



Our Code of Business Conduct

Doing the right thing!

Your worldwide training partner of choice



Our Code of Business Conduct

Doing the right
thing!

At CAE, our short- and long-term success depends, in large part, on how each of us behaves.

Because it matters, we support each other in being:

- Fair, trustworthy and respectful
- Law-abiding, accountable and transparent
- A champion of integrity and of this Code of Business Conduct
- Courageous in promptly reporting violations

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Message from our CEO

If you're like me, you want to feel proud to tell people you work at CAE. Part of what fuels this pride is knowing that our words, decisions and actions are beyond reproach. This means holding ourselves and each other accountable to the highest standards of integrity, honesty and ethics. It also means having the wisdom and courage to do the right thing.

Our world may be increasingly complex, but the values and principles we uphold at CAE are straightforward and timeless. Old-fashioned principles like treating others as you would want to be treated. Abiding by the law. Competing fairly. And behaving honourably.

What we do, and how we do it, matters. It's at the heart of our reputation. An unethical means never justifies the end, no matter how advantageous the end goal may appear to be for you or CAE.

So please read this Code but don't stop there. Make sure you live it too! And when something doesn't quite feel right and you're still not sure what to do, don't agonize over it alone. Reach out. Talk to someone. And know that there'll be no punitive consequences for speaking up.

Remember, we are One CAE and, together, we are stronger. Let's support each other in always adhering to our value of integrity and standing up for what's right.

Because it matters.

Marc Parent
President and Chief Executive Officer

We are a **high-technology** company with a noble mission and vision focused on **safety**



Our mission

To lead at the frontier of digital immersion with high-tech training and operational support solutions to make the world a safer place.

Our vision

To be the worldwide partner of choice in civil aviation, defence and security, and healthcare by revolutionizing our customers' training and critical operations with digitally immersive solutions to elevate safety, efficiency and readiness.

Our values

Our five values are the essence of our identity. They bring our vision to life and define what we strive for. They guide our decisions and drive our culture’s evolution. A strong and healthy culture motivates employees and reassures stakeholders including our communities and investors.

One CAE

We’re proud to work as one passionate, boundaryless and inclusive team.

Empowerment

We give employees the freedom to succeed by enabling them to deliver, take initiative and make decisions.

Innovation

For us, innovation is not a department; it’s a state of mind.

Excellence

We aim to be the very best at every level of everything we do.

Integrity

We believe in clear, truthful communication.





About our Code of Business Conduct

Because it matters, we help each other work and live honourably by being role models of ethical decisions and behaviour.

Our success rises or falls with our ability to consistently meet the highest standards of ethical behaviour. That's why integrity is among our corporate values. Acting with integrity, honesty and respect are musts if, as employees, we want to thrive both personally and professionally.

This Code of Business Conduct spells out what to do when diverse situations arise that could put our own individual and/or CAE's ethics and integrity at risk. It lays out the behaviour we accept and expect from the Board of Directors and all employees of CAE Inc. and our wholly-owned and controlled subsidiaries. This includes any individuals seconded to joint-venture companies as well as all contractors, consultants and other business partners working on our behalf.

Our Code does not override the laws governing our business activities. We must always follow the letter and the spirit of the laws and regulations as applicable to our business and the countries in which we operate. However, when local laws or regulations permit something that is prohibited by the Code, then we must follow our Code. Our Code is also supplemented by corporate policies and procedures which generally provide more specific expectations, guidelines or requirements.

Who's in charge of ethics at CAE?

We all are.

While our Global Ethics and Compliance and Human Resources teams manage the Code, each of us is responsible for adhering to it and making sure others do as well. It's also our duty to speak up when we believe a breach has occurred or is about to occur

Our behaviour strongly influences the way other people act. So if one person does the right thing, others usually follow suit. Employees also take cues from management. That's why we expect all our executives and managers to be role models of impeccable ethics and integrity and ensure that the Code is actively distributed, understood and followed within their teams.



