



Do The Right Thing!



*Code of Business Ethics and Conduct*

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# Message from the Chairman, Nazif Destani

From our inception, Ecolog has been committed to building a model company. Ecolog is a diversified organization with strong corporate governance which ensures the highest ethical standards in conducting its business activities. We strive to achieve market leadership by “Living Our Values” and fulfilling our commitments to all of our stakeholders (including our employees, clients, suppliers and partners). Working with integrity is the way we have been getting things done for over two decades. It is the foundation that supports our continued success.

Ecolog’s Code of Business Ethics and Conduct (Code) is a guide that helps us put our values into practice every day. It helps us meet our obligations to our stakeholders and comply with the law incorporating both international standards and best practices. By living our values every day, we will continue to foster an environment of mutual trust and respect. It is important that every employee upholds these standards and behaves in accordance with them. By living our values every day, we will continue to foster an environment of mutual trust and respect.

Ecolog has earned the reputation as one of the best places to work in our industry. It is up to us to protect that reputation. I count on you to know and follow our Code. There may be situations where the right course of action is not obvious. I rely on you to ask questions every time you are navigating an ethical or legal dilemma and to share your concerns anytime you see or suspect a violation of the Code.

Thank you for living our values and committing to act with the highest standards of integrity.

Ecolog is committed to doing the right thing!

**Sincerely,**  
**Nazif Destani, CHAIRMAN**

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# DARE TO WIN:

## An Introduction to our Code



**Our Code of Business Ethics and Conduct (“Code”) helps us make sure that we are *Living Our Values* in our daily work.** Our Code describes the kind of company we are and the kind of conduct that is expected of all of us every day and everywhere. It highlights our business conduct policies, guides us in how to deal with issues that come up in our jobs and explains where we can get help when we have questions or concerns. At the heart of our Code is our core values and together, they guide us in delivering mission critical solutions to our clients around the world while doing it the right way.

## *Our Core Values*

Our values are the foundation for how we build a model company. They detail how we do business and our success depends upon our unwavering commitment to conducting business ethically, with integrity and in compliance with the laws and regulations that govern our business. All of us are expected to live our values in all our conduct on behalf of Ecolog. As part of this commitment, the Code has been established to help guide our way.

## *Honoring our Code—Living our Values*

Every one of us, including all employees, officers and directors are expected to read, understand and follow our Code. We expect certain business partners and third parties, such as suppliers, agents, representatives, contractors, subcontractors and consultants, who serve as an extension of Ecolog to conduct themselves according to our values and our Code. All breaches of the Code, Company policies or procedures, or any other laws or regulations may involve serious consequences up to and including termination of employment.

Working globally can occasionally raise additional ethics and compliance concerns when local business and cultural practices may not be at the same high standards we hold ourselves to. While we respect and are sensitive to the cultural differences throughout the world, *Living Our Values* means we hold ourselves to the higher standard. When we are *Living Our Values*, we are demonstrating our personal commitment to upholding Ecolog’s reputation and ensuring that we remain one of the greatest places to work. We do this by *acting with integrity, delivering value and protecting our reputation*. In order for us to do this, we all must:

- Demonstrate our commitment to *Living Our Values*.
- Interact with others in an honest and professional manner.
- Know and follow the Code and the laws, regulations and policies that apply to our job.
- Ask for help when we have a question or concern or when we are not sure what we should do in a specific situation.
- Speak up if we become aware of any situation that involves or could lead to a violation of our Code, policies or the law, using any of our Integrity Resources.
- Complete all required training, including the annual training on the Code, and sign an acknowledgement that you have read, understood and will comply with the Code.





While every Ecolog employee is a leader in promoting an ethical culture, our leaders, managers and supervisors have additional responsibilities to:

- Take every opportunity to connect our values to business decisions.
- Let others know that their ideas and opinions are valued and that their questions and concerns will be heard and respected.
- Encourage the use of our Integrity Resources.
- Set a personal example by highlighting ethical behavior as the norm and recognize others who do the right thing.
- Be approachable and make yourself available if someone raises a concern or question. Always seek to keep those matters confidential, and never retaliate against anyone who has raised a concern.
- If an allegation is raised that may involve a violation of our Code, policies, a regulation or the law, contact one of our Integrity Resources for guidance.

