

# Code of Business Conduct

Our most important document



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## CEO's Message



Our reputation is founded on a culture of trust, acting with integrity, and of doing the right thing in the right way. And our success depends upon our reputation.

Our Code of Business Conduct – or “Code”– is the centerpiece of our commitment, emphasizing the importance that each of us plays in building trust with each other, our customers, and partners.

Our Code sets out how we can have a shared clear purpose that unites all parts of the Company and is what will drive us to a higher performance, as we believe in pushing our potential to the maximum. Work which compromises our culture is not work we want to do, and you should be confident that if you make the right decision and walk away, it will be supported by me, as I believe that success is nothing without integrity.

Our Code can't cover every eventuality or every challenge you may face, but it serves as a guide to help you make good decisions.

When faced with a difficult decision or if you're ever unsure about what to do, ask your supervisor, manager, Human Resources representative, or local Ethics Champion. If you're uncomfortable doing that, you can use the Helpline to ask your question or to raise a concern.

The global business environment in which we operate grows ever tougher and presents us with unprecedented challenges. What remains clear and constant, however, is that we maintain a zero tolerance policy toward any kind of bribery or corruption, or retaliation for raising a concern.

Our culture of trust, acting with integrity at all times, and of doing the right thing in the right way helps protect our business, our reputation, our stakeholders, and every employee. It's up to all of us to maintain a good culture and to shape the business into one that we all want to work for and are proud of.

**Dr. J. Mitch Steverson**  
President & CEO

# Our Ethics

This section of our Code describes the culture we expect all employees to embrace to ensure we operate in a fair, ethical, legal, and safe manner, enabling us to work together toward our common goals and the highest standards of business ethics.

## Doing what's right

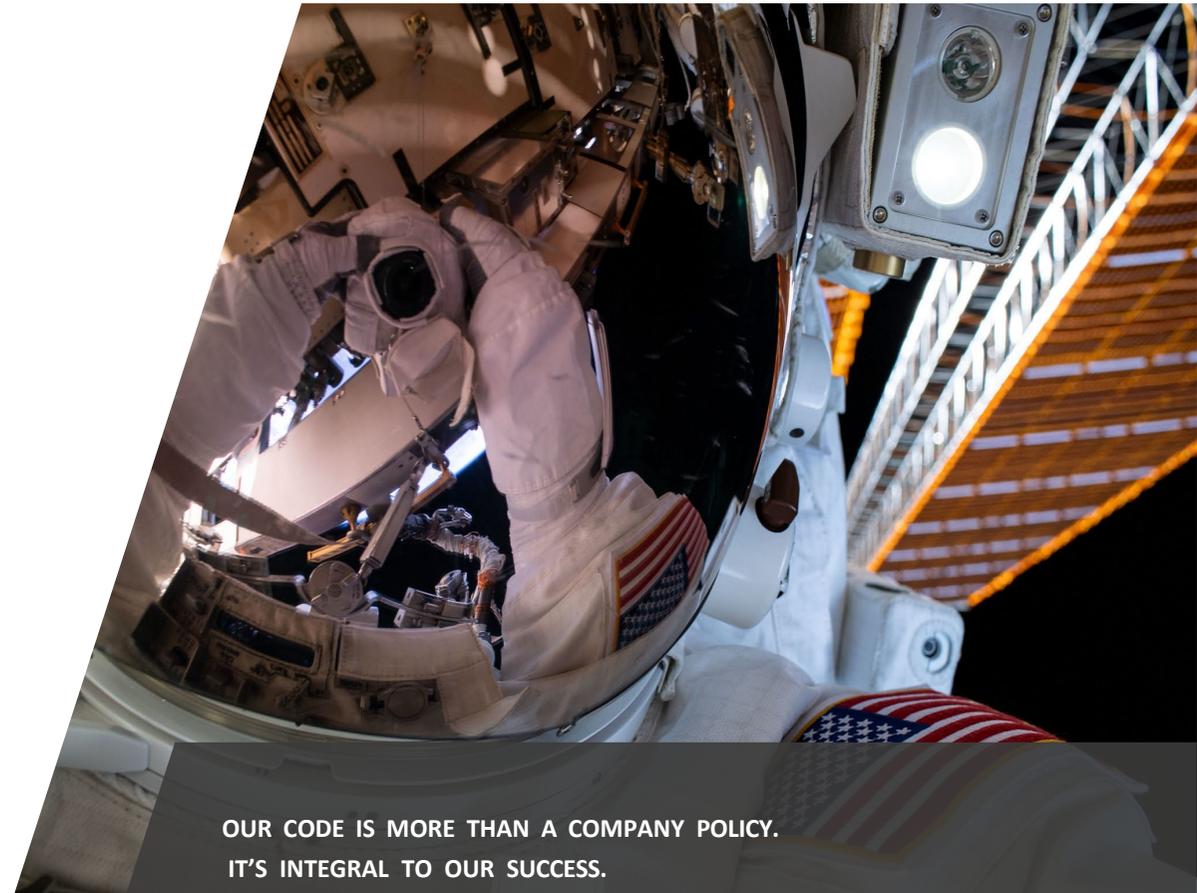
We must all comply with the relevant laws and regulations in the countries in which we operate.

