shall not be used as grounds for discrimination in hiring and employment practices (e.g. advancement, disciplinary decisions, benefits, training, or general workplace conduct).

We will thoroughly investigate complaints of bullying, harassment, discrimination, and victimization that are brought to our attention and take formal disciplinary action where misconduct is identified.

Regardless of whether communicating on ERM systems or in social media, employees should make sure that communications are factual and do not contain offensive, discriminatory or abusive language.

If you see harassing or discriminatory behavior occurring, don't stay silent. [Speak Up](#) and share your concerns.

3.5 NO WORKPLACE VIOLENCE

ERM has a "zero tolerance" policy for workplace violence. Acts or threats of physical violence are not allowed, including but not limited to physical abuse, corporal punishment, intimidation, coercion, stalking, bullying, or similar activities. A worker who engages in acts or threats of violence will be removed from any work assignment with ERM. A workplace violence incident may result in suspension or termination and also may result in civil or criminal legal proceedings.

3.6 EMPLOYMENT PRACTICES AND EQUAL OPPORTUNITY

Wage payments, working hours and benefits must comply with all applicable laws, regulations, and collective agreements. ERM will make sure employment, travel, transfer, and residence of employees conform to applicable immigration, residency and employment laws, including visa and work permits. ERM will provide communications and training in accordance with applicable laws and in the languages of the ERM workforce.

ERM will not participate in the exploitation of workers and shall not use forced, bonded or involuntary labor. Additionally, in the event that ERM provides intern or student work/learn opportunities, ERM will pay interns an appropriate minimum wage under the relevant local law and will not participate in unpaid worker programs of any kind. All workers are free to leave the workplace and have the right to terminate their employment. No workforce member shall be required to surrender passports, official identity documents or work permits as a condition of employment (except for temporary processing or legal requirements) and the retention of such document shall not be used to bind workers or restrict their rights and freedoms. Any fees charged to the workforce must be transparent and reasonable and inappropriate or excessive fees are unacceptable. The rights of the workforce to associate freely, join or not join labor unions, seek representation and join workers' councils in accordance with local laws shall be respected and upheld by ERM.

3.7 CHILD LABOR

ERM shall not employ any person under the minimum legal age for employment as prescribed by the relevant local law or under the age for completing compulsory education, whichever is greatest. Legitimate workplace apprenticeship and intern programs in compliance with all local laws and regulations are acceptable. ERM will comply with all legal requirements for the work of

authorized young workers, including those relating to working hours, wages and safe working conditions. Authorized young workers shall not perform any work that is likely to be hazardous or to interfere with their education or that maybe harmful to their health, physical, mental, social, spiritual or moral developments.

3.8 PRIVACY AND PERSONAL DATA

ERM is committed to the protection and security of the personal data of our employees, clients and others in line with international standards and data protection laws. 'Personal data' refers to any information describing or relating to an identified or identifiable individual by reference to an

Q: A friend asked me to give her the phone numbers and emails of some of my work colleagues so she can contact them about a line of gluten free products she is developing and selling. I think they would like what she is selling and I would like to help her out. Can I go ahead and give her their names and email addresses or phone numbers so she can send them offers by email and text?

A: No, you should not distribute contact information of your colleagues. Your friend will need to develop another way of building her client base. ERM has data privacy policies, and so while you can make recommendations to colleagues it is not ok to hand their information out to vendors, even well-meaning ones.

identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of

that individual. ERM employees who collect, record, organize, store, access, adapt, alter, retrieve, use, disclose, or otherwise process personal data on behalf of ERM are obliged to support this commitment.

You must not access or disclose any person's personal data unless you are authorized to do so in line with your role. If you suspect that any personal data has been lost or stolen you must report it immediately to your manager and to the Data Protection Officer (dataprivacy@erm.com).

If you have a question regarding privacy and personal data, contact dataprivacy@erm.com.

