



Delivering your strategy.

GAC Code of Ethics

Preamble

GAC Code of Ethics sets out the basis of the GAC Group's relationship with customers, suppliers, staff and the law. It is derived from the Group's operating values and practices and the GAC Spirit.

The GAC Spirit's main elements are:

1. Two-way loyalty of staff to management and management to staff.
2. Commitment to quality service and a willingness to go the extra mile.
3. Valuing of people: demonstrating care for the interests of customers and all who do work for GAC.
4. Building enduring relationships with customers and suppliers through long-term commitments and face-to-face contacts.
5. Honesty in communication with customers and all who do work for GAC.
6. Compliance with all relevant laws, regulations and internal GAC Group policies.

This Code of Ethics reflects these values and acts to preserve them. The Code addresses:

1. Global corporate ethics
2. GAC customers
3. GAC staff, subcontractors, consultants and suppliers
4. Community and environment

Bengt Ekstrand, Group President
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Global Corporate Ethics

1. The GAC Group respects and abides by the laws of the countries in which it operates and all relevant supranational laws and regulations. Further, GAC people conduct their business in full understanding of, and in compliance with, GAC Group policies including those covering corruption, bribery, money laundering, whistleblowing and trade sanctions.
2. The GAC Group respects the rights and cultural practices of people in the countries in which it operates.
3. The GAC Group provides a work environment free of discrimination and harassment based on age, ancestry, colour, marital status, medical condition, mental disability, physical disability (including persons infected with the HIV virus or persons with AIDS), national origin, race, religion, sex, sexual orientation or veteran status.

GAC Customers

1. GAC's customers can expect GAC employees to do all within their power to meet their needs and exceed their expectations.
2. GAC's customers can expect all GAC employees to deal honestly with them and not commit any crime at their behest.
3. GAC's customers can expect GAC employees to work to create enduring and positive relationships with them.

GAC Employees, Suppliers, Subcontractors and Consultants

1. People who undertake work for GAC do so cooperatively in a spirit of trust built on honest communication, professional conduct, fairness in business dealings and in full compliance with all laws and regulations.

2. The GAC Group values highly the cultural diversity of all who undertake work for GAC and nurtures their willingness and capacity to work together to achieve common goals.
3. GAC employees ensure that workplace health and safety standards and practices are given priority and extend to all who undertake work for GAC.
4. GAC managers support the honest efforts of all staff to improve themselves and make provision for training and professional development to ensure staff are appropriately equipped for the jobs they are required to do on behalf of customers.
5. GAC managers recognise that all who undertake work for GAC are connected to families and that the well-being of the family has an impact on their ability to work effectively.
6. GAC employees will neither attempt to use their standing as employees of GAC to derive a private business advantage for themselves, any associate or family member nor engage in any other activity which constitutes a conflict of interest between their private and professional roles.

Community and Environment

1. GAC managers are committed to creating a healthy and safe work environment for all who undertake work for GAC.
2. GAC companies are committed over the long term to creating a more sustainable environment through the development of effective recycling and waste management policies and practices.
3. GAC employees recognise the importance of contributing to the well-being and development of the communities in which they work.
4. GAC is committed to causing no harm to the environment.