Our Code requires the highest degree of integrity in all interactions with each other and with all of our stakeholders, such as: customers, suppliers, local communities, governments, and the general public.

Our Code is more than a Frontgrade or "Company" policy. It's integral to our success:

- It sets out the same rules and standards for all.
- It protects our reputation which is key to our business success.
- It keeps us operating within the laws and regulations.
- It helps us to operate ethically.

Each of us is responsible for our own actions and the decisions we make. You will not be able to justify or be excused from the consequences of actions prohibited by Frontgrade because you were ordered to perform the action by someone in higher authority. No one is ever authorized by the Company to direct another employee to commit a prohibited act.



**OUR CODE IS MORE THAN A COMPANY POLICY.  
IT'S INTEGRAL TO OUR SUCCESS.**

## What's expected of employees?

To uphold our Code, we must:

- Understand and follow the laws and regulations that are applicable to your role.
- Read and understand our obligations under our Code and other policies.
- Complete all Company training in a timely manner.
- Respect each other, be inclusive, champion diversity, embrace individuality, and listen to others.
- Fully cooperate with any internal or external investigations and internal or governmental audits. Never discuss details of investigations with others without specific permission from the investigator or a lawyer on the Legal team.
- Never alter or destroy any documents or electronic records after becoming aware of potential or actual litigation, an investigation, or an audit.
- If you learn that a government agency is conducting an investigation or is making inquiries about a suspected violation, you should notify one of the lawyers on the Legal team or the relevant subject matter expert as identified in Company policy.
- Report all violations or suspected violations of our Code, any Company policy, or violations of law or other alleged misconduct.
- If you're ever unsure about what to do, ask your supervisor, manager, Human Resources, an Ethics Champion, the Ethics and Compliance Officer, or contact the Helpline for advice.

You must make sure you're acquainted with the legal standards and restrictions applicable to your own assigned duties and responsibilities, and conduct yourself accordingly. Remember that compliance with the letter of the law is not always enough. We must strive to act in accordance with its spirit (i.e., the principle behind the law).

In a business situation, if faced with a difficult decision, don't take immediate action. Step back and consider these questions first:

- Is it legal?
- Is it in line with our culture or the behaviors we've set for ourselves?
- Does it comply with our Code or Corporate Framework policies and policy requirements?
- Would other people support your decision if you told them?
- Would you feel comfortable if you read about your actions in a newspaper?

If you hesitated when answering or your answer to any of these questions is "no," then don't do it.

## What's expected of leaders?

Our leaders should embrace our purpose and behaviors, execute our strategy, lead by example, and deliver on their promises:

- Lead by example. We "walk the walk" – we don't just "talk the talk." We act with integrity and trust that our team wants to do the right thing. We help them to do so in the right way.
- Talk with our teams about ethics and integrity.
- Work together as a team and cultivate a workplace environment that embraces our purpose and behaviors – one where everyone is proud to work.
- Listen to others and encourage frank and open discussions by having an "open door" philosophy.
- Maintain a workplace which is inclusive and free of harassment and discrimination.
- Allow our teams time to complete assigned training.
- Make sure working relationships do not create, or give the appearance of, favoritism. All decisions are based on job performance.
- Ensure any ethical issue raised is treated confidentially, sensitively, and dealt with appropriately, including escalating it to the most appropriate Company resource.
- Allow our teams time to cooperate with internal investigations.



## What are the consequences of violating our Code?

Failure to comply with any provision of our Code is a serious violation and may result in disciplinary action, including termination of employment. Such consequences may apply to employees who commit misconduct and to those who condone it or fail to report it.

## Zero retaliation

We want you to "speak out" and share your concerns or issues. That's why we don't tolerate retaliation against anyone raising a concern. If you suspect you've become a target of retaliation, you should raise the matter to an appropriate Company resource.

## Getting help

Our Code helps you understand what you need to do if you think something is wrong. Always be aware and curious, ask questions, and if necessary, bring concerns to the attention of a relevant Company resource or make a report via the Helpline. The sooner we identify an issue, the sooner we can stop it becoming serious.

## See it? Say it... Speak out!

We believe that our employees are our most important asset. By creating an open channel of communication, we can maintain a positive and comfortable work environment for everyone.

However, sometimes things can go wrong. If something isn't right, we want you to tell someone so the situation can be looked into and any problems can be addressed before they become too serious.

Our Helpline is available 24/7, and reports can be made online or by telephone in English and Spanish. Calls to the Helpline are answered by a third party, caller ID is never used, and no effort is made to trace a call. Reports can be made anonymously.

Under U.S. law and regulations, Frontgrade employees have certain rights and protections against reprisals if the Frontgrade employee discloses to certain U.S. government officials, information that the Frontgrade employee reasonably believes is evidence of gross mismanagement, of gross waste, a violation of law related to a DoD contract, or evidence of a substantial and specific danger to public health or safety. For further information on these laws and regulations and rights and protections, please contact the Frontgrade Ethics and Compliance Office.

