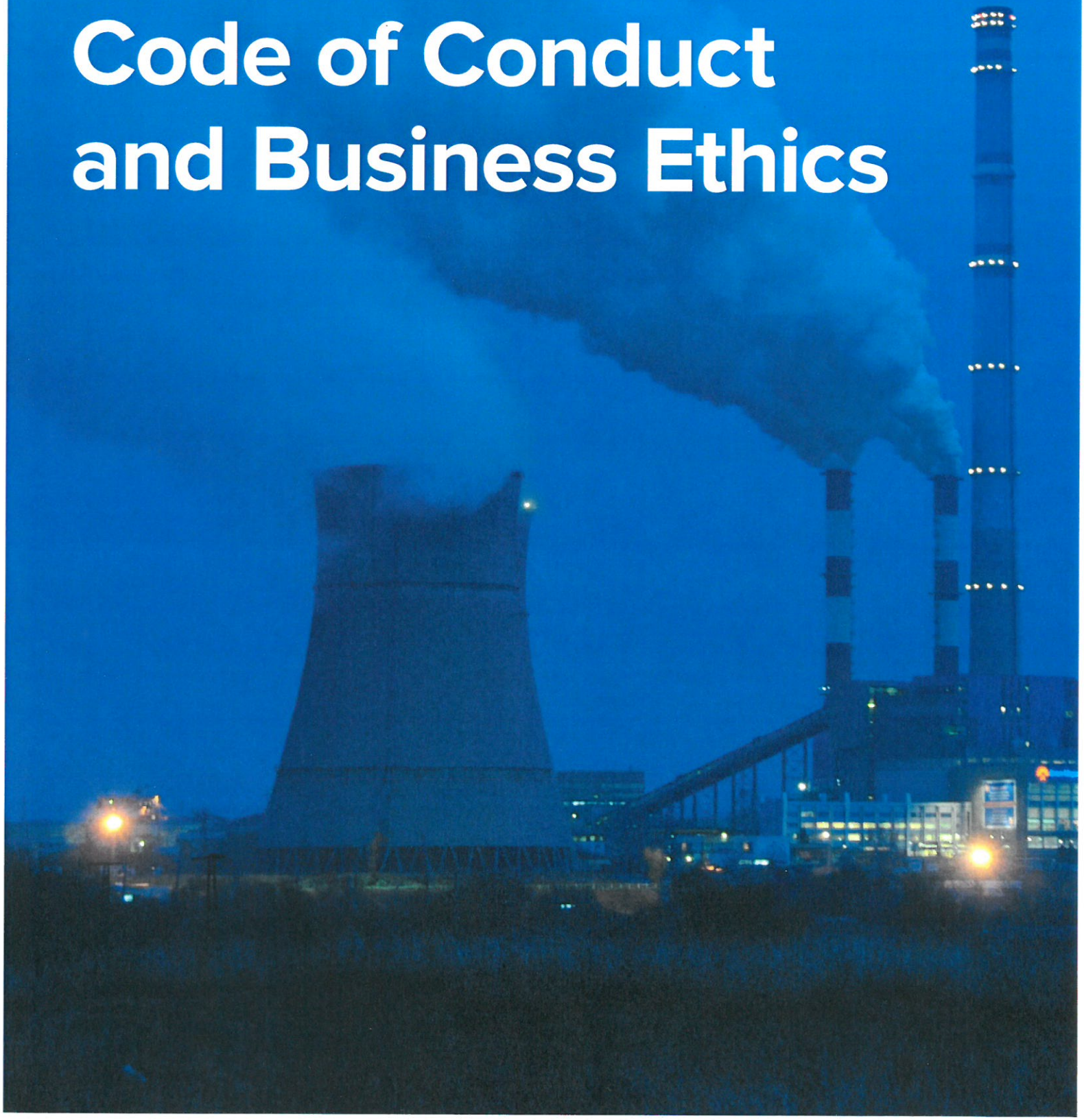
CONTOURGLOBAL

Code of Conduct and Business Ethics



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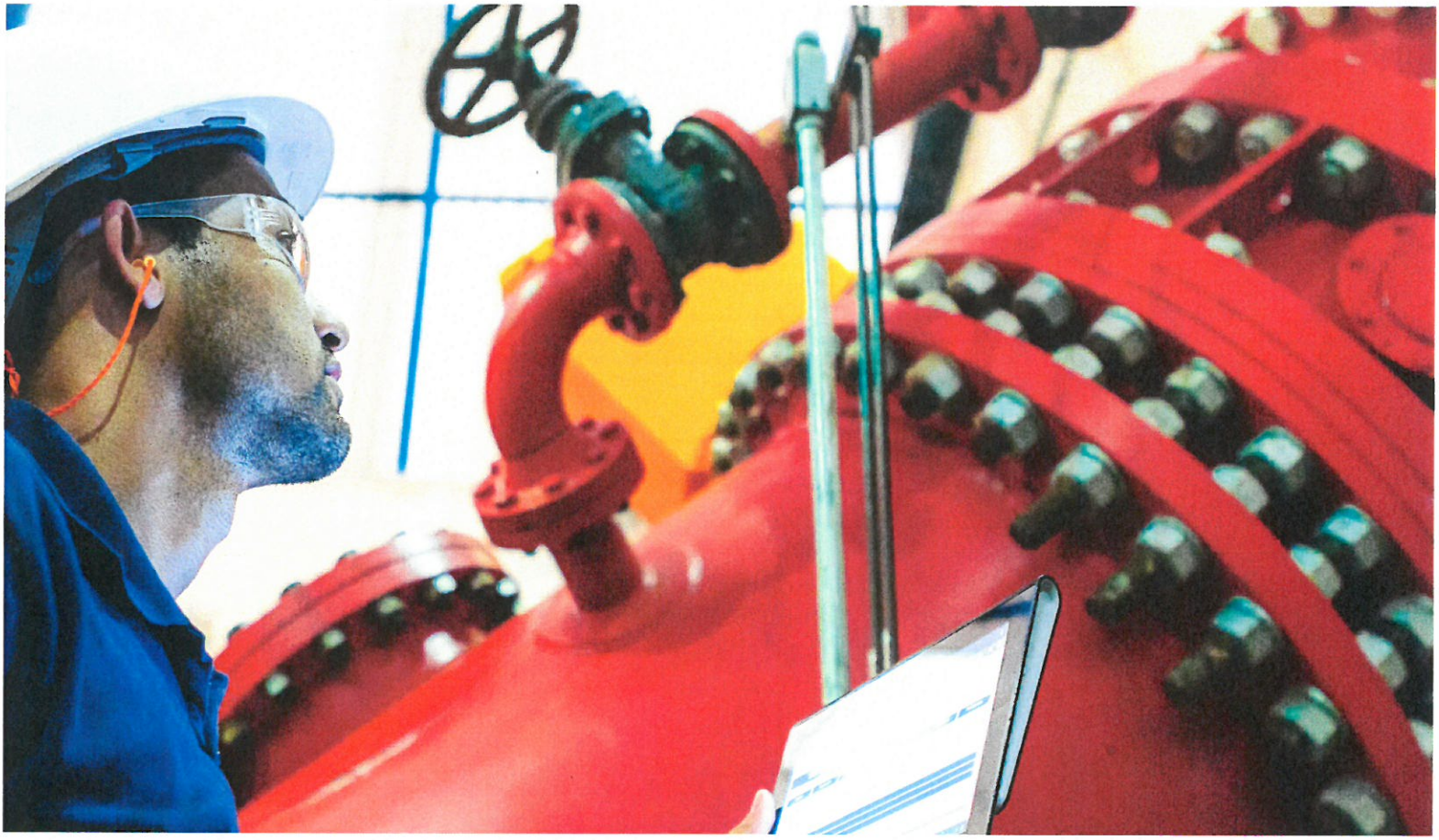
THE CODE OF CONDUCT IS INTENDED TO SERVE AS YOUR RESOURCE.

Message From the CEO

Our values are important to us and form the basis for how we work as an organization. ContourGlobal is an organization committed to conducting business responsibly and with the highest levels of integrity. Whether generating electricity in underserved markets or developing sophisticated technologies in Europe, the manner in which we grow and conduct our business matters as much as the number of megawatts we generate or the revenues that we produce. Responsible business operations require consistently playing by the rules, and we expect everyone at ContourGlobal L.P. and its subsidiaries (collectively, the "Company") to behave legally and ethically at all times.

To help put these values into practice, we have adopted this Code of Conduct and Business Ethics ("Code of Conduct" or "Code"). The Code sets out our expectations of you and will serve as a roadmap to help you act responsibly and ethically in the performance of your responsibilities. The Code applies to all representatives of the Company, including directors, officers and employees, temporary employees and all others who represent us, directly or indirectly.



We believe that adhering to the letter and spirit of our Code will allow us to continue to succeed and to take pride in our collective achievements. It is your responsibility to read and understand the Code and commit to implementing its principles in all of your actions and activities on behalf of the Company.

