



# CODE OF BUSINESS ETHICS AND CONDUCT.

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# CHAPTER 1. INTRODUCTION.

## Message from the Managing Director

### Dear Colleagues

For over 50 years, Supreme has supplied complex logistics solutions to clients in challenging and remote locations. Our culture of ethics and integrity has been a constant throughout.

A strong commitment to ethics and integrity isn't just the right way to do business; it's how we earn the trust and respect that is crucial to our success. Despite the fact that we operate in many countries and in differing conditions, our values have universal application. Our customers trust us to be their advocate. Our suppliers trust us to be an equitable partner. And as Supreme employees, we trust each other to uphold the highest standards of conduct as part of our day-to-day activities.

The Supreme Code of Business Ethics and Conduct ("Supreme Code of Ethics") that follows describes what we believe are the right things to do, not just what we are required to do under the law. No code of conduct can however cover every possible situation. If there is ever any doubt or uncertainty about the right course of action, your manager, supervisor or human resources representative can provide guidance. If the circumstances make it uncomfortable for you to speak with any of these people, or if you continue to have concerns about receiving a response, you should not hesitate to contact Supreme's Ethics and Compliance Hotline, available 24 hours a day, for your local listing turn to page 29 of this booklet, alternatively visit [www.supremegroupethics.ethicspoint.com](http://www.supremegroupethics.ethicspoint.com).

Conducting our business with high standards of ethics and integrity is essential to our future success. It all begins with you; all directors and employees are responsible for understanding and complying with the Supreme Code of Ethics.

I encourage you to set the example through your words and actions!

**Stephen Orenstein**  
**Managing Director**  
**Supreme Group**

## Introduction to the Code of Business Ethics and Conduct

### 1. Company Values

Customers - We are committed to delivering quality solutions to our customers.

People - We recognize and reward the passion and achievements of our people.

Success - We drive success through operational excellence and innovative thinking.

Integrity - We insist that integrity and ethics define our decisions and our actions.

Sustainability - We are dedicated to protecting the environment and creating a sustainable future for communities where we operate.

### 2. Introduction

Supreme Group conducts business in many different parts of the world, each governed by a different set of laws, regulations, and business practices. Because of this, Supreme Group has established global standards to help ensure that our values are upheld wherever we do business, and that we conduct business fairly and honestly in all areas of operation. Supreme Group is committed to maintaining the highest standard of business conduct in all of its activities. Our business success is dependent upon all employees and agents of Supreme Group maintaining the highest standards of ethical behavior in each business interaction they conduct on Supreme Group's behalf.

The Code of Business Ethics and Conduct (the "Code of Conduct" or the "Code") confirms Supreme Group's commitment to conducting our business legally and to the highest ethical standards. As an employee you must follow these ethical standards while carrying out your daily activities. No one in Supreme Group is authorized to conduct any business or to act in a manner which conflicts with the guidelines set out in this Code of Conduct, or any applicable law, and no one at Supreme Group is authorized to ask another employee or a third party (such as a supplier or subcontractor) to do so on Supreme Group's behalf.

Although the Code of Conduct does not cover every subject matter or situation, it sets out basic principles for guidance. In addition, detailed policies and procedures covering many

of the topics in this Code are available on Supreme Group's Intranet at <http://intern.supreme-group.net/> or from your HR representative.

While each of us is responsible and accountable for our own actions, we do not face ethical challenges alone. Questions may be addressed to Supreme Group's Director of Ethics & Compliance or to any member of Supreme's Group Compliance Committee. Your confidentiality will be maintained at all times.

### 3. Why we have a Code of Business Ethics and Conduct

Supreme Group's success depends on our reputation, performance, and how we treat others, whether they are employees, clients, suppliers,



competitors, government authorities, or communities. While business practices and customs vary across cultures and geographies, Supreme Group has established a set of standards that we must meet in all parts of the world, at all times, in order to be successful in our business.

#### 4. To Whom the Code Applies

All employees of Supreme Group must adhere to the standards set out in this Code. In addition, Supreme Group must only select subcontractors, workers, consultants, agents, suppliers and other third-party providers who act in a manner consistent with the standards contained in this Code of Conduct.

#### 5. Breaches of the Code

Minor breaches of the Code will normally be resolved internally and may result in counselling or the clarification of procedures to avoid further breaches. More serious breaches may lead to disciplinary action, up to and including the termination of employment. The intent of disciplinary action is not punitive but corrective, and may be necessary to safeguard the continued success of the company and its employees.