## What happens when you contact the Helpline?

Reports are entered directly on a secure server, and a case number is generated. The reports are only available to specific individuals within the Company who are charged with evaluating the report. This process is overseen by individuals who are appointed to review ethics cases and by a committee with appropriate responsibility from the Frontgrade Executive Leadership Team. We're committed to maintaining confidentiality to the maximum extent possible.

**Q: I'm not sure if what I've observed or heard is a violation of Company policy or involves unethical conduct, but it doesn't look right to me. What should I do?**

**A:** You can ask for advice from your supervisor or manager. If you're not comfortable doing that, either file a report or "ask a question" through the Helpline. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

## What happens next?

A thorough independent investigation will be conducted into the report made. In some instances, this can take some time to complete due to the complexity of the issue. Individuals will be kept informed of progress during this period wherever possible. To facilitate the thoroughness of the investigation, the person reporting the incident, the "Reporter," may also be asked to provide clarification of the details and to answer questions that may arise during the course of the investigation. The Reporter is required to cooperate with the investigation into the concern but can remain anonymous if they wish to. Communications through the Helpline are anonymous and cannot be traced back to the Reporter.

Please understand that the more information that you provide, the easier it is to investigate any issue and to respond. We have zero tolerance towards retaliation; so concerns can be raised without fear of retribution.

Individuals who report a concern are encouraged to check the status of their report by using the case login details provided to them when they made the report. This is especially important if they have submitted a concern or inquiry anonymously because this is the only contact information available.

Once the investigation has been completed, the individual will be notified of the outcome and of any corrective actions necessary, to the extent possible.

# Our Business

This section of our Code explains how we operate and do business at Frontgrade. It outlines how we are expected to behave in the relationships we have with customers, industry partners, suppliers, and the wider marketplace, and how we interact and generate positive relationships with the communities in which we operate and the world around us.

## Corporate Framework and policies

The Corporate Framework provides a concise overview of our structure and governance. The policies that sit under the Corporate Framework cover a number of important areas and set out what we need to do to comply with laws, rules, and regulations, and to provide the information needed to do so. These documents are on the Company intranet. To access these documents, go to Ethics and Compliance and then Corporate Governance.

## Anti-bribery, anti-corruption, and improper payments\*

We have a zero tolerance toward any form of bribery or corruption.

The offer of, the promise of, the payment of, to solicit, to request, agree to receive or agree to accept, a bribe or kickback or other prohibited payment or activity, whether in cash or any other form of inducement (e.g. gifts, entertainment or hospitality) is prohibited. This prohibition applies to dealings with private individuals, public officials or government officials, in order to obtain or retain business or to influence those individuals or public or government officials to act improperly in their duties or favorably toward us.

*\* Refer to Frontgrade's Anti-Bribery/Anti-Corruption policy*

## No facilitation payments\*

Facilitation payments are unofficial payments to a government official to expedite or secure the performance of a routine action, which has already been paid for or for which one is already legally entitled. Examples include obtaining licenses or other documents to do business in a foreign country, to process visas, or to obtain customs clearances.

You must not make facilitation payments of any kind or allow others to make them on behalf of the Company.

*\* Refer to Frontgrade's Anti-Bribery/Anti-Corruption policy*

**Q: A potential supplier has offered me a site tour to demonstrate technology that we may want to use on a project. Is this a problem?**

**A:** Probably not, as long as the trip has a legitimate business purpose and that you – and not your prospective supplier – pay your travel and related costs. You should, however, be aware of bribery risks associated with the visit and comply with the Gifts and Hospitality policy.

## Acceptable gifts and hospitality\*

The exchange of gifts, meals, or event attendance can promote successful working relationships and goodwill. However, there's also the risk that any gift or hospitality may be deemed an attempt to improperly influence a business decision, which not only harms our reputation but may result in civil and criminal penalties. Regardless of value, even the appearance or perception of influence must always be considered before giving or receiving a business courtesy. Some governments have stricter rules; so additional consideration should always be given to the country you are in.

You must, therefore, carefully consider whether to give or accept gifts or hospitality before you do so. Frontgrade's Gifts and Hospitality policy is based on certain principles to help you exercise good judgement when deciding if a gift or hospitality event of nominal value is acceptable or not. Any exchange of gifts or hospitality must comply with the Gifts and Hospitality policy and any deviations must be documented in accordance with the policy.

*\* Refer to Frontgrade's Gifts and Hospitality policy*

- Q:** I'm aware that my manager has been given a gift that I think is inappropriate. If I report it, won't they get the report, cover it up anyway, and retaliate against me for raising it?
- A:** Any concern submitted via the Helpline has a specific distribution, which is designed so that implicated parties are not notified or granted access to reports in which they have been named, regardless of the individual's position in the company. This allows reports to be independently investigated at all times. We have zero tolerance against retaliation; so if you feel your manager did retaliate against you, you must raise it as a separate issue which will be dealt with accordingly.



