



# CODE OF CONDUCT

We know, understand and act in accordance with the values and principles expressed in the KLINGER Code of Conduct and apply them to everything we do and everywhere we operate.

## INTEGRITY

---

We value our relationships with clients, customers and counterparties and are committed to maintaining the highest standards of personal and professional integrity.

## PARTNERSHIP

---

We establish mutually beneficial and healthy relationships with responsible suppliers who meet our standards including quality, commercial terms and commitment to safety as well as environmental protection.

## FAIRNESS

---

We must be sensitive to any activities, interests or relationships that might interfere, or even appear to interfere, with our ability to act in the best interests of KLINGER and our clients.

## COMMUNICATION

---

We encourage our employees to be professional and clear in all communications and to carefully consider the best way to do so.

## TRANSPARENCY

---

We are committed to promoting free and competitive markets. Our goal is transparency, candor and honesty in all our dealings.

## FAIR DEALING

---

We only offer or accept gifts & entertainment if they are reasonable, occasional and of modest value and do not have any influence on business decisions.

## FAIR COMPETITION

---

We declare that a restriction on free competition or any violation of competition and anti-trust laws is irreconcilable with our culture and philosophy.

## RESPONSIBILITY

---

We take responsibility and hold each other accountable. We have a shared responsibility not only to act ethically as individuals, but to expect the same from our colleagues.