## Asking Questions and Raising Concerns

If you become aware of a violation or a potential violation of the Code, the Company's policies or procedures, or of any other law of regulation, you must promptly report that violation to any of the Integrity Resources listed below. If you have any questions or concerns about the Company's expectations or about possible legal or ethical problems, speak to someone and raise the issue. Sometimes, speaking up early enough can help the Company get ahead of an issue before it becomes a problem. Never be afraid to ask a question or raise an ethical concern—raising concerns is fundamental in protecting our reputation at Ecolog. Any of the following Integrity Resource is here to help:

### Retaliation

Ecolog will not tolerate any retaliation against employees who report misconduct or suspected misconduct in good faith. Reporting in "good faith" means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken. If you encounter retaliation for reporting misconduct, contact the Chief Compliance Officer immediately. Anyone who retaliates against another employee for reporting misconduct is subject to disciplinary action.

### How Concerns are handled at Ecolog

When Ecolog becomes aware of concerns, the Company will promptly and appropriately conduct an investigation in compliance with applicable law. Ecolog will take appropriate corrective or disciplinary action for violations of our Code, policies or the law.

We can count on the Company to take our concerns seriously and look into the issues raised. Ecolog respects the privacy of every individual and will treat concerns confidentially, consistent with the need to conduct a thorough investigation and to comply with local law. If the investigation reveals wrongdoing, steps will be taken to rectify the situation including appropriate disciplinary action against anyone who has violated our Business Principles, the law or company policy.

### Ecolog's Integrity Resources

Your immediate manager

Local Human Resources

Corporate Human Resources

Chief Compliance Officer

Global Ethics Hotline (toll free numbers listed on page 31)



The Ecolog's Ethics Hotline is an additional resource where we can raise concerns anytime. Through the Ethics Hotline, concerns can be made anonymously where allowed by local law. The Ethics Hotline is managed by an independent third party and is available 24 hours a day, 7 days a week and in multiple languages. The online reporting system is accessible to everyone on <https://secure.ethicspoint.eu/domain/media/en/gui/104564/index.html>. The 24/7 global toll-free hotline for each country are listed on page 31.

In addition to the Ethics Hotline and online portal, the employees may also contact the Chief Compliance Officer or Human Resources department at +971(0)4-2998170.

TAKE CARE:

Our Commitment to our  
Colleagues and Communities





## Developing a Positive Workplace

We know that our people make us stronger and that our employees are our core strength. We believe that the diversity of our people—including their backgrounds, experiences, approaches and ideas—help make us a great company. We seek to provide equal employment opportunities for all, create an environment where everyone is treated with dignity and respect and that is free from harassment and discrimination. We treat all employees fairly and impartially in all of our employment practices and make all employment related decisions only based on merit, job performance and qualifications and not on an individual's characteristics.

### Our license to operate—All Ecolog employees agree to:

#### **Act with Integrity and Deliver Value by:**

- Fostering an inclusive and open atmosphere that promotes honest and candid communications.

#### **Protect our Reputation by:**

- Not tolerating any form of abuse, harassment or discrimination of our co-workers, business partners or anyone else we do business with.
- Avoiding making comments and sending or posting materials which others might consider offensive.
- Having zero tolerance for unwanted verbal or physical conduct (sexual or otherwise) or degrading and disparaging jokes about other individuals.

### Mission critical information

An **individual characteristic** may include race, ancestry, place of origin, color, religion, ethnic origin, citizenship, creed, age, sex, gender, sexual orientation, sexual preference, gender identity, gender expression, marital status, family status, veteran status, disability, pregnancy status, genetic information and any other characteristic protected under applicable laws. *We do not tolerate discrimination or harassment based on any of these characteristics, regardless of what may be socially acceptable.*

**Harassment** can include any verbal or physical conduct that disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment. Harassing conduct can include inappropriate gestures, remarks, touching or displaying sexually explicit or offensive pictures. Promises of promotion or special treatment in return for sexual favors also constitute harassment.



