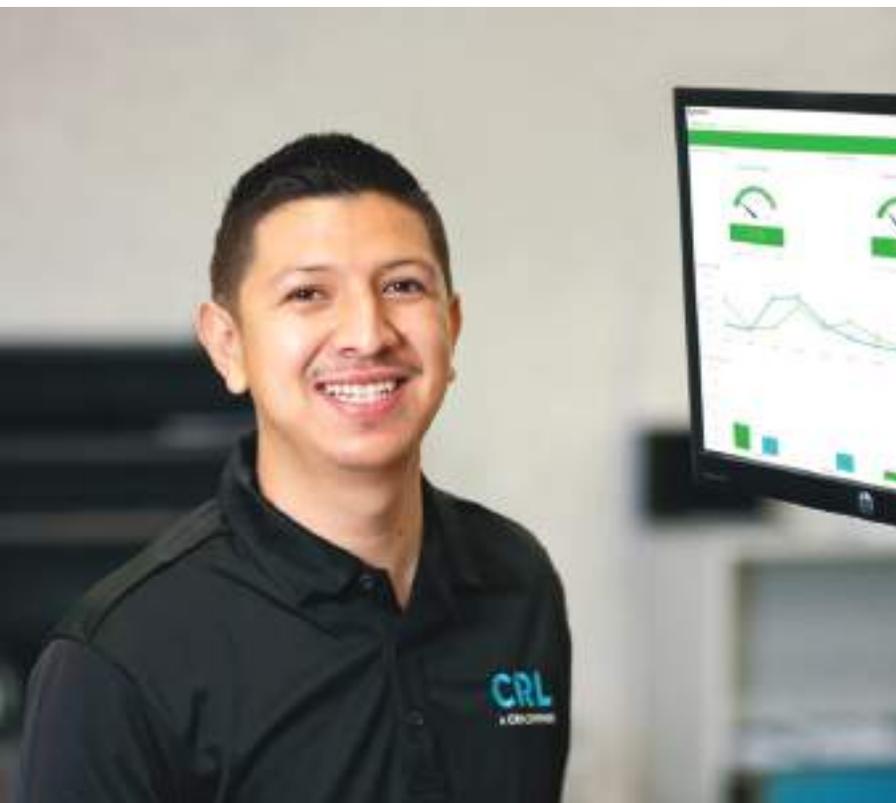


# Code of Business Conduct





# Contents

---

A Message from Bruno Biasiotta

Our Values

It Begins with Me

Making the Right Decisions

Reporting Concerns

---



## **Conduct in Our Workplace**

- Putting Safety First
  - Respecting Others
  - Protecting Company Assets and Data
  - Maintaining Confidentiality and Avoiding Insider Trading
  - Use of IT Systems and Social Media
  - Keeping Accurate Records
- 



## **Conduct in Our Business Practices**

- Competing Fairly
  - Refusing Bribery and Corruption
  - Guidelines on Gifts and Hospitality
  - Avoiding Conflicts of Interest
  - Complying with International Trade Laws
  - Preventing Money Laundering
  - Third Party Relationships
- 



## **Conduct in Our Community**

- Protecting Human Rights
- Promoting Environmental Sustainability
- Engaging with and Supporting the Community
- Making Political Contributions

# A Message from Bruno

It Begins with Me



At OBE, one of our core values is to, "Do what we say and lead with integrity." It is important for all of us to take pride in doing things the right way because it's how we've built our business. This applies equally to everyone at OBE because we all have a role in upholding our business' integrity.

Everything we do is guided by our Code of Business Conduct (COBC). Each of us has a duty to read, understand and follow the COBC. The COBC was updated in 2021 and covers three areas: conduct in our workplace, conduct in our business practices, and conduct in our community. You'll notice a recurring phrase throughout: "It Begins with Me." Putting safety first, following the law, doing the right thing, showing respect to others – it begins with you and it begins with me, every day.

Upholding our culture of integrity also means identifying compliance concerns and speaking up. I encourage you to report any concerns related to unethical or illegal behavior to HR, Legal and Compliance, or the OBE Hotline. I appreciate your cooperation and thank you for your commitment to follow the Code of Business Conduct.

**Bruno Biasiotta**  
Chief Executive Officer

## Our Values



### Put safety first

We value safety. We protect and look out for each other. Safety is a shared, uncompromised value.



### Continuously create value

We constantly seek new and sustainable ways to take on challenges and improve every day for the benefit of our shareholders, customers, employees and the communities in which we operate.



### Do what we say and lead with integrity

We do the right things in the right way, comply with the law and work responsibly. We are ethical and honest.



### Operate locally, but act as one company

Working locally, but together as one, our entrepreneurial spirit is built on a determination to succeed, seize opportunities, win customers, and grow our businesses.



### Build enduring relationships

We are straight talkers, down-to-earth, open, and trustworthy. We develop partnerships that stand the test of time.