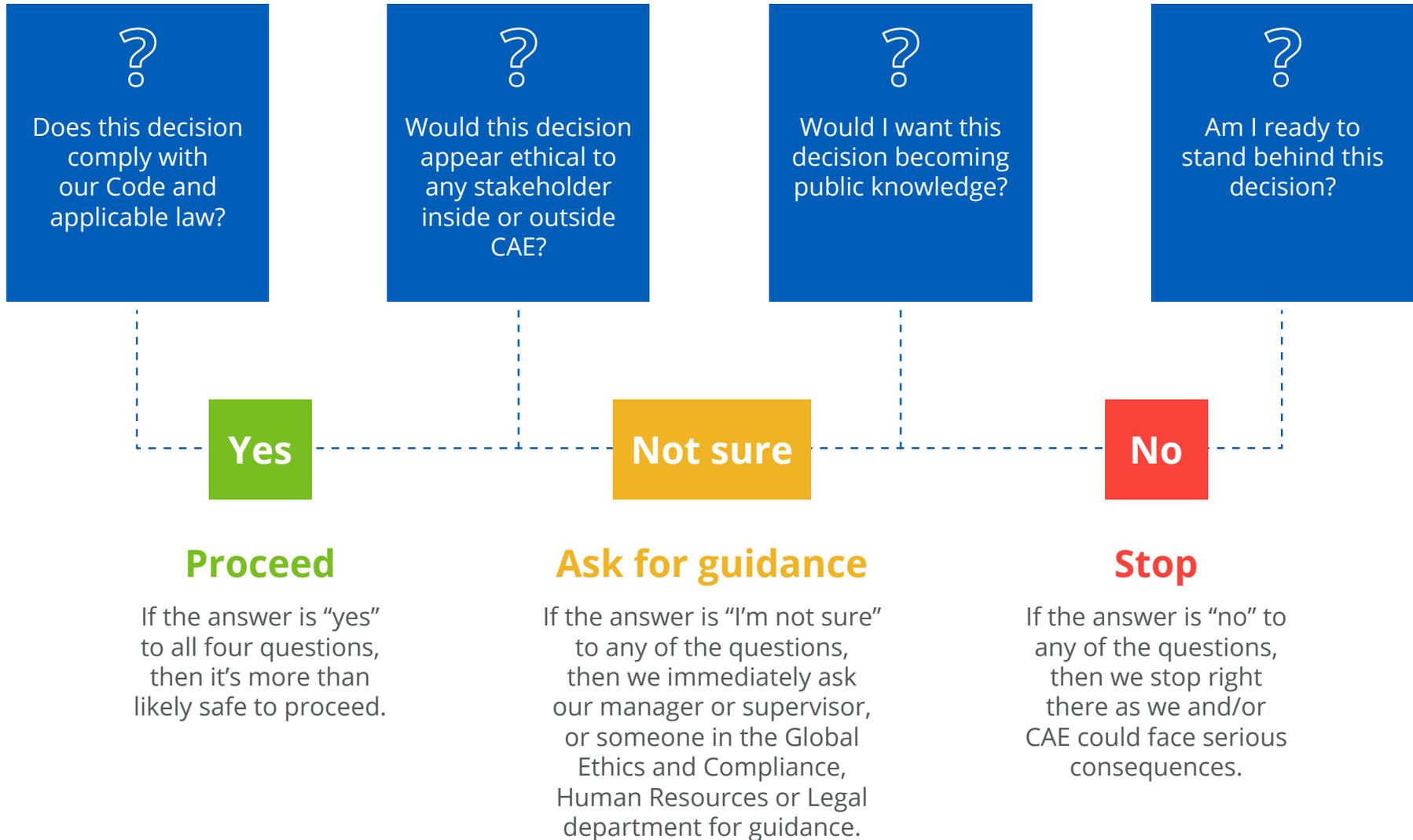
"When it comes to ethical behaviour, silence is never golden. I urge every employee to speak up when something doesn't feel right. If we all do this, we'll be able to continue attracting the best talent, offering industry-leading products and services and earning everyone's trust."

Marc Parent
President and Chief Executive Officer



When faced with an ethical issue

We ask ourselves four simple questions when facing an ethical grey zone:



Reporting a breach: It's our duty

At CAE, we have the courage to speak up.

If we truly believe that a violation of the Code has occurred or is about to occur, we have an obligation to disclose it, knowing that our confidentiality will be protected.

We can report a suspected violation or questionable conduct by:

- 
Telling our manager or supervisor
- 
Contacting the Global Ethics and Compliance Office or the Legal department
- 
Contacting the Global Human Resources department
- 
Making an anonymous report on the EthicsPoint system at www.ethicspoint.com or calling the EthicsPoint toll-free hotline at 1-866-294-9551

We protect your confidentiality.

When we receive information during an investigation, we treat it seriously, fairly and in strict confidentiality. We also take prompt action based on what we learn. Significant allegations are cascaded up to the CEO and the Board of Directors' Governance Committee.

We have zero tolerance for retaliation.

CAE does not tolerate retaliation against anyone who, in good faith, makes an inquiry, participates in an investigation or reports a misconduct. Any supervisor or manager who directly or indirectly intimidates or punishes an employee who reports a potential breach of the Code, is subject to disciplinary action up to and including dismissal.

 [To learn more, see "Internal Reporting/Whistleblowing" in our Corporate Policies and Procedures.](#)



"We won't tolerate any punitive action against anyone who, in good faith, asks a question or submits an allegation of non-compliance with our Code of Business Conduct."

Mark Hounsell
General Counsel, Chief Compliance Officer and Corporate Secretary

A woman with short dark hair, wearing a grey sleeveless top, is pointing her right index finger towards a large computer monitor. A man with short grey hair and glasses, wearing a blue and white striped shirt, is looking at the monitor. They are in an office environment with a window in the background showing a red sign with the word 'KIE' visible. A laptop is open in the foreground, and various office supplies like a keyboard and headphones are on the desk.

Playing fair

We know that playing fair is the only way to feel truly proud of our achievements.

- We have zero tolerance for bribery and corruption
- We value fair competition

We abide by all anti-corruption and anti-bribery laws everywhere we operate. This is non-negotiable.