## Accurate records\*

All books, records, accounts, and financial statements must fully, fairly, and accurately reflect the nature of the transactions recorded, be provided in a timely manner, and conform both to applicable legal and accepted accounting principles as well as to our system of internal controls. All financial reporting is to be prepared in accordance with International Financial Reporting Standards (IFRS), which have been adopted by the Company. Compliance with the Company's Financial Manual and the Minimum Standards of Financial Control is mandatory.

Financial transactions must be lawful, made for the purposes stated and authorized by the Company.

*\* Refer to Frontgrade's Accounting Policy and Finance Manual*

## Delivering accurate cost and pricing data

Our customers expect great products at fair and reasonable prices. If you're involved with the negotiation of U.S. Government procurement that requires cost or pricing data, you'll need to make sure the cost or pricing data is current, complete, and accurate. Cost and pricing data are all facts that a prudent buyer and seller would reasonably expect to significantly affect negotiations. Examples of data include vendor quotations, non-recurring costs, production methods, business projections, operational costs, unit-cost, make or buy decisions, and any management decision that could have a significant bearing on cost or cost allocations.

## Recording labor and other costs

You're required to keep an accurate record of your time. For the labor costs to be accurate, you must submit your labor record on a timely basis and only charge for activities you've been assigned and authorized to work on.

Accurate cost data is essential to any business. It is especially essential to us because many of our U.S. contracts are based on cost and pricing data.

For other costs such as travel, direct costs, subcontracts, etc., you must capture the costs accurately, properly documenting the charge to a contract number, indirect number, or other cost objective.

Some contracts may be unallowable or contract non-reimbursable for U.S. Government contracts, and these costs must be properly captured and excluded from cost claims.



## Anti-fraud

Forging or altering documents belonging to the Company is an act of fraud and strictly forbidden.

Be alert to fraudulent scams. If you receive a request to change account information – either verbally or by email – never do so without obtaining verification from the relevant contact first and also obtaining suitable approval to make such an amendment.

**Q:** My manager told me to close an order as if the job is fully complete so we can invoice the customer to record revenue in order to meet our financial targets. My manager said I could just finish off the work afterwards; so it will be fine. I'm uncomfortable doing this, but is my manager right?

**A:** No. This would lead to inappropriate recording of revenue, which is fraud and must not be done in any circumstances. If you feel you are able, you should explain to your manager that this is not acceptable. If you don't feel comfortable having this discussion, then raise your concern to another Company resource.

## Anti-money laundering

Money laundering is the process by which individuals or entities move criminal funds through the financials of an organization in order to hide traces of the criminal origin of such funds. We're committed to fighting money laundering. You may not be in a position to violate money laundering laws, but you need to be on the lookout for irregularities in the way payments are made.

## Anti-tax evasion

We don't tolerate any form of tax evasion and strictly comply with local tax laws wherever we operate. We and those who work on our behalf must not behave dishonestly to deliberately facilitate tax evasion either for personal gain or for the benefit of others.



## U.S. Government contractor disclosure requirements

As a U.S. Government contractor, the Company and those individuals who have primary supervisory or management responsibility within a business may have an obligation to report potential violations of certain U.S. criminal or civil laws or overpayments by the U.S. Government. These violations may relate to procurement and contract fraud, bribery/kickbacks, gratuities, false statements or claims to the government, human trafficking, and counterfeit parts. If you believe there has been a violation, suspect there's been a violation, or have questions on your obligations, please contact one of the lawyers on the Legal team.

## Confidentiality and intellectual property\*

We use information of all types and in all forms in our daily work. This includes information about our *customers; other third party confidential and/or proprietary* information, processes, or intellectual property; personal information or personal data; export controlled information; and classified information.

All such information must be handled, stored, and protected pursuant to contractual, legal, or other requirements and not accessed or disclosed without requisite business purposes or authority.

Intellectual property includes, but is not limited to, trademarks, copyright, patents, inventions, know how, design, mask works, and trade secrets. Our success is dependent on such information, and such information must be preserved and protected against disclosure, whether intentional or unintentional.

With the wide use of computers and telecommunications, the protection of information in electronic format is of particular concern. The following must all be protected:

Confidential information assets, proprietary information, Company intellectual property and data or information whose destruction or disclosure outside of the Company could result in any of the following: financial loss, loss of competitive position, degraded business operation, violation of a confidentiality agreement with another party, or its use for personal gain.

\* Refer to Frontgrade's Intellectual Property policy

## Protect Company assets

We all have a duty to the Company and our customers to use assets and facilities responsibly and for their intended purposes only. You are expected to take reasonable care in the use, maintenance, and security of Company-owned or leased property. In addition, you must not willfully interfere with or misuse any machinery or other office equipment of any nature. Use of Company or customer facilities, property, or funds for anything other than official Company business is prohibited, unless such use is permitted in our policies or procedures or approval is given by prior written authorization from the General Manager of the business area managing the relevant facilities.

## Information categorization and handling\*

All information is a valuable asset and should be classified based on an assessment of the impact that it would have should the information be disclosed to an unauthorized person or be lost or destroyed inappropriately. All such Company information must be marked in accordance with this classification.