3.9 TYPES OF CONFLICTS OF INTEREST

Two main types of conflicts of interest may arise during your employment with ERM: client representation conflicts or personal (sometimes referred to as "ethical") conflicts of interest. Client representation conflicts occur when work that ERM is doing or has done in the past prevents (or restricts) ERM from performing new work for a particular client. Each employee has the duty to follow ERM policies and procedures so that appropriate client representation checks are performed before commencing work.

The second type of conflict of interest – a personal conflict – exists when an employee is involved in an activity or has a personal or business interest that interferes or has the potential to interfere, with the employee's performance of ERM duties or responsibilities. However, an actual

personal conflict of interest need not be present to constitute a violation of this Code of Conduct. A potential or apparent personal conflict of interest may also violate this Code of Conduct. A potential personal conflict of interest exists when it is likely that in the future, an employee's activity or personal interest could interfere with the employee's performance of ERM duties or responsibilities. An apparent personal conflict of interest exists when the employee's activity or personal interest create the appearance of a conflict of interest. Apparent conflicts should be avoided to prevent a negative reflection on the reputation of ERM and its employees.

3.10 RECOGNIZING POTENTIAL PERSONAL/ETHICAL CONFLICTS OF INTEREST

To avoid either an apparent or an actual conflict of interest, please consider the following definitions of "close family" and "household" as they pertain to this Code. A "close family" member is someone who is related to you "by blood" or by process of law (e.g. adoption, marriage, divorce). Specifically, a close family member can include a spouse, an ex-spouse, partner, parent, step-parent, child, step-child, brother, sister, step-brother, step-sister, nephew, niece, immediate cousin, aunt, uncle, grandparent, grandchild, in-law, or a parent of an in-law. Further, "household" member is defined as any person, regardless of whether the person is related to you by blood, marriage, or other operation of law, who lives in the same dwelling as you, including but not limited to a "roommate," live-in staff, and anyone who pays you rent.

Using nonpublic ERM, client, or supplier information for personal gain by you, relatives or friends is a conflict of interest, including for securities transactions based on such information, is prohibited. Securities transactions (e.g. stock, futures, swaps) with an appearance of conflict of interest can result in reputational damage and legal repercussions for both you and ERM. However, it is not merely the purchase or sale of securities that can violate this Code and our global policies. In addition, holding a financial interest in a business concern that is a competitor, client, subcontractor or supplier of ERM should be assumed to be a conflict unless the interest is only "passive" or has been addressed pursuant to [Section 1](#) of this Code. A "passive" investment interest is one that is minimal enough, as a matter of law, that an employee's independent judgment should not be unduly influenced. For investments in a publicly held company, an investment will not be considered "passive" (and therefore a conflict will exist) if the holding is either: a.) five percent or more of the stock, assets, or other interests of the client, subcontractor, supplier or competitor; or b.) ten percent or more of the employee's net assets;

With those definitions in mind, below are some examples of situations for which an employee is required to either abstain or obtain prior approval through the personal conflict of interest review process ([Section 1](#)):

- Engaging in outside employment in areas similar to those in which ERM is involved (also known as "competing with ERM", "bad faith", or "consulting on the side");
- Having a close relative or household member who works at ERM, provides goods or services to ERM, or is involved in an ERM project;
- Performing outside work for clients, subcontractors, suppliers or competitors of ERM;
- Unauthorized use of ERM or client information or property, including, without limitation, intellectual property;

- Allowing personal interests or activities to influence ERM transactions with other business entities or individuals;
- Accepting personal discounts (on products, services, or other items) from an employee or representative of a client, subcontractor, supplier or competitor of ERM (unless obtained through an ERM-approved discount program);
- Causing ERM to engage in business transactions with relatives unless properly disclosed and prior approval received;
- Receiving a loan, or guarantee of obligations, from ERM or a third party as a result of your position at ERM;
- Speculating or dealing in materials, equipment, supplies, products, lands, leases, or properties purchased or sold by ERM, or for which negotiations to purchase, acquire, or sell are pending or may reasonably be anticipated;
- Receiving (other than from ERM) any compensation, bonus, or commission in connection with any transaction relating to ERM's business;
- Competing, or preparing to compete, with ERM while still employed by or associated with ERM; or
- Engaging in any other activity that could create the appearance of a conflict of interest and potentially impair ERM's reputation for impartiality and fair dealing.

