



# CODE OF BUSINESS CONDUCT AND ETHICS



## **This is your Code of Business Conduct and Ethics**

Each of us, whether an employee, director or officer and whether in a wholly owned Survitec company or within a joint venture must: **Read it, understand it and most importantly, use it if you need to.**





# TABLE OF CONTENTS

- Message from our Chief Executive Officer (CEO)..... Page 4
- What is the Code of Business Conduct and Ethics ..... Page 6
- How can you find out more about this Code ..... Page 7
- Compliance with the law, this Code and Survitec Policies..... Page 7
- Speaking Up ..... Page 8
- Survitec Hotline ..... Page 9
- Eliminating Bribery, corruption, fraud, kick-backs and money laundering..... Page 10
- Gifts and hospitality..... Page 11
- Product Compliance..... Page 12
- Maintaining Accurate Books and Records ..... Page 13
- Proper Documentation..... Page 13
- Conflict of Interest ..... Page 14
- Anti-Trust and Competition Rules..... Page 15
- Trade controls..... Page 16
- Political activities..... Page 17
- A healthy and safe place of work..... Page 18
- A discrimination and harassment free workplace..... Page 19
- Insider Trading..... Page 20
- Confidentiality and Intellectual Property ..... Page 20
- Protecting Personal Information ..... Page 22
- Treating our Customers Fairly ..... Page 23
- Modern Slavery ..... Page 24
- Protecting property..... Page 25
- Protecting the environment..... Page 25
- Communications and social media..... Page 26
- Company Records..... Page 26
- Company technology..... Page 27
- Survitec Hotline ..... Back Cover



## MESSAGE FROM OUR CEO

**This Code of Business Conduct and Ethics (“Code”) sets the standard for how we operate our business and how each of us conducts ourselves and makes decisions no matter what challenges or pressures we may be facing: with the highest levels of integrity, honesty, ethical conduct and compliance with the law.**

Our Code also aligns with and reflects our core Values: Safety, Customers, People, Excellence, Innovation and Integrity.

These Values and this Code provide the foundation on which Survitec builds and maintains relationships and a reputation which is trusted the industries we serve to deliver critical Survival Technology solutions which protect those who rely on us - every day.

As you are reading this Code, it is important to remember that the standards and expectations and our Values apply to all of us, no matter what job we do or where we are located.

They apply as we work together and as we engage with each of our stakeholders including our regulators, partners, suppliers, customers and shareholders as well as all those in the local communities in which we are working.

As well as being the foundation of our success, failure to follow and comply with this Code will have consequences. For example, it may lead to disciplinary action for individuals, as well as reputational and financial damage to our company.

It is important to remember that we have a commitment to one another and to our company to speak up about any situation that we know, or that we suspect, violates this Code and threatens our hard-earned reputation.

In the sections entitled Speaking Up and the Compliance and Ethics Hotline, we outline the process and resources for raising questions or concerns. We also wish to emphasize that retaliation against anyone who “speaks up” will not be tolerated as we respect those who make a report or raise a concern in the reasonable belief there has been a breach of this Code.

Thank you for your commitment to our Values and this Code. Survitec is defined by its People and how we demonstrate the highest standards of Integrity and uphold our reputation for Excellence and Innovation which is expected of us every day by our Customers.



**Robert Steen Kledal**  
Chief Executive Officer

## VALUES AND BEHAVIORS

**Values and behaviors provide the framework for our Code of Business Conduct and Ethics.**

Our Values define who we are and how we behave, even when no-one is looking. This Code is a resource that helps define how we should conduct ourselves.



### **Safety** and reducing risk are integral to everything we do

You promote a supportive and accountable culture, raising issues, admitting errors without fear, and highlighting your own mistakes. You work consistently to improve the safety and well-being of yourselves and others.



### We are committed to delivering real value and confidence to our **customers**

You put the customer first, be it your internal or external customer, in your decisions and actions. You constantly seek opportunities to improve the customer experience. You manage expectations in the right way, being open and transparent.



### We care for our **people** and invest in their development as individuals and teams

You consistently perform at your best and always do the right thing, even when it's difficult. You continue to develop yourself, your team and the teams around you. You are empathic and self-aware and understand how your behaviors impact others.



### We seek to **innovate** at every opportunity

Change is what helps us learn and grow. You have a continuous improvement mindset. You are comfortable with and accept change and have a willingness to try out new methods, processes, ways of working or techniques. When you seek to innovate at Survitec, failure is acceptable when acted upon, “fail fast, learn quick”.



### **Integrity** - we do what we say we will do

You can explain Survitec Values and describe the ethical standards required, as per the Survitec Code of Conduct. You consistently practice and encourage the right Survitec behaviors and avoid double standards.



### We aim for **excellence** in everything we do

You understand that as the world's leading Survival Technology solutions provider, “that is good enough,” is never good enough. Within your role, you maintain accountability, consistently achieving targets. You adopt a proactive approach driving yourself and others to seek continuous improvement. You continuously look to solve problems and avoid using workarounds.

# WHAT IS THE CODE OF BUSINESS CONDUCT AND ETHICS?

The Code sets company-wide rules, standards and behaviors required. The Code is framed by our Values and the laws that apply to our business.

This Code acts as a reference point to make good ethical choices as complexities in the business environment increase and the correct answer or behavior may not be obvious.

“ The Code acts as a reference point to make good choices as complexities in the business environment increase and the correct answer or behavior may not be obvious.”

## It is important to:

- ✓ Know and understand this Code
- ✓ Set an example and make sure your team members have access to and also understand this Code
- ✓ Know and understand company policies, procedures and standards that apply to you and your daily work
- ✓ Know and understand the laws and regulations that apply to us, regardless of where we are located. Violations of these laws can result in severe civil and criminal penalties for our company as well as the individuals involved. Investigations into potential violations are costly and disruptive to our business, damaging to our reputation, and may also lead to disciplinary action
- ✓ Ask questions and seek advice if unsure about how to handle a situation or you need guidance on where to find information. Help us create an environment where people feel confident to speak up and raise concerns and that when concerns are raised, they are taken seriously and followed up



This Code is not intended to be prescriptive and given the global reach of Survitec, it cannot set out every legal or Company requirement. So, there will be occasions when you may need to use good judgment when making ethical decisions based on the principles contained in this Code.

## Ethical dilemma's

If you are faced with a dilemma and you are unsure how to solve it, then you should ask for help.

Help is available to you from your line manager, Legal, Compliance or HR whether in person, by telephone or by email. You will also find details of the Survitec Hotline in this Code.

If you are unable to contact anyone immediately, then it may help if you ask yourself the following questions:

- ? Is what I am doing, or being asked to do, **legal, fair, ethical** and **honest**?
- ? How will I feel about **myself** afterward if I do it?
- ? If I see something or overhear something that is **illegal, unfair, unethical** or **dishonest**, how will I feel if I do nothing about it?
- ? How will I feel if my **family and friends** knew about my actions (or inaction)?
- ? How will my action (or inaction) look if it was **reported in the media**?
- ? Would I be **comfortable** explaining what I did (or did not do) in court?