Offering or receiving any kind of bribe may cost us our job, a large fine and even jail time.



May I accept a business meal from a supplier?

Bribes and other improper payments

Whether it involves a customer, supplier or anyone else, including another CAE employee, we never offer or take any kind of improper payment to get or keep business or in exchange for favourable treatment. This includes direct or indirect payments to a relative, government official, agent, consultant, business partner or employee of another company. This also includes small and unofficial payments made to anyone to secure or expedite the performance of a routine or necessary action (also called “facilitation” or “grease” payments).

Even in countries where bribes, kickbacks, facilitation payments or commissions are an accepted way of doing business, we refuse to play this game. This means we only work with business partners who are known for their integrity and we immediately report any sign of commercial corruption or bribery.

 [To learn more, see “Anti-Corruption” in our Corporate Policies and Procedures. Our Anti-Corruption Policy is also publicly available on CAE’s website.](#)





We contact the Global Ethics and Compliance Office if we're not sure whether a gift or entertainment could be construed as a bribe in a particular country.



I received a gift from a customer that I know I can't accept. What should I do?

We speak with our supervisor if we think we might have a conflict of interest at work.



We just hired an employee who very recently worked for a CAE competitor. May I ask the employee for information about our competitor?

Business courtesies

We always use sound judgement and the utmost caution when giving or receiving business courtesies. We only use gifts, meals, entertainment, travel and lodging to build relationships and goodwill; never to influence decisions or gain an unfair advantage.

We ensure that any courtesy-related expense is reasonable and transparent. A lavish gift or hospitality could easily be interpreted as giving or taking a bribe. We also make sure that we understand the local laws and customs, which can be even stricter than in our native country.



[To learn more, see "Gifts, Entertainment and Business Courtesies" in our Corporate Policies and Procedures or refer to CAE's website](#)

Conflicts of interest

Conflicts of interest can occur any time our financial interests or personal relationships influence the decisions we make on the job. There are many situations that could potentially generate a conflict of interest, for example:

- Owning or having a substantial interest in a company that is a CAE customer, competitor or supplier
- Doing business with a company owned or controlled by a CAE employee or their family
- Family relationships with persons employed by a CAE supplier or competitor
- Accepting business courtesies from those seeking to do business with CAE
- Outside business interests that interfere with our responsibilities at CAE
- Using CAE assets for personal gain
- Having a close or personal relationship with a subordinate employee

We also avoid conflicts of interest in connection with employing or acquiring the services of current or former government employees, which includes military personnel. Please consult the Global Ethics and Compliance Office or the Legal department for guidance.

It's crucial to avoid even the appearance of a conflict between our personal interests and those of CAE. That's why we promptly discuss a potential conflict of interest with our supervisor and, together, find a solution that resolves the situation.



It's against the law to fix prices or allocate customers or sales territories with our competitors.



I ran into an old college friend at a trade show who works for one of our competitors. She asked me how business was going. What should I do?

Unfair competition

We comply with all laws governing competition everywhere we operate. This means we avoid all agreements with competitors on prices, terms of sale, bid rigging and boycotts. We also never discuss sensitive or proprietary information with them regarding our prices, profits, terms of sale, costs, production capacity, strategies, procurement or goods and services to be produced or sold.

We ensure that our dealings with customers, suppliers and competitors are fair, honest and transparent. We never coerce or strong-arm anyone into doing anything. We also respect our customers and suppliers' freedom to conduct business as they see fit.

We always make sure that we understand the local competition laws before doing anything that might restrict or hamper fair competition.

Fraud and deception

We do not seek to gain an advantage of any kind by acting fraudulently, deceiving people, making false claims or allowing anyone representing CAE to do so. This includes defrauding or stealing and any kind of misappropriation of property or information.

These actions not only violate policy, but also may be illegal:

- Mischarging or falsifying timekeeping records
- Incorrectly charging an account or cost objective
- Approving improper charges
- Transferring costs to improper accounts

Trading on or 'tipping' inside information to others may cost us our job, a large fine and even jail time.



My family and friends often ask me about CAE and whether they should buy stock. I usually tell them what I know about our business and suggest they buy stock. Is this okay?

Insider trading

We never use or disclose inside (non-public) information for personal gain or to benefit another person or company. Passing on inside information, or trading in or recommending the purchase or sale of CAE or other company securities based on this information, is both illegal and in violation of our policy.

Examples of material inside information include potential acquisitions or divestments, internal financial information, major product developments, winning or losing a significant contract, or any important financing transaction related to CAE, its suppliers and customers.

We wait for full public disclosure of this information before sharing it. Information is considered public when it has been officially and broadly disseminated and investors have had sufficient time (usually two business days) to evaluate it.

 [To learn more, see "Insider Trading" in our Corporate Policies and Procedures.](#)

Political donations

None of our companies makes donations to political parties, politicians or political candidates, unless approved by Public Affairs and Global Communications and compliant with applicable legislation. As employees, we're free to pursue political affiliations and activities as long as we do so on our own time and refrain from using company assets for such activities.

