

A banner image featuring a dark teal triangle on the left containing the text 'Code of Ethics'. The background of the banner is a close-up, blurred image of several interlocking metal gears.

## Code of Ethics

### PURPOSE

- ▶ This document sets out the principles according to which Control Risks operates.
- ▶ Everything we do in Control Risks is based on our guiding belief that risk-taking is an essential pre-requisite to our clients' success. We help put in place all the necessary measures to ensure that clients are fulfilling their responsibilities to safeguard their organisation and give it the secure foundation on which to grow. Those responsibilities include compliance and ethics. Our advice to our clients will always be objective - with no geographic or political bias - and we will tell them the truth (however unpalatable it may be at times). In turn, Control Risks will never compromise on its own commitment to act ethically and with integrity.
- ▶ Success demands that all Control Risks' employees are required to comply with the laws and regulations of the countries in which they operate. However, legal compliance is only the starting point. The long-term sustainability of our business depends on our ability to maintain the highest standards of personal and collective integrity, often in difficult circumstances.

### SCOPE

This policy applies to all employees (including the Group Board of Directors) in companies in the Control Risks Group ("Control Risks" or the "Company"). Control Risks Group shall be defined as Control Risks International Limited and its subsidiaries and branches.

### SUPPORTING DOCUMENTS AND CONTACTS

This policy must be read in conjunction with the following: [Anti-Bribery and Anti-Corruption Policy and Human Rights Policy](#).

#### Contacts

If you are in any doubt about how to apply this policy please speak to your manager or the Legal, Risk and Compliance team. You can also seek guidance from the Ethics Committee.

If you become aware of any breach of this policy, or suspected breach, we hope that you will feel comfortable talking to your manager. However, if that's not the case please use the Control Risks Whistleblower Hotline.

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# 1. POLICY REQUIREMENTS

## 1.1 Our ethical commitment

Ethics are not an optional extra or something we adopt to make ourselves feel good. They define how we do what we do. Every day we are asked to help clients in controversial, dangerous and morally complex situations. Applying ethics in these circumstances is often difficult, but it is essential. Guided by an ethical code and confident in our own innate integrity, we have the opportunity to help our clients do business in the most challenging circumstances. Making us proud of what we do is always more important than short-term financial gain.

## 1.2 Our values

Control Risks operates according to its core values: integrity and ethics, collaboration and teamwork, commitment to people and professionalism and excellence.

## 1.3 Business integrity

Business integrity goes beyond compliance with the law, and involves the application of our core values. Control Risks does not pay bribes directly or indirectly and does not engage in any acts of corruption including the facilitation of tax evasion. Control Risks' employees are expected to use their judgement not just to avoid malpractice but to promote good practice in accordance with the company's commitment to high standards of integrity.

## 1.4 Conflicts of interest

Control Risks' staff must avoid situations or transactions in which their personal interests could conflict or might be seen to be in conflict with those of Control Risks. This includes: acting on any client information gained through their employment with Control Risks for personal gain; passing such information to a third party; or acting in any way that could be construed as insider trading<sup>1</sup>.

Conflicts of interest can arise if individuals have a personal interest in business dealings involving Control Risks. Personal interest can be direct or indirect, and refers not only to personal interests but to those of family members and friends. If there is a potential for conflict, the interests of Control Risks must take priority.

Control Risks' staff must disclose any personal conflict of interest or perceived conflict to their line manager. (For company conflicts of interest see Conflicts of Interest Policy.)

## 1.5 Confidentiality

Control Risks will not reveal the identity of any Crisis Response client or any other client without their consent.

All Control Risks documentation and client documents entrusted to the company must be handled securely and remain confidential. Any breach, or suspected loss, must be reported to the Group Risk Director and the Chief Information Security Officer immediately.

## 1.6 Human rights

Control Risks respects the full range of human rights. The company and all its employees have accountability to ensure a working environment in which everyone is treated with respect and dignity. The company recognises that protecting the environment supports the human right to live in a healthy and sustainable environment.

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<sup>1</sup> Insider trading is the buying or selling of a security whilst in possession of material non-public information (MNPI). A security is any tradable financial asset. MNPI is information that has not been disclosed to the marketplace (it is non-public) and that would be considered relevant (material) to an investor, or prospective investor, in the security. If the information is likely to make the stock price move up or down, or effect the yield or price of a fixed income security it is material.

Control Risks supports the Universal Declaration of Human Rights, and our employees are never to be complicit in human rights abuses. Control Risks is guided by the UN Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights. It is a Signatory of the UN Global Compact.

## 1.7 Political activities

As a corporate body, Control Risks has a policy of strict political neutrality: we do not make donations to any political parties, organisations, or individuals engaged in politics. However, Control Risks will co-operate with governments and other official bodies in the development of policy and legislation that may affect our legitimate business interests, or where we have specialist expertise.

Control Risks' employees are entitled to their own political views and activities, but they may not use company premises or equipment to promote those views nor associate their views with those of the company.

## 1.8 Business relationships

Control Risks will take account of ethical and reputational issues, as well as legal compliance, when deciding whether to work with particular clients or take on new assignments.

We expect our suppliers, subcontractors, representatives and joint venture partners to adhere to integrity principles that are consistent with our own.

# 2. AUTHORITY AND RESPONSIBILITY

## 2.1 All Control Risks employees

- ▶ Control Risks requires its employees to abide by this code in all circumstances.
- ▶ Control Risks takes breaches of the code very seriously. Employees who fail to abide by the code may face disciplinary action, including dismissal.
- ▶ Employees should report any breach, or suspected breach, of this policy. They will not be penalised for reporting genuine concerns that prove to be unfounded. Please refer to Control Risks Whistleblowing Policy for further details.

## 2.2 Managers

- ▶ Senior management will give full backing to Company staff who find themselves in difficult situations, or who fail to win business, as a result of abiding by the code.