## Watch out for phrases such as:

- ! “No one will ever know.”
- ! “It’s just the way it’s done around here.”
- ! “Everyone does it.”
- ! “I’ll do it/it’s done, just don’t ask me how.”

## How can you ask for help or find out more about the Code?

The document aims to provide an adequate amount of information regarding the Code and the policies and processes relating to it.

However, if you would like help or wish to know more, the sources of further information are:

- ✓ Your Line Manager
- ✓ Human Resources in your region
- ✓ Contacting any member of the Legal and Compliance Department by telephone, Skype or by email: [compliance.support@survitecgroup.com](mailto:compliance.support@survitecgroup.com)
- ✓ The Survitec Hotline (available 24 hours a day, 7 days a week, which can be found at:

## Survitec Policy Center

Through this Code, you will see references to various policies and other sources of information.

Our policies, procedures, processes and controls are vital to the way in which Survitec conducts its business globally. They are in place for a reason, and failure to follow and comply with them may lead to disciplinary action, including dismissal. Some are in place to comply with laws and regulations, others reflect best practices. However they should be followed, even if you think no-one is watching or that no-one will know.

Therefore, please take a moment to [Click Here](#), which will take you to the Survitec policy center, and familiarize yourself with these policies, as well as all others which concern you and your responsibilities. Ask your manager if you are unsure which policies apply to you.

If you have any questions about a policy, process, procedure or control, please contact the policy holder or a member of the Legal and Compliance Department.

## Dilemma

You approach a Stop sign at a junction. You are within 1 km of home. You enter the junction every day and other than rush-hour it is very quiet. You have good visibility over the incoming roads.

**Q:** What do you do?

**A:** The rules of the road require you to stop.

It is midnight. You are tired and want to get home. You approach the junction. It looks clear. You ignore the Stop and roll through the junction. No-one is looking. No-one will know. A pedestrian steps out...

You know the law requires that you bring the car to a complete stop. The junction was designated a Stop zone to protect the safety of other road users and pedestrians. Once implemented, these road users relied on your compliance.

This Code and the Survitec policies, processes and controls are also in place for a reason. Your compliance with them, even when no-one is looking, is relied upon by our company and your colleagues. If you think this Code or any Survitec policy, process or control can be improved, please Speak Up and make your suggestion. Do not just ignore them.





# COMPLIANCE WITH THE LAW AND THIS CODE



## Integrity - we do what we say we will do

You can explain Survitec Values and describe the ethical standards required, as per the Survitec Code of Conduct. You consistently practice and encourage the right Survitec behaviors and avoid double standards.

“...we expect our suppliers, contractors, agents and other business partners to follow similar principles when working on our behalf.”

## We must abide by both the letter and the spirit of our Code

It applies to all employees and contracted staff of Survitec and its subsidiaries and to all officers and members of the Board of Directors. In addition, we expect our suppliers, contractors, agents and other business partners to follow similar principles when working on our behalf and you can find our [Third-Party Code of Conduct here](#).

Each of us must comply with all applicable laws and regulations in each country in which we do business. Persons on assignment typically must also comply with the laws of their home country.

If you find that local laws or regulations conflict with this Code or any related policies, procedures or standards, please consult with the Legal Department.

Failure to comply with the Code and related policies or applicable laws may result in an investigation and disciplinary action which may be deemed to be gross misconduct and which may lead to summary termination of your employment.

If criminal activity is identified, we may contact and assist relevant law enforcement authorities.

No person has the authority to waive any provision of our Code without prior approval from the Legal Department.

“Our aim is to create an **open culture empowering people** to approach relevant departments and ask about the Code and what it means in certain situations.”

## Speaking Up

We all have an obligation to speak up about potential, suspected or actual violations of company policies or applicable laws.



- ✓ By speaking up, we uphold our commitment to integrity, honesty and ethical business practices.
- ✓ Speaking up allows us to address problems and concerns before they become serious issues for our company.

We encourage a culture of open and honest communication, to share concerns and promote integrity. All managers are responsible for maintaining an “open door” for their direct reports and any others who may wish to reach out to them.

If you have any questions relating to ethics and compliance or are seeking to raise a concern, you may reach out to anyone with whom you feel comfortable, including any manager or supervisor, the Legal and Compliance Department, or Human Resources.

You may also send an email to:

[compliance.support@survitecgroup.com](mailto:compliance.support@survitecgroup.com)

...or contact the Survitec Hotline

## Dilemma

Your manager is hosting a dinner with potential customers. They ask you to pay, and they will approve it. So as not to make a scene in front of customers you pay and “go along with it”. However you know that as the host and most senior representative of the Company, they should settle the bill. Their request does not comply with the Company’s policy on internal controls and approvals and you are aware this is not the first time this has happened. You have seen and heard that your manager has a habit of doing things “their own way”, which may not be compliant or ethical but does mean the business posts great results.



### Q: What should you do?

A: Speak up. If you do not feel you can speak to your line manager, or anyone else in your office, you may telephone or email HR or a member of the Legal and Compliance Department in another office. Alternatively, you may make a report using the Survitec Hotline. If you choose to remain anonymous, the company will not attempt to identify you.

### Q: You are fearful of not being believed, your manager “finding out”, or losing your job if you say anything. What can I do?

A: Survitec takes all reports seriously, treats them with respect and makes every effort to protect the confidentiality of those who raise concerns. Where carrying out an investigation means it is impossible to maintain confidentiality, please remember that Survitec does not

tolerate any form of retaliation against anyone who makes a report, raises a concern or helps with an investigation in the reasonable belief there has been a breach of this Code, that making the report is in the public interest, and the report is made in good faith.

### Q: We do what our manager asks us to do. It’s against my culture/the office culture to speak up.

A: This concern about culture is a misconception. Every culture respects those who demonstrate integrity, honesty and ethical behaviors. In every Survitec office, it is our business to make sure you are able to raise a concern where people are making mistakes or behaving inappropriately. Please speak up through whichever channel you feel confident to use.

“We encourage a **culture of open and honest communication**. All managers are responsible for maintaining an “**open door**” for their direct reports and others who may reach out to them.”

## Survitec Hotline

Where you feel uncomfortable raising a concern with someone within the company or you wish to remain anonymous, you may contact the Survitec Hotline by telephone or online.

The Survitec Hotline is a service provided and maintained by Navex, a third-party provider, and is available 24 hours a day, 7 days a week. You may speak to someone or submit your concern in the language of your choice.

The hotline is accessible to all employees in all offices and is also available to our customers and suppliers and the general public.

Details on how to contact the Survitec Hotline to raise a concern can be found here [\(Click Here\)](#).