The examples above are by no means exhaustive. They are illustrative of potential conflicts of interest that must be disclosed and resolved prior to the materialization of the conflict. If you have questions about a potential conflict, contact your HR representative. If needed, issues may be escalated to the Chief Compliance Officer for resolution under [Section 1](#) of this Code.

3.11 ELECTED /DESIGNATED OFFICERS

Employees must obtain approval through the Board of Directors before serving as an officer or director of any business or corporation other than ERM. However, employees who are requested by ERM to participate in nonprofit industrial, professional, civic, or charitable activities need not obtain approval for such activities through the conflict-of-interest review process.

4. INTEGRITY WITH OUR BUSINESS PARTNERS AND WITH OTHERS

4.1 SUPPLY CHAIN MANAGEMENT

Our values, honesty and standards of conduct do not stop with our actions, or at our doors. We expect the same from our suppliers, clients and others with whom we do business. As part of ERM's global operations, ERM relies on many third parties to provide it with the materials or services it requires to conduct its business. A substantial proportion of the work which ERM performs for its clients is carried out by sub-contractors, whose skills are essential in helping us carry out our work safely and responsibly. ERM is committed to choose reputable business partners who share our commitment to ethical standards and business practices. Our [Supplier Code of Business Conduct and Ethics \("Supplier Code"\)](#) sets out the principles and standards of conduct for any person or entity who provides goods or services ("Supplier") to ERM.

A core expectation and requirement of ERM personnel is that all ERM-related tasks should be performed by individuals with the skills, expertise, qualifications and behaviors necessary to uphold our values and meet the standards of our Supplier Code. Accordingly, ERM requires adherence to the Supplier Code in our supply chain contracting, and ERMers are expected to share the Supplier Code with our supply chain, including any individuals who are assigned to supply goods or perform services for ERM or our clients.

Q: A client asked me to set up a subcontractor and pay them through our system, even though ERM won't have a contract with the sub or supervise the sub in anyway. I don't even know what the sub will do for the client, but we can get a 15% mark up on the subcontractor anyway, with no effort, just by doing this. When I asked why, the client said it is too much of a hassle to deal with the set up and paperwork at their company, so it is quicker and easier to do it this way. I should do this for the client, right?

A: No. Just as ERM has strict controls regarding our supply chain, so do our clients. Supply chain controls are there to prevent fraud or money laundering and maintain anti-bribery and anti-corruption mechanisms. Under our supply chain controls, the arrangement would not be appropriate - plus you could be inadvertently aiding in circumventing the client's internal controls. You will need to let the client know that our system doesn't allow us to pay subcontractors and suppliers unless we have a contract directly with the subcontractor or vendor and we are supervising the services or obtaining the products.

4.2 FAIR DEALING

No ERM officer, director, or employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

4.3 FAIR COMPETITION AND ANTITRUST LAWS

We must comply with all applicable fair competition and antitrust laws. These are laws to ensure that businesses compete fairly and honestly and prohibit conduct seeking to reduce or restrain competition. If you are uncertain whether a contemplated action raises unfair competition or antitrust issues, consult the Legal Department.

We never make inappropriate offers to external business partners or other third parties to influence their decision in our favor.

4.4 GATHERING COMPETITIVE INFORMATION

You may not accept, use, or disclose the confidential information of our competitors. Particular care must be taken when dealing with competitors, clients, ex-clients, and ex-employees. Never ask for or disclose confidential or proprietary information. Never ask a person to violate a non-compete or non-disclosure agreement. If you are uncertain about a contemplated action, consult the Legal Department.