#### 6. Industry Practice

Supreme Group recognizes that other companies and their employees may sometimes observe less ethical standards than we do at Supreme Group. If you encounter or suspect such transgressions and feel that we suffer a business disadvantage as a result, report the matter promptly to the Group Legal Department or Director of Ethics & Compliance. Under no circumstances are you permitted to relax or violate this Code of Conduct. Neither Supreme Group policy nor the law exonerates your unethical conduct on the grounds that another company or individual has behaved unethically.



## Responsibilities under the Code

### 1. To make Ethical Decisions

Not all ethical decisions are black and white. In fact, many complex situations we face in business fall in the 'grey area' in between. Supreme Group supports employees by offering a full program of Ethics & Compliance training explaining how to make decisions based on the values set out in this Code of Conduct. However, as a basic guide, if you are uncertain about what to do when faced with an ethical decision and have considered all the issues, ask yourself:

- Does my decision conflict with Supreme Group's values?
- What are the consequences of my decision?
- How will I feel explaining my decision to colleagues?
- Would I be confident explaining my actions to external authorities?
- How would my actions look in a newspaper?
- How will my actions affect the organization as a whole?



If after having considered these questions you remain unsure about your decision, give your supervisor or manager a chance to talk through the issues with you, or consult your Human Resources representative or Supreme Group's Director of Ethics & Compliance.

### 2. Your Responsibility under the Code

All Supreme Group employees are responsible for their own conduct and behavior. It is important that you understand not only what your job is but how your job is to be performed, including what policies you need to operate under.

If you are not sure of your responsibility, you should discuss the matter with your direct manager or, alternatively, your Human Resources representative. As an employee of Supreme Group, you are required to:

- Understand and follow the laws and regulations that apply to your job including any health and safety guidelines provided to protect you, other employees and customers;
- Read, understand, and follow this Code of Conduct; and
- Participate in any Ethics and Compliance Training that is required by the Supreme Group. "Not knowing" is not an option. Every employee has an individual responsibility to understand what acceptable and unacceptable behavior is.

### 3. Duty to Report

As an employee of Supreme Group, you must promptly report whatever you know or have heard about a situation that appears to you, in good faith, to be unlawful or unethical. You may make a report anonymously if you wish to the Ethics Hotline, details of which are set out in a Chapter 8. The person to whom you make the report must pass the information directly to the Director of Ethics & Compliance. Your report will be reviewed promptly, and Supreme Group will not tolerate threats, attacks, or acts of retaliation against you for making a report.

### 4. Cooperation with Internal Reviews, Audits and Investigations

Supreme Group frequently conducts internal reviews, audits and investigations to gather information for our management regarding business activities and to assist with making

sound business judgments. When Supreme Group conducts internal reviews, audits or investigations, it is your duty to cooperate and assist fully in providing materials, data and information as requested.

### 5. Additional Responsibilities for Managers

If you are a manager or supervisor at Supreme Group, you have additional responsibilities. You must:

- Develop and support a work environment where ethical conduct is recognized, valued, and exemplified;
- Ensure those employees who report to you attend any Ethics & Compliance training organized by Supreme Group;
- Assist and support employees who raise questions or concerns in good faith about ethics and legal compliance;
- Monitor and enforce compliance with the standards in this Code of Conduct; and
- Set a good example and encourage others to do likewise.



## Respect for Others

### 1. Equal Employment Opportunity

Our employees are our most valuable resource and at Supreme Group we believe that all employees should be treated fairly and with respect. To ensure this we have established global standards that are followed at all Supreme Group sites around the world. Supreme Group has zero tolerance for discrimination and is an equal opportunities employer. Employment decisions such as hiring, promotion, remuneration, benefits, termination, training opportunities and job assignments are based on qualifications, experience, competence and performance, and are not based on gender, race, national origin or other characteristics.



All managers, supervisors, and employees otherwise in positions of authority have an additional responsibility to maintain and support a healthy work environment.

### 2. Safe and Harassment-free Work Environment

Supreme Group is committed to providing a safe and healthy work environment for all employees. As an employee it is important that you help to maintain this environment by complying with all health and safety regulations and reporting any safety hazards, accidents or injuries immediately to your manager. Supreme Group strives to create a work environment that is free from harassment by co-workers, supervisors, providers of goods and services, contractors, and clients. The Employee Handbook sets

out the following principles for behavior required in the workplace:

- All employees should be treated with respect. This includes using appropriate workplace language when dealing with colleagues and internal and external customers. Swearing in particular is unacceptable; and
- All employees should be aware of the impact of their behavior on others.

Supreme Group has zero tolerance for bullying and harassment and considers it a fundamental obligation of all employees to behave appropriately in the workplace.