Survitec will make every effort to protect the confidentiality of reports of concerns and the identities of those who make reports or participate in an investigation. However, there may be instances when, due to the nature of an investigation or certain legal requirements, it is necessary to disclose someone’s identity. In

those instances, we will work closely with the reporting individual to address any questions or concerns.

Your report will be treated with respect. Survitec does not tolerate any form of retaliation against anyone who makes a report, raises a concern or helps with an investigation in the reasonable belief there has been a breach of this Code.

Reporting in good faith means providing all the information you have with the belief that such information is true, regardless of whether it later turns out to be mistaken.

If you are in a country in which local laws restrict use of the Survitec Hotline and any rights to remain anonymous, then please raise your concerns with the Legal and Compliance Department, any Human Resources representative or employee committee or works council.

# COMPLIANCE WITH THE LAW AND THIS CODE

“ We must comply with all applicable anti-bribery and anti-corruption laws of the countries in which we do business. ”

## Eliminating Bribery, corruption, fraud, kick-backs and money laundering

We do not tolerate and strictly prohibit bribery, fraud, money-laundering, kickbacks, bid-rigging and any other improper payments or activity, whether involving Government Officials, private sector individuals or private or state-owned companies.

Each of us, whether an employee, officer or director, must comply with all applicable anti-bribery and anti-corruption laws of each country in which we do business and of the country in which the applicable Survitec subsidiary is incorporated or registered.

Many countries also require their nationals to comply with their home country anti-bribery and anti-corruption laws wherever they may be doing business, for example nationals of Singapore working in the UK are required to comply with the anti-bribery laws of Singapore and the UK.

Bribery is never an acceptable business practice and will not be tolerated. Facilitation, or “grease”, payments are not permitted and may not be made on our behalf.

This means that we may never pay, or offer to pay, or promise to pay, anything of value to any Government Official or any other person in order to obtain or retain business or to secure an improper business advantage. This prohibition includes offering, promising, authorizing or giving anything of value through a third-party.

It is also prohibited to ask for or to receive a bribe.

Survitec endeavors to use its own colleagues to conduct its business, however, in some limited circumstances the Company uses intermediaries such as agents, consultants and distributors to assist in marketing and distributing its products and services. Every intermediary must be approved by a duly authorized person in Survitec, must have a reputation of integrity, honesty and ethical business practices, and must be screened and approved as a party with whom Survitec can do business. Every intermediary and distributor must receive and understand our standards and comply with them at all times. Simply put, our Survitec Values are important to us and we want those working on our behalf to have the same.

Please see below some key terms and their definitions for further guidance:

- “Government Officials” include elected or appointed officials, national or local government employees, anyone working for state or nationally owned or controlled companies (including national oil companies), political party officials or candidates for public office, employees of public international organizations or anyone else categorized as a government official under local law.
- “Anything of value” includes, but is not limited to money, gifts, meals and hospitality, entertainment, travel and accommodation expenses, per diems, employment opportunities and charitable donations.
- “Facilitation payments” to Government Officials to expedite or ensure the performance of a routine governmental action are prohibited except in exceptional circumstances where you are threatened with violence or imminent physical harm if a payment is not made. In those limited instances, the payments must be immediately reported and accurately recorded in the company’s books and records as a “facilitation payment” together with all the facts and circumstances associated with the payment.
- “Money laundering” is the process by which funds generated through criminal activity, such as terrorism, drug dealing and fraud, are processed through commercial transactions in order to conceal the source of the proceeds, avoid reporting requirements or evade taxes. To help prevent money laundering, compliance due diligence must be performed prior to entering into certain engagements with business partners. We should be alert for money laundering activities by ensuring our business partners maintain a physical presence, are engaged in legitimate business and have proper compliance processes in place.
- A “kick-back” is where a person receives, or is promised, money or money’s worth in return for providing services which are illegal or against company policy. This is most common in contracting and procurement processes where a contract or work is secured through corrupt or unethical practices.

Ensure those that you work with, including our customers, contractors and suppliers, understand that Survitec does not tolerate bribery or any other corrupt and unethical practices.

## Dilemmas

You are going through customs when the customs officers says that your computer needs a permit. The officer says he can help get you the permit if you pay him \$100, otherwise he will have to confiscate it until you leave the country. You believe everything is in order.



**Q: What should you do?**

A: Refuse to pay the money even if that means that the customs officer confiscates your computer. It is against Company policy to pay any facilitation payment. As soon as possible, telephone or speak to any member of the IT, Legal and Compliance departments and explain what has happened.

**You refuse to make the payment, however instead of taking your computer, the customs officials threaten to take your luggage, including your telephone, and take you to a holding cell. You have a genuine fear for your well-being and physical safety.**

**Q: What can you do.**

A: You may make the payment requested however as soon as you are able to do so, you must notify your manager, or any member of the Legal and Compliance department and describe in as much detail as possible the situation in which you found yourself. The payment must be recorded in the company books and records as a “facilitation payment” and accompanied by a description of events.

**You are coordinating a visit for officials from a foreign government entity who are coming to site to carry out an audit. You are asked to write an invitation for four auditors to obtain visas, even though only two auditors would actually travel to the site.**

**Q: What should you do?**

A: Explain that you cannot sign a letter of invitation that would misrepresent the facts about the visit. You should also report the request to your line-manager.

## Gifts and hospitality

Business gifts and entertainment can help strengthen or develop working relationships with business partners and other third parties. However, we must always use good judgment and ethical decision making when offering or accepting such benefits. We should also be aware that some countries and some organizations have a strict limit or prohibition on the giving or receiving of any gifts or hospitality.

Survitec discourages accepting gifts or hospitality from business partners, including current or potential contractors and suppliers.

Any gift or hospitality must never influence a business decision, whether yours or that of another person, or place Survitec under any obligation.

Any gift or hospitality whether offered or received must be:

- ✓ Permissible under all applicable laws
- ✓ Reasonable and appropriate under the circumstances
- ✓ For a legitimate business purpose
- ✓ Properly recorded in the company’s books and records

You must obtain pre-approval for certain benefits provided to governments and Government Officials. For more information and guidance, please refer to the Survitec policy on gifts and hospitality [\(Click Here\)](#).

For any questions or concerns, please contact the Legal and Compliance Department. You may also send an email to: [compliance.support@survitecgroup.com](mailto:compliance.support@survitecgroup.com)

## Dilemmas

**In the lead up to a local festival, one of the company’s business partners sends a box of chocolates.**



**Q: What do you do?**

A: Put them on the side for your colleagues to enjoy.

**Another business partner sends an expensive wheelee bag, knowing that you travel quite a lot.**

**Q: What do you do?**

A: Disclose this to your manager or to the Legal and Compliance department. The decision may be to include the gift in an office raffle or to even return the gift.

**Another business partner contacts you and explains there is a gift “with your name on it. It’s easier to deliver to your home. Can we have details of your address so we can arrange delivery?”**

**Q: What do you do?**

A: Contact your manager or the Legal and Compliance Department immediately. It is inappropriate for a business partner, customer or supplier to send gifts to your home.