4.5 NO DEFAMATION OR MISREPRESENTATION IN THE SALES PROCESS

Selling should not include misstatements, innuendo, or rumors about our competition or the services and financial condition of our competition. Do not make unsupportable promises concerning our services.

4.6 PUBLIC COMMUNICATIONS

ERM expects professionalism in standard business communications and extra care in communications that will be public. Do not represent yourself as speaking on behalf of ERM unless expressly authorized to do so by ERM. Any media inquiries relating to ERM shall be immediately referred to editor@erm.com for handling. How we conduct ourselves on social media is also relevant to our work and this Code of Conduct. ERMers should not post content about ERM staff or personnel, shareholders, customers, suppliers, affiliates or competitors that is derogatory or in contravention of any standards in this Code of Conduct.

5. THE GOVERNMENTS AND COMMUNITIES WHERE WE WORK

5.1 RESPECTING INTERNATIONAL TRADE LAWS

Trade sanctions, including financial sanctions, are complex. We abide by the trade laws of all countries in which we operate -- economic sanctions as well as import and export laws. Most countries in which ERM operates impose restrictions on the movement of materials, technology or finished products across borders. Chemicals, products or samples intended for import or export, including equipment, software, and technology, must be classified in advance, and all required labelling, documentation, licenses and approvals completed. If you need advice for compliance with trade sanctions, consult the Legal Department.

5.2 SUPPORTING INTERNATIONAL EFFORTS AGAINST MODERN SLAVERY

ERM supports international efforts on human rights and complies with the UK Modern Slavery Act. Under international standards, we will not allow forced, compulsory labor, bonded labor, or human trafficking. ERM is committed to taking steps to ensure that modern slavery does not occur in our business or our supply chain and we expect our suppliers to do the same.

5.3 COMBATTING BRIBERY AND CORRUPTION

At ERM, we build relationships based on trust, and we are determined to maintain and enhance our reputation. Even unsubstantiated claims of bribery and corruption may damage ERM's reputation. That is why at ERM, all acts of corruption (including bribes, kickbacks, and self-dealing) are strictly forbidden. We compete fairly on the strength of our expertise and execution excellence. We do not accept corruption in any form and do not make or accept improper payments to obtain or retain business with those in government or the private sector or as a reward for awarding subcontractor or supplier contracts.

We cannot be bribed, and we do not offer bribes.

Everyone involved in ERM’s business must comply with the anti-bribery and corruption (ABC) laws of the countries where we operate, as well as those that apply across borders. ERM adheres to the higher international standard in the UK Bribery Act of no facilitation payments under our international obligations, rather than the lower standard of allowing certain facilitation or “grease” payments under the US Foreign Corrupt Practices Act (“FCPA”). ERM does not permit facilitation or grease payments to be made to government officials, even if such payments are nominal in amount. Examples of facilitation payments include, but are not limited to, undocumented and unreceipted payments made to speed up routine government actions, such as issuing permits or releasing goods held in customs. If you have a question regarding a situation or whether or not a suggested transaction complies with our Code of Conduct or ABC law, contact a member of the Legal Department.

Q: Does ERM’s prohibition against bribery only prohibit bribes to government officials?

A: No. ERM prohibits bribery in any form to anyone, regardless of whether they are a government official.

A kickback or bribe includes any item intended to improperly obtain favorable treatment. With that said, gifts can be perceived as inappropriate and still damage ERM’s reputation even if that is not the actual intent of the giver or receiver. Other than modest gifts given or received in the normal course of business (including travel or entertainment), neither you nor your relatives may give gifts to, or receive gifts from, ERM’s clients and suppliers. Other gifts may be given or accepted only with prior approval of your immediate line manager or senior management. In no event should you put ERM or yourself in a position that would be embarrassing if the gift was made public. In addition to reputational damage and depending on the facts presented, ERM can be held legally liable for any bribes paid by or accepted by an ERM supplier, agents, temporary employees, and subcontractors.