## *Preventing Nepotism and Favoritism*

We treat employees and candidates fairly and impartially in all of our employment practices. We make decisions and reward employees based on their merit, job performance and accomplishments and not because of a personal relationship they may have with us. We do not allow any form of nepotism or favoritism to influence our employment decisions, and we do not give preferential treatment to our applicants, clients, suppliers, independent contractors or any other third parties based on personal, social or financial relationships.

### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Recognizing that nepotism or favouritism can disrupt our positive culture and prevent productivity.
- Working to positively address situations where either actual or perceived nepotism or favouritism may exist.

#### **Protect our Reputation by:**

- Never using our position to influence, promote or help a friend or family member.

## *Coming Together as Good Corporate Citizens*

We are committed to working together to be good corporate citizens and in doing so we find ways to get involved in local community projects that promote higher economic welfare and standards of living. We watch for possible violations of laws and regulations that govern our employment practices and acceptable treatment of basic human rights. We are proud to support peacekeeping missions and the work of humanitarian organizations in our communities. We operate our business for the benefit and wellbeing of our people, clients, public and our local communities and expect our clients, suppliers and other third parties to uphold these standards and comply with all laws supporting the protection of human rights.

### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Supporting the protection of human rights and recognizing their importance in promoting individual health and welfare, economic development and political stability.
- Getting involved in community development, charitable organizations and participating in volunteer activities.
- Expecting our clients, suppliers and other third parties to uphold these standards and comply with all laws.
- Fully respecting all applicable laws that set a minimum wage and maximum hours for employment.

#### **Protect our Reputation by:**

- Not condoning or permitting human trafficking, the use of child, forced, indentured or involuntary labour in any of our operations.
  - Avoiding imposing our beliefs on others or soliciting donations in the workplace for the organizations we personally support.
  - Never leveraging our position at Ecolog to benefit the charities we personally support.
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## *Participating in the Political Process*

Ecolog, as a company, believes that an active, inclusive and fair political process promotes open government and healthy, productive societies. When the Company engages in any political activities, we comply with all the laws and regulations that apply to corporate political activity. As individuals, we are encouraged to participate in civic and political activities and the Company respects your right to participate in the political process and engage in political activities in your own time.

Ecolog employees, however, may not use the Company name, funds, assets, services or facilities to support any political candidate or party, or to engage in any lobbying activity unless authorized in advance by the Legal & Compliance Departments.



### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Engaging in personal political activities only during your personal time and with your own resources.
- Explaining that your political views and actions are your own and in no way represent Ecolog.

#### **Protect our Reputation by:**

- Not seeking reimbursement from the Company for any personal political contributions you may make.
- Not asking for your co-workers' support or distributing material on behalf of a political candidate or organization while at work.

## *Taking Care of our Environment*

We are committed to advancing our sustainable business practices and strive to meet or exceed the environmental requirements applicable to our operations. We support environmental sustainability through pollution mitigation and prevention, waste management, recycling, energy conservation and energy-saving innovations. We work continuously to minimize any negative impact our business has on the environment and look for ways to reduce our carbon footprint.



### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Sourcing the materials we use responsibly and expecting the same from our suppliers.

#### **Protect our Reputation by:**

- Attempting to reduce energy consumption and waste whenever possible.

DELIVER WHAT WE PROMISE:

Our Commitment to the  
Company and Our Stakeholders







## *Ensuring a Safe and Healthy Work Environment*

We all have a role to play in ensuring the health, safety and personal security of anyone working at Ecolog, at one of our locations or on a project. A safe environment is where everything we do complies with applicable laws, standards and best practices in workplace health, safety and security. We will not tolerate any compromise to the health and safety of others, no matter what benefit we think it might bring. We do not tolerate the use, possession, distribution, sale or being under the influence of controlled substances such as non-prescribed drugs or alcohol, in our workplace or while conducting work on behalf of the Company.

### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Being safety conscious and following Company policies and procedures that help us maintain safe and healthy work conditions.
- Continually being on the lookout for unsafe working conditions or practices.
- Using the appropriate safety devices provided in the proper manner.
- Reporting any unsafe conditions, including threats of (or actual) violence by anyone.
- Striving to prevent and minimize injuries.

#### **Protect our Reputation by:**

- Never disregarding or instructing anyone to disregard safety procedures.
- Refraining from fighting, or other conduct that may be dangerous to others.