*\* Refer to Frontgrade's Information Categorization and Handling policy*

## Classified and national security information

You must take all necessary steps to protect such information. It's never appropriate to disclose such information to another person without explicit approval from the appropriate body.

## Document retention†

We deal with large quantities of documents and records. It's important to know how long these should be retained and how to properly dispose of them. You should understand and follow the Document Retention policy and relevant country procedures.

*† Refer to Frontgrade's Records Retention policy*



## Global trade compliance\*

As a global company, we serve the needs of our customers worldwide through the delivery of products and services. All import, export, and re-export activities and/or transactions shall be conducted in full compliance with all applicable export and import laws and regulations, economic and trade sanctions, and Company policies.

An export occurs when hardware and/or technology (including software) is sent out of the U.S., or technical information is disclosed to a foreign person, whether in the U.S. or abroad. In some cases, providing certain services to foreign persons may also be regulated under various export control laws and regulations. If you transport and/or use goods and technology subject to export or import controls or provide certain services, you must understand and follow the relevant laws, regulations, and policies.

Consequences for violating trade controls are severe for the Company and for the individuals involved, and can result in termination of employment, substantial fines, and imprisonment.

If you have any questions, contact the Director of Global Trade Compliance or your local Export Professional.

*\* Refer to Frontgrade's Export and Import Compliance (Global) policy*



## Customers and other partners

We should ensure we understand our customers' needs, deliver on customer commitments, and strive to exceed them every day. We need to remain committed to remaining "customer focused" and achieving operational excellence.

## Suppliers\*

When seeking new suppliers and other partners, we conduct due diligence. We have a Responsible Supply Chain Management policy which provides guidance on what we expect from our suppliers with regard to human trafficking, bribery, and conflict minerals. We also conduct annual due diligence for conflict minerals risks.

*\* Refer to Frontgrade's Responsible Supply Chain Management policy*

## Working with Government officials<sup>† \*\*</sup>

The United States Government (USG) has adopted specific laws and regulations on providing gifts and hospitality to certain USG employees, including USG Executive Branch employees (political appointees and civilian and military personnel), Legislative Branch employees (members of the U.S. Congress and congressional employees), and Judicial Branch employees. The U.S. Government Gratuities policy sets out what is and what is not permissible and is in addition to the Company's Gifts and Hospitality policy requirements.

Governments in some parts of the world have more stringent requirements with regard to gifts and hospitality that are offered to officials. Breaches of these laws and regulations can be serious offenses. If dealing with government officials, make sure you understand any rules and regulations that apply to the country you are in, and if in doubt, seek advice from one of the lawyers on the Legal team.

With regard to state and other similar delegations, it is acceptable to demonstrate and explain our products and to make them feel welcome. However, because some countries have very strict restrictions on hosting State Trade delegations, you should seek specific legal advice to ensure that what you're planning is acceptable. There should never be any attempt to seek improper advantage or decisions by doing so.

If you are asked to provide information in connection with a government or regulatory agency investigation, you must ensure any information you provide is accurate and true. Always seek advice from a lawyer on the Legal team before responding to any such requests.

The hiring of an ex-government official is subject to additional legal requirements in many countries, and Frontgrade must consider these additional legal requirements and take external advice where necessary before hire. If in doubt, always seek advice from one of the lawyers on the Legal team, the relevant Human Resources personnel, or refer to the Hiring Current and Former USG Employees policy.

*† Refer to USG Gratuities policy*

*\*\* Refer to Frontgrade's Hiring Current and Former USG Employees policy*

## Intermediaries and representatives\*

An Intermediary is defined as any third party whose proposed activities include representing the Company or promoting the interests of the Company. The Intermediary policy sets out the requirements before engagement of the Intermediary, which includes performing appropriate due diligence, both pre-engagement and during the term of the agreement, to ensure that any risks associated with third parties are systematically managed in a rigorous and consistent manner.

*\* Refer to Frontgrade's Intermediary Engagement policy*

## Fair competition†

We compete in the marketplace on the basis of our products, technology, quality, service, price, and similar competitive factors. We do not seek to gain any improper advantage through the use of manipulation, concealment, dishonesty, abuse of privileged information, misrepresentation of facts, or any other unfair dealing practices.

We're required to interact fairly with each other as well as with our customers, suppliers, and competitors. Stealing or illegally appropriating proprietary information, disclosing proprietary information without authorization, possessing trade secret information improperly obtained, inducing such disclosures from past or present employees of other companies, or taking such information from prior places of employment is prohibited.

The use of information, offered or found, to which the Company has no right is unacceptable. This could include such things as unauthorized bids, proposals, or source selection material.

You must never make a payment that is for the benefit of any supplier, customer, or other person for the purpose of inducing that person to act against the interest of their employer.

Anti-trust, trade, and competition laws prohibit agreements and practices that are anti-competitive and undermine fair competition. We're committed to open and fair competition and complying with all competition and anti-trust laws applicable in the countries where we operate.