## It Begins with Me

Our company culture is built by the day-to-day actions of you, our employees. This Code of Business Conduct ("the Code") is your practical guide to upholding OBE's values and acting ethically in our workplace, in our business practices and in our communities. Since the Code does not address all possible situations you might face in your work, you are expected to use good judgment and common sense, ask for guidance when uncertain, and speak up when something isn't right.

Everyone who works for OBE has a duty to read, understand, and abide by this Code. The Code applies equally to everyone, from temporary and part-time employees to our most senior management. Our management-controlled joint ventures also agree to abide by the Code.

No one is ever authorized to violate the Code. Anyone doing so is acting solely on his/her own behalf, contrary to OBE's best interests, and is subject to appropriate discipline.

Additionally, if you are in a management position, you have a responsibility to:

- Ensure each person on your team has read and understands the Code
- Lead with integrity: Model the good conduct you want to see in your team
- Foster an open-door culture where your team feels comfortable asking questions and raising concerns about conduct issues
- Embrace all initiatives and training that support the Code

## Your Guide



## Making the Right Decisions

At times you may be faced with a situation where the right thing to do isn't obvious. To assist you in making the right decision, ask yourself these questions:



Is it legal?



Is it consistent with our values, ethics, and culture?



Would I be comfortable telling my family and friends about it?



Yes to all

Move forward



Unsure

Get advice - speak to your manager or contact Legal and Compliance

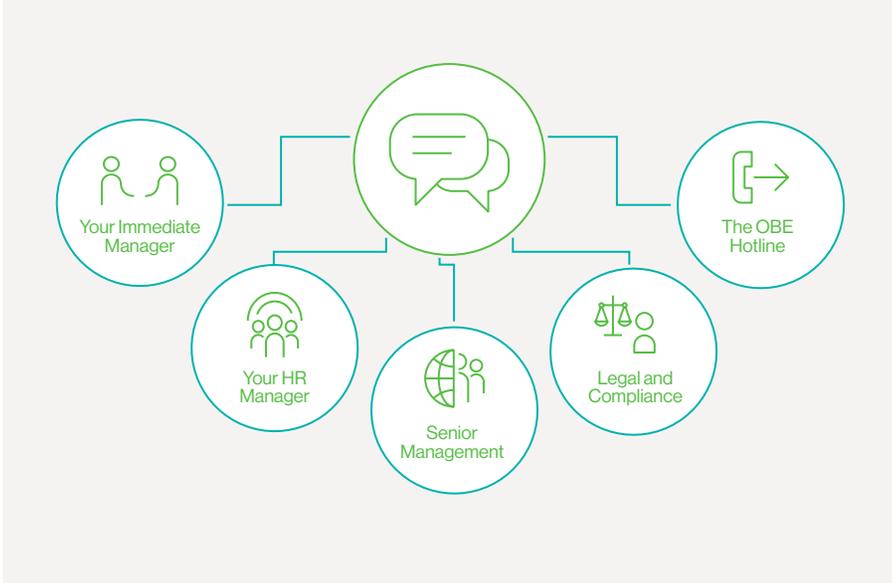


No to any

Stop, don't do it!

# Reporting Concerns

If you have a genuine concern about a possible breach of the Code, you must speak up about it. There are five ways you can report your concerns. Throughout this Code, "REPORT" means to inform any of the following:



## The OBE Hotline

The OBE Hotline allows employees, customers, suppliers and other stakeholders to report genuine concerns relevant to the Code, inappropriate or illegal behavior, or violations of OBE policies or local laws. Retaliation for reporting genuine concerns is not tolerated at OBE. Please note that routine employee issues are best dealt with by your local HR team.



If I see or hear something unsafe, unethical, or illegal, I will speak up!

# When I Contact the OBE Hotline...

 <p>Can I report anonymously?</p>	 <p>Who investigates my report?</p>	 <p>I want to report a concern but I'm afraid I will be retaliated against.</p>
<p>Yes. The OBE Hotline is managed by an external third party and you do not have to provide your name.</p>	<p>Your report will be sent to Legal and Compliance and assigned to an appropriate person to investigate. Each report is taken seriously and fully investigated.</p>	<p>OBE does not tolerate retaliation for reporting a genuine concern. Your report will be handled discreetly and in a confidential manner, to the extent reasonably possible and allowed by local laws.</p>

**Oldcastle BuildingEnvelope**

**CONFIDENTIAL REPORTING HOTLINE**

Oldcastle BuildingEnvelope, Inc. provides a confidential reporting hotline for employees to report any of the following incidents:

- FRAUD
- HEALTH & SAFETY
- THEFT OR MISUSE OF ASSETS
- UNETHICAL BEHAVIOR
- ANY VIOLATIONS OF THE LAW
- ANTI-COMPETITIVE BEHAVIOR
- EMPLOYEE CONCERNS AROUND DISCRIMINATION OR HARASSMENT

Oldcastle BuildingEnvelope Hotline  
**833-204-8782**

The hotline is an independent way to report without fear of retaliation. Reports can be made anonymously.

