



CODE OF CONDUCT AND ETHICS

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www.atlanticcontract.com

ATLANTIC CONTRACT CODE OF CONDUCT & ETHICS

ATLANTIC CONTRACT is committed to achieving outstanding performance and results to provide value to our shareholders, while considering the interests of employees, customers, the community and others with whom we do business. In striving for outstanding performance and results, we should not compromise our ethics or principles. ATLANTIC CONTRACT places great importance on honesty, integrity, quality and trust.

No matter what your role is, or which location you work in, you are expected to:

- demonstrate the behaviors of honesty, integrity, quality and trust at all times
- set an example for others and recognize those around you who also demonstrate these behaviors
- speak out when you feel that these behaviors are threatened or compromised.

What is the Code of Conduct and Ethics and the Conduct and Ethics Policy Framework?

The Code of Conduct and Ethics sets standards for the way we work at ATLANTIC CONTRACT.

The Code provides a practical set of guiding principles to help you make decisions in your day to day work, whatever you do and wherever you do it. The Code is supported by a number of more detailed policies that form part of the ATLANTIC CONTRACT Conduct and Ethics Policy Framework. These are mentioned in this document and can be found on the ATLANTIC CONTRACT internet.

ATLANTIC CONTRACT's Code of Conduct principles are:

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We act in ATLANTIC CONTRACT's best interests and value ATLANTIC CONTRACT's

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We respect and maintain privacy and confidentiality

2

We act with honesty and integrity

6

We do not make or receive improper payments, benefits or gains

3

We treat others with respect, value difference and maintain a safe working environment

7

We comply with this Code, the law and our policies and procedures

4

We identify conflicts of interest and manage them responsibly

8

We immediately report any breaches of the Code, the law or our policies and procedures

WHO DOES THE CODE APPLY TO?

This Code applies to anyone who is employed by or works at ATLANTIC CONTRACT including employees (both permanent and temporary), contractors and consultants.

ATLANTIC CONTRACT encourages our partners to adopt and maintain similar conduct and ethics principles to those outlined in the Code.

WHEN DOES THE CODE APPLY?

The Code applies to you whenever you are identified as an employee of ATLANTIC CONTRACT. In some circumstances, this will include times when you are outside your immediate workplace or working hours, for example at work functions, out of hours work activities or when you are out in the community on behalf of ATLANTIC CONTRACT

WHAT WILL HAPPEN IF I BREACH THE CODE?

Failure to comply with the principles or the spirit of the Code or the Policy Framework will be considered a serious breach of ATLANTIC CONTRACT policy and will be investigated. Breaches of the Code or the Policy Framework will result in disciplinary action, ranging from a verbal warning through to the termination of your employment for serious breaches.

HOW CAN I BE SURE MY CONDUCT COMPLIES WITH THE CODE AND POLICY FRAMEWORK?

While the Code provides general guidance and minimum expectations regarding your conduct, no code or policy can ever cover every conceivable circumstance you may face.

In everything you do, you are expected to listen to and act upon your conscience to help build and maintain our and your own reputation.

If you are in doubt about whether your conduct is consistent with this Code, it may help you to ask yourself the following questions:

Does it feel like the right thing to do?

- What would an ATLANTIC CONTRACT customer or shareholder expect or want me to do in this situation?
- What would the reaction be if this was reported in the newspapers?
- Would my colleagues or manager consider my behavior appropriate?
- What impact might this have on ATLANTIC CONTRACT and its commitment to shareholder value?

WHO CAN SUPPORT ME IN COMPLYING WITH THE CODE AND POLICY FRAMEWORK?

If you need more information or are unsure of ATLANTIC CONTRACT's expectations or your obligations, we encourage you to speak with your line manager. Your business unit human resources representative or risk representative can also provide assistance where necessary.

HOW DOES ATLANTIC CONTRACT ENSURE THE CODE IS EFFECTIVE?

Group Human Resources is responsible for ongoing review and development of the Code.

On commencement of employment and every twelve months after that, everyone who is employed by or works at ATLANTIC CONTRACT must complete the Code of Conduct and Ethics Declaration, to show that they understand the principles of the Code, confirm that they have complied with them in the previous 12 months and agree to comply with them going forward.

All breaches of the Code of Conduct and Ethics are required to be recorded and reported in line with ATLANTIC CONTRACT's policies and procedures.

1. WE ACT IN ATLANTIC CONTRACT'S BEST INTEREST

ATLANTIC CONTRACT's reputation as a trusted and respected organization is one of our greatest assets. Each of us has the ability to build and maintain ATLANTIC CONTRACT's reputation, or to harm that reputation and undermine ATLANTIC CONTRACT's performance.