You must not make any formal or informal agreements or conduct any formal or informal discussions with competitors regarding prices or pricing policies, allocating customers, supplier or customer selection or classifications, allocating markets or territories in which competitive products are sold or in which there are customer or supplier boycotts or where competitors are excluded from the marketplace, or trade is unfairly restricted.

*† Refer to Frontgrade's Unfair Competition and Anti-trust policy*

## Corporate opportunities

If you learn of a business or investment opportunity through the use of corporate property or information from a competitor or an actual or potential customer, client, supplier, or business associate of the Company, you may not participate in the opportunity or make the investment without the prior written approval of the CEO or one of the lawyers within the Legal team. We must not use any corporate property or information for improper personal gain.



## Trade associations

A trade association is an organization founded and funded by businesses that operate in a specific industry. A trade association can benefit competition in several ways. However, trade associations pose certain risks because their membership is often made up of competing firms.

You must take care that contact with competitors does not create a basis for creating an unlawful agreement or result in illegal information exchange. Before joining a trade association, you should ensure you understand its purpose, the number of members, when it was formed, and if there is a lawyer on its staff.

You should not join any trade association that intends to discuss pricing, competition, or customers, or which restricts its membership to only certain industry members. Discuss participation with a supervisor, manager and gain approval before discussing with one of the lawyers on the Legal team.

## Communities and the public

### Working with communities

We want to generate positive relationships in our local communities and in our end-user markets. As such, we want to minimize disruption to our neighbors, provide an effective complaints mechanism, ensure full and fair opportunity is given to local companies and local people to engage with us at the most appropriate level, and contribute to our communities in an appropriate way.

We wish to minimize any social and environmental impacts and risks associated with our products and services throughout their lifecycle and to enhance their social and environmental benefits.

### Respecting the environment

This means the efficient use of energy, raw materials, and natural resources throughout product design, operations, supply chain management, and logistics; reduction in the type and use of hazardous substances; and protection of the Company's operations and supply chain from the significant adverse effects of climate change such as storms, flooding, wildfires, and drought.

All of us – our facilities and our operations – must comply with all applicable environmental, health, and safety (EHS) laws and all applicable rules and regulations as a minimum, and report any accidents, injuries, ill-health, and environmental incidents or concerns.

### Charitable gifts and donations\*

Charitable gifts and donations cannot be made using Company funds except in compliance with the Community Involvement policy. We don't seek to discourage anyone from supporting bona fide charitable organizations through their own fundraising or individual effort outside of and unconnected to their employment at Frontgrade.

*\* Refer to Frontgrade's Community Involvement policy*

### Political contributions\*

Contribution of Company funds or the use of Company assets or facilities for the benefit of political parties or candidates anywhere in the world is prohibited.

You are entitled to make personal donations, and this includes, for the avoidance of doubt, making personal contributions to a Political Action Committee (PAC) in the U.S. The Company will not reimburse you for any such contribution.

*\* Refer to Frontgrade's Anti-Bribery/Anti-Corruption policy*

## Human rights and anti-human trafficking\*

We seek to demonstrate respect for basic human rights through the principles and policies contained in this Code, the Corporate Framework, and Company policies.

We support the principles contained in the Universal Declaration of Human Rights and seek to reflect these principles in the context of our business activities wherever possible, bearing in mind that the Declaration is aimed at nation states rather than businesses.

We respect the human rights of our employees as set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. This includes: paying at least a statutory minimum wage; freedom of association; non-discrimination; the elimination of slavery such as forced, compulsory, bonded, and child labor; and the elimination of human trafficking, discrimination, and harassment in employment and occupation.

We oppose human trafficking in all its forms and seek to identify and eradicate its occurrence within our own operations and within our supply chain wherever possible through a due diligence process.

Millions of people are trapped in some form of slavery, whether they are forced to labor against their will with no means of escape or they're forced to endure physical punishment. There are many indicators of these practices to watch for within the business environment, and you should be vigilant at all times and learn to recognize victims so you can report any instances, or potential instances, found.

Likewise, we expect our suppliers to work toward implementing operations and supply chains that are free from modern slavery and human trafficking.

\* Refer to Frontgrade's *Combating Trafficking in Persons policy*



# Our People

This section of our Code outlines our commitment to you and to each other, and describes in more detail the conduct and behavior expected from all of us to ensure a respectful and inclusive working environment.

## Our People

Frontgrade has a unique role in the world; we're a company that has both been places and is going places in the future. Those places can be dangerous, thrilling, life enhancing, and a million things in between. While the projects we undertake are incredibly varied, we approach them all with the same mind-set – People Focused and Mission Driven – with our customers, our partners, and each other as a team.

## Health and safety

We are committed to providing a safe workplace for everyone who works at Frontgrade and ensuring the safety of the products and services we provide.

We are committed to striving toward zero harm (i.e., continuously reducing accidents, injuries, ill-health, and the environmental impacts arising from our operations, activities, products, and services wherever practicable). We each have a personal duty of care to ourselves and to each other, the communities in which we operate, and to society in general to promote and foster a positive and proactive culture with respect to safety, health, and environment and to work toward achieving zero harm.