### 3. Use of Drugs and Alcohol

The use of drugs and alcohol in the workplace puts you, your fellow employees and the reputation of Supreme Group at risk. Employees may not attend work under the influence of controlled substances or alcohol, or bring illicit drugs or alcohol onto any of Supreme Group's premises. Similarly, use of controlled substances, the misuse or abuse of alcohol or medication away from company premises in any manner that may impair your ability to perform assigned duties, threatens the safety of others, or otherwise adversely impacts Supreme Group's business is not in the best interest of Supreme Group and is a violation of the Code of Conduct. If you are taking prescribed medication that could impair your ability to do your job or cause danger to yourself or others, you should discuss

this with your direct manager or your Human Resources representative. Supreme Group has a zero tolerance policy for abuse of drugs and reserves the right to employ random drug screening to ensure compliance.

#### 4. Social activities

This Code of Conduct is not intended to cover the private lives of Supreme Group employees. However, this is sometimes a grey area and the Code of Conduct will apply when an employee's private or social actions impact negatively on their colleagues and/or Supreme Group. In particular, employees should exercise discretion and integrity when conducting a personal relationship of any nature with another employee. All such relationships must also be conducted in full compliance with Supreme Group's Conflicts of Interest policy.

#### 5. Employee Privacy and Confidential Information

Supreme Group collects and maintains personal information relating to your employment, including compensation, medical, and other benefit information for legitimate business purposes only. Any employee who has access to sensitive information is subject to strict guidelines on the use of this information, including approval processes for accessing and sharing confidential employee information for legitimate business purposes.

Supreme Group also collects personal information relating to employees of our customers, suppliers and subcontractors. We are a global organization with business processes, management structures, and technical systems that may require the sharing of such information across country borders and we have implemented worldwide data privacy policies to protect information wherever it is stored or processed. If your position requires you to access personal information of employees, customers, suppliers or subcontractors, you must confirm with your manager that proper authorization has been obtained before any disclosure of this information to third parties.

#### 6. Competitors

At Supreme Group, we firmly believe that our services are superior to those of our competition. The most effective way to promote our business is to explain this to our customers, not to talk down or disparage the competition. When you possess non-public information about a competing firm, you must refrain from using it to influence a customer, even if you believe the information to be true.



## Working with Integrity

### 1. Avoiding Conflicts of Interest

A conflict of interest arises when your own personal interests, or those of people close to you, conflict with the impartial performance of your professional duties. Supreme Group is sensitive to even the appearance of a conflict of interest. The perception of a conflict of interest could arise where circumstances exist which lead a reasonable person to think that you could be influenced. In order to avoid conflicts of interest you must conduct business in an open manner. All financial, business and other activities both inside and outside of your job must be lawful and free of any conflict of interest, or even the suggestion of a conflict of interest with your responsibilities to Supreme Group. Please see Supreme Group's Conflicts of Interest policy for more information on your obligations with respect to Conflicts of Interest.

### 2. Working Time and Supreme Group Assets

Supreme Group's property, such as its facilities and computer/communications equipment, is provided to you so you can perform business activities on behalf of Supreme Group. You may not perform non-Supreme work or solicit non-Supreme business on Supreme Group's premises or by using Supreme Group's equipment or while

working on Supreme Group's time. You may not under any circumstances use Supreme Group equipment to store or access pornographic or offensive materials or material that is discriminatory or contains derogatory references to national origin, race, color, age, disability, religion, gender, sexual orientation, marital or family status, or any other protected characteristic.

### 3. Information belonging to others

Just as Supreme Group believes that its internal information and expertise constitute a major business asset, we recognize that other companies are entitled to retain control of their internal information assets.

You may not solicit, acquire, use, or distribute the proprietary, confidential, or trade secret information of another company or party. There is no general applicable standard for recognizing proprietary documents, but you should at least assume that markings such as "Company

Private," "Confidential," "Proprietary," "Restricted Distribution," "Internal Use," and so on, mean that the materials should not be used without prior written authorization from the owner. Even if the materials aren't specially marked, if you have any reason to believe they are or may be proprietary, you must treat them as such.

### 4. Protecting Supreme Group's Public Image

The public image of Supreme Group can be influenced by your actions. You must not make comments about, or on behalf of, Supreme Group to the media unless written authorization has been provided by the Group Legal Department. If you are asked to do so, please take the details of the caller and refer to the Group Communications Department for advice. Employees can also be associated with Supreme Group through their clothing, badges and vehicles. It is important that you consider yourself an ambassador for Supreme Group and conduct yourself accordingly when wearing Supreme Group branding.