Or visit: [www.lighthouse-services.com/obe](http://www.lighthouse-services.com/obe)

**syntrio**

Syntrio is an independent provider that assists your organization to identify reported activity. We are committed to protecting the identity of all persons who use our secure reporting system. Reports are submitted by Syntrio to the organization's program, and they or they will be investigated at the sole discretion of the organization. Although we will not disclose your identity without your express permission, it is possible that your identity may be discovered as a result of an investigation of the matter reported because of information you have provided.

Contact the OBE Hotline at [www.lighthouse-services.com/obe](http://www.lighthouse-services.com/obe) or take a picture of the QR code with your mobile device.

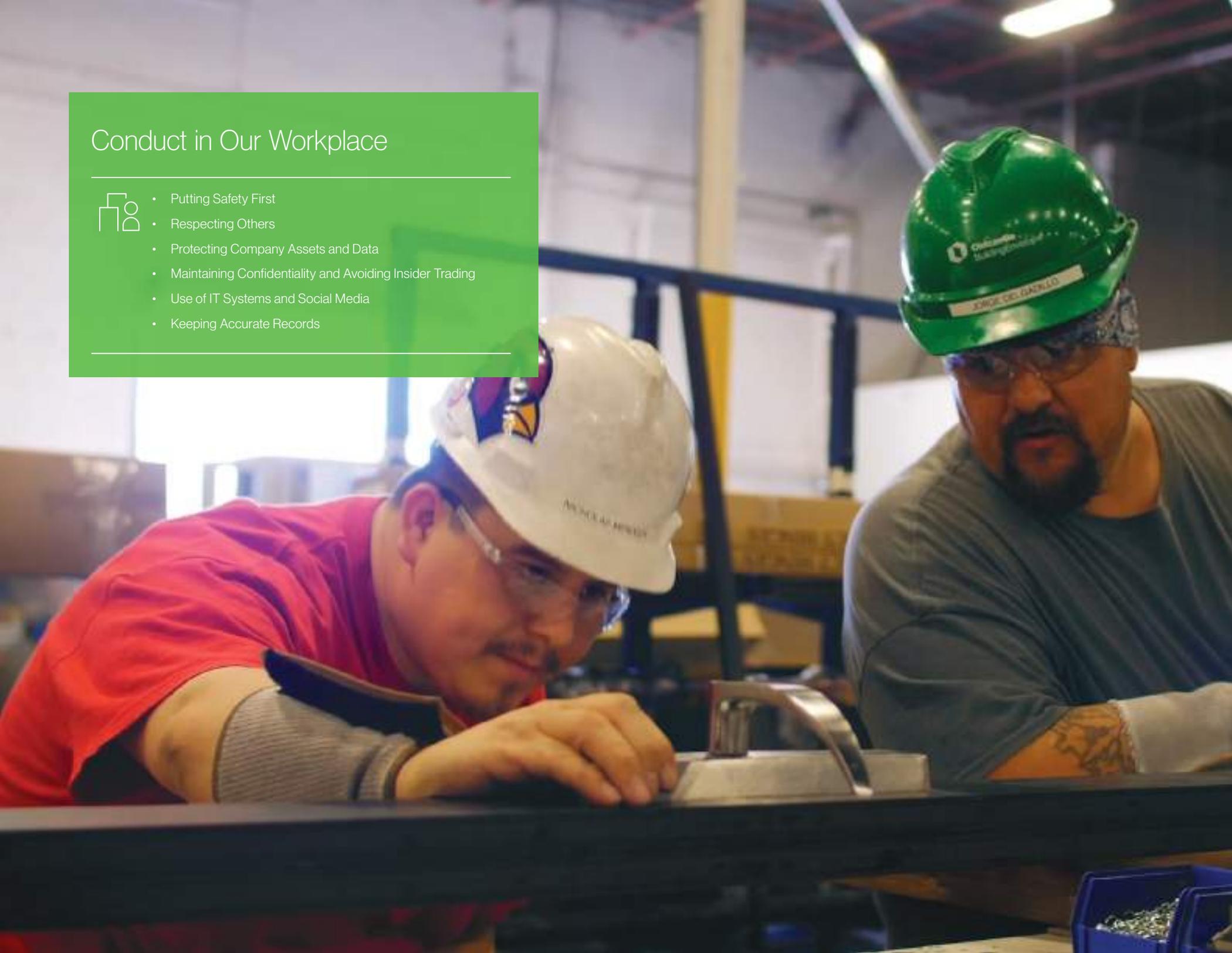


## Conduct in Our Workplace

---



- Putting Safety First
  - Respecting Others
  - Protecting Company Assets and Data
  - Maintaining Confidentiality and Avoiding Insider Trading
  - Use of IT Systems and Social Media
  - Keeping Accurate Records
- 



# Putting Safety First

Everyone should go home from work every day unharmed. Putting safety first makes this possible. Our aim is zero-harm.

