



Code of Conduct

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Definitions & Preamble

For the purposes of this Conduct, by Global Sustain “associates”, it is meant all levels of Global Sustain employees; including but not limited to the Managing Directors, Partners, Directors, Managers, Consultants, Advisors, all permanent, fixed-term, casual, full time and part-time employees; volunteers; student placements, interns and work experienced personnel, external consultants, contractors, affiliates and in general anyone having a business relation with Global Sustain (salaried or with a commission fee).

The business and work environment is becoming increasingly complex and characterized by ongoing change. In order for all Global Sustain associates to understand the expectations and obligations placed on each of us in our daily work, this Code of Conduct has been drafted and put in place. Global Sustain commits to encouraging a safe, supportive and productive work environment. This can only happen when everyone cooperates and agrees to suitable standards of professional conduct. The standards endorsed in this Code of Conduct support Global Sustain values of excellent service, integrity, accountability, equality, collaboration and learning that are expected of all Global Sustain associates.

They are minimum standards of behaviour that inform associates on how to exercise judgment and accept personal responsibility in their professional roles and not bring Global Sustain into disrepute. In addition to the Code, all associates are responsible for ensuring they are familiar with and comply with relevant legislative requirements, corporate policy and procedures, and employee guidelines in their respective workplace in all countries and territories where Global Sustain operates and conducts business.

Non-compliance with the Code may result in disciplinary action and a consequence could be termination of contract and / or of employment. Anyone bound by this Code is committed to providing reliable, credible, efficient and effective services and products to all Global Sustain members and clients in a professional, courteous and appropriately sensitive manner. Anyone bound by this Code must have a clear understanding of the standards of conduct outlined within, and use it as a guide to help in decision-making, particularly in situations where the "correct" course of action may not be obvious.

Compliance and non-compliance with the Code is monitored by Global Sustain Group Managing Director and the Code of Conduct will be reviewed regularly and updated in line with new and amended legislation as an integral accountability element in keeping with business and market standards and practices.

A. Organizational code of conduct

1. Global Sustain and its associates must, at all times, comply with all applicable laws and regulations as they apply in their respective territories / countries.
2. Global Sustain will not condone activities of associates who achieve results through violation of the law or unethical business dealings.
3. This includes any payments for illegal acts, indirect contributions, rebates, and bribery.
4. Global Sustain does not permit any activity that fails to stand the closest possible public scrutiny.
5. All business conduct should be well above the minimum standards required by law in the respective countries of operation.
6. Accordingly, associates must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing Global Sustain operations in their respective countries of activities.
7. Associates uncertain about the application or interpretation of any legal requirements should refer the matter to their supervisor, and / or to the Global Sustain Group Managing Director, who, if necessary, should seek appropriate legal advice.

B. General associates conduct

8. Global Sustain expects its associates to conduct themselves in a businesslike manner.
9. Drinking, gambling, fighting, swearing, and similar unprofessional activities are strictly prohibited while on the job and / or while representing Global Sustain interests worldwide.
10. Associates while performing their Global Sustain duties must not engage in sexual harassment, or conduct themselves in a way that could be construed as such, for example, by using inappropriate language, keeping or posting inappropriate materials in their Global Sustain work area, or accessing inappropriate materials on their Global Sustain computer.

C. Conflicts of interest

11. Global Sustain expects that associates will perform their duties conscientiously, honestly, and in accordance with the best interests of Global Sustain.
12. Associates must not use their positions or the knowledge gained as a result of their positions for private or personal advantage.
13. Regardless of the circumstances, if associates sense that a course of action they have pursued, or are presently pursuing, or are contemplating pursuing may involve them in a conflict of interest with Global Sustain, they should immediately communicate all the facts to their supervisor and / or Global Sustain Group Managing Director.

D. Outside activities

14. All associates share a serious responsibility for Global Sustain good public relations, especially at the community level.
15. Their readiness to help with community, fundraising, charitable, educational, and civic activities brings credit to Global Sustain and is strongly encouraged.
16. Associates must, however, avoid acquiring any business interest or participating in any other activity outside Global Sustain that would, or would appear to create a conflict of interest - an obligation, interest, or distraction - that may interfere with the independent exercise of judgment in Global Sustain best interest.

E. Relationships with clients and suppliers

17. Associates should avoid investing in or acquiring a financial interest for their own accounts in any business organization that has a contractual relationship with Global Sustain, or that provides goods or services, or both, to Global Sustain if such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of Global Sustain.

F. Gifts, entertainment and favors

18. Associates must not accept entertainment, gifts, or personal favors that could, in any way, influence, or appear to influence, business decisions in favor of any person or organization with whom or with which Global Sustain has, or is likely to have, business dealings.

19. Similarly, associates must not accept any other preferential treatment under these circumstances because their relations and / or positions with Global Sustain might be inclined to, or be perceived to, place them under obligation to return the preferential treatment on behalf of Global Sustain.

