

CODE OF ETHICS

Control Risks' mission is to enable its clients to succeed in complex or hostile business environments. Such environments often include regions with high security risks and unstable political systems. Success demands that we retain the trust and respect of our clients and business partners, as well as the government officials and communities among whom we operate.

All Control Risks' employees are required to comply with the laws and regulations of the countries in which they operate. However, legal compliance is only the starting point. The long-term sustainability of our business depends on our ability to maintain the highest standards of personal and collective integrity, often in difficult circumstances.

This Code of Ethics should be read in conjunction with Control Risks' Anti-Bribery and Anti-Corruption policy. Together these form the Business Principles according to which Control Risks operates.

Our ethical commitment

Ethics are not an optional extra or something we adopt to make ourselves feel good. They define how we do what we do. Every day we are asked to help clients in controversial, dangerous and morally complex situations. Applying ethics in these circumstances is often difficult, but it is essential. Guided by an ethical code and confident in our own innate integrity, we have the opportunity to help our clients do business in the most challenging circumstances. Making us - and indeed our families - proud of what we do is always more important than short-term financial gain.

Our values

Control Risks operates according to its core values: integrity and ethics, collaboration and teamwork, commitment to people and professionalism and excellence.

Business integrity

Business integrity goes beyond compliance with the law, and involves the application of our core values. Control Risks does not pay bribes, engage in acts of corruption or receive kickbacks either *directly* or *indirectly*. Control Risks' employees are expected to use their judgement not just to avoid malpractice but to promote good practice in accordance with the company's commitment to high standards of integrity.

Conflicts of interest

Control Risks' staff must avoid situations or transactions in which their personal interests could conflict or might be seen to be in conflict of those of Control Risks. This includes: acting on any client information gained through their employment with Control Risks for personal gain; passing such information to a third party; or acting in any way that could be construed as insider trading.

Conflicts of interest can arise if individuals have a personal interest in business dealings involving Control Risks. Personal interest can be direct or indirect, and refers not only to personal interests but to those of family members and friends. If there is a potential for conflict, the interests of Control Risks must take priority.

Control Risks' staff must disclose any personal conflict of interest or perceived conflict to their line manager. (For company conflicts of interest see Conflicts of Interest Policy.)

Confidentiality

Control Risks will not reveal the identity of any Crisis Response client, or any other client without their consent. Even if a client decides to reveal Control Risks' involvement, we will neither confirm nor deny our involvement.

All Control Risks documentation and client documents entrusted to the company must be handled securely and remain confidential. Any breach, or suspected loss, must be reported to the Group Risk Manager and the Chief Information Officer immediately.

Human rights

Control Risks supports the Universal Declaration of Human Rights, and our employees are never to be complicit in human rights abuses. We examine all advice to clients for its potential direct and indirect impacts on human rights. Control Risks abides by the Voluntary Principles on Security and Human Rights.

Political activities

As a corporate body, Control Risks has a policy of strict political neutrality: we do not make donations to any political parties, organisations, or individuals engaged in politics. However, Control Risks will co-operate with governments and other official bodies in the development of policy and legislation that may affect our legitimate business interests, or where we have specialist expertise.

Control Risks' employees are entitled to their own political views and activities, but they may not use company premises or equipment to promote those views nor associate their views with those of the company.

Business relationships

Control Risks expects its suppliers, sub-contractors, representatives and joint venture partners to adhere to integrity principles that are consistent with our own.

We will take account of ethical and reputational issues, as well as legal compliance, when deciding whether to work with particular clients or take on new assignments.

Guidance

Control Risks requires its employees to abide by this code in all circumstances. If in doubt about the application of this code, employees are to seek guidance from their line manager, who as appropriate will refer to a Regional Director or the Ethics Committee. Senior management will give full backing to company staff who find themselves in difficult situations, or who fail to win business, as a result of abiding by the code.

Employees must report actual or suspected infringements of this code to their head of office or divisional head who in turn must report it to the Ethics Committee. Employees may report suspected breaches of the code in confidence. They will not be penalised for reporting genuine concerns that prove to be unfounded.

Control Risks takes breaches of the code very seriously. Employees who fail to abide by the code may face disciplinary action, including dismissal.