## At OBE

We always put safety first. We must ensure a healthy and safe environment for all employees, contractors, customers and visitors at our locations.

## It Begins with Me

- Work in a safe manner at all times
- If you see something unsafe, stop and do something about it
- Follow all local policies on drugs and alcohol in the workplace
- Comply with local safety requirements, as well as the Health & Safety Policy
- Live by the Lifesaving Rules

### What if...

I'm a maintenance manager and I have serious concerns about a piece of equipment. I tell my supervisor, but he says that we don't have the budget to fix the equipment this quarter and we need it in operation so we can meet our production targets. What should I do?

If possible, guard off the equipment and REPORT the situation.

My co-worker removes a machine safety guard while it is still in operation to inspect an issue.

Safety guards should never be removed while a machine is still operating, as you risk serious injury to yourself and others. If you observe a co-worker removing a safety guard without following proper safety procedures, stop them from proceeding.



If I see something unsafe, I will stop and do something!

# Respecting Others

Respect means treating everyone in your workplace the way you want to be treated.

## At OBE

We provide equal, merit-based opportunities to all our employees, valuing their diversity, promoting inclusion and rewarding them fairly.

We do not tolerate discrimination, bullying, harassment, or any other behavior that is not reflective of our values.

## It Begins with Me

- Treat everyone in your workplace with dignity and respect
- Value diversity and the contributions of others
- Do your part to create a culture of respect and be actively inclusive in your work environment



# Protecting Company Assets and Data

A company's assets are essential to its operations. Its people, shareholders and customers, all rely on the security of company assets and data.

## At OBE

Our assets take many forms, some of which are shown below. No matter the form, all assets and resources are valuable to our business and must be protected. We all have a responsibility to use our assets and resources in a proper manner and for their assigned purpose.

## It Begins with Me

- Safeguard all forms of OBE assets, including from theft and damage
- Special care should be taken when handling the personal data of employees or customers, ensuring that it is secure and encrypted
- Read the Information Security Policy

Real property, equipment, and vehicles 	Stocks of raw materials, supplies 	Funds (cash and investments) 	Time 	Intellectual property 
Accounting and other business records 	Confidential information 	Computer hardware and software 	Electronic mail and internet access 	Personal data 



I will take care of company property and will not steal or misuse anything.

## What if...

I notice that inventory is missing after the weekend. Only one other employee and I have access to alarm codes and door keys.

You should REPORT your suspicion of theft.

I see a colleague plugging in external storage devices to his laptop and saving files to them. This colleague has recently handed in his notice.

As an employee of OBE, you have a duty to REPORT any suspicious activity. Contact lists, files, etc. are all property of OBE.

I accidentally share a file containing employees' personal data with a third party.

You should REPORT the inadvertent disclosure before taking any action.

I work in accounts payable, and I receive an email from my regional CFO asking for a wire transfer to be made immediately to a vendor that I've never heard of.

Do not process the payment until you have called the CFO to confirm that she sent this request. If she did not send the request, REPORT the fraudulent email.



## Maintaining Confidentiality and Avoiding Insider Trading

Employees often have confidential information about their company, its customers, or suppliers. Some confidential information is particularly significant and could influence investors if they were made aware of it ("inside information").

The purchase or sale of shares in a company based on inside information is known as insider trading. Insider trading is illegal. Providing inside information to others so that they can buy or sell shares in a company is also illegal.

### At OBE

Protecting our confidential information is crucial to our competitiveness, compliance with the law, and relationships with stakeholders.

As a publicly traded company, we must comply with all relevant laws and regulations related to inside information and the trading of OBE shares and securities.

### It Begins with Me

- Only share confidential information for legitimate business purposes and if authorized to do so
- Any inside information must be kept confidential
- Insider trading is a complex topic; if you have any queries or concerns please contact the Company Secretary's Office

### What if...

I heard that OBE is about to purchase another company. The purchase will probably increase the share price. Can I mention this information to my husband and son?

No. This information is confidential. Also, if you, your husband, or son trade OBE shares or shares of the purchased company based on this information, all of you could be violating insider trading laws.

## Using IT Systems and Social Media

IT systems are vital for running a business. IT systems include internet access, email, company-issued mobile devices, and licensed software. Social media platforms are an opportunity to share targeted information with a global audience.

### At OBE

IT systems should never be used to do anything illegal or unethical, including distributing, downloading or viewing unlawful, offensive, or otherwise inappropriate materials.

Communication with the public is only authorized through official channels including: press releases, formal company publications, media briefings, our website ([www.obe.com](http://www.obe.com)) and our official social media accounts. Conversations on social media should be respectful and professional.