 [To learn more, see "Charitable Donations and Sponsorships" and "Lobbying and Political Contributions" in our Corporate Policies and Procedures.](#)





Respecting each other

We know that everyone's dignity
and empowerment matter too.

- We have zero tolerance for
Discrimination
- We have zero tolerance for
Harassment
- We respect Human Rights

Our beliefs, assumptions, words and actions impact our coworkers and, ultimately, shape our culture. Each of us has a role to play in making CAE a dignified and harassment-free place for all to work. That's why we consistently treat each other with respect and vigorously oppose any form of discrimination or harassment.

Equal opportunity

At CAE, our goal is to be an employer of choice. Through our employment policies and practices, we seek to recruit, develop, reward and retain employees based on merit, ability and performance. Discrimination, intimidation or harassment based on any personal trait (such as race, religion, colour, ethnicity, national origin, disability, sexual orientation, gender, gender identity, sexual expression or marital status) is not tolerated. Neither is any political coercion or bullying.

Harassment

Empowerment is one of our core values. All forms of violence or harassment, whether physical, sexual or psychological, seek to disempower people and are not tolerated at CAE. We're committed to ensuring that our employees, consultants, suppliers and customers feel safe, respected and valued.

Sexual harassment

Every allegation of sexual harassment is treated with seriousness, sensitivity and confidentiality. If we believe that we're being sexually harassed at work, Human Resources can guide us on how to proceed.

When necessary, CAE calls on the Global Ethics and Compliance Office or the Legal department and outside lawyers to help investigate allegations of human rights violations including harassment of any kind. If the allegations are found to be true, the individuals involved face disciplinary action up to and including dismissal.

Human rights

We conduct our business in a way that respects human rights in every jurisdiction in which we operate by treating our employees, and people working for our suppliers, with dignity and promoting fair employment practices. This includes:

- Providing fair and competitive wages
- Prohibiting use of child, or forced, bonded or indentured labor
- Not engaging in trafficking of persons for any purpose
- Fostering a diverse and inclusive work environment
- Respecting the right of employees to exercise their right of free association



[To learn more, see "Human Rights" and "Harassment" in our Corporate Policies and Procedures.](#)

Did you know that...

CAE defines sexual harassment as any kind of physical contact, remarks, insults, jokes and comments of a sexual nature; unsolicited demands for sexual favours; or any intimidation, reprisal, unjust treatment, denial of promotion or dismissal resulting from a refusal to grant these favours.





Ensuring a safe workplace

- We keep each other safe.
- We maintain a safe and healthy work environment

People need to be safe to contribute to their full potential. At CAE, ensuring the safety of everyone who steps onto any of our premises is a top priority.

We don't work under the influence of alcohol or controlled drugs, or bring these substances into the workplace or onto customer sites. The same goes for firearms. And if we smoke cigarettes or vaporizers and municipal laws prohibit smoking at work and in public places, we smoke on our break outside the building.

Occupational health and safety

To sustain our success, excellence in health and safety is a must. Across CAE, we implement industry-leading health and safety practices and comply with all related regulations. We're also committed to continuous improvement.

As CAE employees, we:

- Understand and adhere to all health and safety policies, procedures and practices including the use of personal protective equipment as required
- Take responsibility for our own safety and that of our coworkers
- Actively participate in all health and safety training activities
- Identify and communicate workplace hazards and takes steps to address them



[To learn more, see "Global Environment, Health & Safety" in our Corporate Policies and Procedures.](#)



A photograph of two women in professional attire sitting at a desk and looking at a laptop. The woman on the left has brown hair and is wearing a black blazer and a necklace. The woman on the right has short reddish hair and is wearing a black blazer over a white patterned top. They are both smiling. A yellow rectangular box is overlaid on the bottom left of the image, containing the text 'Communicating with external stakeholders'.

**Communicating
with external
stakeholders**



Because it's so easily tarnished, a company's reputation needs to be carefully preserved. That's why, unless it's part of our job, we need permission from Public Affairs and Global Communications before making public statements or speaking to the media on behalf of CAE. And if we're presenting views that don't reflect CAE's position, we need to explain that we're expressing a personal opinion.

 [To learn more, see "Disclosure" and "CAE Employee Social Media" in our Corporate Policies and Procedures.](#)



Taking care of the environment

We uphold CAE's commitment
to actively protecting the
environment.



Our global policies and procedures reflect a strong commitment to go beyond what environmental laws require. We actively seek to minimize waste, emissions and hazardous materials, and take proactive actions to ensure a sustainable future for following generations. We help identify and implement pollution prevention practices to safeguard the communities where we do business as well as our own health and safety.

 [To learn more, see “Global Environment, Health & Safety” in our Corporate Policies and Procedures.](#)



Helping keep the skies safe

We work together to ensure the safety of the globe's pilots, crews, passengers and airspace.



At CAE, we strive to achieve the highest levels of safety for all our stakeholders. We do this by working together to ensure that we meet global regulations/standards and client safety requirements. We continuously assess the safety performance of our own activities. We also actively support our Just Culture initiative, which encourages the open, honest and early reporting of safety issues by all stakeholders.

