

Lantos - Code of Business Conduct and Ethics Policy - V1

Statement from Executive Management Team

At Lantos, we recognise that all businesses have a responsibility to be an active contributor to promote positive societal change. Our company was founded on this principle - that running a successful company needs to recognise and demonstrate contribution to society by providing meaningful and sustainable outcomes for all people and organisations we engage with.

We pride our business operating with the highest ethical standards and in full compliance with all applicable laws within jurisdictions for which we operate in. This Code of Business Conduct and Ethics Policy has been developed by executive management to provide clear guidance to all personnel (inclusive of employees, sub-contractors and affiliated third party suppliers) to ensure a consistent approach to business practices when engaged in Lantos company operations.

We thank you for your commitment to comply unequivocally with the highest standards of integrity and business ethics.

When in Doubt: A Moral Compass

Lantos' Code is not intended to address all laws, rules, policies or circumstances involving ethical conduct. We recognise and accept we all must use a measure of common sense and good judgment in determining appropriate conduct.

Where you find yourself in circumstances where you are unsure of the ethical implications of an action or situation, we encourage you to consider and apply the following simple questions as a moral compass:

- Is it consistent with the Code?
- Is it ethical?
- Am I being fair and honest?
- Are my actions legal?
- Is this the right thing to do?
- Will it reflect well on me and the Company?
- Would I want to read about it in the newspaper or on the internet?

If the answer is “No” to any of these above questions, then don’t do it.

If you still need guidance, talk to your Supervising Manager or Compliance Manager.

Purpose

The purpose of this policy is to ensure Lantos establishes and maintains a culture of openness, trust and to emphasise all personnel and client's expectations to be treated to fair business practices. This policy seeks to provide a set of guidelines for business behaviour to ensure ethical conduct is practiced in all our business dealings.

We recognise and promote that ethics is a shared responsibility involving participation and commitment from all employees and sub-contractors. Accordingly, all personnel must ensure they familiarise themselves with all the guidelines and any related Lantos policies.

Scope

This policy applies to Lantos personnel, inclusive of employees, sub-contractors, consultants, interims and staff from affiliated with third parties.

Our Ethical Values

Lantos and all its personnel are expected to conduct their affairs with uncompromising honesty and integrity. Business ethics are no different than personal ethics. The same high standard applies to both and we require you to adhere to, and exhibit, the highest business conduct and ethical standards regardless of local custom.

Personnel are expected to be honest and ethical in dealing with each other, with clients, suppliers and all other third parties. You must also respect the rights of your fellow employees and third parties. Your actions must be free from discrimination, libel, slander or harassment. Each person must be accorded equal opportunity.

Misconduct will never be excused or ignored. In this regard, you are expected to alert management whenever an illegal, dishonest or unethical act is discovered or suspected. You will never be penalised for reporting your discoveries or suspicions even if they turn out to be untrue; provided you gave this information honestly and with no ulterior motive.

A violation of the standards contained in this *Code of Business Conduct and Ethics Policy* will result in serious management review and action, including but not limited to possible dismissal.

Conflicts of Interest

You must avoid engaging in, or undertaking, any personal activity, investment or association which could, or will, interfere with exercising good judgment concerning Lantos' operations or best interests. You may not exploit your position or relationship with Lantos for personal gain.

You should endeavour to avoid even the appearance of such a conflict from occurring. For example, there is a likely conflict of interest if you:

- cause Lantos to engage in business transactions with relatives or friends;
- use Lantos, client or vendor information for personal gain by you, relatives or friends;
- have more than a modest financial interest in Lantos suppliers, clients or competitors;

- compete, or prepare to compete, with Lantos while still employed by Lantos. There are other situations in which a conflict of interest may arise.

It is sometimes difficult to determine whether certain activity constitutes a conflict of interest. Any Lantos personnel with doubts about whether certain conduct actually is, or could be construed as, a conflict of interest should consult the Supervising Manager or Compliance Manager before taking any action.

Accepting Business Courtesies

Most business courtesies offered to us in the course of our employment are offered because of our positions at Lantos. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favouritism or that may adversely affect the company's reputation for impartiality and fair dealing.

The prudent course is to politely refuse a courtesy from a supplier when Lantos is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain Lantos business.

Meals, Refreshments Entertainment and Gifts

Lantos personnel may accept occasional meals, refreshments, entertainment and similar business courtesies that are customary and conform to reasonable ethical practices of the marketplace, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The personnel accepting the business courtesy would not feel uncomfortable discussing the courtesy with their supervising manager, co-worker or having the courtesies known by the public.

Any personnel with questions about accepting business courtesies should consult their supervising manager or the Compliance Manager.

Offering Business Courtesies

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Lantos.

Further, management may approve specific business courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any laws, regulations or the standards of conduct of the recipient's organisation.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not considered lavish or inappropriate.
- The business courtesy is properly reflected on the Lantos company books and records accordingly.

Any personnel with questions about offering business courtesies should consult their Supervising Manager or the Compliance Manager.

