

International SOS takes pride in our reputation for integrity and the business success that our reputation has enabled. This reputation has taken years to build and maintaining it is vital to our success.

The Code has been developed to convey International SOS's expectation to all Providers to adhere to the highest ethical standards when conducting business.

Providers are required to take reasonable steps to ensure that the Code is communicated throughout their organisations and to make the Code available to their employees.

International SOS values its business relationships with its Providers and requires its Providers to share our commitment to, at a minimum, compliance with the following standards:

1. Anti-corruption Compliance

Providers may not act in any way, in their business relationship with International SOS or otherwise, that violates the U.S. Foreign Corrupt Practices Act or any other anti-corruption law around the world. International SOS entities use Providers that do not violate our ethical standards through bribes, kickbacks, or other similar improper or unlawful payments.

Providers shall comply with all national and international anti-bribery regulations as well as applicable anti-corruption laws, regulations and standards. Providers shall not (either directly or indirectly) offer or promise to provide anything of value to improperly influence an official act or to secure an improper advantage in order to obtain or retain business.

2. Compliance with Laws

Provider's personnel and operations shall operate in full compliance with the laws of their respective countries and with all other applicable laws, all statutory, regulatory and other legal requirements, including but not limited to antitrust, trade controls and sanction regimes. Additionally, Providers will ensure that products and services for International SOS adhere to all applicable international trade compliance laws, all statutory, regulatory and other legal requirements.

International SOS has as its core policy a commitment to comply with the sanctions regimes of the United Nations, the United States of America, the European Union, Singapore and the Hong Kong SAR, and requires its

Providers to comply with these and any other sanctions rules which may be applicable to their activities in and from the territories in which they operate. When providing services to International SOS or its customers, Providers may not deal with any entities, organisations, persons or vessels which are under any applicable sanctions.

3. Confidential/Proprietary Information

Providers must respect International SOS's intellectual property, trade secrets and other confidential, proprietary or sensitive information and may not use or disclose any such information except in accordance with their contract with International SOS and for the benefit of International SOS. Any information or data regarding International SOS's operations shall always be treated by Providers as confidential unless that information enters the public domain through no fault of the Providers.

4. Data Protection and Privacy Laws

Providers will undertake necessary measures to ensure that personal data it handles on behalf of International SOS will be protected against unauthorised disclosure, access, use and modification and that it will be used only for purposes of rendering the relevant services or as in compliance with applicable data privacy and data protection laws.

5. Ethical Dealings

Honest dealing with customers and Providers is essential to sound business relationships. International SOS seeks to give all Providers fair consideration. Decisions are based on objective criteria such as price, quality, and service capability as well as Providers' reliability and integrity. Invoices, financial settlements and reports should correctly reflect the business transactions between us.

Providers are required to demonstrate these same high ethical standards and to conduct all business transactions with integrity and fairness and shall encourage its own suppliers to adhere to the Code as part of fulfilling their contractual obligations.

Providers shall equally disclose any potential conflict of interests where individuals have private or personal interests that could influence their decisions.

6. Money Laundering and Financial Records

Providers shall comply with applicable laws and regulations designed to combat money laundering activities. Providers shall maintain financial records and reports according to international laws and regulations.

7. Health and Safety

Providers who do business with International SOS are encouraged to maintain a focus on health and safety that is consistent with International SOS and must provide a safe and healthy work environment for all employees working at their sites.

In addition, any Provider representative providing on-site services in an International SOS facility is required to adhere to International SOS safety standards.

It is our expectation that Providers have and enforce a written policy on drugs, alcohol and other prohibited items.

8. Business Continuity Planning

Providers shall be prepared for potential disruptions of its business through natural disasters, illness, pandemics, criminal acts, etc. This should include emergency plans to protect both employees and their wellbeing as well as to minimize the effects of such events on the delivery of products and services.

9. Diversity and Inclusion

Providers shall encourage an inclusive work environment, valuing the diversity of its employees and contractors and avoiding discrimination with respect to gender, race, religion, age, disability, sexual orientation, origin or any other differentiating characteristics.

10. Modern Slavery

Providers shall not use any form of forced, bonded or involuntary labour. All labour must be voluntary. Workers must be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal legal documents). Providers shall ensure that workers do not pay fees or make any payment connected to obtaining employment throughout the hiring process and the employment period. Providers shall pay workers in a timely manner and clearly convey the basis on which workers are being paid.

Punishments, mental and/or physical coercion are prohibited. Disciplinary policies and procedures shall be clearly defined and communicated to the workers.

Providers shall also not employ children under the legal age of employment in any country or local jurisdiction.

11. Environmental Responsibility

Providers shall comply with all applicable environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment.

We expect our business partners to strive to support global climate protection goals through the products and services they deliver and to operate sustainably and conscious of the environmental impact.

Adherence & Violations

Providers must immediately notify International SOS in writing upon becoming aware of any negative or other adverse publicity concerning the Providers or any product and services being provided to International SOS by the Provider, or any event or circumstance related to the Provider that could be expected to cause negative or other adverse publicity concerning International SOS.

It is the responsibility of each Provider to ensure that its employees and representatives understand and comply with the Code.

Failure to adhere to the Code may be grounds for terminating the Provider relationship depending on the seriousness of the violation and the circumstances.

Definitions

“International SOS” means AEA International Holdings Pte. Ltd. and its Affiliates. where “Affiliates” mean any person or party that controls International SOS, is controlled by International SOS or is under common control with International SOS, where “control” means owning, directly or indirectly, more than 50% of the capital stock (or other ownership interest, if not a corporation) of a person or party ordinarily having voting rights or otherwise having the right or ability, by contract or otherwise, to direct the management and policies of such person or party.

“The Code” means International SOS Providers Code of Conduct.

“Providers” or “Provider” means current and future individuals and/or entities which are contracted with International SOS as Providers to which International SOS refers their client’s workforce, their employees and others who may subscribe to its services or who may be entitled to Intl.SOS’ services under a specific program.

If you have any questions about the Code, you may contact us at Compliance@internationalsos.com.

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