Through our hazard identification, risk assessment, safety reporting and incident investigation processes, we help identify and resolve hazards, broadly share safety-related information in a timely manner, and continuously improve our policies, procedures and Safety Management System.



Working with governments

We deal honestly and
transparently with governments
around the world.

Government contracts

We and/or CAE could be civilly or criminally liable if we deliver an intentionally false, incomplete or misleading proposal, quote or document to a government customer. That's why, as a supplier or subcontractor, it's important to follow all government contract and procurement rules and requirements.

Government inquiries

Sometimes a government official will make a request that goes beyond standard practices and procedures. When a government official requests an interview, seeks information or access to a file, or asks a non-routine question, we contact our supervisor who, in turn, consults with the Public Affairs and Global Communications, the Legal department or the Global Ethics and Compliance Office.

Classified government information

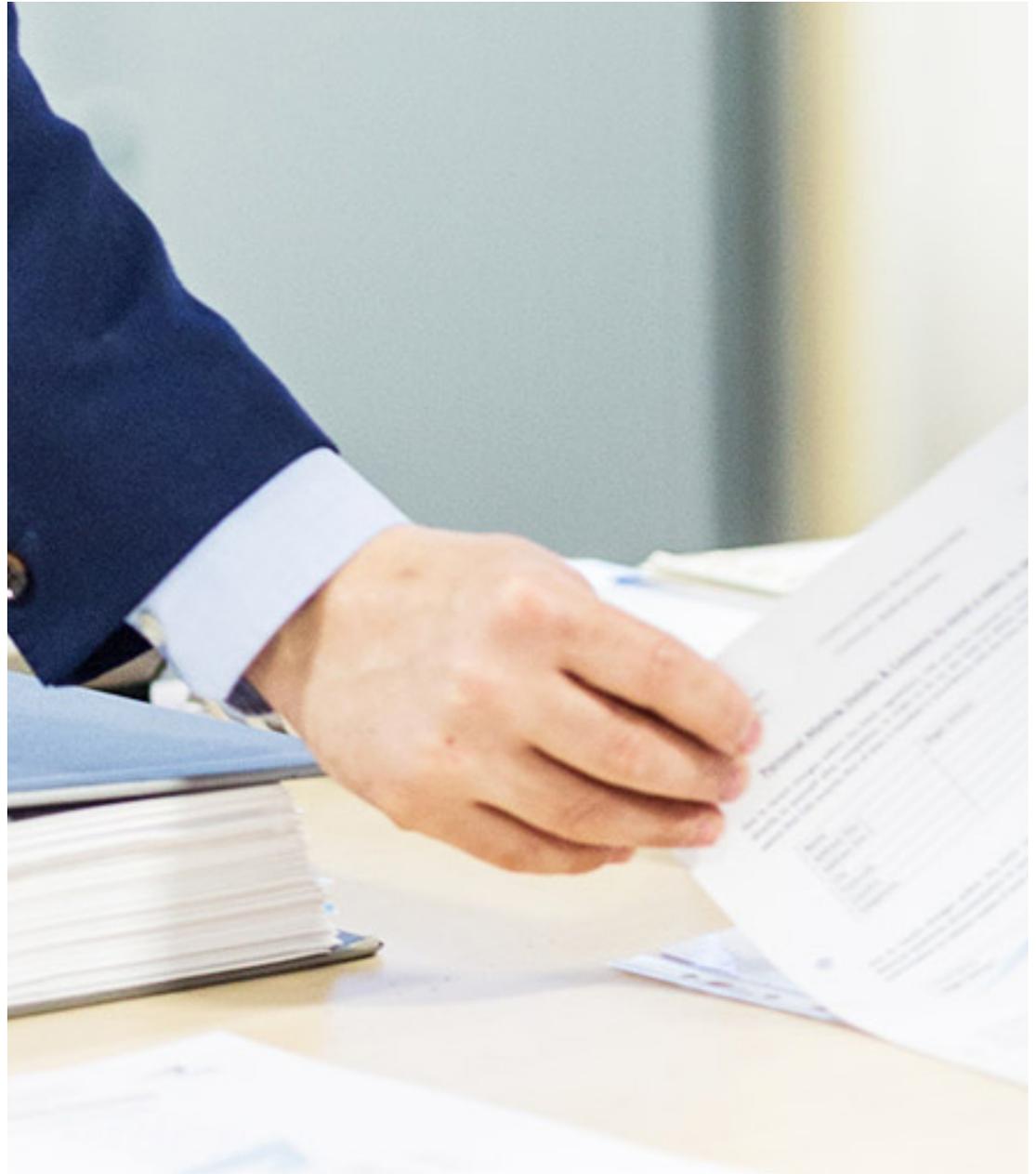
If our security clearance gives us access to classified information, we make sure we comply with all applicable regulations and procedures when handling this information. We never access, accept or keep any classified information unless we have the appropriate clearance and need the information to do our job. Our Security Officer knows which documents are or should be restricted or classified.

Lobbying

All communications and business relationships with government officials must comply with our Code, our Anti-Corruption Policy, the Gift, Entertainment and Business Courtesies Policy and all applicable legal, regulatory and policy requirements.



