

INTERNATIONAL SOS PROVIDER CODE OF CONDUCT

International SOS takes pride in our reputation for integrity and the business success that our reputation has enabled. This reputation has taken years to build and maintaining it is vital to our success.

The Code has been developed to convey to all Providers International SOS's expectation for all of its Providers to adhere to the highest ethical standards when conducting business. This document is modelled from the International SOS Code of Conduct, which is available for your review upon request.

Providers are required to take reasonable steps to ensure that the Code is communicated throughout their organizations and to make the Code available to their employees.

International SOS values its business relationships with its Providers and requires its Providers to share our commitment to, at a minimum, compliance with the following standards:

Definitions:

"*International SOS*" means International SOS Pte. Ltd. and its Affiliates, where "Affiliates" mean any person or party that controls International SOS, is controlled by International SOS or is under common control with International SOS, where "control" means owning, directly or indirectly, more than 50% of the capital stock (or other ownership interest, if not a corporation) of a person or party ordinarily having voting rights or otherwise having the right or ability, by contract or otherwise, to direct the management and policies of such person or party.

"*The Code*" means International SOS Providers Code of Conduct.

"*Providers*" or "*Provider*" means current and future vendor(s), supplier(s), contractor(s), consultant(s), agent(s) and other provider(s) of goods and services.

1. Anti-corruption Compliance

International SOS's commitment to dealing legally and ethically with governments applies worldwide. Company policy, the U.S. Foreign Corrupt Practices Act, and similar anti-bribery laws around the world prohibit our employee or their agents from giving or offering to give money or anything of value – whether cash or not, or whether directly or indirectly through others – to any government official (e.g., any employee of any government or of any government-owned or operated enterprise, entity or corporation) to induce that official to affect any governmental act or decision, or to assist the Company in obtaining or retaining business or securing any improper advantage.

Providers may not act in any way, in their business relationship with International SOS or otherwise, that violates the U.S. Foreign Corrupt Practices Act or any other anti-corruption law around the world. International SOS entities use Providers that do not violate our ethical standards through bribes, kickbacks, or other similar improper or unlawful payments.

2. Compliance with Laws

Provider's personnel and operations shall operate in full compliance with the laws of their respective countries and with all other applicable laws, all statutory, regulatory and other legal requirements. Additionally, Providers will ensure that products and services for International SOS adhere to all applicable international trade compliance laws, all statutory, regulatory and other legal requirements.

When providing services to International SOS or its customers, Providers may not deal with any entities, organizations, persons or vessels which are under any applicable sanctions.

3. Confidential/Proprietary Information

Providers must respect International SOS's intellectual property, trade secrets and other confidential, proprietary or sensitive information and may not use or disclose any such information except in accordance with their contract with International SOS and for the benefit of International SOS. Any information or data regarding International SOS operations shall be treated by Providers as confidential at all times unless that information enters the public domain through no fault of the Providers. The Providers' obligations with respect to International SOS confidential or proprietary information include:

- Not to disclose this information to other people within the Providers' organization except on a strict "need to know" or "need to use" basis.
- Not to disclose this information to persons outside of the Providers' organization.
- Not to use this information for the Providers' own benefit or the benefit of any other person.

4. Data Protection and Privacy Laws

Provider will undertake reasonable measures to ensure that personal data it handles on behalf of International SOS will be protected against unauthorized disclosure, access, use and modification and that it will be used only for purposes of rendering the relevant services or as required by law.

International SOS is committed to protecting the personal information of its employees, contractors, vendors and members in accordance with applicable privacy and data protection laws. If you have not already done so, please ensure that you adopt adequate administrative, physical and technical safeguards to keep all personal data used pursuant to your agreement with International SOS secure, and that you have in place procedures to ensure your activities fully comply with applicable data privacy and data protection laws.

5. Ethical Dealings

Honest dealing with customers and Providers is essential to sound business relationships. International SOS seeks to give all Providers fair consideration. Decisions are based on objective criteria such as price, quality, and service capability as well as Providers' reliability and integrity. Invoices, financial settlements and reports should correctly reflect the business transactions between us.

INTERNATIONAL SOS PROVIDER CODE OF CONDUCT

Our Providers are required to demonstrate these same high ethical standards and to conduct all business transactions with integrity and fairness.

6. Gifts and Entertainment

Providers should be aware that it is not permissible for International SOS employee to give or receive gifts, payments or other benefits that influence any business decision or that create the appearance of influencing any business decision. Providers are therefore discouraged from providing any gifts or other benefits to International SOS employees.

International SOS recognizes that it is customary for some of its Providers, customers and other business associates occasionally give small gifts or offer modest business entertainment to those with whom they do business. It is important, however, that these gifts and entertainment events do not affect an employee's business judgment, or give the appearance that judgment may be affected. When doing business with or conducting business on behalf of International SOS, Providers may, for legitimate business purposes: (i) offer gifts or entertainment to other Providers, International SOS customers or business associates; or (ii) accept gifts or entertainment offered by Providers, that in each instance the gift or entertainment:

- is unsolicited;
- is not a bribe, kickback or other illegal or illicit payment;
- is not given in exchange for any consideration; and
- does not create the appearance (or an actual or implied obligation) that the gift giver is entitled to preferential treatment, an award of business, better prices or improved terms of sale.

7. Health and Safety

Providers who do business with International SOS are encouraged to maintain a focus on health and safety that is consistent with International SOS and must provide a safe and healthy work environment for all employees working at their sites.

In addition, any Provider representative providing on-site services in an International SOS facility is required to adhere to International SOS safety standards.

It is our expectation is that Providers have and enforce a written policy on drugs, alcohol and other prohibited items.

To the extent permitted by law, International SOS expects its Providers to have in place reasonable and appropriate systems through which allegations of wrongdoing may be investigated and remediated. International SOS expects that its Providers will fully investigate allegations of wrongdoing within their own organizations.

In addition, a Provider must immediately notify International SOS in writing upon becoming aware of any negative or other adverse publicity concerning the Providers or any product and services being provided to International SOS by the Provider, or any event or circumstance related to the Provider that could be expected to

cause negative or other adverse publicity concerning International SOS.

It is the responsibility of each Provider to ensure that its employees and representatives understand and comply with the Code.

Failure to adhere to the Code may be grounds for terminating the Provider relationship depending on the seriousness of the violation and the particular circumstances.

Online version of the International SOS Provider Code of Conduct is available in additional languages online at <https://www.internationalsos.com/terms-and-conditions>

If you have any questions about the Code, you may contact us at Compliance@internationalsos.com