If a facilitation payment has been requested or made, you must immediately report it to your line manager and the Chief Compliance Officer or use our [Speak Up Helpline](#). If you make a payment because you genuinely believe your life, limb or liberty is at risk, this is not a facilitation payment but must be reported to ERM as if it were.

5.4 OUTSIDE CONSULTANTS AND SUBCONTRACTORS

When ERM hires outside consultants, agents, or subcontractors, ERM management will provide copies of this Code of Conduct as well as the [ERM Supplier Code of Business Conduct and Ethics \(“Supplier Code”\)](#) and inform the consultant, agent, or subcontractor that work should be performed in accordance with this Code of Conduct and the Supplier Code.

We do not allow subcontractors or agents of ours to do what we are prohibited from doing. All of us, included subcontractors and agents of ours, must refrain from offering, giving, promising, or soliciting — either directly or through a third party — any payment or supply of services, gifts, or leisure activities to obtain or retain a market or competitive advantage. This rule applies to transactions with government officials, companies, and private persons. Under international law, the acts of agents used to facilitate ERM business are considered our acts, so our agents in various countries must adhere to the same standards that we set for ourselves.

5.5 GOVERNMENT AGENCIES

From time to time we will have direct dealings with the regulators and it is our commitment to do so with respect and cooperation. Regulatory agencies may request to review ERM's plans, specifications, reports, activities, workplaces and project sites. ERM's Legal Department should be contacted immediately after civil or administrative inspections, and immediately at the start of any criminal inspection.

If you become aware of any agency request for documents or information, be sure to get the full contact information/business card of the requesting agency personnel. In the event that a business card is not available, be sure to get the name, agency, department and phone number.

At any time during a civil inspection, if the inspector expresses serious concerns (whether those concerns are expressed by the inspector verbally or in writing) -- stop all work immediately. Contact the Partner in Charge and the Legal Department immediately. If the concerns involve health/safety issues, be sure to contact the Health & Safety Officer as well.

In the unlikely event of a criminal investigation, ask if the agent/investigator has a search warrant. If the agent/investigator does not have a search warrant, do not consent on behalf of ERM to any search. Rather, contact the Group General Counsel or the Chief Compliance Officer immediately. If you cannot reach either, contact another member of the Legal Department.

5.6 GOVERNMENT OFFICIALS

To avoid reputational harm or the appearance of impropriety no gift, money, loan, entertainment, service or other item of value may be promised to a government official, or the official's friends or family members, in connection with work with ERM. For purposes of this Code of Conduct, "government official" includes any officer, employee, candidate, agent, representative, official or de facto official of any government, military, government-owned or affiliated company, political party, or any public international organization existing under any international treaty or treaties (example, United Nations or World Bank). When government officials are involved, even simple business courtesies such as meals, entertainment or travel may be illegal under international law or the laws of the host country.

In the ordinary course of business, employees may interact with government agencies and employees. Dealing with government employees is often different than dealing with private persons. Many governmental bodies strictly prohibit the receipt of any gratuities by their employees, including meals and entertainment. You must be aware of and strictly follow these prohibitions. Further, interactions with government agencies, officials and employees are often regulated by campaign finance, lobby disclosure and government ethics laws.

5.7 NO POLITICAL OR RELIGIOUS CONTRIBUTIONS

Due to our global operations and respect for the many cultures in which we operate, ERM observes strict political and religious neutrality. Therefore, ERM does not make financial contributions to political candidates, elected representatives, political parties, or religious institutions. In particular, so that we do not inadvertently create the impression of an improper or corrupt payment, ERM does not allow charitable contributions requested by political figures or governmental authorities.

Q: A friend of mine is running for political office. Can I help her out with the campaign?