## *Protecting Data Privacy*

Through the course of our work, some of us will hold or have access to personal information about other employees, our clients, suppliers and other business partners or individuals. It is essential that we respect and protect this information to ensure we meet the requirements of applicable data privacy laws and regulations in effect everywhere we do business (including but not limited to the UK's Data Protection Act of 1998, as amended and EU's General Data Protection Regulation 2016/679, as amended, as well as related statutes and guidelines from the competent authorities). Any personal information which we hold, or which others collect, hold or process for us, or to which we have access, must only be used for legitimate business purposes.

### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Always considering data privacy implications before using any personal information.
- Knowing how to identify personal information and managing it appropriately.
- Collecting, accessing and storing personal information only if we are authorized and need to in order to perform our job.
- Reporting any breach promptly.

#### **Protect our Reputation by:**

- Never sharing personal information with someone for whom it is not intended or who is not authorized to receive it.
- Never using personal information in ways that violate the applicable privacy and data protection laws.

### **Mission critical information**

**“Personal information”** is a term for any information that can identify an individual. Examples of personal information include an individual's name, birthdate, email address, telephone number, home address, government-issued identification number, payment card numbers and financial account information.

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## *Communicating Honestly*

The Ecolog reputation is one of our highly valuable assets and it is crucial that we **Take Care** when promoting and speaking about our business. To ensure that our communications are always clear and consistent, Ecolog has certain specialists who are trained and qualified to disclose information, and to deal with the media and public on the Company's behalf.

### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Understanding the effects of what we say and how our communications can affect our business, our reputation, and even our contractual obligations.
- Always using discretion, thoughtfulness, and respect for others in our social media posts.
- Making it clear when using social media for personal reasons, to speak for ourselves alone and not the Company.

#### **Protect our Reputation by:**

- Never discussing or sharing confidential information about Ecolog, our clients or anyone we do business with while using social media—whether our conversations are intended to be public or private.
- Not speaking on Ecolog's behalf unless we have proper authorization.
- Not using Ecolog provided computers, computer systems or other technology resources to use social media in an inappropriate way.

## *Maintaining Accurate Business and Financial Records*

Our employees, clients, suppliers, creditors and others we do business with rely on the accuracy and correctness of the information contained within our business and financial records. The Company has processes and procedures in place that are specifically designed to follow generally accepted accounting principles and the regulations of all places where we do business, and to ensure accurate reporting. We all have a responsibility to follow these processes and to prevent others from attempting to bypass those controls.

### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Providing timely and appropriate documentation for all business transactions so that they can accurately be reflected in our books and records.
- Using thoughtful, appropriate and accurate wording when creating business records.
- Submitting only accurate and honest financial records, such as correct time sheets, invoices, or expense reports.
- Cooperating with government inquiries, internal and external investigations, our auditors and others in an honest and ethical way.

#### **Protect our Reputation by:**

- Never misrepresenting or misleading the true nature of any financial or non-financial transaction.
  - Never setting up or maintaining for any purpose any cash funds, other assets or liabilities that are secret or unrecorded.
  - Never concealing or destroying documents or records that are subject to investigation or a Legal Hold Notice.
  - Not taking or authorizing any action that would cause our financial records or disclosures to fail to comply with applicable laws.
  - Preventing fraud and watching for indicators or red flags and reporting these concerns immediately.
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## *Protecting Company Resources and Assets*

We are provided with many resources, including supplies and information technology resources, to help us perform our work and achieve our business objectives. These resources are provided to advance our business interests and not for personal gain. We are all expected to **Take Care** and be stewards of these assets by using them responsibly in a professional, ethical and lawful manner. Proper care, discretion and restraint should always govern the use of Ecolog's assets, including incidental personal use. In addition, all employees are responsible for protecting Ecolog's resources from fraud, theft and misappropriation.



### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Using Company assets in a way that is reasonable, lawful and appropriate.
- Treating all assets entrusted to us in a professional manner and in support of business goals.
- Protecting Ecolog's resources from fraud, theft and misappropriation by following Company policies and procedures.
- Using or authorizing the use of any Ecolog asset only for business purposes, regardless of condition or value.