## 5. Hiring Former Employees of Government or International Organizations

There are many complex laws that affect the employment of former government employees or former employees of international organizations. In some cases, even discussions of proposed employment are prohibited. These restrictions also apply to other government contractors and subcontractors who may be seeking an employment opportunity with Supreme Group. Although it may be possible to hire a government employee in certain instances, appropriate precautions must be taken. A Supreme Group employee may not have discussions concerning possible employment, whether in person, by telephone, fax or e-mail, with a potential new hire who is a current government employee without prior authorization from the Group Legal Department. A former Government employee may also be subject to restrictions on the type of work and/or the communications they may make to government officials.

## 6. Political Contributions/Political Lobbying

Employees may not give, offer, or authorize to offer company funds or other company assets (either directly or indirectly) for political purposes. Use of company property for political lobbying is prohibited, and is grounds for disciplinary action. Under certain U.S. legislation, Supreme Group is prohibited from making political contributions including in-kind contributions to the campaigns of candidates for federal office.

Furthermore, Supreme Group will not make or offer monetary or in-kind political contributions to political parties, political party officials, candidates for political office, or political advocacy groups.



## Protection of Supreme Group Assets

### 1. Monitoring Property

Supreme Group's property is vital to its business, helping you carry out your duties and meet the needs of our customers. As such, it is important that you use Supreme Group property in a responsible manner. This includes securing company property from theft or abuse. You must take proper care of any company property in your possession, in particular:

- Mobile phones;
- Computer hardware and accessories;
- Software and computer files.

Personal use of company property such as telephones and internet access is not prohibited by Supreme Group, but should be kept to a minimum and utilized outside of business hours.

Transmission or receipt of any material in violation of any Supreme Group policy or applicable laws is prohibited. Supreme Group reserves the right to monitor, access, disclose and use the content of communications composed, sent or received through company systems for any legitimate business purpose.

Intellectual property and confidential information belonging to Supreme Group is also company property. Any ideas, inventions, computer programs, technical innovations, system designs, or technical enhancements that you design or conceive while at Supreme Group are the sole property of the Supreme Group and must be protected like any other form of confidential information.



### 2. Protecting Supreme Group Information

Information about our work processes, procedures, clientele, suppliers, and employees is highly confidential and must be protected at all times. No employee may release non-public company information such as trade secrets, confidential operations, processes or dealings, or any information concerning the organization, business, finances, transactions or affairs of Supreme Group to the public without the approval of the Group Legal Department. Employees are required to keep all confidential information entrusted to them during the performance of their duties in complete secrecy and not use or attempt to use any such information in a manner that may injure or cause loss either directly or indirectly to Supreme Group. Employees must not share such information with anyone, even a co-worker, who does not need to know about it. If you have family or other close personal ties to a competitor, customer, supplier, subcontractor or other organization involved with our business, you must be especially careful not to disclose confidential information to them. Employees must also ensure that all confidential information entrusted to them is stored in line with Supreme Group policy.

### 3. Preserving Supreme Group Records

Supreme Group applies specific document retention controls which include hardcopy, electronic, and magnetic documents and records, as well as invoices, agreements, and contracts. Before destroying any records, employees must check with their supervisors

to assure compliance with Supreme Group policy. Records pertaining to any pending, threatened, or anticipated investigation, litigation, review, investigation or audit may not be destroyed for any reason.

#### 4. When you depart Supreme Group

If you depart Supreme Group for any reason you must return all Supreme Group property, including documents and media that contain proprietary or confidential information, and you may not disclose or use any proprietary or confidential information. You may not reformat your computer's hard drive or delete any information or data from it. After you leave Supreme Group your confidentiality obligations will continue.





## Fairness and Honesty in Business

### 1. Gifts, Entertainment

As gifts and entertainment can be regarded as bribes, employees must only accept gifts or entertainment that would not be so regarded. Different companies offer a wide variety of gifts from conference souvenirs to material goods, services, promotional premiums and discounts.



Common business courtesies that are usually acceptable include occasional meals with outside business associates, or the acceptance of reasonable and customary gifts, and promotional items of nominal value such as hats, shirts, pens, notepads or coffee mugs. When other gifts are received from third parties, the item must be returned with a clear explanation that the gift violates Supreme Group's Gifts, Entertainment and Anti-Bribery Policy. You must also notify the Director of Ethics & Compliance of any gift which is being received and/or returned.

As previously stated, this Code of Conduct regulates business conduct; it is not intended to regulate or control private and personal affairs. It is not intended to apply to situations where a company offers you something of substantial value for personal reasons that have absolutely nothing to do with Supreme Group. It may be hard to tell whether you are being

offered something in your personal capacity or as a Supreme Group employee. If you have the slightest doubt, you should review the proposed gift with your manager or Director of Ethics & Compliance before accepting it.

