



9/1/2017

Code of Conduct

A guide of principles designed to help conduct business honestly and with integrity.



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INTRODUCTION

At Delta Blade Consultants (DBC), we are committed to our core values of Honesty, Integrity and Respect. They are key to the way we work and interact with our clients, suppliers and colleagues across the business and underpin our customer promise “to keep confidential and deliver best possible results.”

The key value, underpinning all others, is that people act with integrity - constantly striving to uphold the highest professional standards, provide sound advice, and rigorously maintain their independence.

Our Code of Ethics (the “Code”) outlines the standards and behaviors that help to shape and strengthen our culture. All colleagues are expected to uphold these high standards wherever in the world we conduct business, ensuring that honesty and integrity is maintained. The Code sets out in brief, with some explanation, key Company policies and procedures.

This Code, although not addressing every situation you may face as an employee or contractor, does provide a guide to the values, behaviors and ways of working which are core to our firm and which each of us is responsible for upholding as an employee.

Thank you for your commitment to ethics and compliance.



Jonathan Dass
Managing Director

PURPOSE

This document summarizes DBC's anti-bribery and anti-corruption approach, including relevant policies and procedures that are required to be followed by personnel.

This summary is designed to be used by DBC staff and partners when carrying out assignments whether on full time, part time or contractor basis.

This document will be updated from time to time as required.

OUR POSITION

DBC's position is that bribery and corruption are unethical and unacceptable and are inconsistent with our values and our Code of Conduct. Specifically, in relation to anti-bribery and corruption, the Code commits us to:

- Act lawfully, ethically and in the public interest;
- Prohibit bribery and corruption by our people;
- Not tolerate illegal or unethical behaviour by our clients, suppliers or by public officials; and
- Follow high standards of ethical conduct around the world including aspiring to the ten principles of the UN Global Compact (including anti-bribery).

ANTI-BRIBERY POLICY

DBC's anti-bribery policy is a specific prohibition against involvement (or an impression of involvement) in any type in bribery even if such conduct is legal or permitted under applicable law or local practice. This prohibition extends to both public and private sectors.

As such:

- DBC member firms and personnel must not offer, promise, make, solicit or accept bribes (whether directly or through an intermediary such as a commercial agent) even if such conduct is legal or permitted under applicable law or local practice.
- DBC member firms and personnel must also take steps to assess and mitigate the risk that any third party are that any third party who acts on their behalf (for example, agents, distributors, consultants, etc.) does not offer, promise, make, solicit or accept bribes on their behalf; and
- DBC member firms and personnel must also avoid conduct that may give the impression of involvement in bribery.

CONFLICTS OF INTEREST POLICY

You should not put yourself in a position where you are involved in an activity for personal gain, to you or your family, which conflicts with the Company's interests. Conflicts of interest can take many forms including, but not limited to:

- Engaging in any activity that competes with DBC;
- Taking personal advantage of an opportunity that belongs to DBC;
- Engaging in a business relationship on behalf of DBC where you or a family member has an interest in the other party, including a directorship or shareholding, unless previously advised to, and agreed by management.

FACILITATION PAYMENTS

Facilitation payments are prohibited by DBC member firms or personnel entirely except where the facilitation payment is made on behalf of the member firm and only then in instances where there is an immediate and credible threat to life, limb or liberty.