Who are government officials?





Protecting our intellectual property

We treat intellectual property
with the importance it deserves.



Like many of our customers and suppliers, we invest heavily to develop intellectual property (IP), including, among other things, patents, designs, copyrights, trademarks, trade secrets and know-how, whether registered or not.

A company's IP is an extremely valuable business asset and major competitive advantage. Negligent handling of this property can cause irreparable damage to a business's competitiveness and stakeholder relationships and trust.

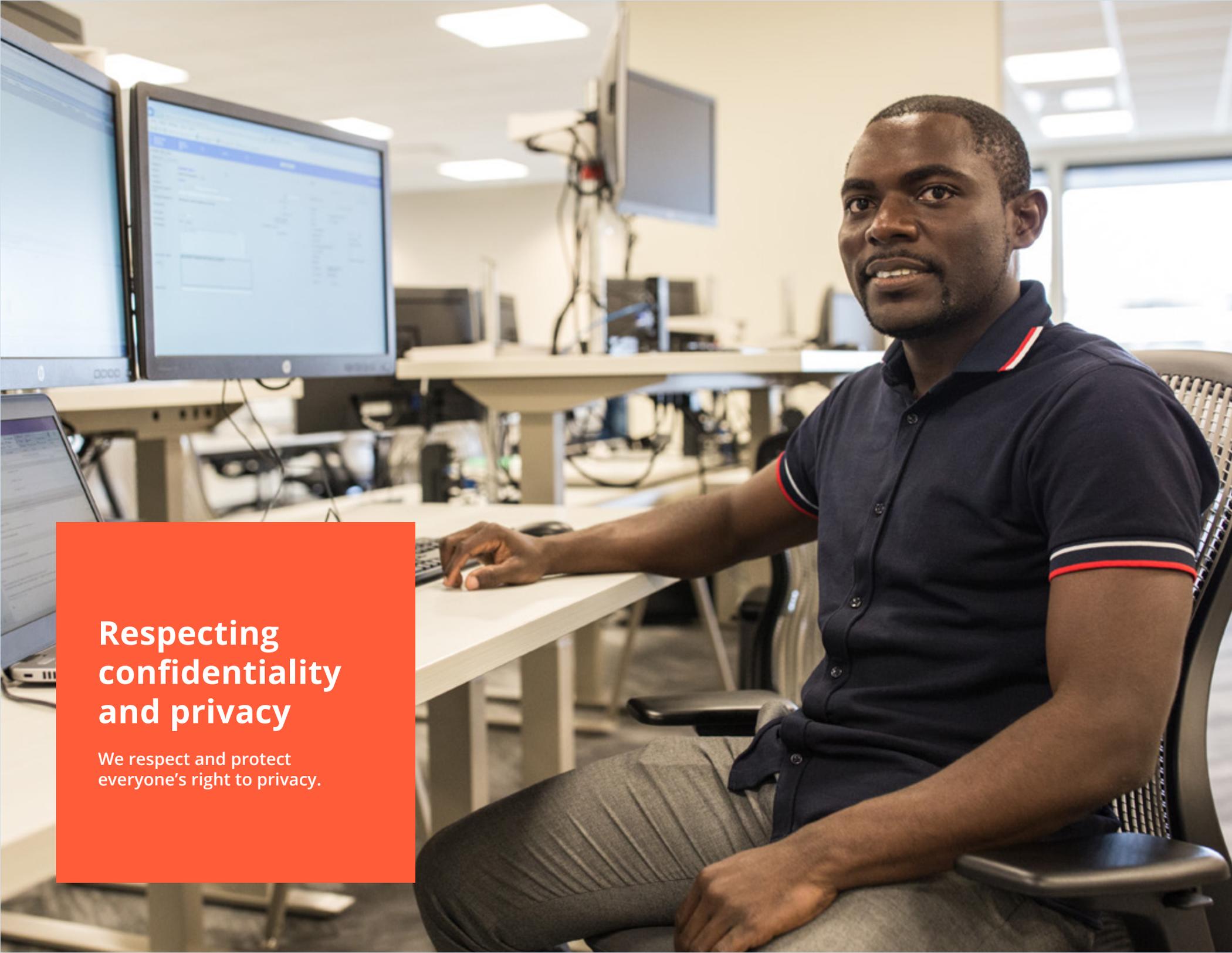
When hired at CAE, we sign agreements specifying that anything we create within the scope of our work or related to the company's business belongs to CAE.

We diligently protect CAE's IP by complying with the company's IP Policy and guidelines, including those relating to branding and open source software, among others.

We disclose CAE's IP only to our coworkers with a need to know for their job, or when we have the proper agreements in place. We protect third-parties' IP by respecting the terms of all agreements we have with them. We also agree not to misappropriate any third-party trade secrets.

We report a breach of CAE's IP-related policies and guidelines in the same way that we report any breach of this Code. We also promptly report a third-party's unauthorized use of CAE's IP to the Legal department.