### 2. Gifts to and from Government or Public Employees

Special laws and rules apply to the giving or receiving of gifts and entertainment to or from Government or public officials anywhere in the world. Therefore, you may never offer or give money, credit, gifts, gratuities, or any other compensation, whether directly or indirectly, to a government employee or public official as this could be perceived as an inducement or bribe.

Furthermore, Supreme employees should not offer any government employees involved in the procurement process anything except beverages or light snacks at a business meeting.

As a rule, you may never accept a gift from a government official in any country. In very exceptional cases, it may be appropriate to accept a low-value gift from a government department (for example, a modest box of chocolates sent to a team at Supreme Group on the occasion of an official public holiday and for which it is customary to give business courtesies of this nature). However, the receipt of all such gifts must be notified to, and approved by, Supreme Group's Director of Ethics & Compliance.

Violation of these rules may have severe consequences for Supreme Group and its employees, including imprisonment for a criminal offence and substantial penalties and fines. Supreme Group might also be debarred or suspended from government contracting and be ineligible for export licenses. As a result, each employee must ask for advice when in doubt of what to do in a particular situation. Any

arrangements or agreements between Supreme Group personnel and Government employees or public officials must be authorized by the Group Legal Department prior to execution. For any questions, please contact the Group's Legal Department or the Director of Ethics & Compliance.

### 3. Bribes and Facilitation Payments

No employee may offer, give or receive a bribe when conducting business for Supreme. A bribe is something of value (usually money) offered to a person in a position of trust to influence his or her judgment or conduct (i.e. to circumvent ethical or other rules). Bribes can include but are not limited to cash payments, gifts, travel and entertainment, kickbacks, preferential treatment, unexplained rebates, payments for advertising or other disguised allowances or expenses.

Also, you may not, under any circumstances, pay what are commonly referred to as 'facilitation' or 'grease' payments to officials or anyone else to expedite a process more quickly or obtain an advantage or favour. Examples of facilitation payments include requests for improper payments by immigration officials for processing visas or similar requests made by customs or border guards to permit goods or trucks to cross a border. This does not prevent you making payment of officially advertised fees for which a proper receipt will be given.

### 4. Theft and Fraud

Supreme Group will not tolerate any theft or fraud by any employee. Fraud is an act or intent to cheat, trick, steal, deceive, or lie. Fraud is an act of dishonesty and, in most cases, is a criminal act. Intentional acts of fraud are treated very seriously and will be subject to strict disciplinary action, up to and including termination of employment and possible further legal recourse. Some examples of fraud include:

- Submitting false expense reports;
- Forging or altering cheques;
- Misappropriating assets or misusing company property; and
- Unauthorized handling or reporting of transactions.

### 5. Reporting Expenses

Supreme Group recognizes that employees may encounter reasonable expenses during the course of their duties, and reimburses legitimate business expenses in accordance with Supreme Group policy. Expenses incurred by employees should always be reasonable, represent good value and be incurred and claimed in strict adherence to Supreme Group's Business Related Expenses and Travel Policy and Procedure.

### 6. Creating Accurate Records

Various laws require us to maintain books and records of our business transactions. These books and records must, of course, be accurate. Dishonest reporting, for example, to management or auditors within Supreme Group, or to organizations or people outside the Supreme Group, is strictly prohibited. "Dishonest reporting" includes not only reporting information inaccurately but also organizing it in a way that is intended to mislead or misinform those who receive it. Never make false or misleading statements in financial reports, environmental monitoring reports, documents submitted to or maintained for government agencies, or status reports on contracts, particularly in situations where Supreme Group is serving a government customer. Dishonest reporting can lead to civil or even criminal liability for you and Supreme Group.

In accordance with this practice, Supreme Group is committed to advising its customers, suppliers, and business partners of any clerical or accounting errors as soon as they come to our attention, and we promptly correct any errors through credits, refunds, or other appropriate means.

### 7. Public Statements

As leaders in ethical business conduct, all of Supreme Group's public and private statements must be strictly honest, fair, and free of intent to mislead or deceive. If your job responsibilities include direct interaction with customers, the press, or other public audiences, you must recognize that you are entrusted with a special obligation to make fair and honest statements. If an attorney, investigator, law enforcement official, or government official asks you for information about Supreme Group, you must refer the request immediately to the Group Legal Department.

### 8. Suppliers

Suppliers competing for our business must have confidence in the fairness of our selection process. In our process, we gather and weigh the facts to determine who will best suit our needs. If you participate in supplier selection, you must have an impartial approach, regardless of the size of the purchase or its importance to the business. Keep pricing and any other information submitted by suppliers, confidential. Regardless of whether you are actually in a position to influence decisions about suppliers, you must not exert (or attempt to exert) influence to get "special treatment" for anyone. Even to appear to do so can undermine the integrity of our established procedures.