The Company is committed to transparency and an environment where employees can communicate openly. We want you to feel comfortable in approaching your supervisor or management in instances where you believe violations of policies, standards or laws may have occurred. If in the course of your duties for the Company you become aware of a potentially unsafe, unethical or illegal situation, please report it immediately to your supervisor, the Legal function ("Legal"), the Compliance function ("Compliance"), or anonymously using the Company's EthicsLine reporting mechanism. The Company will not tolerate retaliation against employees who, in good faith, report a concern. Note that the expectation of reporting under this Code is subject to any local law requirements that may restrict reporting, including anonymous reporting or through a confidential reporting mechanism, under certain circumstances.

The Code of Conduct is intended to serve as your resource. Please keep it accessible, refer to it often, and reach out to your supervisor, Legal, or Compliance if you have any questions or would like individualized guidance.

Joseph C. Brandt

Joseph C. Brandt
ContourGlobal President and Chief Executive Officer

Introduction

PURPOSE

Consistent with our sustainability principles and membership in the UN Global Compact, our Code of Conduct describes how we should conduct our activities in accordance with the highest standards of integrity. This means our standards will always meet, and may exceed, those required by standard commercial practice or applicable laws. This Code applies to everyone at all levels of the Company, including officers, directors, employees, temporary employees and all others who represent us, directly or indirectly. We believe that by adhering to these standards, we will fulfill our commitment to our sustainability principles and maintain an ethical, healthy, and safe workplace that is free from discrimination, harassment, or illegal activities. If you have a leadership role within the Company, you have the responsibility not only to abide by the Code in your own actions, but to promote compliance and ethics by example and to foster an environment where employees feel comfortable asking questions and reporting issues.