# PRODUCT COMPLIANCE



## We aim for excellence in everything we do

You understand that as the world's leading Survival Technology solutions provider, "that is good enough," is never good enough. Within your role, you maintain accountability, consistently achieving targets. You adopt a proactive approach driving yourself and others to seek continuous improvement. You continuously look to solve problems and avoid using workarounds.

### We design, manufacture, market and sell products which save lives

This responsibility demands excellence in everything we do and means each of us must comply with applicable legal requirements concerning each of our products and services, as well as internal quality controls and standards.

This means that there must not be any:

- ✗ tampering with tests or test results;
- ✗ shortcuts taken on any product approvals or licensing which compromise product compliance or integrity; or
- ✗ statements made about our products or services which are a misrepresentation or a false representation of their design, performance, capabilities or attributes.

### Dilemmas

Management has made it clear a delivery of products must be made by the end of the week and the team is running slightly behind. If your team meets the deadline, you'll all receive a bonus.



**Q:** You see a colleague overlooking a defect in a product and put it into the packaging. Do you tell your colleague to go back and repair the defect or discard the product?

A: Yes.

**Q:** On a break you overhear that some defects/failed test results may have been ignored in the interests of getting the batch out the door. You know that pulling the batch to "check and if necessary" fix the defects or re-run the tests will mean a delay, foregoing the bonus, and the company may possibly have to offer a late delivery discount to the customer.

A: You must notify your line manager, or if you do not believe you are being heard, you can contact HR or any member of the Legal and Compliance Department. Or contact the Survitec Hotline.

# VALUES AND BEHAVIORS

## Maintaining accurate books and records

We are required to maintain accurate books and records in accordance with the financial and accounting laws of the countries in which we do business. We may never make a false representation in our books or otherwise mischaracterize information.

Each of us is responsible for ensuring we maintain accurate records of transactions, time reports, expense accounts and other financial records to comply with our company's internal controls over financial reporting.

This means we cannot:

- ✗ Intentionally distort or disguise the true nature of any transaction
- ✗ Make a representation, written or verbal, that is not fully accurate
- ✗ Establish any undisclosed or unrecorded funds or assets for any purpose

We have a responsibility to cooperate with internal and external auditors reviewing our business activities. This responsibility also applies to government investigators.

We must never interfere with or seek to improperly influence any audits or examinations of our company.

### Dilemma

You lose the receipt for your airline ticket. However, you purchased an expensive watch at the airport which was almost the same value.



**Q:** Can you use the receipt for the watch to support your claim for the cost of the flight since the value is the same?

A: No. All expense claims must be accompanied by original receipts and all receipts must reflect actual costs incurred for eligible expenses. In this case, you should contact the airline and request a duplicate receipt that can be submitted with your expense claim.

Survitec expects that all business transactions are documented properly and accurately reflect the intention of the parties.

Where there are specific policies and processes governing the negotiation, review, execution, storage, management and close-out of contracts, these should be understood and followed.

Only persons with appropriate limits of authorization may execute agreements.

### Dilemma

You're about ready to sign a new customer to a big contract worth over €250k. Your manager is under a lot of pressure to increase sales. They call you into their office and tells you their job is on the line, and they ask you to include the revenue for your contract in the sales figures for the quarter that ends tomorrow. You know the contract is a sure thing but the customer is out of town and cannot possibly sign by tomorrow.

**Q:** What do you do?

A: You must accurately record information in the books and records of the company together with all relevant documentation and approvals. This includes recording the correct date. Failing to keep accurate books and records may be a criminal offence. You should also report that such a request was made of you.





# CONFLICTS OF INTEREST

“ We must avoid situations where our personal, social, financial or political interests could be in conflict with the interests of our company...” ”

## Conflict of interest

We must avoid situations where our personal, social, financial or political interests could be in conflict with the interests of our company or could be perceived by others to be in conflict with such interests.

Where there is potential for a conflict of interest to arise, it should be immediately disclosed to your manager or the Legal and Compliance Department and recorded in accordance with the Conflicts of Interest policy which can be found here [\(Click Here\)](#).

The conflict may be capable of being accommodated, however it must be recognized that certain conflicts of interest may not be capable of being mitigated or resolved.

### Examples of potential conflicts of interest include:

- ✓ Personal Investments or Transactions: Financial interests that could interfere with the best interests of the company, or having a financial or personal interest in a company that does business with Survitec
- ✓ Outside Business and Other Activities: Interests such as a second job or board membership that could affect your objectivity, motivation, or performance at Survitec
- ✓ Personal Relationships: Hiring, managing or otherwise establishing a business relationship with someone from a previous employment or a family member, a close personal friend or someone with whom you have an intimate relationship
- ✓ Accepting Gifts and Entertainment: Accepting certain gifts, meals, hospitality, entertainment, travel support or other items of value from business partners and other third parties with whom Survitec conducts business

Please speak to the Legal and Compliance Department or email [compliance.support@survitecgroup.com](mailto:compliance.support@survitecgroup.com) if you have any questions on whether a conflict of interest might exist.

## Dilemma

**Q: Your child applies for a job at the Company. What should you do?**

A: Inform your Manager and HR and ensure that you do nothing to influence the decision-making process at the interview

**Q: A customer asks at the end of a business meeting if you can help her son with some work experience. What do you do?**

A: You may not help directly, however you may give the customer details of HR and suggest that her son applies directly to HR for any work experience placements.

**You are asked to run a bid to secure the supply of some services. Your Uncle runs a business which is likely to be a suitable candidate for the work.**

**Q: Can your Uncle's business be included in the bid process?**

A: Yes, and you may advise your Uncle of the potential opportunity. However, you may not give any confidential or commercially sensitive information to your Uncle. Furthermore, if he submits a bid you should remove yourself from the process and neither receive any information concerning bidder selection nor, if your Uncle's bid is successful, any information concerning the negotiation or conclusion of the contract.



## Anti-trust and competition rules

Survitec competes on the merit of its products and services and conducts all its business in compliance with all applicable anti-trust, competition and trade practice laws.

Anti-trust law prohibits agreements or understandings between competitors which may unlawfully limit trade or restrict full and fair competition, such as agreements on prices, market-share, reimbursables from customers, monopolization, certain mergers and acquisitions, price discrimination and bid-rigging.

Survitec does not tolerate violation of these laws, so it is important that anyone with direct interactions with customers, distributors, suppliers and competitors understands what activities could violate the law.

If you suspect that you have been approached to participate in activity, or if you overhear any discussions concerning any activity, which could violate these laws, you must immediately notify the Legal and Compliance Department.

Please speak to any member of the Legal and Compliance Department or email us on:

[compliance.support@survitecgroup.com](mailto:compliance.support@survitecgroup.com)

## Dilemma

You are asked to phone a competitor pretending to be a potential customer and request a quote.



**Q: What should you do?**

A: Refuse to do what is being asked. This is an unethical means of obtaining intelligence on a competitor. You should also notify the Legal and Compliance department.