# CHAPTER 7. COMPLIANCE.

## Compliance

### 1. Antitrust Compliance

Supreme Group succeeds in the marketplace because we deliver superior services and results to our customers. We do not engage in price fixing, dividing territories, agreeing to contract terms, or other similar activities with competitors that negatively impact the client and are counter to free market principles.

To comply with competition laws, you must be particularly careful about relationships with competing companies (which may include our suppliers or subcontractors). If your assignment requires you to interact with our competitors, you must observe the following restrictions and consult the Group Legal Department or Director of Ethics & Compliance as necessary:

- Avoid any discussion of pricing and contracting policies, costs, delivery capacities, and plans related to competing services with any Supreme Group competitors.
- Do not disclose any market or product plans, market segmentation or analysis, or market surveys in areas where our competitors compete.
- Do not offer or solicit any agreement, formal or informal, with any competitor or group of competitors concerning Supreme Group business practices, sales, territories, prices, terms, conditions, or supply volumes.
- If a competitor initiates a discussion in any of these areas, you are required to remove yourself from the discussion and immediately report the matter to the Group Legal Department or Director of Ethics & Compliance.

### 2. Compliance with Laws

Laws in many locations have a direct impact on the conduct of business by Supreme Group. You must comply with all relevant laws, in addition to the standards set in this Code of Conduct which may be more restrictive than those required by law. If you have any questions on specific laws or regulations, contact the Group Legal Department.

In particular, we are committed to full compliance with all export control laws of the U.S. and other jurisdictions in which it operates, including obtaining proper export authorization, establishing eligibility of export recipients, and acquiring and retaining all required documentation. Similarly, we expect that all Supreme Group employees, agents, and contractors will also adhere to applicable customs laws for importing products.

U.S. law also prohibits Supreme Group and its agents from complying with or supporting a foreign country's boycott of a country that is "friendly" to the United States. We are also required to report promptly to the U.S. government any request to support a boycott or to furnish information concerning a boycott. Examples of improper boycott requests are: requests that we refuse to do business with a boycotted country, including its citizens; requests that we refuse to do business with so-called blacklisted companies who do business with the boycotted country; or requests to provide information about activities in a boycotted country or implement letters of credit with boycott conditions. If you hear of a boycott or receive a request to support a boycott or to provide information related to it, you should contact the Group Legal Department or Director of Ethics & Compliance.

### 3. Supreme Group Policies, Systems, Procedures

As a Supreme Group employee, you must comply with all documented Supreme Group policies, systems and procedures which apply to the role you are employed to perform and the tasks you are required to accomplish. If you believe that an exception is required to any policy, system or procedure, the appropriate approvals (as laid out in that policy, system or procedure) must be sought and fully documented in writing.