#### **Protect our Reputation by:**

- Never allowing Company assets to be wasted, abused or destroyed.
- Never expecting privacy when using Company computer systems; as where allowed by local law, Ecolog reserves the right to monitor the use of computer systems and e-mail.
- Safeguarding and not sharing our passwords with others.
- Not allowing for materials such as tools and equipment to be used for private purposes, on or off our work sites.





## *Safeguarding Confidential Information*

Ecolog's confidential information is one of our most valuable assets and we all must be vigilant in protecting it. We are committed to using and protecting our confidential information and intellectual property to enhance the confidence of our clients and the competitiveness of our Company. We must use this information carefully and responsibly, and respect and protect the confidential information and intellectual property of others.

### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Assuming that any information we produce or learn on our job is confidential and that we should not disclose it to others (even family members).
- Keeping company confidential information secure and limiting access to those who have a need to know.
- Returning all materials containing confidential information to Ecolog if our employment ends.

#### **Protect our Reputation by:**

- Avoiding discussing confidential information in public places.
  - Not sharing the proprietary information belonging to Ecolog or others with anyone outside the Company.
  - Never bringing confidential information to a new employer or using it for personal gain after our employment relationship ends.
  - Not soliciting confidential information about another company from employees, clients or other business partners.
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# PROVIDE SOLUTIONS:

Our Commitment to our Clients



## Practicing Fair and Ethical Business Practices

We work hard to *Deliver What We Promise* and to understand and meet our customer's needs, while always remaining true to our own ethical standards. Integrity, honesty and transparency guide our business interactions. We expect anyone acting on our behalf, including suppliers, agents and other third parties to not only comply with all applicable laws and regulations but also to hold themselves accountable to the same standards.

### Our license to operate—All Ecolog employees agree to:

#### **Act with Integrity and Deliver Value by:**

- Bringing suspected unethical or illegal activity to the immediate attention of the Legal Department.
- Immediately raising concerns about any error, omission, undue delay, or defect in quality or customer service.
- Selecting our suppliers on the basis of fair and legitimate business needs including their price, quality, safety and reliability.
- Delivering on our promises.

#### **Protect our Reputation by:**

- Never following a customer's or third party's request to do something that could be unethical or unlawful.
- Not taking unfair advantage through manipulation, abuse of confidential information, misrepresentation of material facts or any other unfair or deceptive practice.
- Never cutting corners, or allowing others to do so, on quality or delivery standards.

## Interacting Honestly with Government Clients

Since our inception, we have been passionate about delivering mission-critical support to our clients in challenging environments. As a trusted partner to our government clients around the world, we all have an obligation to be aware of and follow the unique rules that apply to *Providing Solutions* on their behalf. The rules on providing products, services and solutions directly or indirectly to the government or other public sector entities are complex and considerably stricter than those that govern our work with commercial clients. Failure to comply with those laws and regulations may result in serious consequences for the Company, and to individual employees, ranging from fines to jail time.

### Our license to operate—All Ecolog employees agree to:

#### **Act with Integrity and Deliver Value by:**

- Complying with the Company's policies and procedures pertaining to government contracts.
- Conducting ourselves in an honest and ethical manner and expecting the same of everyone who works on our behalf.
- Monitoring our actions, and the actions of those working on our behalf, to ensure conformity with our contractual obligations and their laws and regulations.
- Reporting any concerns or potential violations that have occurred.

#### **Protect our Reputation by:**

- Never compromising our integrity and putting Ecolog at risk for severe penalties and potential suspension or debarment on future contracts.
- Not allowing third parties to take actions or make decisions that we cannot do ourselves, as we can be held accountable for what they do.





## *Procurement Integrity*

We **Dare to Win** but only with integrity, solely based of the merits of our work, quality of our products and commitment to commercial excellence. We act ethically, and comply with procurement laws, rules and regulations as they apply to our business with all of our clients around the world. We will take special care to follow the unique rules that govern our business with governments, and never compromise our reputation by seeking unfair advantages.

### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Understanding and complying with the procurement integrity laws and regulations, such as the Procurement Integrity Act.
- Ensuring that procurement, contracting, pricing and invoicing practices are compliant and accurate, and any potential errors are immediately resolved.
- Committing to strictly complying with contractual specifications and never making unauthorized substitutions.
- Invoicing clients for costs or prices according to the contract terms and any applicable laws and regulations.