**You are at a party on the weekend and you are catching up with a close friend who has recently started working for a competitor. Your friend discloses some information which you know is confidential and commercially sensitive. They also ask if you might be around tomorrow to discuss.**

**Q: What should you do?**

A: Even though this person may be a close friend, or even a relative, the disclosure and proposal to discuss the information has the potential of being illegal. You should disengage from the conversation immediately and notify the Legal and Compliance department.





# TRADE CONTROLS & ANTI-TAX EVASION

## Trade controls

Violation of international trade controls laws carries heavy civil and criminal penalties, and may lead to withdrawal of export and import privileges and damage to our reputation.

Therefore, you should be aware of the export, re-export and import laws and regulations which govern the business you are associated with. This includes the products (including any software and technology) and services, the final and any intermediate destinations, the end-user(s) and any intermediaries, and the purpose for which the products and services will be used.

Note that trade controls also govern the personal and Survitec equipment we travel with such as smart phones, tablets, laptops. It also covers the software and data on those devices.

Also note that trade controls may apply to products even if solely for demonstration purposes.

Therefore, we must screen our products and technical information to verify any export controls that might apply to any product before it is exported, complete and file all required documentation, and comply with any legal or company restrictions or processes that are in place.

Should you have any questions about the applicability of international trade controls, please speak to your local Export Control Officer on site or the contact the Legal and Compliance Department by phone or email:

[compliance.support@survitecgroup.com](mailto:compliance.support@survitecgroup.com)

Trade controls include international boycotts, trade sanctions, foreign trade controls, export controls, non-proliferation, anti-terrorism or similar laws.

It is important to note that these laws are subject to change so it is always worth raising any order requests from countries you are not confident we should be trading with to the Compliance team.

Please refer to the Survitec policies for more information [\(Click Here\)](#).

## Anti-tax evasion

The facilitation of tax evasion and the failure to take reasonable steps to prevent the facilitation of tax evasion are criminal offences. An offence occurs when a corporation fails to take reasonable steps to prevent an associated party engaging in or facilitating tax evasion.

Survitec pays all required taxes relating to its business. Employees are prohibited from knowingly assisting any person or company, including our customers, joint venture partners or employees, from evading applicable taxes.

## Dilemma

You receive some documents which you are told needs to be signed to allow certain products to be delivered to a customer in another country. You have authority to sign them but you don't understand them. You are told "they are okay. So just sign here."



### Q: What do you do?

A: You need to find someone who can explain what the forms mean and find the right person to sign them, if in fact they are okay to sign. There could be a mistake which means the products are not permitted to be delivered to the country or end-user, which could leave the company and employees at risk of civil, commercial and criminal penalties. As well as reputational damage. You should not sign any document that you do not understand or are unsure whether you have authority to sign.

### Q: It's Friday and 30 minutes before the items are collected for a Monday delivery deadline. What do you do?

A: Find someone to help you. Survitec has an open-door policy, which includes being available by telephone at any time of the day, on weekends and holidays. If you cannot locate your manager or one of the Export Compliance Officers, you should call a member of the Legal and Compliance Department.

# POLITICAL ACTIVITIES

While Survitec respects the right of our people to personally support political activities on their own time and at their own expense, employees may not use company property, facilities, time or funds for political activities.

As a company, Survitec doesn't support or make donations (in cash or kind) to any political party, to the campaign of any candidate for elected office, or in support of any elected official.

**" We may only participate in political activities on our own time and at our own expense. "**

## Dilemma

There is a local election and I am involved in the local politics. I want to hold a gathering of my party and supporters. The office has an ideal meeting room for such an event. There are no other suitable meeting venues. Or if there are, they are too expensive.



### Q: Can I be involved in politics?

A: Survitec respects the right of its people to be involved in political activities in their own time and at their own expense.

### Q: Can I use the office meeting room, even if I pay for all the refreshments?

A: No. The company does not allow the use of its facilities, equipment or resources for political activities.





# A HEALTHY AND SAFE PLACE OF WORK



## Safety and reducing risk are integral to everything we do

You promote a supportive and accountable culture, raising issues, admitting errors without fear, and highlighting your own mistakes. You work consistently to improve the safety and well-being of yourselves and others.

### A healthy and safe place of work

Health and safety throughout our organization is a critical responsibility. It is one that we must never ignore, minimize or compromise.

We must pay attention to detail and adhere to quality and safety standards at all times. We must ensure that our equipment, services and products comply with quality standards, laws, regulations and internal controls that govern our work.

We all have a responsibility to ourselves, our colleagues and the public to make time for safety, speak up about safety and support the continuous development of our safety culture.

We must be aware of and follow health and safety laws, regulations and policies related to our work activities.

- **SpeakUp:** If you become aware of, or suspect, unsafe working conditions or significant safety issues and report the situation.
- **Substance Abuse:** We must be free from the influence of alcohol or any other substance that could prevent us from performing our jobs safely and effectively.
- **Violence:** We do not tolerate violence. This includes acts or threats of violence in the workplace or in other settings in which we may find ourselves in connection with our work activities. Unauthorized firearms, dangerous weapons and contraband are not permitted on company premises or while conducting business on the company's behalf.

### Dilemma

You are using some company equipment. You notice it is starting to fail. Someone comes along to use it.



#### Q: What do you do?

A: Stop the person using the equipment. Put a notice on it and notify the engineers.

#### Q: You think you can fix it. Should you try?

A: You should not tamper with or attempt to repair or modify any machinery or equipment unless you are qualified to do so.

An employee is moving a liferaft which slips and falls to the ground narrowly missing a colleague.

#### Q: What should they do?

A: They should report the incident as a near miss. Reporting near misses is an important step in helping avoid more serious accidents or incidents in the future.

“ We must ensure that our equipment, services and products comply with quality standards, laws, regulations and internal controls that govern our work. ”

# A DISCRIMINATION AND HARASSMENT FREE WORKPLACE

We are committed to providing an equal opportunity workplace free from discrimination and harassment, where everyone is treated courteously, with dignity and respect. As such, everyone's human rights are to be respected. Survitec embodies the commitment to protecting against discrimination enshrined in international standards such as the United Nations Declaration of Human Rights.

We will not tolerate and strictly prohibit discrimination of any type, including on the grounds of race, colour, religion, gender, national origin, marital status, age, sexual orientation or disability status, and are committed to equal employment opportunity for all employees and applicants.

We recruit, reward and develop our employees on merit and have a strict equal pay policy.

We prohibit any form of harassment, including sexual harassment and workplace bullying of any employee in any situation, including Survitec related social events. Harassment can be physical, verbal or visual (including inappropriate electronic messages, jokes, gestures, pictures or written material), inappropriate physical or verbal interactions that are sexually suggestive or physically aggressive in nature, and generally includes any conduct toward a person that is unwelcomed by that person and has the purpose or effect of creating an intimidating, humiliating, hostile or offensive work environment.