ATLANTIC CONTRACT shareholders, customers and the community expect ATLANTIC CONTRACT and everyone who works at ATLANTIC CONTRACT to act professionally and ethically. We must do what we can to meet these expectations and support others to do the same. In everything you do, you should consider how your or someone else's actions could impact on ATLANTIC CONTRACT's performance, reputation or other assets and take action to prevent or remedy anything that could adversely impact ATLANTIC CONTRACT.

WHAT YOU MUST DO:

Undertake your duties with care and diligence. Remember, you are accountable for the decisions you make and the actions you take.

- Deal fairly and honestly with all ATLANTIC CONTRACT's customers, suppliers, competitors and any other third parties or business partners.
- Only provide advice to customers that you are authorized to provide in the course of your work. For example, you must not provide any government contracting advice where ATLANTIC CONTRACT has not authorized you or you are not qualified to do so.
- Help protect ATLANTIC CONTRACT and its customers against potential theft or fraud.
- Help protect ATLANTIC CONTRACT from being associated with money laundering or terrorist financing, or from transacting with countries, entities or individuals who are subject to economic sanctions. This includes being alert to suspicious customer behavior and reporting suspicious activity.
- Exercise your authorities, including your credit discretion, expenditure commitment and payment discretions and corporate credit card funds, responsibly and within their limits. You are responsible for understanding your authorities, including any relevant limits, and are accountable for how they are used.

- Behave in a way that takes into account our impact on the broader community and the environment in both the short and long term.
- Use all of ATLANTIC CONTRACT's systems and equipment appropriately and for proper purposes. This includes email, messaging, internet access, and technology and banking systems.
- Never entertain customers or clients or participate in ATLANTIC CONTRACT activities or functions in a way that may damage ATLANTIC CONTRACT's reputation, for example by consuming excessive alcohol or attending an inappropriate adult venue.

For more detailed information on your obligations, please see the following Conduct and Ethics Policies:

ATLANTIC CONTRACT Anti-Money Laundering and Counter Terrorism Activities

ATLANTIC CONTRACT Anti-Money Laundering and Counter-Terrorism Financing Program Appendices

ATLANTIC CONTRACT Use of Systems, Equipment and Information Policy, particularly the sections on use of systems and equipment

2. WE ACT WITH HONESTY & DIGNITY

HONESTY AND INTEGRITY ARE ESSENTIAL TO EVERYTHING WE DO AT ATLANTIC CONTRACT.

Our success depends on the trust of our customers, which is earned by acting with honesty and integrity and by considering ATLANTIC CONTRACT, our shareholders, customers, colleagues and the general community when making decisions.

Honesty and integrity can be just as important in the things we fail to do.

For example, failing to report the suspicious or dishonest conduct of a colleague reflects on your own honesty and integrity, and may ultimately affect ATLANTIC CONTRACT's reputation for honesty and integrity as well.

What you must do:

- Immediately report any suspicions of fraud, tax evasion, theft or other dishonest behavior by others (including colleagues or customers).
- Never improperly use your position with ATLANTIC CONTRACT, or any information you receive through your work at ATLANTIC CONTRACT, to further your own personal interests, or help others to do so.
- Never help a customer or anyone else to break or evade the law.
- Consider the interests and needs of the customer when providing advice, products or services to them.

ATLANTIC CONTRACT values difference and is committed to achieving a truly diverse workforce that remains inclusive and respectful of each other's differences.

We are all expected to treat all people we deal with through our work at ATLANTIC CONTRACT with dignity and respect, whether they are colleagues, customers, suppliers or other third parties.

Unlawful discrimination, harassment of any kind, bullying or victimization or other unacceptable or offensive conduct will not be tolerated.

ATLANTIC CONTRACT believes the safety, security and physical and mental health of ATLANTIC CONTRACT people lie at the heart of each person's ability to contribute to our success. ATLANTIC CONTRACT respects the right of all individuals to work in a safe working environment that promotes wellbeing.

What you must do:

- Treat all people you deal with through your work at ATLANTIC CONTRACT with dignity and respect.
- Make employment decisions based on merit, and not on attributes that are irrelevant to employment or performance.
- Be honest and forthright in all of your communications and dealings with ATLANTIC CONTRACT, including with your line manager, colleagues, customers, auditors and regulators. This includes communications and dealings as a customer, as well as someone who works with ATLANTIC CONTRACT.
- Ensure all dealings (such as transactions or commitments) with customers, suppliers or third parties are properly reported transparent.
- Use ATLANTIC CONTRACT assets and funds (including corporate credit cards) for proper purposes and keep accurate and transparent records of all payments or receipts for transactions using ATLANTIC CONTRACT funds.
- Never structure or amend any transaction to disguise, conceal or misrepresent the involvement of any party or the true nature of the transaction (for example, to conceal money laundering or the involvement of sanctioned countries, entities or individuals).