#### **Protect our Reputation by:**

- Not seeking, disclosing or using any unauthorized confidential contractor bid or proposal information, or source selection information before a contract award.
- Not sharing any of our own proprietary information with government officials who are not on the government's approved list.
- Not discussing employment or offering anything of value to those who participate in the procurement process.
- Contacting the Legal & Compliance Departments immediately if you suspect you have received unauthorized confidential contractor bid or proposal information or source selection information.

## *Hiring Current and Former Government or Military Employees*

We pride ourselves on building a talented and diverse workforce that leads us to winning the confidence of our clients and exceeding the expectations of our shareholders. Through the work that we do, we are in contact with current and former employees of many different governments who we may feel would be a valuable asset to the Ecolog team. It is imperative that we understand and follow the rules and regulations related to hiring or even discussing a potential job opportunity with these individuals. These rules and regulations have been put in place to ensure honest and fair dealings within potential job opportunities and to avoid potential or apparent conflicts of interest or the appearance of bribery and collusion.



### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Respecting the so-called “cooling off” time restriction rules that may prohibit government employees from discussing or accepting a position with Ecolog after they leave the government.
- Understanding that in certain circumstances where we may be allowed to hire a former government employee, there could be restrictions on the type of work they can perform on our behalf as well as discussions they can have with their former employer as it relates to the work they do for us.

#### **Protect our Reputation by:**

- Not discussing potential employment opportunities with current or former government employees without first seeking advice from both Human Resources and the Legal Department.
  - Never hiding from clients that we have a former government employee working for us as we may have an obligation to disclose this to our government clients prior to any proposal being made.
  - Seeking guidance from the Legal Department to resolve any uncertainty regarding the potential restrictions involving interactions with current or former government employees.
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## *Billing, Pricing and Contract Compliance*

We demonstrate our value of *Honesty Works* in all of our billing, pricing and contracts. We provide information that is clear, accurate, timely and honest and only in ways that reflect our actual costs/prices, level of effort, market conditions and other pertinent factors.

### Our license to operate—All Ecolog employees agree to:

#### **Act with Integrity and Deliver Value by:**

- Making sure that all cost and pricing information provided to our government clients is current, accurate and complete, and that all statements, communications and representations made are accurate and truthful.
- Delivering the materials and products and performing quality control and testing as promised or required under our government contracts.
- Being transparent and accurate in our bidding and pricing as required.
- Providing accurate submission of claims, bids, proposals, time cards, cost records and other documents.

#### **Protect our Reputation by:**

- Never deviating from the contract terms or substituting materials or products or changing the testing requirements or quality controls specified in a government contract without first obtaining the required approval and following all applicable government procedures.
- Never falsifying timecards or other labour or cost records.
- Never charging a customer for hours not actually worked or charging one contract for hours when they were actually worked on for another contract.

## Organizational Conflicts of Interest

We are all responsible for making decisions and taking actions that promote Ecolog's best interests and avoiding even the appearance of a conflict of interest. This section provides just an overview of conflict of interest in detail; however, when working with the government, it is critical to understand that we are also subject to special rules related to organizational conflicts of interest (OCIs). If we are unable to neutralize or mitigate an OCI, we may be required to remove ourselves from a contract competition or be terminated from an awarded contract. Therefore, it is imperative that we identify any potential or actual OCIs as soon as possible, so we can work with the government to mitigate them.



### Our license to operate—All Ecolog employees agree to:

#### Act with Integrity and Deliver Value by:

- Identifying and evaluating potential OCIs as early in the procurement process as possible.
- Reporting any actual or potential OCIs to the Legal & Compliance Departments as soon as possible.
- Evaluating our objectivity and partiality in performing contractual obligations for the government.

#### Protect our Reputation by:

- Avoiding, neutralizing, or mitigating significant potential OCIs before and after contract award.
- Conducting due diligence on our partners (e.g., subcontractors, teaming partners) to ensure they do not have an actual or potential OCI.