### It Begins with Me

- Use all IT systems responsibly and lawfully
- Only use company-owned devices to store company information, unless you have explicit approval from local management to use your own device
- Do not use social media to:
  - Share confidential information,
  - Violate the Code,
  - Engage in harassment, discrimination, or retaliation, or
  - Violate any other laws or ethical standards
- Remember that if your social media activity would violate any of OBE's policies in another forum, it will also violate them in an online forum

### What if...

I recently worked on the development of a new product. The product launch is not for another three months. I'm proud of my work, and I want to post some details about the new product on my personal Twitter account.

Since OBE has not officially announced the new product, the product details are confidential and therefore should not be shared publicly.

# Keeping Accurate Records

It is important to keep accurate and complete business records and to ensure timely and accurate reporting of financial and non-financial information as required by local laws. Any attempt to hide, falsify, or misrepresent information in order to mislead others is fraud.

## At OBE

We promote integrity throughout the organization and meet our responsibilities to stakeholders.

OBE does not tolerate any form of fraud and requires all its employees to demonstrate a high standard of honesty and integrity in their work.

## It Begins with Me

- Ensure all business records are complete and accurate
- Never submit false or misleading information to a customer or government authority
- Read the Anti-Fraud/Anti-Theft Policy
- REPORT any actual, suspected, or attempted frauds



I will hold myself to the highest standards of honesty and integrity in my work.

## What if...

A customer's contract requires a particular material be used on a project. To save time, can I substitute a similar material that is more readily available without telling the customer?

No, that would be fraud. You must use the material specified in the contract or obtain the customer's approval to use a different material that still meets the project specifications.

The sales numbers at my plant have been unusually low this quarter. I'm expecting a major sale to go through early next quarter, so I want to go ahead and record it now so that I will meet my quarterly sales goal.

Purposely creating an inaccurate financial record is fraud. Your sales must be recorded in the quarter in which the transaction takes place.

After a monthly inventory count, there is a large difference between the actual stock on site versus what is in the system. My colleague suggests that I simply change the numbers in the system to match what's on site and not inform anyone.

Do not alter the accounting system to hide the missing inventory. Tell your manager about the discrepancy.

I am performing quality control tests for a public transportation authority project. I receive test results that are below standard, but I know that reporting this could cause a delay in the project. Should I consider manually adjusting the results in my report to the transportation authority to avoid a delay?

Do not adjust the test results. By doing so you would be submitting a falsified report to a government authority. This can result in serious consequences for you and OBE.



## Conduct in Our Business Practices

---



- Competing Fairly
  - Refusing Bribery and Corruption
  - Considering Gifts and Hospitality
  - Avoiding Conflicts of Interest
  - Complying with International Trade Laws
  - Preventing Money Laundering
  - Third Party Relationships
- 



# Competing Fairly

Competing fairly is important because it results in a free and open market. In a free market system, competition drives efficiency and innovation, and companies compete on a level playing field. Violations of laws that protect competition can lead to penalties that include large fines, jail time, damaged reputation and exclusion from government contracts.

## At OBE

Fair competition is in everyone's best interest. We are committed to complying with competition/antitrust laws wherever we operate.

## It Begins with Me

- When interacting with competitors always refer to the Do & Don't guidance
- Seek guidance from Legal and Compliance, whenever a competition/antitrust law question arises
- Read the Competition/Antitrust Policy

## What if...

I want to analyse trends in my local market. What sources can I use to gather information about my competitors?

Publicly available sources such as trading results, trade journals, and websites can be used, but do not obtain information directly or indirectly from a competitor or discuss what you find out with a competitor. Always record where you obtained information about a competitor.

A competitor sent me a text message suggesting we are not making enough money in a certain region and we should get together to agree minimum prices to charge customers in that region.

Contact Legal and Compliance and get advice on how to respond. Clearly refusing to participate is important because silence can be seen as agreement.

A OBE company and two other competitors (companies B and C) were invited to submit a tender. A representative from company B approached me and suggested that I submit a lower bid and guarantee Company B a position as a subcontractor. Neither OBE nor company B was awarded the contract. Did I engage in anti-competitive behavior?

Yes, the fact that you and company B were unsuccessful in the tender process does not change the fact that your actions were anti-competitive.

## Do

- Compete vigorously, using public information and competitive circumstances to your best advantage
- Remember that compliance is always in OBE's best interest. No one is ever authorized to violate the law
- Remember that appearances are important
- Ask Legal and Compliance if you have any doubts. On competition matters, there are no stupid questions

## Don't

- Discuss with a competitor any terms on which you compete, prices, or allocations of jobs, customers, or markets
- Discuss with a competitor whether or not you intend to submit a bid or quote for any particular project or customer
- Talk to anyone about boycotting or refusing to deal with a supplier or customer
- Take any action just to hurt or retaliate against a competitor



I will enhance our competitive advantage by complying with the law.