 [To learn more, see our Intellectual Property Policy.](#)

A man with short dark hair and a goatee, wearing a dark blue polo shirt with red and white stripes on the collar and sleeves, is sitting in a black office chair at a white desk. He is looking towards the camera with a slight smile. His right hand is on a computer mouse. In the background, there are several computer workstations with multiple monitors. The room is brightly lit with overhead fluorescent lights. A large orange rectangular box is overlaid on the bottom left of the image, containing white text.

Respecting confidentiality and privacy

We respect and protect
everyone's right to privacy.

While our internal email and voicemail are secure, we know that some countries' phone and email/data systems are routinely monitored for business-sensitive information.

We protect confidential information.

The protection of confidential information is extremely important at CAE, regardless of whether it is personal or corporate. We don't use, reproduce or transmit confidential information to anyone without an explicit right to do so. We maintain this confidentiality even when we no longer work for CAE.

Confidential information includes intellectual property and personal information, in any form, regarding CAE, its employees, customers, subcontractors, suppliers, business partners, competitors as well as potential, acquisitions or divestments, in our possession or received from these parties.

We carefully control access to all confidential and private information when we work at or out of the office, even when working from our home office. We don't discuss it in public places or with anyone other than colleagues who need to know this information to do their jobs and in compliance with our agreements. This means that we don't share confidential information with family members, our loved ones and/or friends. When we transmit confidential information to others, we do so only via secured media and as authorized by CAE policies. We get permission from its owner before taking third-party confidential information off CAE premises and we follow CAE security requirements for disposing of it.

We also immediately return all information in compliance with agreements or when we stop working at CAE for any reason.

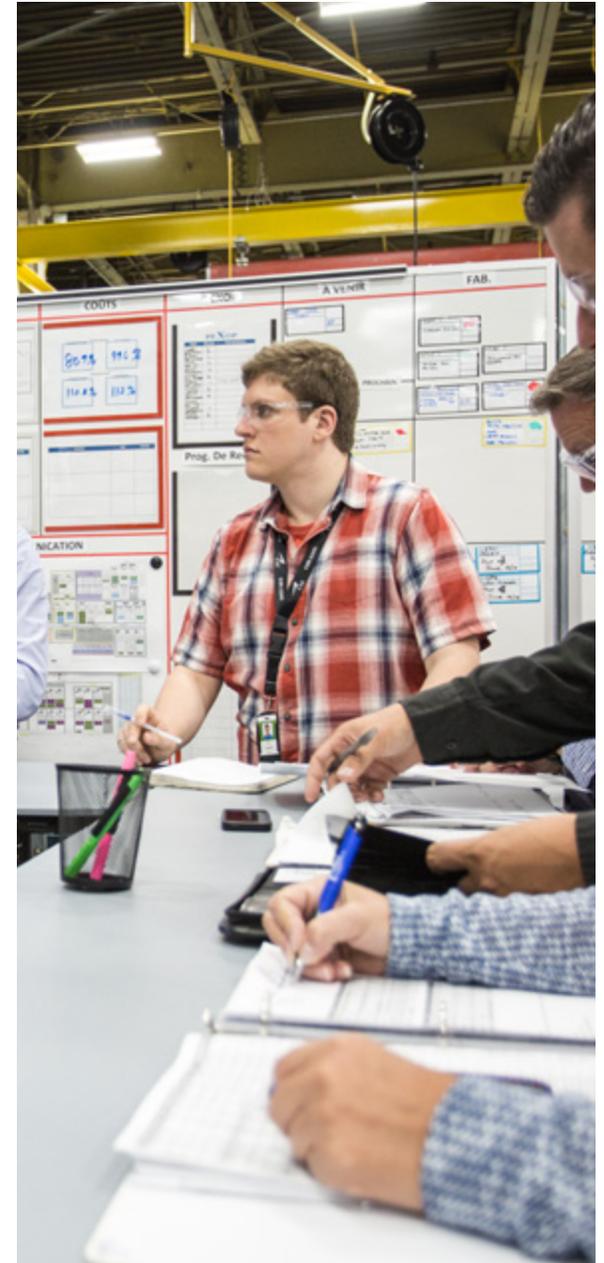
If we improperly use or disclose an employee's personal information, CAE could face fines and sanctions and we could face disciplinary measures including dismissal.

We respect privacy.

We only use legal and ethical means to gather personal information on employees, customers, suppliers, partners and competitors. We process personal information for specific legitimate purposes only and we do so in a manner that is transparent. We also only process the amount of personal information that is necessary to fulfil the purpose for which it was originally collected, and we keep it secured and confidential in compliance with CAE policies. We keep personal information for only as long as we legitimately need it and we delete it thereafter as required by law.

When we disclose this information to other employees or third parties without authorization, we risk disciplinary sanctions up to and including the loss of our job.

 [To learn more, see "Global Privacy" in our Corporate Policies and Procedures.](#)



A photograph showing two individuals, a woman on the left and a man on the right, focused on working with a medical training simulator. The woman has blonde hair tied back and is wearing a pink cardigan over a black patterned top. The man has dark hair tied back and is wearing a grey and white zip-up hoodie. They are in a clinical or laboratory environment with various pieces of equipment visible in the background. The simulator is a large, tan-colored mannequin lying on a blue surface, with its torso open to reveal internal mechanical components. The man is holding a detached part of the simulator, possibly a head or chest component, while the woman looks on. A purple rectangular box is overlaid on the lower-left portion of the image, containing white text.