A: Yes, your volunteer support is your personal decision. However, in no case may you use ERM resources—including Company time, phones, emails, supplies, the Company name or your Company title—to advance the campaign.

While no ERM funds may be given to political candidates, political parties, or religious institutions, of course you may engage in political or religious activity with your own resources on your own time.

6. FINANCIAL INTEGRITY AND PROTECTING OUR ASSETS

6.1 ACCURACY OF BOOKS, RECORDS, AND REPORTS

Full, fair, accurate, timely, and understandable reports and business records are essential to the success of our business. Mistakes should never be covered up but should be immediately fully disclosed and corrected. Falsification of any ERM, client, or third-party record is prohibited.

Please exercise the highest standard of care in preparing ERM reports in accordance with the following guidelines:

- All of our accounting records, as well as reports produced from those records, must be in accordance with the laws of each applicable jurisdiction.
- All of our records must fairly and accurately reflect the transactions or occurrences to which they relate, including but not limited to all timekeeping records.
- All of our records must fairly and accurately reflect, in reasonable detail, our assets, liabilities, revenues, and expenses.
- Our records must not contain any false or intentionally misleading entries.
- No transactions should be intentionally misclassified as to accounts, departments, or accounting periods.
- All of our transactions must be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period.
- No information should be concealed from Finance or Legal, and especially not from our internal auditors or our independent auditors.
- No false or misleading information should be given to Finance or Legal, and especially not to our internal auditors or our independent auditors.

- No individual should ask or instruct any of our clients or suppliers to provide false or misleading information to, or conceal any information from Finance or Legal, and especially not from our internal auditors or our independent auditors.
- Compliance with our internal controls over financial reporting and all other internal controls is required.

It may seem that the standards set out above are primarily applicable only to our accounting and financial personnel. However, all of our business communications are expected to be conducted with integrity and professionalism. Accordingly, all employees must communicate accurately and in appropriate detail on the transactions in which they are involved.

6.2 TAX MATTERS

ERM has a “zero tolerance” approach to engaging in, or facilitating, tax evasion. At all times and in all countries, business should be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented. Tax means all forms of taxation, including but not limited to indirect taxes (e.g. VAT/GST/sales taxes), withholding taxes, corporate taxes, social security taxes and stamp duties. If you have any questions on the appropriate tax approach, you should seek advice from ERM’s Tax Department.

6.3 INFORMATION SECURITY AND CONFIDENTIAL INFORMATION

Information security seeks to preserve the confidentiality, integrity, and availability of information to reduce the risk and the impact of potential threats to our business and operations. To keep our business safe, ERM needs you to comply with our security standards for our various systems, and with the rules related to the use of our information systems. Although cyberattacks are complex, they always start with an imprudent act or a lack of awareness. Therefore, the most important thing you can do is read awareness information and remain vigilant at all times, especially when handling emails, browsing the web, deciding on whether to click on links, or taking outside phone calls. For more information and suggestions on “dos and don’ts”, consult the IT site on Minerva.

In addition to the systems security mentioned above and the data privacy and protection obligations discussed previously in [Section 3.8](#), every ERM employee is required to protect both ERM’s confidential information as well as the confidential information of ERM’s clients. The proprietary, trade secret and confidential information of ERM is a valuable asset, and ERM employees must follow ERM policy and procedure regarding safeguarding ERM and client information. Employees who have received or have access to confidential information must exercise skill, care and diligence to maintain confidentiality. This includes:

- Accessing, storing, securely transferring and deleting confidential information in line with ERM’s security policies;
- Not viewing or discussing confidential information in public,
- Not forwarding confidential, trade secret, or proprietary information to personal email addresses;
- Not disclosing confidential information to any third parties (including competitors) unless specifically authorized to do so; and

- Not using or disclosing confidential information on any social networking sites.