### Mission critical information

- An “**organizational conflict of interest**” (OCIs) can be defined, initially, as any situation where Ecolog plays two or more roles on behalf of the customer that could potentially be in conflict with each other. OCIs typically occur when, because of a pre-existing business relationship between us and our government customer, we are unable or potentially unable to render impartial assistance to a government entity, our objectivity in performing the work is or might be otherwise impaired, or we have an unfair competitive advantage.
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# HONESTY WORKS:

Our Commitment  
in the Global Marketplace



## Preventing Bribery and Corruption

We are committed to conducting business ethically, with integrity and in compliance with applicable laws and regulations that prohibit bribery and corruption in our operations worldwide. We do not offer, provide or accept bribes in order to secure or influence a business decision. There is no place for bribery and corruption at Ecolog, regardless of where we operate or whether we are dealing with a government or commercial client.

### Our license to operate—All Ecolog employees agree to:

#### **Act with Integrity and Deliver Value by:**

- Complying with all applicable bribery and corruption laws.
- Working diligently to ensure that we compete and make decisions ethically and in accordance with the law.
- Competing based on the value and quality of our solutions.
- Accurately recording all payments and transactions and applying proper accounting and recordkeeping principles.

#### **Protect our Reputation by:**

- Never offering, providing or receiving anything of value in order to influence a decision or action or attempting to do so.
- Avoiding paying facilitation payments and never receiving kickbacks or attempting to do so.
- Never using or allowing our third parties to make corrupt payments on our behalf—we take special care to ensure that our external business associates undergo proper due diligence.
- Refusing to participate in corruption, even if it means walking away from a business opportunity.

### Mission critical information

**Bribery** occurs when we offer, provide or receive “anything of value” in order to influence or benefit us, the Company or someone else. “Anything of value” is broadly defined. It means anything that will give an inappropriate advantage (e.g. money, gifts, travel expenses, meals, drinks, services, prizes, entertainment, recreation and charitable contributions). Under various laws facilitation or facilitating payments, which are small payments to government employees in order to help speed up an administrative process, and kickbacks, which are when a person asks for the return of part of a purchase price for personal benefit, may be considered bribery or corruption.

## Avoiding Personal Conflicts of Interest

As employees of Ecolog, we believe in making business decisions based on sound judgment and what is in Ecolog's best interest. Fundamental to achieving this is avoiding any situation that involves a conflict between our personal interests and those of the Company. We know that *Honesty Works* and if we have a conflict of interest, the best solution is to disclose it.

### Our license to operate—All Ecolog employees agree to:

#### **Act with Integrity and Deliver Value by:**

- Being transparent about any outside activities and relationships.
- Watching for situations where our objectivity may be compromised.
- Acting responsibly with our financial interest in a customer, competitor or supplier and not holding a significant financial interest in these companies.

#### **Protect our Reputation by:**

- Never using our position to benefit ourselves or our friends or family members.
- Removing ourselves from decisions to hire or supervise family members or friends.
- Not taking for ourselves opportunities discovered through the use of Company property, information or our position.
- Never competing with Ecolog, either directly or indirectly.

## Integrity with Business Courtesies (Non-Government Clients, Suppliers and Partners)

Business courtesies, such as gifts and hospitality, given to or received from clients, suppliers and other partners are commonly used to build goodwill and acknowledge appreciation in business relationships. We should always avoid business courtesies that could appear to be bribes, and raise questions about conflicts of interest or damage our reputation. In addition, we must be mindful that business courtesies offered to government employees are governed by different rules—behavior that is acceptable for our non-government clients may be unacceptable, or even illegal, when offered to our government customers. Therefore, always contact the Legal & Compliance Departments before attempting to provide anything of value to a government customer or potential government customer.

### Our license to operate—All Ecolog employees agree to:

#### **Act with Integrity and Deliver Value by:**

- Exchanging gifts, entertainment and business courtesies that are appropriate for the business relationship and comply with local custom and law.
- Entertaining only those who have a potential or actual business relationship with Ecolog.
- Understanding that there may be different limits for each country where we do business and complying with our policies.
- Seeking guidance from the Legal & Compliance Departments when we have any questions about what is or is not an acceptable business courtesy.