For more information, please refer to the Survitec policies here [\(Click Here\)](#).

### Dilemma

A colleague makes suggestive remarks, which are unwelcome and feel inappropriate.



#### Q: What do you do?

A: Survitec does not tolerate any form of harassment and you are encouraged to speak to your line manager, HR or a member of the Legal and Compliance Department. You may also make a report using the Survitec Hotline.

Q: The colleague asks about your private life and you feel it is being intrusive. You also fear that certain information about your private life could affect how you are treated at work.

A: Survitec does not tolerate any form of harassment, bullying or discrimination. Employees may keep their private lives private.

Q: A colleague makes suggestive comments. You are keen on this person and do wish to reciprocate. You believe there is an opportunity to develop a relationship. What do you do?

A: This is a personal decision. However, for both of you, any relationship must not interfere with your duties as an employee of Survitec. For example, the relationship must not create any conflicts of interest or result in the disclosure of information which one is authorized to receive and the other is not.





# INSIDER TRADING

In your work at Survitec you may learn of material, non-public information, otherwise known as “insider information”. This includes non-public financial, operational or contractual information, or confidential customer or supplier information.

Employees, officers and directors of Survitec are prohibited from using Survitec inside information, or inside information of any company which Survitec is doing business with. This includes trading in Survitec securities or debt instruments on any exchange, passing on insider information, or otherwise using inside information to someone’s advantage.

The use or disclosure of non-public, or insider information, for financial benefit is a crime. It is also unethical.

The company will advise of the commencement and termination of any black-out periods which may be relevant to certain persons before and after any public filings or press releases.

## Dilemma

You are negotiating a contract with a supplier. The negotiations are confidential and you are aware that this contract will be viewed favorably by the shareholders of the supplier.



**Q: Can you use that non-public information to buy shares in the supplier?**

A: No. It is illegal to use insider information for financial gain.

**Q: Can you pass the information to another person for their “information”?**

A: No. It is illegal to give a “stock tip” based on insider information. Furthermore, any unauthorised disclosure of confidential information is against company policy and could expose the company to breach of confidentiality claims by the supplier.

“...we are committed to the proper management and use of personal information.”

In the course of running our business we all have access to personal information and are required to entrust certain aspects of our own personal information to the company.

Personal information includes any information that identifies a living person, such as government-issued identification numbers, email addresses, home addresses and telephone numbers, as well as personal financial, health information and technical data such as IP addresses. Certain sensitive categories of personal information must not be collected, used or disclosed without a specific legal reason, such as with the express consent of the relevant individual.

Survitec is committed to the proper management and use of personal information. We may only collect, access, use or disclose such information for specific business purposes, and must not share it with anyone, inside or outside of the company, who does not have a legitimate business need to know it.

If you have access to the personal information of others as part of your role at Survitec, you must ensure that you understand how to secure, handle or process it lawfully and securely.

You can find details of our processing purposes and more guidance concerning the protection of personal information in the Survitec Policies [\(Click Here\)](#).

Many countries, as well as States, have their own Data Protection or Privacy laws governing the use of personal information. We must understand and comply with the specific requirements that apply in the countries in which we work.

If you become aware of any actual or potential data protection breach, you must notify the Data Privacy Team at [data.privacy@survitecgroup.com](mailto:data.privacy@survitecgroup.com).

Please contact HR or speak to the Legal and Compliance Department or send an email to [compliance.support@survitecgroup.com](mailto:compliance.support@survitecgroup.com)

# PROTECTING PERSONAL INFORMATION



We care for our people and invest in their development as individuals and teams

You consistently perform at your best and always do the right thing, even when it’s difficult. You continue to develop yourself, your team and the teams around you. You are empathic and self-aware and understand how your behaviors impact others.

## Confidentiality and intellectual property

Confidential information and intellectual property that is held or owned by the company must be protected. In many cases we have obligations under statute or under our license and commercial agreements to safeguard personal, commercial and financial data and/or not to disclose information unless required or permitted by law.

It is important to recognize that data privacy and financial regulatory laws vary from country to country and can be quite stringent. Survitec is obligated to comply with all laws in countries where it does business. If you are unsure of these requirements, you should refer to the Survitec policies [\(Click Here\)](#) speak to the Legal and Compliance department or send an email to [compliance.support@survitecgroup.com](mailto:compliance.support@survitecgroup.com)

We may have obligations not to disclose non-public information to others or not to use non-public information which could be used in making an investment decision in connection with the company.

It may be unlawful to acquire and use personal information without the knowledge and, in some cases, the consent of the persons concerned.

Similarly, the use of confidential and proprietary information belonging to others without their knowledge or consent may breach our commercial agreements or applicable law.

We may not obtain intelligence on our competitors through illegal or unethical means and if you become aware of any such information, or any attempt to obtain such information, you should immediately raise a concern with the Legal and Compliance Department or using the Survitec Hotline.





Some simple steps which can always be taken to safeguard the personal data and confidential information that the company holds are:

- ✔ Ensure that the purpose for collecting, using or disclosing personal information is clear and in accordance with applicable laws and the company's policies
- ✔ You may not access, use or disclose any personal or confidential information, such as pricing, material contract terms or intellectual property unless authorized to do so
- ✔ Avoid discussing company matters, your colleagues or customers in public spaces whether with colleagues or when on the telephone
- ✔ Do not disclose confidential company information (including personal information) to unauthorized persons, including family or friends
- ✔ Before sending an email, message or letter, check the name and contact details of the person(s) to whom you are sending the message to ensure they are the correct recipients
- ✔ Do not leave company papers open in public spaces or when you are meeting with partners, customers, suppliers or contractors
- ✔ When using your laptop, mobile device or company papers in public places protect them from prying eyes
- ✔ Ensure your laptop and mobile devices are password locked when not being used
- ✔ If you lose or misplace any company documents, equipment or mobile devices, you should notify relevant persons and IT as soon as you can so appropriate measures can be taken to protect the company's data
- ✔ Any company information that is confidential and is to be provided to a third party should be disclosed under a confidentiality agreement and marked confidential
- ✔ Any confidential third-party information may not be disclosed to any person without permission
- ✔ Dispose of company papers in a secure manner, such as by shredding or depositing in a confidential waste bin
- ✔ Secure paper records containing personal information or confidential records in locked cupboards when not in use

“ Our data, information and intellectual property must be protected. ”

### Dilemma

A new employee approaches you asking about the process that the sales department has for receiving information about new customers. You explain the process and ask why he wants to know. He tells you that he has copied the customer data base from his previous job and wants to upload and add it to the Company's data set.



**Q: What should you do?**

A: Explain to the new employee that his actions are unacceptable as they run contrary to our core values. You should also inform your Manager, HR or a member of the Legal and Compliance Department about this situation.

You have found out confidentially in your role that a colleague and a close friend will be made redundant.

**Q: Can you tell him?**

A: No. This will be a breach of your obligations of confidentiality.