Confidential information includes but is not limited to the following examples:

- All information and personal data gathered through employment with ERM unless it is clearly stated to be otherwise or already in the public domain;
- Business, strategic, marketing, recruiting, or retention plans;
- Financial information;
- Employment data, including salary, bonus, or performance data;
- Any client information, client contact information, or client contractual matters;
- Personal data relating to ERM colleagues and clients; and
- Information related to our subcontractors or other business interactions.

The above types of confidential information are only examples. You must carefully consider whether the information available to you is confidential or proprietary and treat it accordingly. If in doubt, contact the Legal Department at litigationandemployment@erm.com. Your obligations in relation to the protection of confidential information apply indefinitely (even after you leave ERM employment).

Most ERM contracts with clients have stringent confidentiality provisions -- a failure to protect client confidential information may place ERM in material breach of contract with a client. In addition to carefully guarding paper and electronic client information, be sure to conduct yourself in a manner that protects client confidential information. You must follow all client requirements for communication and delivery of work product. Be cognizant of where you conduct cell phone conversations, and do not discuss client matters in public places such as elevators or airplanes.

6.4 IMPROPER USE OR THEFT OF ERM PROPERTY

Every employee, officer, and director must safeguard our property from loss or theft and may not take ERM property for personal use. Our property includes confidential and proprietary information, trade secrets, intellectual property, software, computers, office space, vehicles, field equipment, office equipment, and supplies. You must appropriately secure all of our property within your control to prevent its unauthorized use. Using our computers or communications systems to access or distribute personal and/or non-ERM business related information, data, or graphics may be a security breach of our systems, a misuse of ERM property, or a violation of other sections of this Code.

If you suspect that any ERM property, including confidential information has been used for improper purposes, or is lost or stolen, you must report it immediately to your manager, the Legal Department or through the Speak Up platform.

6.5 CORPORATE OPPORTUNITIES

All of our officers, directors, and employees have a duty to advance our legitimate business interests when the opportunity to do so arises. Our officers, directors, and employees may not

take personal advantage of opportunities that are discovered through the use of ERM property, information, or position, and may not compete with ERM for business opportunities. In the event you have a question regarding an opportunity, review the "Conflicts of Interest" section of this Code of Conduct and then discuss any remaining concerns with the Chief Compliance Officer.

6.6 SECURITIES TRADING

In the course of your employment with ERM, you may become aware of material information about other companies that has not been made public. The use of such "inside information" for your financial or other benefit is not only unethical, but also may be violation of strict laws against "insider trading" in securities (for example, stocks, bonds and options). "Insider information" means information that: a.) is not available to the public, and b.) is "material."

"Material information" in relationship to securities laws means information that a reasonable investor would likely consider important in deciding whether to buy or sell a security. Many of our employees may have inside information simply by virtue of their positions and work that they are doing for clients. Inside information might include, for example:

- The purchase or sale of a major asset;
- Changes in dividend policy;
- Mergers, acquisitions and joint ventures;
- Significant changes in operations or business plans;
- Major developments in litigation;
- The financial condition or operating results of a company, including earnings statements and forecasts; or
- Regulatory developments.










If you have knowledge of any of these kinds of information – and the information is non-public – it is inside information, and no ERM employee may buy or sell a security while aware of inside information pertaining to that security. Inside information can also be information you obtained confidentially during the course of your work about another company – for example, from clients or suppliers. You should also be aware that the insider trading prohibition applies to people outside ERM companies who obtain the information from one of our employees (for example, an employee's spouse, friends or broker). This means you must never give someone outside ERM a "tip" regarding non-public inside information – this includes discussions on Internet "chat rooms." If you do, and the person you provided the information to uses it to trade, both you and the person to whom you provided the information are subject to action under applicable securities law.

Government agencies regularly monitor trading activities through computerized searches. ERM employees (and outsiders they are associated with) who have inside information can lawfully trade in the market once the information is made public through established channels and enough time has passed for the information to be absorbed by the public.

If you have any questions or concerns about your responsibilities under the insider trading laws, contact the Legal Department for further guidance.

