



Bluegrace Holdings

Ethical Business Conduct Code

01 January 2021

The Bluegrace Code of Conduct outlines expected behaviors for all Bluegrace employees. Bluegrace will conduct its business fairly, impartially, in an ethical and proper manner, in full compliance with all applicable laws and regulations, and consistent with the Bluegrace values. In conducting its business, integrity must underlie all company relationships, including those with customers, suppliers, communities and among employees. The highest standards of ethical business conduct are required of Bluegrace employees in the performance of their company responsibilities. Employees will not engage in conduct or activity that may raise questions as to the company's honesty, impartiality, reputation or otherwise cause embarrassment to the company.

As an employee of Bluegrace Holdings, I will ensure that:

- ✓ I will not engage in any activity that might create a conflict of interest for me or the company.
- ✓ I will not take advantage of my Bluegrace position to seek personal gain through the inappropriate use of Bluegrace or non-public information or abuse my position.
- ✓ I will follow all restrictions on use and disclosure of information. This includes following all requirements for protecting Bluegrace information and ensuring that non-Bluegrace proprietary information is used and disclosed only as authorized by the owner of the information or as otherwise permitted by law.
- ✓ I will observe fair dealing in all of my transactions and interactions.
- ✓ I will protect all company, customer and supplier assets and use them only for appropriate company approved activities.
- ✓ Without exception, I will comply with all applicable laws, rules and regulations.
- ✓ I will promptly report any illegal or unethical conduct to management or other appropriate authorities.

Every employee has the responsibility to ask questions, seek guidance and report suspected violations of this Code of Conduct. Retaliation against employees who come forward to raise genuine concerns will not be tolerated.