REPORTING VIOLATIONS OF THE CODE

All persons subject to the Code have an obligation to report any known or suspected violation of this Code, other Company policies, or applicable laws, subject to local law. By asking questions and raising concerns, we protect ourselves, our coworkers, and the Company. If you know of or suspect a violation of our Code of Conduct - whether it relates to you, your manager, or anyone else - you should immediately report it. In many if not most instances, you may report the issue to your manager, and he or she will work with you to respond to your concerns and advise you of any next steps. If you do not feel comfortable discussing the issue with your manager or would like to contact someone outside your team, you may report the issue to Legal or Compliance or to any member of the Company's senior management. Any reports of known or suspected violations of the law, this Code of Conduct, or any Company policy will be handled sensitively and discreetly. We will protect the confidentiality of your complaint to the greatest extent possible.

If you wish to report an issue on an anonymous basis, you may do so via the Company's EthicsLine, which is hosted by EthicsPoint, an independent third-party provider, and available at www.contourglobalethicsline.com. If you choose to report a matter using the EthicsLine, the information you provide to EthicsPoint will shared with Legal and Compliance on a completely confidential basis. All claims or reports received will be reviewed and the appropriate follow up conducted. The confidentiality of your complaint will be maintained to the greatest extent possible.

POLICY AGAINST RETALIATION

If you report a known or suspected violation of our Code of Conduct or applicable laws or regulations, you should know that you are doing so without fear of dismissal or retaliation of any kind, provided you have done so in good faith. Reporting in "good faith" means accurately providing information that you believe to be true, including contextual information of which you are aware and that is necessary to evaluate the reported conduct.

Claims of retaliation are taken seriously and will not be tolerated. Retaliation means any direct or indirect adverse action taken against someone for raising a concern or reporting misconduct in good faith. Legal or Compliance will look into all allegations of retaliation and appropriate action will be taken. Anyone that is found responsible for retaliating against an employee may be subject to appropriate disciplinary action, up to and including termination of employment.

ADDRESSING VIOLATIONS OF THIS CODE

If you violate the Code, the Company may take disciplinary action against you and any other employees that are involved. Depending on the nature and seriousness of the infraction, this may include termination of employment and reporting a legal violation to the appropriate authorities. The Company will consider the facts and circumstances of each particular situation to ensure the process is fair, as well as abide by all processes required by local law. You will be given an adequate opportunity to present your version of the events prior to any determination of appropriate disciplinary action.

ALWAYS REMEMBER TO USE GOOD JUDGMENT AND DO THE RIGHT THING.

WAIVERS OF THE CODE

In situations where you may have violated the Code but did so unintentionally or without bad faith, the Company may decide to forego disciplinary action. We realize that mistakes can happen and we want to encourage you to take responsibility for your actions in these situations by self-reporting to your supervisor, Legal, Compliance, or a member of the Company's senior management.

We realize that mistakes can happen and we want to encourage you to take responsibility for your actions.

SEEKING HELP AND INFORMATION

The Code of Conduct is not intended to be a comprehensive rulebook and cannot address every situation that you may face. Always remember to use good judgment and do the right thing. If you feel uncomfortable about a situation, feel that you have been treated unfairly, or have any doubts about whether circumstances are consistent with the Company's ethical standards, seek help—**when in doubt, reach out!**

We encourage you to contact your manager for help first. If he or she cannot answer your question or if you prefer to discuss the matter with someone outside your team, you may always contact Legal or Compliance.

Conflicts of Interest

IDENTIFYING POTENTIAL CONFLICTS OF INTEREST

As an employee, you must not allow any outside personal interests to influence your ability to act in the best interests of the Company or make it difficult to perform your work objectively and effectively.

Conflicts of interest often arise when you have a relationship with a Company customer, client, service provider, supplier, or competitor. Sometimes, activities of family members or relatives can also cause conflicts. A "customer" or "client" is broadly defined so this might include any person, group, legal entity, or governmental body with whom the Company does business. If you are uncertain whether a person or a company is a customer, supplier or competitor, please ask your manager, Legal, and/or Compliance. To avoid damage to both you and the Company, you must avoid any activity that involves even the appearance of a conflict of interest.

The following list provides some examples of potential conflicts of interest:

Outside Employment. You should not be employed by, serve as a director of, or provide any services to an entity that is a customer, client, supplier, or competitor of the Company.

Improper Personal Benefits. You should not obtain any personal benefits or favors because of your position with the Company unless it is in line with the Company's Gifts and Hospitality Policy.

Financial Interests. You should not hold a significant financial interest (ownership or otherwise) in any entity that is a customer, client, supplier, or competitor of the Company. A "significant financial interest" means ownership of greater than 1% of the equity of such entity.

Loans or Other Financial Transactions. You should not obtain loans or guarantees of personal obligations from, or enter into any other personal financial transaction with, any entity that is a customer, client, service provider, supplier, or competitor of the Company. This guideline does not prohibit arms-length transactions with banks, brokerage firms, or other financial institutions, provided the same individual within the financial institution does not handle both Company and personal matters.

Service on Boards and Committees. You should not serve on a board of directors or trustees or on a committee of any entity (whether profit or not-for-profit) whose interests reasonably would be expected to conflict with those of the Company.

