



Code of Ethics

Updated January 2021



This document contains important information for ERG's employees & any of our partners or customers.

1. Emerging Risk Global. Goals and Core Values

It's our goal to support customers to identify threats and to design and implement effective mitigation solutions.

Central to achieving this are **our core values of integrity and trust.**

Our operations must always comply with applicable laws and regulations, but we also expect that all of our associates behave in a way that is in accordance with our ethics and values.

2. The purpose of this Code of Ethics

This Code of Ethics reflects our commitment to conduct our business in accordance with the highest ethical standards.

This Code of Ethics openly shares our core values with our stakeholders and partners and provides a framework of fundamental principles to guide behaviour and to help them to make 'better choices'. It sets clear expectations for ourselves and others regarding the appropriate standards of business conduct.

Everyone covered by the Code of Ethics is expected to read, understand and follow it, and noncompliance can have serious consequences. Send any questions to: information@emergingrisksglobal.com

3. Who this Code of Ethics applies to

All of ERG's employees and the people who work for us – including our executives and directors – are expected to read, understand and follow this Code of Ethics. This document is an integrated part of all ERG's employment agreements.

The Code of Ethics also extends to our community of consumers, customers and businesses, and to anyone doing business with us, such as our partners and suppliers.

4. How to apply our core values of integrity and trust

A. Act ethically and use good judgment

We require our employees to promote and maintain ethical behaviour in the work environment. We expect our employees to act in a fair, responsible and professional manner, to conduct their duties honestly and with integrity, and to treat others with respect. We're committed to supporting and reflecting this in our working culture and processes.

We expect the same level of conduct from our community and anyone doing business with us.

B. Build and preserve trust

We're committed to taking a neutral and objective stance in our judgements and any recommendations that we give.

We expect our employees, our community and anyone doing business with us to maintain a high standard of behaviour that underscores and promotes trust in ERG.

C. Maintain confidentiality

We understand the importance of handling sensitive information with care. We require our employees and those working with us to preserve the confidentiality of all non-public information about our business and our customers.

We're committed to maintaining the highest degree of integrity in our relations with our community of customers, consumers and businesses, as well as our suppliers, vendors and other third parties – both in terms of general commercial confidentiality, and regarding the protection of all personal information received while providing our services.

We expect our community and anyone doing business with us to also maintain a high level of integrity, and to protect and maintain the confidentiality of non-public information.

D. Uphold duties of care, and comply with anti-bribery responsibilities

Our employees, our community of customers, consumers and businesses, and anyone doing business with us must fully comply with all relevant anti-corruption laws of the countries in which we do business. This includes the U.S. Foreign Corrupt Practices Act (FCPA) and the United Kingdom Bribery Act of 2010, which apply globally.

E. Avoid conflicts of interest

Anyone covered by this Code of Ethics should avoid conflicts of interest.

ERG employees should avoid additional or supplemental employment that could in practice or appearance create a conflict of interest. If any full-time ERG employees wish to engage in additional or supplemental employment, they must receive prior written consent from the Governance Team.

F. Maintain a commitment to loyalty

Employees and others covered by the Code of Ethics have a duty of loyalty to ERG, and an obligation to act in the best interests of ERG.

G. Show respect and avoid threatening or abusive behavior

We believe in treating everyone with respect. We don't tolerate aggressive behavior, coercive language, or abuse or threats from or against ERG employees. Unlawful conduct will be reported to the authorities.

H. Practice equality and avoid discrimination and harassment

We value diversity among our employees.

Day to day, our employees are not only expected to avoid discrimination in their relationships with each other and with customers, vendors and suppliers, but to also encourage others to behave in a proper manner. We also strive to ensure freedom from harassment for all staff in accordance with our **Non-Discrimination and Anti-Harassment Policy**, and we're not influenced in our decisions, actions or recommendations by issues of gender, race, creed, colour, age or personal disabilities.

We're committed to maintaining a safe, harassment-free and discrimination-free work environment in which employees at all levels can devote their full attention and best efforts to their jobs. Harassment, discrimination or other inappropriate conduct, whether intentional or unintentional, has no place in the ERG culture.

Accordingly, we do not authorise and will not tolerate any form of harassment, discrimination or other inappropriate conduct by any employee, whether supervisory or non-supervisory. This applies to conduct occurring in, but not limited to, our primary locations and any work-related settings outside of the office, including business trips, business meetings, and business-related social events.

We also expect anyone doing business with us to encourage and facilitate practices that promote equality and avoid discrimination and harassment.

We work to ensure that modern slavery isn't taking place within our organisation or within our supply chains. We therefore require the people who work with us to fully comply with all relevant modern slavery laws of the countries in which we do business, including the Modern Slavery Act 2015 in the United Kingdom. We also request and expect our partners to respect the rights of all workers and to commit to acting lawfully and ethically in all components of their businesses - as set out in our Modern Slavery Code of Conduct.

I. Strive to set the standard

We see our employees as 'trust ambassadors' that represent ERG in their professional capacity both internally and beyond the workplace – including on social media and LinkedIn. We expect them to act in a way that reflects our values, builds trust in our company and furthers our reputation.

We encourage our employees and everyone doing business with us to lead by example and 'set the standard' in ERG behaviour.

Special rules for ERG employees

Our **Code of Ethics Guide & Examples** is an internal document on our intranet that provides guidance for employees and staff on how to apply our values, including examples of acceptable and unacceptable conduct. It must be read together with this Code of Ethics.

All ERG employees must:

- Comply with all applicable laws.
- Comply with this Code of Ethics, knowing that failure to do so may result in disciplinary action.
- Comply with all ERG policies.
- Promptly report dishonest, unethical or illegal activities to ERG's Governance Team.

Reporting violations of this Code of Ethics

Violations should be reported to ERG's Governance Team: information@emergingrisksglobal.com

Reported violations by ERG employees of the Code of Ethics or the special rules on reviews in our Code of Ethics Guide & Examples will be investigated confidentially, thoroughly and fairly, and appropriate action taken.

Violation, including posting fraudulent reviews or reporting reviews, may result in disciplinary action including dismissal or termination of employment and, if warranted, legal proceedings.

Questions

ERG's Governance Team is responsible for this Code of Ethics. Please contact them at information@emergingrisksglobal.com you have any questions about its contents.