6.7 PREVENT MONEY LAUNDERING

Money laundering occurs when someone involved in a criminal activity such as terrorism, narcotics, bribery or fraud “launders” the proceeds of the crime to prevent detection and appear legitimate. Our widespread global operations make us a prime target for money laundering attempts. If ERM inadvertently allows a money laundering transaction, an operating account can be frozen by authorities during an investigation. The best prevention is due diligence before engaging in a transaction. Our sales and opportunity, trade sanction screening, credit screening and subcontractor pre-qualification systems are all set up with due diligence and checks to prevent both trade sanction and money laundering risks. Use our systems for all transactions, before the transactions occur, so that we are proactively preventing money laundering risk in our operations.

RED FLAG ALERTS FOR MONEY LAUNDERING	
	CASH TRANSACTIONS
	LARGE OVERPAYMENTS AND REFUNDS TO THE CLIENT, ESPECIALLY IF A CURRENCY CONVERSION OCCURS
	PAYMENTS FROM AN UNIDENTIFIABLE OR UNKNOWN ORIGIN
	RELUCTANCE BY AN ERM CLIENT TO DISCLOSE BUSINESS ACTIVITIES OR DETAILS
	ANY HINT OF A BRIBERY ARRANGEMENT
	LARGE COMMISSIONS OR CONSULTING FEES TO A SUBCONTRACTOR OR AGENT, ESPECIALLY ONE DESIGNATED BY THE CLIENT
	RELUCTANCE OF AN ERMER TO OFFER INFORMATION AND DOCUMENTATION ABOUT THE USE OF FUNDS
	UNVERIFIABLE PHONE NUMBERS, ADDRESSES, OR OTHER CONTACT INFORMATION
	INTERMEDIARY REPRESENTING AN UNKNOWN CUSTOMER

6.8 USE OF ERM BRAND OR NAME

The goodwill of our brand as well as our global trademark portfolio are both valuable assets at ERM.

To obtain consent to use ERM pictures or licenses for images to be used on websites or in any marketing materials, contact editor@erm.com.

Just as we protect our intellectual property and assets, we respect the intellectual property and assets of others. We take care in funding and conducting maintenance of these assets. In the course of conducting marketing or promotional materials/websites, ERM’s prior written approval is required in some instances. By way of example, trademark and copyright rights may be at issue or a license may need to be obtained. You must not:

- Making unauthorized business marketing commitments involving ERM;
- Using photographs, videos or audio recordings of either ERM or ERM client projects or operations without ERM’s prior written approval; and

- Changing ERM's logo, trademarks or proprietary graphics in any way, without ERM's prior consent.

7. COMPLIANCE AND ETHICS PROGRAM

7.1 SCOPE, TRAINING AND REPORTING

Our Code of Conduct applies to everyone who works for ERM, including the Board, Executive Committee, employees and third parties working under the direction of ERM. Employees will attend training on the Code of Conduct as determined by the company. Employees suspecting a violation of this Code of Conduct, other ERM policies or procedures, or applicable laws, should promptly report the concern to the Chief Compliance Officer. Employees must not conduct their own preliminary investigations without notifying the Chief Compliance Officer.

7.2 ERM GLOBAL POLICY MANUAL ADMINISTRATION

Policy Title: Code of Business Conduct and Ethics

Policy Number: 1

Version Number: 4

Effective Date of this Version: 26 March 2024

Original Approver and Original Effective Date: Group CEO/October 2006. Approval and version history maintained by the ERM Legal Department.

Policy Description: Establishes fundamental operational expectations and international standards of business conduct and ethics.

Authority to Amend this Policy: Group CEO, Group General Counsel, and Chief Compliance Officer

Authority to Update Resources Guidance: Chief Compliance Officer

Authority to Waive this Policy: None

Policy Review Cycle: 3 years from Effective Date of this version

Docket responsibility for review cycle: Chief Compliance Officer