G. Kickbacks and secret commissions

20. Regarding Global Sustain business activities, associates may not receive payment or compensation of any kind, except as authorized under Global Sustain business and payroll policies.
21. In particular, Global Sustain strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others.
22. Any breach of this rule will result in immediate termination of the associate's contract and /or employment and prosecution to the fullest extent of the law.

H. Funds and other assets

23. Associates who have access to Global Sustain funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in the Global Sustain policies and procedures or other explanatory materials, or both.
24. Global Sustain imposes strict standards to prevent fraud and dishonesty.
25. If associates become aware of any evidence of fraud and dishonesty, they should immediately advise their supervisor and / or Global Sustain Group Managing Director or seek appropriate legal guidance so that Global Sustain can promptly investigate further.
26. When an associate's position requires spending Global Sustain funds or incurring any reimbursable personal expenses (where applicable), that individual must use good judgment on the Global Sustain behalf to ensure that good value is received for every expenditure.
27. Global Sustain funds and all other assets of Global Sustain are purposed for Global Sustain only and not for personal benefit.
28. This includes the personal use of organizational assets (where applicable), such as computers, tablets, printers, scanners, fax machines and phones.

I. Records and communications

29. Accurate and reliable records of many kinds are necessary to meet the Global Sustain legal and financial obligations and to manage the affairs of the company.
30. Global Sustain books and records must reflect in an accurate and timely manner all business transactions.
31. The associates responsible for accounting and recordkeeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements.
32. Associates must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to:
- i. False expense and attendance (where applicable as per respective contract), production, financial, or similar reports and statements
 - ii. False advertising, deceptive marketing practices, or other misleading representations

J. Dealing with outside people and organizations

33. Associates must take care to separate their personal roles from their Global Sustain positions when communicating on matters not involving Global Sustain business.
34. Associates must not use organization identification, stationery, supplies, and equipment for personal or political matters.
35. When communicating publicly on matters that involve Global Sustain business, associates must not presume to speak for Global Sustain on any topic, unless they are certain that the views they express are those of Global Sustain, and it is Global Sustain desire that such views be publicly disseminated.
36. When dealing with anyone outside Global Sustain, including public officials, associates must take care not to compromise the integrity or damage the reputation of Global Sustain, or any outside individual, business, or government body.

K. Prompt communications

37. In all matters relevant to customers, suppliers, government authorities, the public and others in Global Sustain, all associates must make every effort to achieve complete, accurate, and timely communications - responding promptly and courteously to all proper requests for information and to all complaints.

L. Privacy and confidentiality

38. When handling financial and personal information about customers or others with whom Global Sustain has dealings, observe the following principles:
- Collect, use, and retain only the personal information necessary for Global Sustain business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
 - Retain information only for as long as necessary or as required by law. Protect the physical security of this information.
 - Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.
 - Comply with relevant confidentiality and / or non-disclosure agreements.

M. Examples of unacceptable acts and practices

39. The following is a non-exhaustive list of examples of acts and practices which Global Sustain considers unacceptable.
40. Any associate found engaging in these acts will be subject to disciplinary action which may include reprimand, warning, suspension, dismissal or / and termination of contract:
- Being absent from work without a valid reason (applicable to associates employed directly by Global Sustain)
 - Willfully damaging, destroying or stealing property belonging to fellow associate or the company
 - Fighting or engaging in disorderly conduct while in Global Sustain premises or while contacting business on behalf of Global Sustain.
 - Refusing to follow or failing to carry out the reasonable instructions of a supervisor or respective Head (if applicable)
 - Ignoring work duties or wasting time during working hours, while engaged on and / or representing Global Sustain activities.
 - Appearing to work under the influence of alcohol or any drug, or bringing alcoholic beverages or drugs on to company property (excludes prescribed drugs)
 - Intentionally giving any false or misleading information to obtain a leave of absence (applicable to associates employed directly by Global Sustain).
 - Using threatening or abusive language towards a fellow associate or company stakeholder
 - Smoking contrary to established policy or violating any fire protection regulation as applied to the respective territories and countries.
 - Willfully or habitually violating health and safety regulations as applied to the respective territories and countries.
 - Failing to wear clothing conforming to commonly accepted working standards
 - Being late or taking unexcused absences from work (applicable to associates employed directly by Global Sustain)
 - Not taking proper care of, neglecting or abusing company equipment or tools
 - Using company equipment in an unauthorized manner
 - Possessing firearms or weapons of any kind on company property.

N. Application of the Code of Conduct

41. The Global Sustain Code of Conduct binds all levels of Global Sustain associates as outlined in the Definition paragraph

Signature and corporate seal

On behalf of Global Sustain:

Michael Spanos
Managing Director
Global Sustain Group

Signature _____

Name _____

Last updated: June 18, 2016

Effective upon signature by both parties

Date _____