Every Frontgrade site and employee is required to comply with all current applicable requirements of the U.S. Occupational Safety & Health Administration (OSHA) and the U.S. Environmental Protection Agency (EPA) as well as all federal, state, and local environmental and health regulations and standards in the jurisdiction of the operating site.

## Prevention of workplace discrimination and harassment

Any kind of discrimination, harassment, or bullying by or against a colleague, customer, or supplier will not be tolerated.

Discrimination could relate to gender identity or expression, race, color, sex, ethnicity, sexual orientation, physical or mental disability, age, pregnancy, religion, veteran status, national origin, or any other legally protected status.

Harassment is directed at an individual. It can take the form of demeaning, insulting or derogatory comments, slurs or innuendos, or intimidating behavior.

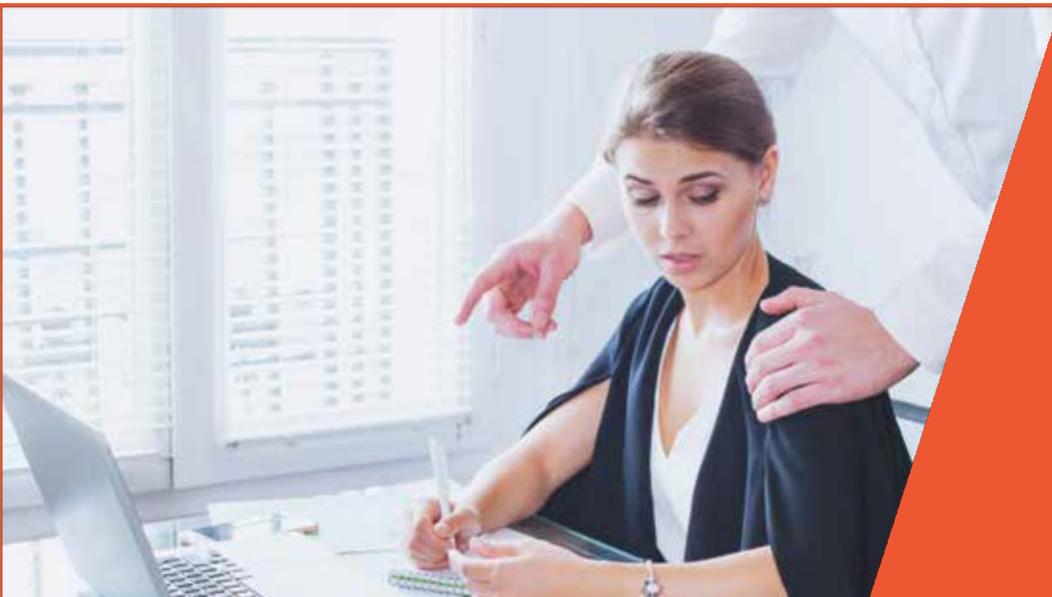
**Q: I'm friends with a man whom I work with. Sometimes we share jokes in my office that might be considered offensive to others, but we're careful to shut the door so no one hears. We also forward each other funny jokes via email. Could this be considered inappropriate behavior, even though it's between two friends and not shared with anyone who would be offended?**

**A:** We don't attempt to regulate your private behavior. However, the situation described takes place on Company property during Company time, using Company assets. This behavior is not acceptable and does not fit into our workplace, even in the privacy of an office.

## Prevention of sexual harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when such conduct is made either as an explicit or implicit condition of employment; is used as the basis for an employment decision affecting the harassed employee; or the harassment is severe or pervasive such that it unreasonably interferes with an employee's work performance or creates an intimidating and/or hostile working environment.

Sexually harassing behavior is strictly prohibited and includes sexual propositions; sexual innuendo; suggestive comments; sexually oriented kidding, teasing, or practical jokes; jokes about gender-specific traits; obscene language or gestures; display of obscene printed or visual material; and any unwanted physical contact such as patting, pinching, or brushing against another person's body.



- Q:** I've noticed that my new boss John leans extremely close to me when we're reviewing reports. He also touches my hand or shoulder frequently as we discuss work. I've tried moving away, but he doesn't seem to be getting the message and his behavior continues. What should I do?
- A:** Either tell John directly that such behavior is making you feel uncomfortable and it should stop immediately or if you're not comfortable doing that, make a complaint to a relevant company resource. There is no reason for you to feel uncomfortable in the workplace, and there is no valid reason for John to engage in such behavior.

## Inappropriate pressure to meet the numbers

- **NEVER** put an inappropriate amount of pressure on anyone to meet targets, disregard procedures, or to cut corners.
- **NEVER** let the pressure to "meet the numbers" compromise your integrity or the safety, health, and environmental impact on other colleagues, our products or services, or the community. We must always do the right thing in the right way.

## Equality, diversity, and inclusion\*

We recruit, employ, train, promote, and compensate individuals based on merit, performance, job-related qualifications, and requirements of the job and the organization.

Diversity and inclusion are embedded in our culture, and we're committed to providing equal opportunities in all aspects of employment. We value our differences and work better together because of them. A work environment which values individual differences and encourages the full contribution of every employee strengthens us.