**Using CAE
property
responsibly**

CAE's property matters.



Each of us is responsible for safeguarding the CAE assets under our control from harm, loss, misuse or theft, whether we are at or outside CAE's premises. These assets include money, physical and intellectual property, technology and all business- and customer-related information and data. With our supervisor's permission, we can take CAE assets off the premises to do our work; however, we follow all security policies and procedures to ensure these assets' safety.

Computer systems

When using CAE computer systems, we:

- Only use authorized computer programs and software
- Adhere to all vendor and third-party licensing, confidentiality and registration requirements
- Comply with computer backup and virus protection requirements
- Safeguard all access identifiers
- Report system or security protection deficiencies
- Maintain the confidentiality of CAE system and security protection processes and procedures

We also keep all documents, information and contracts in the CAE network server to avoid losing documents and to facilitate access by authorized CAE colleagues.

We also ensure to use, store and protect confidential information (including personal information, personal data, export control information, CAE proprietary information and third-party proprietary information) in accordance with applicable requirements and CAE policies and guidelines.



What are some examples of social media use that violate our policies?

Internet, intranet and email

Whether we work at or outside of CAE, including when working from home, we use the internet, intranet and email primarily for business-related purposes. We may occasionally use the internet for non-business research or browsing as long as it's on our own time and doesn't affect our productivity or CAE's reputation. We never use our CAE email to create a personal social media account or for personal reasons that may contradict CAE policies. We also comply with all CAE policies and applicable laws covering intellectual property, privacy, human rights, defamation, pornography and unfair competition.

We must always use CAE's information technology responsibly. We acknowledge that CAE owns and has the right to monitor, review, intercept, access, modify, delete or disclose all electronic files and records on its systems and servers.

We also recognize that CAE computers and cell phones, as well as any authorized personal cell phone, IPAD or other device, may be audited by CAE or a third party to ensure the protection of confidential information or as part of a litigation process or court order.



[To learn more, see "Information Technology" and "CAE Employee Social Media" in our Corporate Policies and Procedures.](#)

Responsible use of AI and data analytics

As a high technology company, CAE makes use of digital technologies to process large amounts of data using big data, AI and machine learning for analytics purposes. While digital technologies and services stimulate innovation and generate new opportunities for CAE, they also present emerging data risks. That's why we need to adhere to high ethical standards when developing, procuring, deploying or making use of AI systems or other new digital technologies for the purpose of analytics.

As a rapidly evolving discipline, there may be risks that must be considered and addressed in the design and implementation of future initiatives involving big data, AI systems and machine learning. Please consult the Global Ethics and Compliance Office for additional guidance.



To learn more, see "CAE's Ethical principles for the use of data".





Because it matters, we make sure our decisions and actions are beyond reproach.



For all export control issues, we either check our Global Export Compliancy Policy or the applicable national policy, or speak with our Security Officer.

Complying with import/export controls and economic sanctions

It's our responsibility to know the laws and customs of the regions in which we're operating. This includes applicable laws, regulations and directives, including economic sanctions and embargoes, governing the export and transfer of parts, components, and technical data and services.

Given that international transactions can be complex, our Export Controls group is there to help us with these dealings. Certain transactions, including those involving defence equipment, services and technical data, may require approval from the Canadian and/or foreign government. Our Export experts can help us determine whether a specific transaction needs these approvals.

Keeping contracts and records in order

We also promptly and accurately enter all business transactions in our books and business records. We also ensure that any contract involving CAE is in writing and executed by all parties to it. Only our Legal department can authorize side or comfort letters that aren't part of the contract.

Improper charges on government and customer contracts can result in civil and criminal liability for CAE and any employee involved. The same goes for our financial statements. It's the responsibility of employees preparing these statements to ensure that all information is accurate and not misleading.

 [To learn more, see "Contracts and Commitments", "Anti-Corruption" and "Gifts, Entertainment and Business Courtesies" in our Corporate Policies and Procedures.](#)

A woman with curly brown hair is talking on a silver mobile phone. She is wearing a white lace top and a necklace with blue beads. Another person with long brown hair is partially visible on the right side of the frame. The background is a blurred indoor setting with red walls.

Getting help interpreting the Code

Because it matters, we take the time to make sure we fully understand this Code.

When we aren't sure about something in the Code, we reach out to people who can help us understand and interpret the Code. Here's a summary of the main contacts who can assist us:



Conflicts of interest

- Supervisor
- Global Ethics and Compliance Office
- Human Resources representative
- Legal department



Employee issues

- Human Resources representative
- Global Ethics and Compliance Office



Insider trading

- General Counsel



What should I do if my manager asks me to perform a task that I believe might violate our Code or a law?



Legal matters

- Legal department



Media inquiries

- Public Affairs and Global Communications department



Suspected breach of the Code

- Supervisor
- Human Resources department
- Global Ethics and Compliance Office

