## Cohort plc

## Cohort plc Statement of Ethical Business Conduct

It is Cohort plc's policy to conduct all our business in an honest and ethical manner. Cohort plc and its group subsidiaries ('the Cohort Group") are committed to acting professionally and with integrity in all our business dealings and relationships wherever we operate and to high standards of ethical conduct.

We will conduct our business consistently with this in all our dealings with customers, suppliers, employees, shareholders, government and wider society.

The highest standard of behaviour, professionalism and personal conduct is expected from employees, directors and all parties acting on the Cohort Group's behalf.

In addition to their obligations under the relevant Group and subsidiary policies, directors and employees shall at all times

- · act in compliance with all legal and regulatory requirements in the countries in which we operate
- refrain from conduct that would bring us into disrepute with customers, suppliers, employees, shareholders, government and wider society.

Failure to meet these standards by any director or Cohort Group employee will be regarded as a serious disciplinary offence.

Any Cohort Group employee who becomes aware of behaviour that is in breach of these standards should bring it immediately to the attention of their immediate manager, or use the Safecall service, the number of which is displayed in all Cohort Group premises.

All policies and management directives within the Cohort Group and its subsidiaries shall be consistent with this Statement.

We expect and require similar standards of behaviour from our suppliers and partners.

Andrew S Thomis Chief Executive

Date of issue: 26 April 2018

Date of next review: 26 April 2020