## Refusing Bribery and Corruption

A bribe is anything of value that is offered, given, or received, with the intention of influencing the actions of a person or company. There are strict laws against any form of bribery, particularly bribery of public officials. People who work for any level of government are public officials. For example, local council members, safety inspectors and law enforcement officers are all public officials.

A bribe can be:

<p>Money</p> 	<p>Gifts</p> 	<p>Hospitality, including travel expenses</p> 	<p>Business or employment opportunities</p> 
<p>Political contributions</p> 	<p>Charitable or community donations</p> 	<p>Other favors or benefits</p> 	<p>Facilitation payments</p> 

Corruption is the abuse of power for personal gain. Examples of corruption include embezzlement and kickbacks.

### At OBE

OBE is committed to abiding by all applicable anti-bribery laws, including the US Foreign Corrupt Practices Act and the UK Bribery Act.

We do not tolerate any form of bribery or corruption.

### It Begins with Me

- Never offer, pay, solicit, or accept bribes
- Always avoid situations that could give the appearance of bribery or corruption
- Be aware when dealing with government officials and regulators. Follow any local rules related to offering things of value to government officials.
- Read the Anti-Bribery Policy



I will not offer or take any bribes nor will I engage in corruption of any sort.

## Considering Gifts and Hospitality

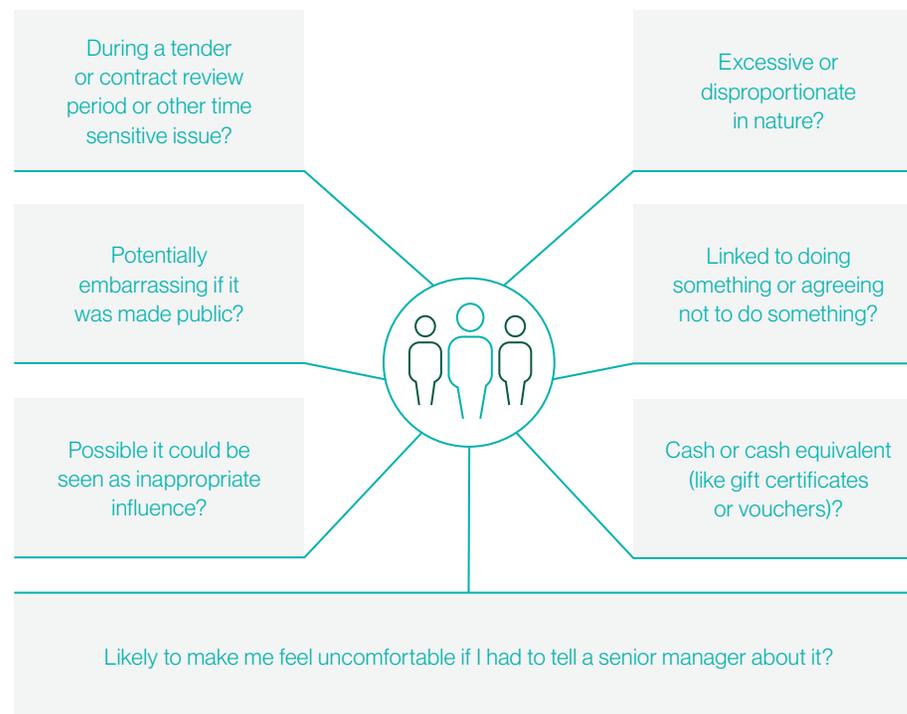
Giving and receiving gifts and hospitality can be an acceptable way of building business relationships if ethical guidelines are followed.

### At OBE

We believe that business gifts and hospitality can be given and received if they are reasonable, justifiable, and proportionate. Otherwise this may be bribery or look like bribery.

### It Begins with Me

- Determine if your department or local operating company has issued gifts and hospitality guidelines
- Before offering or accepting gifts and hospitality, ask is it:



Yes to any question? Do not proceed. Contact Legal and Compliance [for advice](#).

### What if...

I am working on a project with materials being imported from overseas. The import clearance has been delayed. If I give the customs official a small payment directly, he will clear the materials immediately. I have already paid the official fee for the import clearance. Should I pay the official?

No, this would be a facilitation payment prohibited by OBE policy and could be illegal.

A representative of a potential supplier tells me that if we award them the contract I'll be eligible for a cash payment under their "corporate customer reward programme." How should I respond?

The supplier has offered you a cash gift that is linked to a positive business decision, so this could be seen as a bribe. You should tell the commercial representative that you cannot participate in the reward programme and REPORT the offer.

### What if...

A public official, the Director of Public Works, stops by my plant one day with a question on a change order I submitted. While there, he mentions that his truck could use some new brake pads. He is curious to see if our mechanic could replace them. I have the right brake pads in my shop so our mechanic replaces them free of charge. The Director grants the change order the next day. Is there a problem?

Yes. While the brake pads did not cost much to replace, the timing makes it look like it was done to influence the Director's decision about the change order, and this could be seen as bribery.