Actions of Family Members. The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence an employee's objectivity in making decisions on behalf of the Company. For purposes of this Code, your "family members" include your spouse or significant other, brothers, sisters, parents, in-laws, and children.

YOU MAY ONLY ACCESS AND USE CONFIDENTIAL INFORMATION FOR AUTHORIZED COMPANY PURPOSES.

DISCLOSURE OF CONFLICTS OF INTEREST

As soon as you become aware that you may have a conflict of interest, you must disclose it to Legal or Compliance. You should raise the potential conflict of interest even if you are unsure whether a certain transaction, activity, or relationship constitutes or will constitute an actual conflict. We will work with you to determine whether you have a conflict of interest and, if so, how best to address it.

CORPORATE OPPORTUNITIES

As employees, we have an obligation to advance the Company's interests when the opportunity to do so arises. If you discover or are presented with a business opportunity through the use of the Company's property or information, or because of your position with the Company, you should present the business opportunity to the Company's senior management. You should not use corporate property, information, or your position with the Company for personal gain or to compete with the Company in any way.

If the Company decides not to pursue a business opportunity and you feel this is something you would like to pursue individually, the Company must first formally waive its right to pursue the business opportunity. A formal waiver can be requested from Legal, which will take all factors into account, including whether your pursuit of the opportunity could lead to a conflict of interest that could be detrimental to the Company.

CONFIDENTIAL AND PROPRIETARY INFORMATION

The Company insists on the highest standards of safety, security, confidentiality, and professionalism in the workplace. You must retain in strictest confidence, and use solely for the benefit of the Company, all confidential information relating to the Company that you, directly or indirectly, acquire in connection with your employment with the Company. Your participation, cooperation and observation of these practices will help to ensure our business and reputational success.

Employees have access to a variety of confidential information while employed here. Confidential information includes all non-public information that might be of use to competitors, or, if disclosed, harmful to the Company or its customers. Examples of confidential information include investment memoranda, legal documentation, customer, counterparty or employee information, Company records (described below), Company or project related internal reports or pitches, development information, certain information received by the Company in response to requests for proposals or other competitive transactions, and other business ventures or opportunities not otherwise in the public domain.

You are responsible for safeguarding all confidential information within your possession and control, except when disclosure is authorized by the Company or legally mandated. This includes taking steps to ensure documents are produced, handled, and disposed of in a manner that minimizes the risk that unauthorized persons might obtain access to them. You may only access and use confidential information for authorized Company purposes. Use of confidential information for the personal interest, benefit or gain of any employee, family member, friend, acquaintance of any employee, or any other third party is strictly prohibited.

Additionally, you are not permitted to take any written or electronically stored confidential information with you if you leave the Company. Your obligation to protect confidential information continues even after you have left the Company and regardless of the circumstances of your departure. Where necessary, the Company may take legal actions to safeguard its confidential information. Note that processes, procedures, "know how," or other ways of operating and related information that you have developed or helped develop in the course of your employment

with the Company are the Company's property and must remain at the Company. If you are uncertain as to whether particular information is confidential and/or proprietary and covered by these restrictions, you should seek guidance from your manager, Legal, and/or Compliance.

The Company insists on the highest standards of safety, security, confidentiality, and professionalism in the workplace.

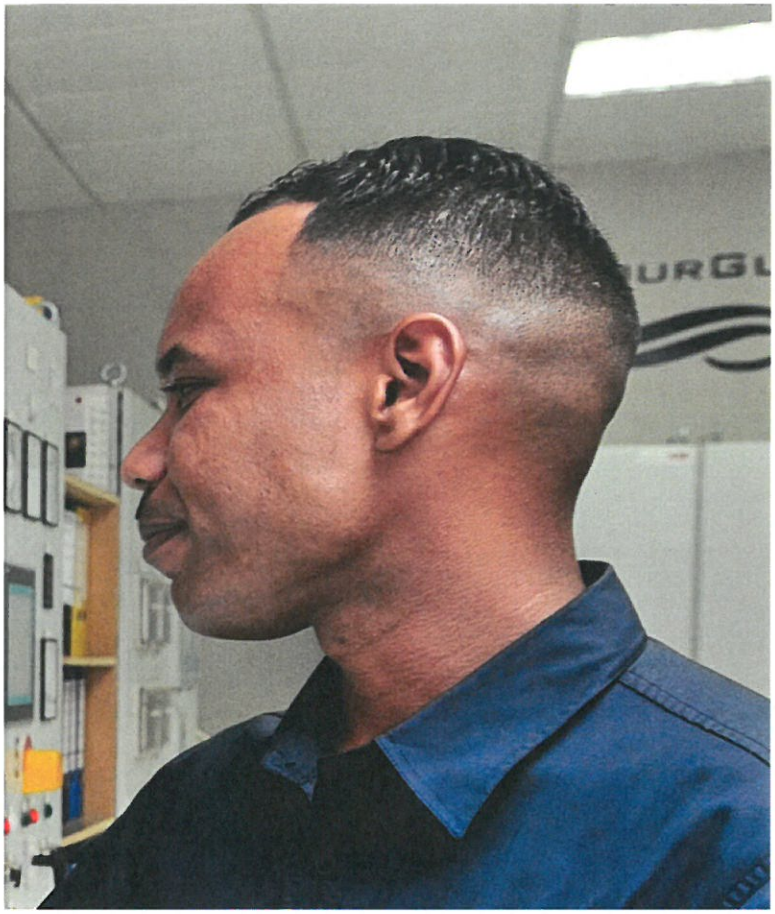
Insider Trading

In the course of your work for the Company you may come into possession of confidential information regarding the Company or other companies (such as suppliers and counterparties) that issue securities. It is illegal and a violation of this Code to buy or sell securities in any company using material, non-public or "inside information." Information is generally considered "material" where a reasonable investor would consider the information important in making an investment decision. Information is generally considered "public" after a widely-circulated public announcement, either in the press or in a document, such as an annual and quarterly report, filed with a governmental securities regulator such as the U.S. Securities and Exchange Commission. Applicable insider trading laws also prohibit providing inside information to others in order to assist them in their trading. Violations of insider trading laws may result in substantial civil and criminal penalties, including jail time.