For more detailed information on your obligations, please see the following Conduct and Ethics Policies:

ATLANTIC CONTRACT Global Fraud and Corruption Policy

ATLANTIC CONTRACT Group Expense Policy

3. WE TREAT OTHERS WITH RESPECT, VALUE DIFFERENCE AND MAINTAIN A SAFE WORKING ENVIRONMENT

- Never unlawfully discriminate, harass or bully your colleagues, customers, ATLANTIC CONTRACT visitors or anyone else in the workplace. This includes being aware that some behavior may be acceptable to you but not to others, and acting appropriately.
- Contribute to promoting a safe working environment by taking responsibility for health and safety and reporting any issues as soon as possible.
- Never treat somebody less favorably because they have brought or propose to bring a genuine complaint of unacceptable behavior.

For more detailed information on your obligations, please see the following Conduct and Ethics Policies:

ATLANTIC CONTRACT Equal Employment Opportunity, Bullying and Harassment Policy

ATLANTIC CONTRACT Equal Employment Opportunity, Bullying and Harassment Policy

ATLANTIC CONTRACT Health and Safety Policy

4. WE IDENTIFY CONFLICTS OF INTEREST AND MANAGE THEM RESPONSIBLY

Acting honestly and with integrity also means managing conflicts of interest and never putting yourself in a situation that puts, or appears to put, your own personal interests before those of ATLANTIC CONTRACT or our customers.

The perception of a conflict of interest can do as much damage to ATLANTIC CONTRACT's reputation as an actual conflict of interest. You must be mindful of when a conflict may be perceived by others, and take action to avoid or address this risk.

What you must do:

- Be alert to actual or potential conflicts of interest and disclose them to your line manager, human resources representative or your operating risk and compliance representative.
- Seek approval for any outside business interest including non-ATLANTIC CONTRACT work (paid or unpaid), business ventures, directorships, partnerships or a direct or indirect financial interest which has the potential to be in conflict with your employment, the interests of ATLANTIC CONTRACT or ATLANTIC CONTRACT's partners, customers or suppliers.
- Keep an arm's length relationship when dealing with customers or suppliers and obtain written approval of ATLANTIC CONTRACT to do business, hold accounts, transact with or hold a direct or indirect financial interest in customers or suppliers you deal with in the course of your work with ATLANTIC CONTRACT.
- Never provide or maintain products or services for, or complete or approve transactions on behalf of, immediate family members or relatives in the course of your work.
- Disclose to your line manager any personal associations with a third party that you are involved in evaluating or negotiating with for ATLANTIC CONTRACT, whether for employment, as a customer or supplier or any other reason.

5. WE RESPECT AND MAINTAIN PRIVACY AND CONFIDENTIALITY

In your work at ATLANTIC CONTRACT, you may come across private and confidential information relating to ATLANTIC CONTRACT, colleagues, customers, suppliers or other third parties.

When people provide us with this type of information they are trusting ATLANTIC CONTRACT.

Misuse of confidential and private information can have severe commercial and reputational consequences for ATLANTIC CONTRACT and can also greatly affect those whose information is misused. If people feel they can't trust us with their information they are unlikely to trust us with their finances or business.

ATLANTIC CONTRACT is committed to maintaining the confidentiality and security of this information and you are expected to do your part to help honor this commitment.

What you must do:

- Do all you can to keep information secure. This includes not sharing private or confidential information with other employees unless they need it to perform their work at ATLANTIC CONTRACT.
- Never release information about customers or colleagues to third parties outside of ATLANTIC CONTRACT unless the person the information relates to has agreed or if ATLANTIC CONTRACT

is required to release the information under the law. This includes not giving any information to family members, friends or others about an account to which they are not a signatory.

- Follow procedures and requirements to protect information whenever you provide details over the phone, by email or fax.
- Follow all protocols and procedures relating to the maintenance of passwords and user profile setup.
- Never allow someone else to log on using your individual details.
- Collect, use, store, handle, update and destroy information, particularly personal information, in line with applicable policies and processes at all times.
- Never disclose any information about ATLANTIC CONTRACT that is not already in the public domain without the proper authority to do so.

For more detailed information on your obligations, please see the

ATLANTIC CONTRACT Use of Systems, Equipment and Information Policy, particularly the sections on information security.