I recently met with an official from a public university to discuss supplying materials for a student housing project. The official told me that she will make sure we get the contract if we donate to the university's scholarship fund. Should we make the donation?

No, making a donation in exchange for an award of a contract is bribery. Tell the official that you cannot make a donation that is tied to a contract decision and REPORT the conversation.



# Avoiding Conflicts of Interest

A conflict of interest occurs when an employee's personal interests interfere with his/her ability to act in the best interests of the company.

## At OBE

A conflict of interest that influences your business judgment is a violation of the Code.

Having a potential conflict of interest is not automatically a violation of the Code, but failure to disclose it is.

## It Begins with Me

- Disclose all potential conflicts of interest you may have
- If you have questions on the disclosure process, contact Legal and Compliance
- Do not act as the decision maker where there is a conflict
- REPORT any situation that you believe may be a conflict of interest



Is it a conflict? Ask yourself:

**A.** Could my personal interests or relationships influence the decisions I make?

**B.** Could it look that way to someone else?

**If yes, it is a conflict.**  
Seek guidance when you are not sure.



I will avoid conflicts between my private interests and my job.  
If there is a potential conflict, I will disclose it.

## What if...

I am the manager of a readymix business. On my own time, I develop and sell a readymix plant component part that improves production. I purchase 500 of these for use in our plants.

Because you are both the supplier of the component part and the purchaser, this is a clear conflict of interest. You should disclose it to your manager and not be involved in the decision to purchase.

I work in IT. My son-in-law owns a technology company that offers a solution that would help our data security efforts. I ask my son-in-law for a quote. I don't get any other quotes. Is there a conflict?

A conflict exists. Additional quotes should be sought from other third parties, and you should not be involved in the decision to purchase. You should also disclose the conflict to your manager.

I oversee the sales department for my company. My sister is the President of the largest competitor in my area.

This is a potential conflict and should be disclosed.



## Complying with International Trade Laws

International trade laws and regulations, which are put in place by the United States, European Union and other governments, include export control laws, trade sanction laws (restricting trade with certain countries or individuals), import laws and anti-boycott laws.

### At OBE

We are committed to complying with international trade laws that are applicable to our businesses. Violations of these laws can negatively impact our reputation and could result in penalties.

### It Begins with Me

- Employees involved in international procurement or sales should be aware of relevant trade laws, who our customers and suppliers are, the end-use and ultimate destination of our products, and how payments are made
- Report any actual or suspected breaches of international trade laws to your manager and Legal and Compliance
- Read the International Trade Compliance Policy



## Preventing Money Laundering

Money laundering is using otherwise lawful business transactions as a way to hide the source of money that has been obtained illegally. It is “cleaning” funds obtained from criminal activities. Money laundering typically involves payments in the form of cash or money order. Suspicious activity includes: large cash transactions as well as customers who are reluctant to provide verifiable information.

### At OBE

We are committed to complying with applicable anti-money laundering and counter terrorist financing laws and regulations. We do not condone, facilitate, or support money laundering or terrorist financing.

### It Begins with Me

- Watch out for irregularities in the way payments are made
- If you have concerns about a payment, request an alternative form be used and report the concern to your manager
- If the transaction seems suspicious, report it to Legal and Compliance, even if you do not move forward with the transaction
- Determine if your business has specific preventative measures in place

## Third Party Relationships

Suppliers, both direct and indirect, are key stakeholders in the success of any business. Working with responsible suppliers is an important part of Corporate Social Responsibility.

### At OBE

We only choose suppliers who share our commitment to ethical business practices and who meet our standards in respect of health & safety, human rights, and environmental stewardship.

### It Begins with Me

- Ensure suppliers meet the requirements of our Supplier Code of Conduct
- Read the Supplier Code of Conduct

## Conduct in Our Community

---



- Respecting Human and Labor Rights
  - Promoting Environmental Sustainability
  - Engaging With and Supporting the Community
  - Making Political Contributions
- 



## Respecting Human and Labor Rights

There is opportunity to protect human rights and labor rights everywhere along a company's supply chain and in its production and sales activities.

### At OBE

We are committed to respecting human and labor rights, no matter where we operate in the world. We support the principles outlined in the UN's Universal Declaration of Human Rights and the International Labor Organization's Fundamental Labor Principles.

### It Begins with Me

- Do your part to ensure that human rights abuses, such as the use of compulsory, forced, or child labor, are not occurring within our businesses or supply chains
- Support freedom of association and recognize the right to collective bargaining
- Ensure we deal responsibly with our suppliers and customers
- Read the Commitment to Human Rights: Modern Slavery Statement and the Social Policy



I will respect human rights and comply with labor laws.

## Promoting Environmental Sustainability

Working to meet high environmental standards, actively addressing climate change and continuously improving processes all promote environmental sustainability.