Fair Dealing and Competition

FAIR DEALING

We expect all our people to be fair when dealing with our customers, suppliers, and competitors. Our business success depends upon our ability to foster lasting relationships with customers, vendors, suppliers, contractors, and other parties and we have worked hard to build our reputation. You should always deal with people fairly, honestly, and with integrity and you should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.



YOU SHOULD ALWAYS DEAL WITH PEOPLE FAIRLY, HONESTLY, AND WITH INTEGRITY.

When dealing with any external parties, you should always exercise sound judgment and observe the following guidelines:

- Agreements with current or potential suppliers and contractors should be based on price, quality, service and reputation, among other factors relevant to business considerations;
- Information we supply to others should be accurate and complete to the best of our knowledge;
- You should be objective when assessing suppliers and consider all parties, even when a party deals with a competitor or some other third party;
- You should never accept or solicit any personal benefit from a supplier or service provider that might compromise, or appear to compromise, your objective assessment of the supplier's or service provider's products, services, and prices and your ability to operate in the best interest of the Company; and
- When providing entertainment or other benefits that could be viewed as an inducement to, or a reward for, decisions by customers or other parties with which we do business you should make sure you comply with the Company's Gifts and Hospitality Policy and Anti-Corruption Policy.

COMPETITION AND ANTITRUST

The Company is committed to free and open competition in the marketplace. Most if not all countries in which we operate have strict laws in place that are intended to preserve a competitive free market system by prohibiting collusion and other unfair restraints on trade. In the European Union and elsewhere these laws are called competition laws, and in the United States they are referred to as antitrust laws. Violations of competition and antitrust laws have severe consequences for companies and individuals, including potentially enormous fines for companies and lengthy prison sentences for individuals.

The types of conduct prohibited by competition and antitrust laws, and strictly prohibited by this Code, include:

- An agreement with a competitor to fix or stabilize prices (potentially including conversations with competitors regarding cost or pricing);
- An agreement with a competitor to share or allocate markets or customers; and
- An agreement with a competitor to boycott certain customers or suppliers.

Industry conferences or other activities that involve meetings among competitors are not prohibited by law or this Code, but may present competition and antitrust risks because sharing certain types of information with a competitor could be deemed a collusive agreement. Accordingly, when participating in a trade or industry conference, you must pay careful attention and not share sensitive information with competitors. Seek guidance from Legal in the event of any questions.

From time-to-time, the Company participates in tender processes, which are typically subject to both general competition laws and specific tender regulations.

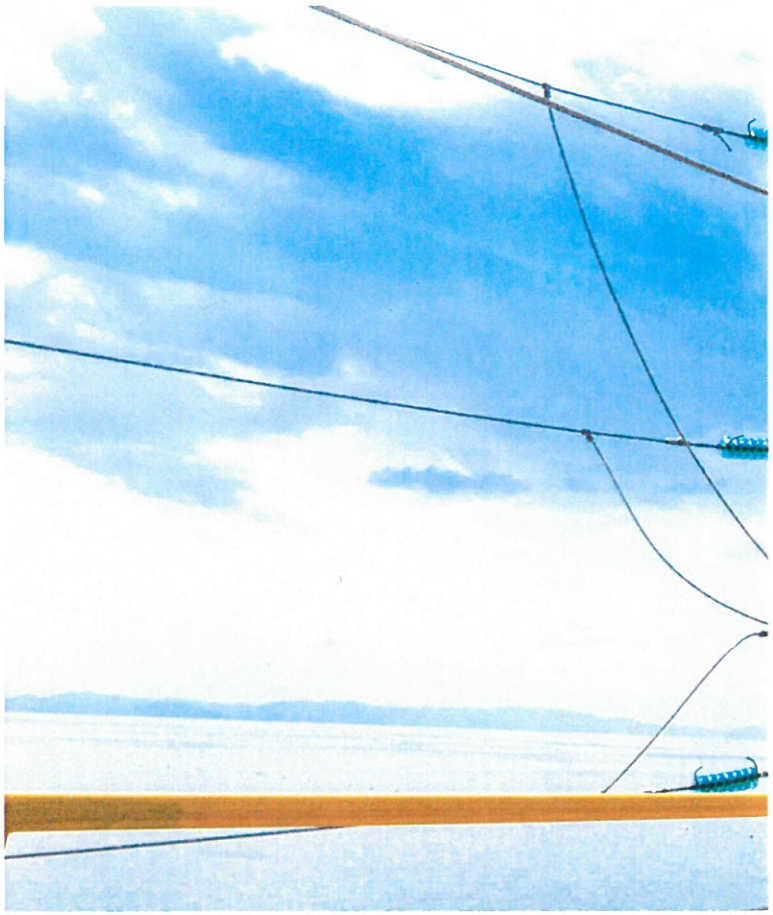
You must pay careful attention and not share sensitive information.

