



Code of Conduct

Groeneveld Group

Contents

1. Introduction
2. Legal Compliance
3. Workplace and respect for Human Rights
4. International Business Practices
 - 4.1 Competition laws
 - 4.2 Anti-Corruption laws
5. Protecting Groeneveld's Assets
 - 5.1 Intellectual property
6. Media Policy
7. Conflicts of Interest
8. Environment
9. Reporting Code of Business Conduct Violations
10. Severability

1. Introduction

Groeneveld is committed to conducting her business with honesty and integrity, in accordance with high ethical and legal standards, and with respect for each other and those with whom we do business. This Code of Conduct (Code) sets out the basic rules, standards and behaviors necessary to achieve these objectives.

All employees of Groeneveld are expected to display responsible and ethical behavior, to follow consistently both the meaning and intent of this Code and to act with integrity in all our business dealings. Managers and supervisors are expected to take such action as is necessary and appropriate to ensure that the Groeneveld business processes and practices are in full compliance with the Code.

2. Legal Compliance

Groeneveld's policy is to comply with all laws and regulations that apply to her business. Although Groeneveld employees are not expected to know the details of every legal requirement applicable to our business in every jurisdiction, they are responsible for understanding those legal requirements applicable to our employment duties. They need to understand the regulatory environment in which Groeneveld operates well enough to know when to seek advice from other appropriate personnel.

As Groeneveld considers legal compliance to be one of her primary duties, we also expect this from our suppliers. We expect our suppliers not only to comply with the content of this Code in their own organization but also to ensure in turn that their subcontractors adhere to this international standards summarized in the Code.

3. Workplace and respect for Human Rights

Groeneveld encourages a workforce that is as diverse as the customers we represent. Harassment of any kind in our workplace will not be tolerated.

Groeneveld expects its suppliers to respect the basic human rights of employees as defined in the international conventions of the United Nations (UN), the International Labor Organization (ILO), the Organization for Economic Cooperation and Development (OECD) and the UN Global Compact Initiative.

4. International Business Practices

4.1 Competition laws

Competition laws prohibit practices that restrain trade or restrict free and fair competition. All countries in which Groeneveld operates have enacted competition laws. These laws apply to us as both a supplier and a buyer of goods and services. Competition laws are complex and the provisions in the Code are not intended to serve as a complete and definitive statement on every aspect of competition laws.

4.2 Anti-Corruption laws

As with competition laws, the countries in which Groeneveld operates have enacted anti-corruption laws that apply to our business activities. Allegations of corruption can do serious damage to our business and reputation. It is essential that we comply with all applicable Anti-Corruption laws in the conduct of our business.

5. Protecting Groeneveld's Assets

Groeneveld's assets in the broadest sense of the word, must be secured and protected in order to preserve their value.

5.1 Intellectual property

Groeneveld's intellectual property rights are valuable assets and all employees are expected to protect them. We are also highly respectful of all intellectual property rights of others. Any use of Company systems in violation of applicable intellectual property rights, such as the illegal or unauthorized duplication or distribution of copyrighted materials, is strictly prohibited.

6. Media Policy

If Groeneveld employees externally publish information relating to Groeneveld Group business in publications, lectures and interviews, they must follow the Groeneveld internal guidelines.

7. Conflicts of Interest

The employees of Groeneveld have to avoid all conflicts of interest that may adversely influence business relationships. All Groeneveld assets should be used for legitimate purposes.

8. Environment

Groeneveld is committed to acting in an environmentally responsible manner and should therefore approach environmental issues positively.

9. Reporting Code of Business Conduct Violations

Groeneveld wants to promote an open culture, where people can ask questions if they believe the Code has been violated. Guidance can be sought from the General Counsel of the Groeneveld Group.

Groeneveld will not permit retaliation against any employee who, in good faith,

seeks advice concerning, or who reports or complains of violations of, the Code or other illegal or unethical conduct. If, however, an employee makes a false report of a violation or of questionable behavior for the purpose of harming another person, the reporting employee will be subject to disciplinary action.

10. Severability

If any provision of the Code is held to be illegal, void or unenforceable because of any law or public policy, the remaining provisions will continue in full force and effect.