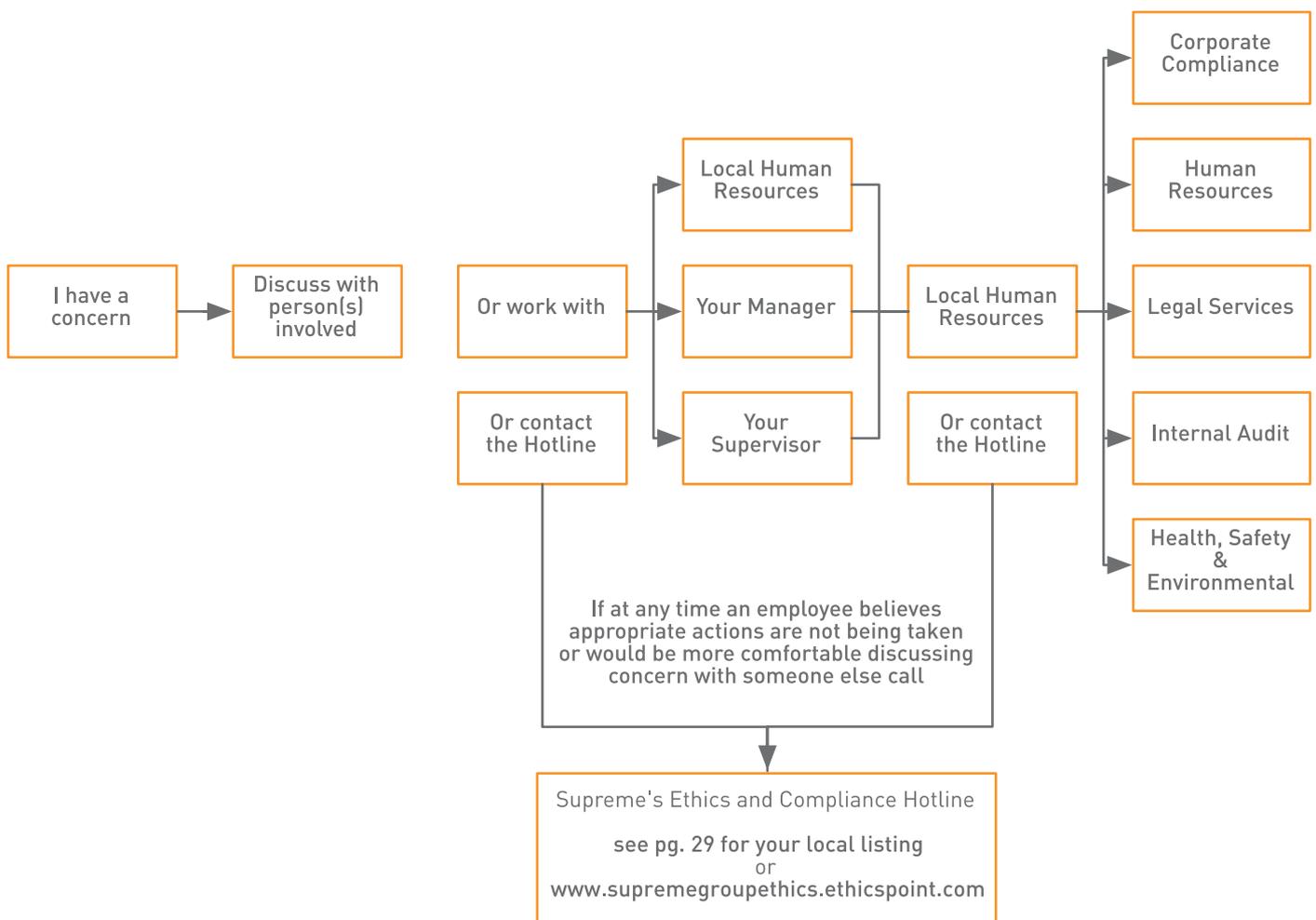
## Obtaining Assistance and Reporting Suspected Problems

### Duty to Report

Remember, you have a duty to immediately report whatever you know or have heard about a situation that appears to you, in good faith, to be unlawful or unethical.

What to do if you have a concern related to the Code of Business Ethics and Conduct? If possible, discuss the question or concern directly with the person involved or contact your immediate supervisor for guidance. If it is uncomfortable for you or inappropriate to speak to your supervisor about your question or concern, you can contact:

- Your Human Resources representative;
- The next line manager above your supervisor;
- Supreme Group's Director of Ethics & Compliance; or
- Your local Supreme Group's Ethics and Compliance Hotline (see pg. 29)
- Visit [www.supremegrouphethics.ethicspoint.com](http://www.supremegrouphethics.ethicspoint.com)



Situations may arise where it is necessary to report a concern about suspected unethical misconduct. Supreme Group is committed to supporting our employees and will protect you from retaliation if you report suspected illegal or unethical conduct in good faith. It is Supreme Group policy that the Ethics and Compliance Hotline email address is not tracked or traced for anonymous users.

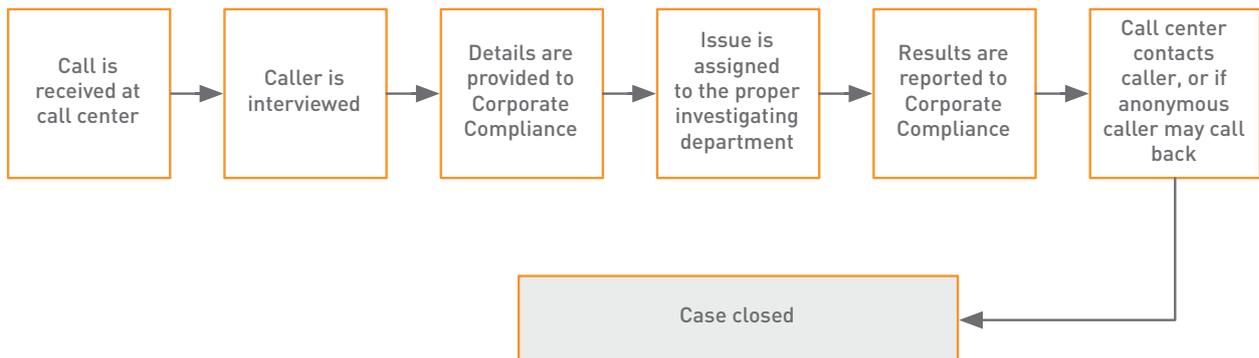
If at any time you believe appropriate action is not being taken or would be more comfortable discussing your concerns with someone else, the Supreme Group Ethics and Compliance Hotline is available, 24 hours a day, 7 days a week.