In general, when participating in a tender you are prohibited from unfair, deceptive or anticompetitive conduct, such as:

- Discussing tender offer terms, such as prices and conditions, with competitors or other bidders;
- Agreeing on an allocation of tender participation with other bidders;
- Agreeing with competitors to submit a mock offer; or
- Agreeing to withdraw from a tender in order to obtain compensation from a competitor.

Competition and antitrust laws and the laws pertaining to tenders are complex and vary from country to country. Therefore, we ask that you to seek guidance from Legal whenever a specific competition or antitrust issue arises and prior to participating in any tender process.

EXERCISE REASONABLE CARE TO PREVENT THEFT, DAMAGE OR MISUSE OF COMPANY PROPERTY.



Protection and Use of Company Assets

As part of your employment, you are entrusted to use Company assets. Protecting the Company's assets, both tangible and intangible, against loss, theft, and misuse is your responsibility. Whether this means using a laptop, a corporate credit card, cash, customer information, supplier, contractor or vendor information, Company logos, intellectual property, a uniform, a vehicle, a generator, or a dam, it is essential that we protect the assets and use them for legitimate business purposes only. Company assets may not be used for personal benefit, sold, loaned, given away, or otherwise disposed of except with prior authorization of your manager.

Misappropriation of Company assets is theft and a breach of your duty to the Company. An employee engaging in such action is subject to immediate dismissal and prosecution, subject to local law.

To ensure the protection and proper use of the Company's assets, you must:

- exercise reasonable care to prevent theft, damage or misuse of Company property;
- report the actual or suspected theft, damage, or misuse of Company property to a supervisor;
- safeguard all electronic programs, data, communications, and written materials from inadvertent access by others; and
- use Company property only in connection with your job responsibilities, including workplace or office equipment and supplies, vehicles, information technology and telecommunications systems, written materials, and other physical property, as well as any rights or privileges under Company agreements, licenses, or business relationships.

You should also be aware that Company property includes all data and communications transmitted to, received by, or contained in, the Company's electronic or telephonic systems, and also includes all written communications sent or received in the course of your employment. Company electronic and telephonic systems and all electronic and hard copy documents and files created, sent, or received in the course of your employment (including but not limited to email and other electronic communications) are the property of the Company and may be subject to review at any time by authorized Company representatives. The protection of our Company's information is critical to the success of our business and you should have no expectation of personal privacy with respect to any communication systems or information sent to or from or stored in Company communications systems as it relates to Company business or assets.

If you become aware of the theft or misuse of Company assets, immediately report the matter to your manager, Legal, and the Chief Compliance Officer.

Bribery and Corruption

We do not engage in or tolerate bribery or corruption in any form, whether by Company employees or third parties acting on our behalf. This means that employees or anyone acting on our behalf cannot promise, offer, or pay, or authorize the payment of money or anything of value to anyone – whether a commercial counterparty or a government official – in order to secure any improper advantage for the Company. The Company has adopted an Anti-Corruption Policy and an AntiCorruption Compliance Guide, available on the Ethics and Compliance page on Sharepoint which set out our anti-corruption policies and procedures in detail and provide practical guidance on how to comply with these policies and applicable law.

GIFTS AND HOSPITALITY

The giving and receiving of gifts, hospitality, and travel is a common business practice and, when handled appropriately, may be a valuable tool to build relationships and understanding among business partners. However, such activities must not compromise, or appear to compromise, the ability of the recipient to make objective and fair business or professional decisions. To ensure that gifts and hospitality are properly and transparently given, and are not of such a nature as to appear to influence the recipient's decision making, the Company has developed a Gift and Hospitality Policy, available on the Ethics and Compliance page on Sharepoint. Employees must observe the Gift and Hospitality Policy at all times.

INTERACTIONS WITH GOVERNMENT OFFICIALS

The Company frequently interacts with national and local governments in various countries. We are committed to conducting our business with integrity, according to the highest standards of business ethics and always in compliance with all applicable laws and regulations. If you are interacting with any governmental body, you should carefully review the Company's Anti-Corruption Policy and Anti-Corruption Compliance Guide to ensure you understand these policies and know how to comply with them. If you have any questions, you should discuss them with your manager, Legal, and/or Compliance.

You should discuss your concerns with your manager.

Political Contributions and Activities

We encourage you to participate in civic and political processes as an individual outside of work. However, you are not permitted to use Company funds or assets to support any political party or candidate.

The following guidelines are intended to ensure that any political activity you pursue complies with this policy:

- ***Contribution of Funds.*** You may contribute your personal funds to political parties or candidates in accordance with applicable laws. The Company will not reimburse you for personal political contributions.
- ***Volunteer Activities.*** You may participate in volunteer political activities during non- work time. You may not participate in political activities during working hours.
- ***Use of Company Facilities.*** The Company's facilities may not be used for political activities (including fundraisers or other activities related to running for office).

WE ENCOURAGE YOU TO PARTICIPATE IN CIVIC AND POLITICAL PROCESSES AS AN INDIVIDUAL OUTSIDE OF WORK.