#### **Protect our Reputation by:**

- Never soliciting gifts, entertainment or other business courtesies.
- Never giving or accepting cash or cash equivalents, such as gift certificates or gift cards.
- Declining a gift, entertainment or other business courtesy that is not appropriate or lavish.
- Never offering or receiving anything that could or does influence a business decision.
- Never providing or offering gifts, entertainment or any other business courtesy, including free meals, to a government official or to employees of government-owned entities.





## *Competing with Integrity*

We compete in a global marketplace with integrity and seek to outperform our competitors fairly and honestly. We achieve our competitive advantage through superior performance and never through unethical or illegal business practices. We *Dare to Win* but only while complying with all laws intended to protect and promote free and fair competition around the world.

### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Familiarising ourselves with the competition laws that apply to the work we do.
- Gathering competitive information about other companies only from public sources, such as market research, product evaluation and review of publicly available information.
- Seeking advice from the Legal Department when we have questions or need guidance.

#### **Protect our Reputation by:**

- Not communicating or entering into any kind of agreement or understanding—whether formal or informal, written or spoken—that relates to a competitive matter.
  - Never obtaining a competitor's confidential information from its current or former employees or from any partners, clients, suppliers or vendors with which they do business.
  - Not agreeing or even entering into discussions with competitors to fix prices or other terms, limit production, allocate territories or products or clients, or refusing to deal with any customer or supplier.
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## *Respecting Global Trade Regulations*

We **Provide Solutions** to countries and clients throughout the world. As a result, our activities are governed by international trade laws that we abide by in any country where we do business. We are committed to following applicable international trade laws including import and export controls regulations and compliance with sanctions and anti-boycott laws. We also abide by the laws that are designed to deter criminal enterprise, keep us safe from terrorism and protect the national security of the countries where we do business.



### **Our license to operate—All Ecolog employees agree to:**

#### **Act with Integrity and Deliver Value by:**

- Recognizing and understanding the international trade laws that apply to the work we do.
- Verifying that the people we do business with are not on a "restricted party list".
- Being alert for illegal boycott requests and not participating in an unauthorized illegal boycott.
- Clearing all goods through customs while providing accurate information to customs officials.
- Obtaining the necessary licences to import and export any products.

#### **Protect our Reputation by:**

- Not doing business with restricted countries, individuals or entities.
- Not applying inappropriate monetary values to goods and services or proceeding with a transaction if we know that a violation has occurred or is about to occur.
- Avoiding arrangements that involve the transfer of funds to or from countries or entities not related to the transaction.
- Not engaging in unusually complex deals that don't reflect a real business purpose, or attempts to evade record-keeping or reporting requirements.

# CONTACTS:

## Ecolog's Integrity Resources



Chief Compliance Officer or Human Resources department at **+971(0)4-2998170**



Online Reporting Portal:  
<https://secure.ethicspoint.eu/domain/media/en/gui/104564/index.html>



International Toll-Free phone numbers:

Country	Call Type	Phone Numbers
Afghanistan	Collect	503-495-2705
Central African Republic	Collect	5037471822
Haiti	Collect	5037471823
Lithuania	Global Inbound Services (GIS)	880031189
Mali	Collect	5037471824
Mozambique	Collect	5037471825
Qatar	Global Inbound Services (GIS)	800100942
United States (Domestic)	Collect	844-595-8429
Germany	Direct Access Worldwide Connect (WWC) 2 Step Dialling Process	<b>First Step:</b> 0-800-225-5288 <b>Second Step:</b> 844-595-8429
Macedonia (F.Y.R)	Direct Access WWC 2 Step Dialling Process	<b>First Step:</b> 0800-94288 <b>Second Step:</b> 844-595-8429
United Arab Emirates	Direct Access WWC 2 Step Dialling Process	<b>First Step:</b> (U.A.E) 8000-021, or (U.A.E - du) 8000-555-66, or U.A.E. (Military-USO and cellular) 8000-061 <b>Second Step:</b> 844-595-8429
United Kingdom	Direct Access WWC—British Telecom 2 Step Dialling Process	<b>First Step:</b> 0-800-89-0011 <b>Second Step:</b> 844-595-8429
Iraq		
Kenya		
Kosovo		
Kuwait		
Somalia		

web portal reporting only