*\* Refer to Frontgrade's Diversity policy*

## Teamwork and collaboration

We're all part of the same team – working collaboratively with integrity, trusting in each other.

While it's understood that many long-term relationships are formed at work, care must be taken to avoid the perception of an improper relationship between management and anyone in their reporting chain, particularly where work assignments, career advancement, or compensation can be directly or indirectly influenced. An improper relationship could arise due to personal or family relationships. We must never have any direct management or hiring authority over a family member or someone we have a close personal relationship with.

Should such a relationship develop, you should discuss the situation with a supervisor, manager, or Human Resources to decide on necessary actions going forward, with a written record of the discussion being retained on file.

## Conflicts of interest disclosure

We understand and respect our employees' right to engage in activities outside their jobs at Frontgrade. However, you must avoid any investment, interest, or association that interferes, may interfere, or creates the appearance of interfering with the judgement you exercise or the performance of your responsibilities. You must avoid any scenario where personal interests conflict with, or are perceived to conflict with, those of the Company.

Examples (non-exhaustive list) of potential conflicts of interest include:

- Doing business with a company managed by a close friend or family member
- Paying a supplier more than contractually agreed upon for goods or services
- Working as a consultant to a supplier, customer, or competitor
- Using confidential Company information or improperly using Company property, information, or opportunities for personal benefit or the benefit of others
- Outside work that interferes with your performance at work or diverts business away from the Company
- Financial investments that may reasonably be considered to lessen your impartiality

You must provide written disclosure of any actual or potential conflict of interest to your supervisor, manager, or Human Resources, even if the conflict of interest is realized after the situation has arisen. If you consider undertaking an activity, including an investment that may create an actual, apparent, or potential conflict of interest, you must seek written approval from your supervisor, manager or Human Resources immediately, who will keep a written record of such disclosures and approvals on file.



## Drug and alcohol free workplace

Using illegal drugs, controlled substances, or alcohol can have an adverse effect on work performance, jeopardize the safety of colleagues, and constitute a risk to the business and interests of the Company.

You must not distribute, possess, sell, transfer, use, or be under the influence of alcohol, illegal drugs, or controlled substances on Company property, on Company time, in connection with Company business, or in a manner that may affect the performance of Company responsibilities. If alcohol is served during work events, you need to exercise moderation and good judgement, and never drive under the influence of alcohol or over the legal speed limit permitted. This will help prevent accidents and injuries to colleagues and other persons, protect our overall business performance, and protect employees from convictions.

With regard to prescribed medication, you should consult with your medical practitioners or pharmacists prescribing the medication to determine if there are any possible side effects relating to workplace safety and disclose such side effects and use to Human Resources, where required to do so.

As a U.S. Government contractor, we must comply with the Drug Free Workplace Act and applicable local laws. While marijuana has been legalized in certain U.S. states and under other initiatives, it is still illegal under U.S. Federal law and does not change our prohibition on the distribution, possession, sales, transfer, or use of that drug.



## Prevention of workplace violence

Any kind of hostile, violent, intimidating, threatening, or other aggressive conduct in the workplace will not be tolerated. This behavior may include pushing, hitting, or any type of potentially dangerous physical acts. You must not bring, possess, or use a weapon or anything intended to be used as a weapon to inflict harm, physical damage, or injury or for threatening or intimidation purposes into Company buildings. You must report any instance of violence, hostile behavior, or possession of weapons immediately.

**In a case of imminent danger, contact the police immediately.**



## Privacy and data protection of personal information\*

We respect employee privacy and, therefore, will collect, use, and retain information only when a valid business or employment reason exists. Internal disclosure is therefore limited, and all personal data is protected against unauthorized or accidental disclosure, modification, or destruction.

We're all responsible for keeping personal data secure and observing the privacy of individuals. Any data collected must be processed and held in line with applicable laws and the Data Protection policy.

*\* Refer to Frontgrade's Data Protection policy*

## Careful use of social media

We provide most employees with access to the internet on work computers. You must be careful to protect our reputation and business information by not posting any comments or documents on any social media sites that are confidential or could be attributed to our Company. You should never use Company time, property, or networks for social media communications.

If you choose to do so outside of the work environment, make sure the communications do not violate the law or disparage or insult the Company, customers, suppliers, or competitors. If speaking about your professional life, clearly state that these are personal views and not necessarily the views of the Company. Always safeguard personal information.



## Five Key Takeaways

### Important points to remember

1. Always comply with applicable laws, regulations, and corporate policies
2. Never accept or give a bribe or kickback
3. Don't ever compromise your integrity
4. Always do the right thing, in the right way
5. See it? Say it. Speak out!

### Training

Our Code is supported by the annual Code of Conduct training, which every employee across Frontgrade must complete each year.



## Helpline

<http://frontgrade.ethicspoint.com/>

or call toll-free in the United States:

**1-833-996-3948**

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Colorado Springs, CO 80907 USA  
+1 719.594.8000

**[www.frontgrade.com](http://www.frontgrade.com)**