Your colleague is unwell and currently off work. You would like to send a "get well" card however you do not know your colleague's home address.

**Q: What should you do?**

A: Speak to your HR department. Although they cannot disclose the address, they will be able to add the address and post the card for you.

The factory floor route to the tea-room requires security clearance which you do not have. A colleague who does have clearance says "Come on. I'll take you through".

**Q: What do you do?**

A: You are not authorized to enter the factory floor and should not accept your colleague's proposal.

# TREATING OUR CUSTOMERS FAIRLY



We are committed to delivering real value and confidence to our customers

You put the customer first, be it your internal or external customer, in your decisions and actions. You constantly seek opportunities to improve the customer experience. You manage expectations in the right way, being open and transparent.

## Our reputation is fundamental to our success

Therefore, we treat all our customers and suppliers fairly and with integrity, honesty and dignity irrespective of the value or duration of the relationship.

We conduct due diligence and third-party screening in accordance with our policies prior to entering into transactions with a third-party and we aim to work with third parties with similar values and ethical principles.

### Dilemma

You are in sales. You become aware a supplier has delivered some defective parts which are integrated into flagship product. The parts need to be re-ordered and the finished products re-tested. This will lead to some delays in delivery of the flagship product. At a customer update meeting, your manager makes no mention of the likely delay. The customer has described some challenges, including costs and damage to its reputation, if it doesn't receive the products on time.



**Q: Should you/your manager tell the customer?**

A: Our reputation is integral to our success as a business and we must treat our customers with integrity, honesty and respect. Unless the manager genuinely believes that the products will be delivered on time, there should be a discussion around how and when to convey the situation to the customer so as to protect the company's reputation.

The manufacturing cost of one of the products your company makes has dropped by 20%. This reduction in costs has been passed on to one of your customers at the most recent contract renewal.

**Q: Should your other customers be offered the price reduction?**

A: You are not required to do so however you may wish to consider the various commercial and reputational aspects of the situation.

## Communities in which we work

We recognize that we have the ability to help make a lasting improvement to the quality of life in the communities where we do business.

Survitec is committed to contributing directly and indirectly to the general wellbeing of the communities within which we work and each of our business partners, contractors and suppliers are expected to adhere to these same principles and standards.

Every year, for half of our working day Survitec teams give back to the communities they live and work in by participating in Survitec Purpose Day.

By supporting the environment, organizations and people who may be less fortunate than we are, we are united in giving our time and resource with a common purpose of helping one another and our planet.

### Dilemma

Fundraising days involving the community are a great way to support charities and something that we can all get involved in.



**Q: Can I do this?**

A: Any activity involving local community must comply with company policies and be approved by Survitec management. They must also be developed in conjunction with relevant Survitec functions, such as marketing, HR and health and safety.



# MODERN SLAVERY

Survitec has a zero-tolerance approach to modern slavery, including forced, bonded or compulsory labor, human trafficking and any form of child labor. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and improving effective systems, controls and practices to ensure modern slavery or child labor is not taking place in our supply chains. The Survitec Modern Slavery Statement can be found here [\(Click Here\)](#).

We are also committed to ensuring there is transparency in our own business. We believe all employees and workers should be treated fairly, honestly and with respect in relation to basic human rights and we expect the same standards from all our contractors, suppliers, third parties and other business partners

If you see or hear about any slavery or human trafficking within Survitec, its customers or supply chain please speak to the Legal and Compliance Department or email

[compliance.support@survitecgroup.com](mailto:compliance.support@survitecgroup.com)

## Dilemma

One bidder to supply an item has come in well below the others. All other aspects of the bid are fully compliant. You could accept this lowest bid, as per the tender protocol, however you are suspicious that the bidder has not properly described the conditions at the place of manufacture of the item.

### Q: What do you do?

A: Look into the matter further. There may be a risk that the lowest bidder is providing inappropriate working conditions for its workers, or using forced, indentured or child labor.



# PROTECTING PROPERTY



## We seek to **innovate** at every opportunity

Change is what helps us learn and grow. You have a continuous improvement mindset. You are comfortable with and accept change and have a willingness to try out new methods, processes, ways of working or techniques. When you seek to innovate at Survitec, failure is acceptable when acted upon, "fail fast, learn quick".

## Protecting property

We must protect the company's physical property from theft, damage, loss or misuse.

This includes Survitec products, facilities, tools, vehicles, computers, mobile devices, other business equipment and supplies.

It also includes using good judgment when spending company money, for example on equipment, supplies, projects, advisors or other expenses.

## Protecting the environment

Survitec is committed to protecting the environment in all areas of operations. We must meet, and strive to exceed, all applicable environmental laws and regulations, including matters such as:

- ✓ Classification and disposal of hazardous materials
- ✓ Spill prevention and clean-up
- ✓ Air emission and water quality requirements
- ✓ Product specifications

## Dilemma

You are friends with a sales manager working for one of our business partners and the two of you often go out for dinner socially to catch up.

Q: Would it be right for you to use the company credit card to pay for a meal and declare it as a business dinner?

A: No it would be wrong for you to use company money to pay for a social occasion, even if with a business colleague.



## Dilemma

As you leave at the end of the day, you notice a strong smell of solvent from a storage unit.

Q: What do you do?

A: Inform the health and safety or site manager. Do not attempt to open the unit unless you are trained, authorized and have the appropriate personal protective equipment (PPE).



“ Survitec is committed to protecting the environment in all areas of operations. We must meet, and strive to exceed, all applicable environmental laws and regulations...” ”



# COMMUNICATIONS AND SOCIAL MEDIA

All internal and external Survitec communications should give an accurate and consistent view of our business, be authorized, and comply with relevant laws, regulations and standards in the countries where we do business.

We must carefully manage the Survitec brand and refer any outside inquiries to the appropriate individuals.

Inquiries from the media must be directed to the Communications Department at [communications@survitecgroup.com](mailto:communications@survitecgroup.com) and any public communications regarding Survitec or its business activities should be made solely through our Marketing Teams.

Social Media has changed the way we share information. While

Survitec values the use of social media, we must comply with company policies on the use of social media during or away from work, especially where any communication involves Survitec, its operations, people, competitors and/or other business-related matters. In certain circumstances Survitec may restrict the ability for company devices to access or use social media.

[Click Here](#) for Survitec's social media policies.



## Company records

Employees are expected to know and comply with Survitec's Record Keeping Policy, which includes the maintenance of all documents and records.

Company records can include all forms of paper and electronic documents (including recorded messages and conference calls) and records in company databases, electronic systems (including smart phones and tablets), our shared networks and physical data stores.

We must properly and securely store company records to ensure they are accurate and accessible when required. Retention requirements may include archiving or destruction in accordance with company policies and applicable laws and regulations. These retention requirements apply whether the records or documents are held on a Company-issued or non- Company-issued electronic device, commonly known as a "Bring Your Own Device" or "BYOD".