### At OBE

Our Environmental Policy demonstrates our commitment to implementing best practices concerning environmental issues and outlines improvements we are making across our organization. It covers environmental compliance, communications, climate change, emission reduction, resource use, recycling, biodiversity, sustainable innovation, and good stakeholder relationships.

### It Begins with Me

- Comply with environmental laws and regulations applicable to your work
- Participate in relevant training programmes
- REPORT any concerns of non-compliance with environmental laws or regulations
- Read the Environmental Policy



I will think about the environment I would like to live in and play my part to protect it.



## Engaging With and Supporting the Community

Being a responsible company means developing trusting relationships and creating a long-term positive impact in the communities in which we operate.

### At OBE

We take our community engagement responsibility seriously. All community engagement and interaction is respectful and appropriate. We encourage employees and businesses to develop local interests and involvements which support the development of a thriving community and a better overall living environment.

### It Begins with Me

- Be a good neighbor in your local community. Find ways to make a positive impact, while following local company guidelines on community engagement
- Where possible, develop a community engagement plan for your location
- Read the Charitable Donations and Community Engagement Policy

### What if...

A customer asks me to donate to a local school fundraiser for a new roof. She is collecting cash donations. Can I make a donation on behalf of OBE?

Cash donations and donations to individuals are strictly prohibited. All charitable donations should be approved by management and made in the form of a company cheque or by electronic transfer to the receiving organization.



I will be a good neighbor in my local community.

## Making Political Contributions

Political contributions include any donation to support a candidate, party, or political cause. An in-kind political contribution could be the use of company facilities, resources, or employees' time to further a political campaign.

### At OBE

We respect and comply with the laws regarding political contributions in the countries and regions in which we operate.

### It Begins with Me

- Before making a company political contribution, always contact Legal and Compliance to confirm that it is permitted by local law. If so, obtain management approval according to your operating company's policy
- Always use a company cheque or electronic transfer to make a political contribution and ensure it is properly recorded

### What if...

A friend of mine is running for local office. She asked if she could hold a campaign fundraiser in my company's training facility outside of business hours. Is this considered a political contribution?

Yes, this would be an in-kind contribution to your friend's campaign. You should contact Legal and Compliance before making any plans to allow her to use a company facility.

I attended a fundraising event benefiting a candidate for local office. I think that this candidate will support our industry. Can I include the cost of this event on my expense report and receive reimbursement from the company?

No, even if your country and local jurisdiction allow corporate contributions, you must not receive reimbursement from the company for a political contribution. Any contributions must be made directly by the company.

## Quick Reference Tools

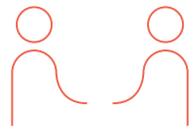
---



- Guide for Reporting Concerns
  - Code of Business Conduct: It Begins with Me Guide
-

# Guide for Reporting Concerns

Remember, if you have a genuine concern about a possible breach of the Code or the law, speak up. Please report your concern to any of the following:



Your Immediate  
Manager



Senior  
Management



The OBE  
Hotline



Your HR Manager



Legal and  
Compliance

# Our Code of Business Conduct: It Begins with Me

The Code of Business Conduct is our guide to doing the right thing. I will follow our Code every day by:



### Putting Safety First

If I see something unsafe I will stop and do something.



### Respecting Others

I will treat everyone in my workplace the way I want to be treated.



### Protecting Company Assets and Data

I will take care of company property and will not steal or misuse anything.



### Respecting the Law

I will not break any laws. I will hold myself to the highest standards of honesty and integrity in my work.

### Avoiding Conflicts of Interest

I will avoid conflicts between my private interests and my job. If there is a potential conflict I will disclose it.



### Supporting the Community

I will be a good neighbor in my local community.



### Respecting the Environment

I will think about the environment I would like to live in and play my part to protect it.



To download the Code take a picture of the QR Code



Concerned? Speak Up! OBE Hotline

## Notes



# Our Code of Business Conduct It Begins with Me

As an employee of OBE plc, or a subsidiary thereof (the “Company”), I acknowledge the following:

1. I have received and will follow the OBE Code of Business Conduct (the “Code”) and the other OBE policies it references. If I have any questions about the Code or other OBE policies, I will ask my manager or Legal and Compliance.
2. I will obey the law and act with integrity in my work.
3. Violating the Code or the law is never in the Company’s best interest. If I violate the Code or the law, I am not fulfilling my duty to the Company as its employee. Violating the Code can lead to disciplinary action including termination and possible civil liability and/or criminal prosecution.
4. If I see or suspect a violation of the Code or the law, I will report it. I understand that I can make an anonymous report to the OBE Hotline.
5. If I am asked or directed to violate the Code or the law, I will not do it and I will report the request to the OBE Hotline or Legal and Compliance.
6. I understand that compliance with the Code is a condition of my continued employment with the Company. For US employees: This acknowledgement does not create and is not a part of any employment contract. It is an acknowledgement of a part of my duties as an employee.

Print Name

Signature

Date