Compliance with Law

You are expected to comply with the applicable laws, rules and regulations, within the UK and within the jurisdictions in which Lantos operates.

If you have legal questions, you should seek guidance from the Compliance Manager or their Supervising Manager.

Bribery and Corruption

Neither you nor your relatives may give gifts to, or receive gifts from, Lantos's current or prospective clients, suppliers or any other commercial partners without prior written approval from the Executive Management Team.

If a gift, entertainment or hospitality has been authorised by Executive Management, the person receiving it needs to record the gift, entertainment or hospitality in the Lantos gift register.

We are proud of our reputation as a trusted and respected business. We do not tolerate any form of corruption, whether direct or indirect, by Lantos personnel or by business partners who act on our behalf. We do not offer, give, ask for or receive, bribes or other improper advantages for business gain. This prohibition applies to any form of bribe of any value and is not limited to cash.

We must all take special care that our actions cannot be interpreted as bribery, particularly in the areas of gifts, hospitality, entertainment, expenses, political contributions, charitable donations, lobbying, and sponsorship.

We must also remain vigilant that our relationships with our business partners, suppliers and government officials do not lead to bribery or corruption risks for Lantos.

For specific information and further guidance, please refer to the "*Lantos Anti-Bribery and Corruption Policy*".

Any personnel with questions or issues relating to clarification, or concerns, regarding aspects of bribery or corruption, should consult their Supervising Manager or the Compliance Manager.

Improper Use or Theft of Company Property

All personnel must safeguard Lantos property from loss or theft and may not use or take such property for personal use. Lantos company property includes stored confidential documentation and company data, hardware, software, mobile phones, office equipment and supplies. You must appropriately secure all Lantos property within your control to prevent its unauthorised use.

Covering Up Mistakes; Falsifying Records

We fully recognise that during the normal course of business mistakes may occur. Mistakes should never be covered up but should be immediately fully disclosed and corrective action taken. Falsification of any Lantos, client or third-party data is prohibited and will be dealt with by Executive Management in an extremely serious manner which may lead to dismissal and/or criminal proceedings being instituted.

If you are uncertain about whether a mistake has been made, you should consult with your Supervising Manager or the Compliance Manager to seek advice.

Protection of Client or Vendor Information

You may not use and/or reveal Lantos, client or vendor proprietary and confidential information to others. Additionally, you must take appropriate steps – including securing documents, limiting access to computers and electronic media, and proper disposal methods – to prevent unauthorised access to, or loss of, such information.

Lantos proprietary and/or confidential information (non-exhaustive list) includes: business processes, methods, pricing models and marketing data, strategy, forms, research, information about, or received from, Lantos current, former and prospective clients, suppliers, sub-contractors and associates.

Fair Dealing with Others

No Lantos employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

If any of these types of unfair dealings has been identified or brought to your attention, you should consult with your Supervising Manager or the Compliance Manager to seek advice.

Record Keeping and Financial Reporting

Lantos requires all personnel to ensure honest and accurate recording and reporting of information to make responsible business decisions.

All of Lantos books, records, accounts and financial statements must be maintained in reasonable detail, accurately and appropriately reflect transactions and comply with applicable legal requirements within the jurisdictions in which we operate and adhere to Lantos internal controls and procedures.

Relations, Respect and Contribution

We function as a team. Your success as part of this team depends on your contribution and ability to inspire the trust and confidence of your colleagues and management. Respect for the rights and dignity of others and a dedication to the good of our company are essential. We must each respect the rights of others while working as a team to fulfil our objectives. To effectively function as part of a team, you must be trustworthy and dedicated to high standards of performance.

Human Trafficking

Lantos is committed to conducting business with honesty and integrity wherever we operate, treating all people with dignity and respect and complying with all applicable laws, regulations and treaties. We are also committed to protecting and promoting human rights globally. We do not tolerate illegal child labour, forced labour or any use of force or other form of coercion, fraud, deception, abuse of power or other means to exploit people.

We respect international principles of human rights – including, but not limited to, those in the UN Declaration of Human Rights and the UK Modern Slavery Act of 2015 – and embody these principles and commitments in our business policies and this *Business Code of Conduct and Ethics Policy*.

Reporting Ethical or Fraudulent Violations

Your conduct can reinforce an ethical atmosphere and positively influence the conduct of your colleagues, suppliers, and Lantos clients. If you are powerless to stop suspected misconduct or discover it after it has occurred, you must report it to your supervising manager in the first instance.

If you are still concerned after speaking with your local management or feel uncomfortable speaking to them, you must (anonymously, if you wish):

- Contact and speak with the Compliance Manager by phone at (020) 8249 6023 or send detailed information of the misconduct or violations to the Compliance.Manager@lantos.co.uk who will coordinate all investigations both internally and externally.

Your calls and/or emails will be dealt with strict confidentiality. You have the commitment of the Executive Management Team that you will be protected from retaliation.

Amendments and Modifications of this Code

There shall be no amendment or modification to this Code except by a vote of the Board of Directors or a designated Board committee that will ascertain whether an amendment or modification is appropriate.