When you call the Hotline:

- You will be asked for your name and contact information. You are not required to identify yourself, however providing your information is beneficial to conducting the investigation
- You will be asked to provide detailed information about your concern or question
- You will be given a case tracking number
- If you have identified yourself, you may receive a call from the assigned investigator to provide further information to thoroughly investigate the matter reported
- If you have not identified yourself, you will be asked to call back in two weeks in order to follow up with any additional information that may be necessary to thoroughly investigate the matter reported

### What happens when I contact the Ethics and Compliance Hotline by email?

The more information you provide, the easier it will be for Supreme Group to investigate or appropriately respond. Upon receipt of your email, an investigator will be assigned and you will receive a reply with a case tracking number. If further information is needed, you will be contacted by email.



### What if I feel threatened for reporting a problem?

Supreme Group will not tolerate any direct or indirect retaliation against an employee for reporting a suspected problem in good faith. If you suspect you are a victim of retaliation, contact Human Resources, the Director of Ethics & Compliance or the Ethics and Compliance Hotline. Retaliation against someone who reports a problem in good faith will result in prompt and strong sanctions against the retaliator, up to and including termination.

### Consequences of violating the Code

Violations of the Code may result in discipline, up to and including termination. In some instances, the offender may be reported to the appropriate authorities for legal prosecution.

## Summary of the Code of Business Ethics and Conduct

The aim of the Supreme Group Code of Business Ethics and Conduct is to maintain and confirm the reputation of Supreme Group as a positive employer by setting the highest behavior standards for all employees. All employees of Supreme Group are required to behave and act in a manner which is not prejudicial or causes harm to the company and/or their colleagues.

### Your Local Supreme Group Ethics and Compliance Hotline Number

<b>Afghanistan</b>	Collect Call: 503-619-1839	<b>Latvia</b>	Direct Access Code: 8000-0937
<b>Belize</b>	Direct Access Code: 811 Hotels Only: 555 then: 866-881-5746	<b>Liberia</b>	Collect Call: 503-619-1839
<b>Bosnia/ Herzegovina</b>	Direct Access Code: 00-800-0010	<b>Luxembourg</b>	Direct Access Code: 800-2-1157
<b>Chad</b>	Collect Call: 503-619-1839	<b>Macedonia</b>	Direct Access Code: 0-8000-4288 then: 866-881-5746
<b>Congo</b>	Collect Call: 503-619-1839	<b>The Netherlands</b>	Direct Access Code: 0800-0226174
<b>Denmark</b>	Direct Access Code: 80-882809	<b>Pakistan</b>	Direct Access Code: 00-800-01-001 then: 866-881-5746
<b>Falkland Islands</b>	Collect Call: 503-619-1839	<b>Somalia</b>	Collect Call: 503-619-1839
<b>Germany</b>	Direct Access Code: 0800-1016582	<b>Sudan</b>	Collect Call: 503-619-1839
<b>Ivory Coast</b>	Direct Access Code: 00-111-11 or 00-111-12 (French Operator) then: 866-881-5746	<b>Switzerland</b>	Direct Access Code: 0800-562907
<b>Jordan</b>	Direct Access Code: 1-880-0000 then: 866-881-5746	<b>UAE</b>	Direct Access Code(s): U.A.E.: 8000-021 Military-USO & cellular: 8000-051 Military-USO & cellular: 8000-061 then: 866-881-5746
<b>Kosovo</b>	Collect Call: 503-619-1839	<b>UK</b>	Direct Access Code: 08-000328483
<b>Kuwait</b>	Collect Call: 503-619-1839	<b>USA</b>	Direct Access Code: 1-866-881-5746
<b>Kyrgyzstan</b>	Collect Call: 503-619-1839		



## Employee Acknowledgement

I acknowledge that I have received a copy of the Supreme Code of Ethics and Business Conduct. I understand that:

- I am responsible for reading and complying with the Code of Ethics and Business Conduct;
- I am expected to adhere to the highest moral and ethical standards for business and personal conduct;
- I am personally responsible and accountable for my actions and should avoid any activity or behavior that may conflict with my duties under Supreme’s Code of Ethics and Business Conduct;
- I am required to report any violations or suspected violations of this policy to my supervisor, HR manager, or Legal department;
- I should direct any questions concerning this policy to my supervisor, HR manager, or Legal department;
- A copy of this page will be kept in my personnel file; and
- Violations of this Code may result in disciplinary action, up to and including termination.

.....  
**Employee Signature**

.....  
**Employee Name (please print)**

.....  
**Date**

.....  
**Received by Human Resources**