The Company reserves the right to inspect, review and secure any data, records or documents on Company electronic devices and, to the extent it concerns or relates to any Company data, record or document, on any BYOD.

On occasion, you may be notified that records or documents under your control or in your custody are required in connection with a legal matter, compliance matter or government investigation. If you receive this type of notice, you must preserve, and must not alter, conceal, delete or destroy these documents, whether in physical or electronic form, until you are notified that these items no longer have to be preserved.

A copy of the applicable Survitec Policies can be found here [\(Click Here\)](#).

### Dilemma

You are reviewing a contract which has just been signed. You notice one of the prices is incorrect. You are sure the real price was agreed so you think you can go ahead and make the change and replace the page before you file the document.

**Q: Can I do this?**

A: No. Any changes to documents must be authorized.

You were speculating with a colleague on some potential issues with a product. Months later the customer issued a claim against the company. You realize your emails might not be helpful to the company if they are found.

**Q: Do you delete them?**

A: No. Deleting or tampering with data and other company records that could be part of a legal case or an investigation is against company policy and may be illegal.



# COMPANY TECHNOLOGY

We are required to use company technology in a professional, ethical and lawful manner.

You may not use company-issued IT equipment including computers or systems to download, display, send or store material that is fraudulent, harassing, sexually explicit, obscene or otherwise unlawful, inappropriate or offensive. If you receive any such material please notify the Legal or IT departments.

To avoid exposing the company to external cyber threats it is critical that we follow, and do not disengage, deactivate or circumvent, any IT system security measures and internal controls.

The company's technology and communications systems are monitored and logged to the extent permitted by applicable law to protect the company from external or internal threats and, where appropriate, to prevent or investigate breaches of the law, this Code or company policies. We will always respect your privacy in accordance with applicable laws and regulations when we monitor your use of our systems.

You can view applicable Survitec IT Policies here [Click Here](#)

### Dilemma

You need to transfer a document from your laptop to another. A friend lends you their USB drive.

**Q: Should you use it?**

A: No. Only properly protected and secure equipment should be connected to a company laptop.

Your child needs to complete some homework.

**Q: Can you give your laptop with the password for your child to use and complete the assignment?**

A: No. Company equipment is for company use and your password should be known only by you.



**“ You may not use company-issued computers or systems to download, display, send or store material that is fraudulent, harassing, sexually explicit, obscene or otherwise unlawful, inappropriate or offensive. ”**

Note: You should be familiar with the policies that apply to your role and responsibilities

# SURVITEC HOTLINE

## AUSTRALIA

**International Toll-Free Service (ITFS)** ..... T: 1-800-139957

From an outside line dial the ITFS number for your location

## BAHRAIN

Direct Access

1. From an outside line dial the direct access number for your location
2. At the English prompt dial 855-229-9304

**Bahrain (U.S. Military Bases)** ..... T: 800-000-00

**Bahrain** ..... T: 800-00-001

**Bahrain (Cellular)** ..... T: 800-000-05

## BELGIUM

**International Toll-Free Service (ITFS)** ..... T: 0800-78755

From an outside line dial the ITFS number for your location

## BRAZIL

**International Toll-Free Service (ITFS)** ..... T: 0800-8920515

From an outside line dial the ITFS number for your location

## CANADA

**Direct Dial** ..... T: 855-229-9304

From an outside line dial direct for your location

## CHINA

**Global Inbound Services (GIS)** ..... T: 400-999-4530

From an outside line dial the GIS number for your location

## CYPRUS

**Direct Access** ..... T: 800-900-10

1. From an outside line dial the direct access number for your location:.....
2. At the English prompt dial 855-229-9304.

## DENMARK

**International Toll-Free Service (ITFS)** ..... T: 80-251000

From an outside line dial the ITFS number for your location

## FRANCE

**International Toll-Free Service (ITFS)** ..... T: 0800-917075

From an outside line dial the ITFS number for your location

## GERMANY

**International Toll-Free Service (ITFS)** ..... T: 0800-1800042

From an outside line dial the ITFS number for your location

## SPAIN

**International Toll-Free Service (ITFS)** ..... T: 999-971251

From an outside line dial the ITFS number for your location

## GREECE

**International Toll-Free Service (ITFS)** ..... T: 00-800-11002-8935

From an outside line dial the ITFS number for your location

## HONG KONG

**International Toll-Free Service (ITFS)** ..... T: 800-908839

From an outside line dial the ITFS number for your location

## ITALY

**International Toll-Free Service (ITFS)** ..... T: 800-797458

From an outside line dial the ITFS number for your location

## JAPAN

**International Toll-Free Service (ITFS)** ..... T: 00531-110303

..... T: 0066-33-830532

..... T: 0034-800-600152

From an outside line dial the ITFS number for your location

## NETHERLANDS

**International Toll-Free Service (ITFS)** ..... T: 0800-0232214

From an outside line dial the ITFS number for your location

## NEW ZEALAND

**International Toll-Free Service (ITFS)** ..... T: 0800-447933

From an outside line dial the ITFS number for your location

## NORWAY

**International Toll-Free Service (ITFS)** ..... T: 800-12183

From an outside line dial the ITFS number for your location

## PANAMA

**Direct Access** ..... T: 800-0109

**Panama (Spanish Operator)** ..... T: 800-2288

1. From an outside line dial the direct access number for your location
2. At the English prompt dial 855-229-9304

## POLAND

**International Toll-Free Service (ITFS)** ..... T: 0-0-800-1510052

From an outside line dial the ITFS number for your location

## PORTUGAL

**International Toll-Free Service (ITFS)** ..... T: 8008-11587

From an outside line dial the ITFS number for your location

## QATAR

**Reverse Charge Calls / Collect Calls** ..... T: 704-526-1129

1. From an outside line contact your local operator
2. Request a reverse charge or collect call to be placed to the United States, to the number below
3. All reverse charge or collect calls will be accepted by the Contact Center using an automated English message

## KOREA (SOUTH)

**International Toll-Free Service (ITFS)** ..... T: 00308-132884

From an outside line dial the ITFS number for your location

## SWEDEN

**International Toll-Free Service (ITFS)** ..... T: 020-79-8389

From an outside line dial the ITFS number for your location

## TURKEY

**Direct Access** ..... T: 0811-288-0001

1. From an outside line dial the direct access number for your location
2. At the English prompt dial 855-229-9304

## UNITED ARAB EMIRATES

**Direct Access** ..... T: 8000-021

**United Arab Emirates (du)** ..... T: 8000-555-66

**United Arab Emirates (Military-USO and cellular)** ..... T: 8000-061

1. From an outside line dial the direct access number for your location
2. At the English prompt dial 855-229-9304

## UNITED KINGDOM

**International Toll-Free Service (ITFS)** ..... T: 0808-234-7287

From an outside line dial the ITFS number for your location

## UNITED STATES

**Direct Dial** ..... T: 855-229-9304

From an outside line dial direct for your location