- ***Use of Company Name.*** When you participate in political affairs, you should be careful to make it clear that your views and actions are your own, and not made on behalf of ContourGlobal. For instance, Company letterhead may not be used to send out personal letters in connection with political activities.

ContourGlobal may sometimes express its views on local, national and international issues that affect its operations. In such cases, Company funds and resources may be used, but only when permitted by law and when pre-approved by Legal.

The Company will not reimburse you for personal political contributions.

Company Records and Reporting

ACCURATE RECORDKEEPING

Accurate and reliable records are not only crucial to our business, they are required by law. Our records are the basis of our financial, operational, and management reports, and guide our business decision making and strategic planning. Company records include booking information, payroll, timecards, travel and expense reports, emails, accounting and financial data, measurement and performance records, electronic data files, and all other records maintained in the ordinary course of our business.

All Company records must be complete, accurate, and reliable. You are personally responsible for the integrity of the information, records, and reports under your control. Records must be maintained in sufficient detail as to accurately reflect the Company's transactions. You should be vigilant in identifying and reporting any misrepresentation of information such as undisclosed or unrecorded funds, or payments or receipts that are inconsistent with our business practices or are prohibited. You are expected to demonstrate integrity and diligence in submitting travel and expense reports and ensuring contractual commitments are within your scope of authority. You are responsible for understanding our

record-keeping policies in the organization and complying with them.

Records must be maintained and destroyed according to the Company's Document Retention Policy. The retention requirements in the Document Retention Policy apply to all Company documents, including email and other electronic documents.

Additionally, you must abide by any "litigation holds" for records. Litigation holds are written notices from Legal requiring that certain records be retained beyond normal retention periods for legal or compliance reasons. It is unlawful to destroy, conceal, alter, forge or falsify any Company business or other record, documents, or object (including email and other electronic records) for the purpose of obstructing or influencing any governmental or legal proceeding, investigation or lawsuit. Therefore, you are prohibited from destroying any records that are potentially relevant to a violation of law, any currently pending, threatened or reasonably foreseeable litigation or any pending, threatened or reasonably foreseeable government or other investigation proceeding.

REQUESTS FOR INFORMATION FROM THIRD PARTIES

You should notify Legal if you receive, as a Company representative, any summons, subpoena, inquiry, or other communication from a court, marshal, sheriff, government agent, regulatory agency, or any lawyer regarding the Company or any Company director, employee, supplier, contractor, vendor, business partner, customer, or competitor. You must always contact Legal before producing any documents, submitting to an interview, answering questions or responding to any request regarding litigation, investigation, or any legal or regulatory proceeding.

All Company records must be complete, accurate, and reliable.

OUR BUSINESS RELIES ON THE SAFETY OF OUR WORKERS.

Compliance with Laws and Regulations

Every employee has an obligation to ensure the Company complies with all laws, rules, and regulations. We operate in numerous jurisdictions with a lot of rules, including laws covering bribery and kickbacks, copyrights, trademarks and trade secrets, information privacy, illegal political contributions, antitrust prohibitions, foreign and domestic corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information, and misuse of corporate assets. You are expected to understand and comply with all laws, rules, and regulations that apply to your position. If you see someone else in the organization knowingly or unknowingly is breaking a law, you also have an obligation to bring this to the attention of the Regional General Counsel and the Chief Compliance Officer, subject to local law. If any doubt exists about whether a course of action is unlawful, you should always seek advice from your manager or Legal.

Health and Safety

Our business relies on the safety of our workers. Our Company is committed to providing and maintaining a safe and healthy working environment for all employees, contractors, visitors and other stakeholders. We aspire to the goal of zero-harm in all our activities and commit to continual improvement by monitoring our health and safety performance and implementing actions that will deliver enhanced results. We believe that all injuries are preventable if we apply a 24/7 approach to health and safety. The Company has adopted a Health and Safety Policy, available on the Health & Safety page on Sharepoint, which set out our health and safety policies and procedures in detail.

Social Responsibility, Environmental Sustainability and Human Rights

The Company is committed to protecting the environment and respecting the communities where we do business. We have adopted a comprehensive set of social and environmental principles, the Policy on Social Responsibility & Environmental Sustainability, as guidelines to ensure that our projects are developed in a socially responsible manner and reflect sound environmental management practices.

Respect for human rights is also an important aspect of our corporate social responsibility. We are committed to ensuring that human rights are respected at each of our businesses and offices. Our commitment to human rights extends to all Company employees and we will identify and do business with partners that conduct business according to human rights standards consistent with our Human Rights Policy.

We are committed to ensuring that human rights are respected at each of our businesses and offices.

A Safe and Respectful Work Environment

EQUAL EMPLOYMENT OPPORTUNITY

Whether in the hiring process or in the work environment, we are committed to treating all people fairly. Our people are critical to our success and we believe diversity and inclusion are values that reflect our culture of respect for the individual and the importance we place on our differences. It is our policy to provide equal employment opportunity for all applicants and employees. We are fully committed to compliance with the letter and spirit of the full range of fair employment practices and nondiscrimination laws. This means that the Company does not discriminate on the basis of race, color, religion, gender, gender orientation, sexual orientation, national origin, ancestry, age, medical condition, physical or mental disability, marital status, worker's compensation status, veteran status, citizenship status, or any other legally protected status. This policy applies to all areas of employment, including recruitment, hiring, training, promotion, compensation, benefits, transfer, and conditions of employment.