6. WE DO NOT MAKE OR RECEIVE IMPROPER PAYMENTS, BENEFITS OR GAINS

Integrity and trust are inconsistent with improper payments, benefits or gains of any kind.

There are certain situations that have a higher risk of an improper payment, benefit or gain being made or received. These include rewards from current or potential customers or suppliers that are out of the ordinary, such as cash, cheques, gifts, gift certificates or travel of a high value.

Where rewards from a current or potential customer or supplier create any obligation or expectation that you will give preferential treatment to the person or company offering the reward, the reward is improper and must be refused.

What you must do:

- Never accept any gift, reward or entertainment, including discounted products, free travel or accommodation, if it could create any obligation or expectation that could conflict with your work at ATLANTIC CONTRACT.
- Never try to improperly influence the outcome of an official decision, for example by offering a payment or benefit that is not legitimately due. These payments or benefits are unacceptable.

- Only accept gifts or entertainment in line with applicable policies and processes.
- Never make any donation or other financial contribution from ATLANTIC CONTRACT to a political party or candidate unless it has been approved by the ATLANTIC CONTRACT CEO and the ATLANTIC CONTRACT Board.
- Only entertain customers and business associates with lunches, dinners or other events (such as football, cricket or the theatre) if the nature and value of the entertainment is reasonable in light of the nature and value of the business relationship with ATLANTIC CONTRACT and the seniority of the parties attending.
- Obtain proper approval for and properly record any donations, sponsorships, charitable contributions, gifts and entertainment you accept from, or give to, a third party on behalf of ATLANTIC CONTRACT.

For more detailed information on your obligations, please see the
ATLANTIC CONTRACT Anti-Bribery Policy.

6. WE COMPLY WITH THIS CODE, THE LAW AND ATLANTIC CONTRACT

As an organization working in the US and all 28 NATO members states, we are subject to laws and regulations in all the locations in which we do business.

You must be familiar and comply with all relevant laws and regulations in the location or locations in which you work. Any breaches of the law can have serious consequences beyond your employment, both for ATLANTIC CONTRACT and for you as an individual.

Although the laws that apply may be complex, ignorance is no excuse. You are ultimately responsible for understanding which laws and regulations apply to you and the work you do.

ATLANTIC CONTRACT is committed to helping you by designing systems and processes that comply with the law, and by providing relevant policies and training.

This Code, and ATLANTIC CONTRACT's policies, procedures and practices take into account not only the strict letter of the law but also the ATLANTIC CONTRACT way of doing things. In many cases, the standards expected by ATLANTIC CONTRACT exceed those required by law. Wherever there is an inconsistency between an applicable law and this Code, an ATLANTIC CONTRACT policy, procedure or practice, you must comply with whichever is the higher standard.

What you must do:

- Not take any action, or fail to take any action, that may breach this Code, the law, ATLANTIC CONTRACT policies, procedures or practices.
- Complete all required training and education programs to build and maintain your awareness and understanding of relevant laws, policies, procedures and practices.
- If you are unsure whether a particular law, policy, procedure or practice applies, seek guidance from your supervisor, line manager, human resources representative or operating risk and compliance representative.

For more detailed information on your obligations, please see the

ATLANTIC CONTRACT Policy Library.

8. WE IMMEDIATELY REPORT ANY BREACHES OF THE CODE, THE LAW OR ATLANTIC CONTRACT

As someone working with ATLANTIC CONTRACT, you are required to comply with this Code and report any conduct that may be in breach of the law, this Code, the underlying Policy Framework or any other ATLANTIC CONTRACT policies or procedures as soon as you can.

Any reports of a breach of the Code will be taken seriously and investigated appropriately by ATLANTIC CONTRACT. It is important that all reports are based on truth and fact. If you make a report in good faith, you will not be disadvantaged personally or in your employment, even if the conduct that is reported is later found not to be in breach of the Code.

At the same time, if you make an intentionally false or malicious report, you may find yourself in breach of the Code, and dealing with the consequences that follow.

There are many different avenues for reporting a breach - who you should raise the matter with will depend on the particular circumstances.

In most cases, you should raise breaches of the Code, the law or policies and procedures with your line manager, your human resources representative or your operating risk and compliance representative.

There may be times where it is inappropriate to raise a concern within your business unit, in which case you may contact an ATLANTIC CONTRACT Whistleblower Protection Officer (WPO) or use

ATLANTIC CONTRACT's

Whistleblower hotline

0048-606-369-333.

Reports to WPOs or the hotline are confidential and protected by the ATLANTIC CONTRACT Whistleblower Protection Policy.