OUR PEOPLE ARE CRITICAL TO OUR SUCCESS.

If you observe any discriminatory treatment of an employee or applicant, you have an obligation to report this to Human Resources. All complaints will be promptly investigated and information obtained during the investigations is confidential and only disclosed to those who have a need for the information.

We believe diversity and inclusion are values that reflect our culture.

HARASSMENT-FREE WORKPLACE

The Company does not tolerate workplace harassment, whether committed by or against a supervisor, co-worker, supplier, service provider, business partner, customer, or visitor. Harassment violates an individual's fundamental rights and personal dignity. Harassment also undermines the Company's deep commitment to a reward system based purely on merit, intellectual excellence, and job performance. The Company considers all types of harassment, including sexual harassment, to be a serious offense.

Below are some examples of harassment:

- Behaving in a way that a reasonable person would consider offensive, hostile, malicious or discriminatory;
- Sexually harassing a colleague by making unwanted sexual advances or behaving in any other sexually offensive way;
- Engaging in any form of harassment with the intent or effect of creating a hostile or intimidating work environment or affecting an individual's employment opportunity;
- Telling jokes or making insults of a racial, ethnic, religious, disability-related, gender or sexual nature; and
- Spreading malicious rumors or sharing offensive, derogatory or discriminatory information through any means.

It is the responsibility of every employee to follow this policy and our policy also applies to third parties we work with, including customers and vendors. If you believe that you are being harassed by someone within or working for ContourGlobal, this should be reported immediately to your manager, Human Resources, or Legal. Supervisors must report all allegations of harassment to Human Resources or Legal whether or not there has been a written or formal complaint. Confidentiality of the matter will be respected throughout the process and maintained to the greatest extent possible.

We will not tolerate any retaliation against any person who makes a good faith report of discrimination or harassment, or who assists in providing relevant information in connection with such a report. If you see discrimination or harassment taking place, it is your responsibility to report it, even if you are not the person subject to the discrimination or harassment. If you have any questions regarding this policy or what constitutes unlawful harassment, discuss them with your manager, HR, or Legal. We are a global and diverse company and want our work environment to be an inviting place where everyone is treated with respect.

ALCOHOL, DRUGS, AND FIREARMS

The Company strives to ensure that the workplace is safe and free from substance abuse. This means that you are prohibited from using illicit drugs in the workplace. The consumption of alcohol is limited to authorized special occasions. The possession of firearms in the workplace is strictly prohibited.

You are prohibited from using illicit drugs in the workplace.

EMPLOYEES MUST NOT PUBLISH, POST OR RELEASE ANY INFORMATION THAT IS CONSIDERED CONFIDENTIAL.

SOCIAL MEDIA

Social media includes electronic forums such as blogs wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner.

The following principles apply to professional use of social media on behalf of the Company, as well as the personal use of social media when discussing the Company:

- Employees must adhere to this Code of Conduct and other Company policies when using social media in reference to the Company.
- Employees should be aware of the effect their actions may have on their images, as well as the Company's image.
- Employees may not publish, post or release material that is defamatory, obscene, profane, threatening, abusive, harassing or targeted toward any person or entity within the organization, its leadership, or customers, suppliers, or competitors.
- Employees must not publish, post or release any information that is considered confidential, proprietary, or not public. If there are questions about what is considered confidential or proprietary, employees should ask their supervisor or Legal.

- Social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions. Employees must refer these inquiries to authorized Company spokespersons.
- Employees must obtain appropriate permission before using the Company's or a third party's copyrights, copyrighted material, trademarks, logos, or other intellectual property.

Employees should be aware of the effect their actions may have on their images, as well as the Company's image.

Conclusion

This Code of Conduct sets forth our expectations of you as you work at the Company and we believe that it will help us conduct our business with integrity and in a manner consistent with the highest ethical standards. As a result, we will be a better Company. We appreciate your continued commitment to responsible business operations and compliance with this Code.

If you have any questions regarding this Code of Conduct and Business Ethics, please contact your supervisor, Human Resources, Legal, or Compliance.

COMPANY POLICES

All policies mentioned below can be found on SharePoint

- Anti-Corruption Policy
- Policy for Engaging Suppliers and Service Providers
- Anti-Corruption Compliance Guide
- ContourGlobal Accounting Manual
- Record Retention Policy
- Health and Safety Policy
- Policy on Social Responsibility & Environmental Sustainability
- Human Rights Policy
- Equal Employment Opportunity Policy
- Supplier Code of Conduct

CERTIFICATE OF COMPLIANCE WITH CODE OF CONDUCT

I, _____, an employee/officer/director/consultant/agent/service provider of ContourGlobal (the "Company"), hereby confirm that I have read and understand the Company's Code of Conduct and Business Ethics (the "Code of Conduct").

I further confirm that I have abided by the Code of Conduct to date and agree to abide by the Code of Conduct and to review its terms prior to engaging in any activities on behalf of or in connection with the Company or its business. If I have any questions concerning any proposed matter within the scope of the Code of Conduct, I will present them to my supervisor, Human Resources, Legal, or Compliance prior to engaging in any such transaction or activity.

I also agree that during my employment relationship with the Company, I will immediately report to my supervisor, Human Resources, Legal, or Compliance any actual or suspected violations of the Code of Conduct.

ACKNOWLEDGED AND AGREED:

_____

SIGNATURE

_____

DATE

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