



Code of Conduct Policy

Introduction and scope

The Code of Conduct is a set of rules and principles for how we want to act and behave as a company. This includes but is not limited to topics such as bribery, facilitation payments, fraud, gifts, entertainment and hospitality, conflict of interest, donations, government relations and relations with third parties, for example agents.

The Policy applies to officers, all employees, and to any company acting on behalf of Bish's. Compliance with this policy is a condition of employment at Bish's.

Rules

1.1 Compliance with laws

All of Bish's employees must comply with the Federal, State, and Local laws and regulations of the United States legal system.

1.2 Bribery

Bish's does not engage in, support or condone bribery in any form. Bish's employees, or any persons or companies working on our behalf, may not offer or demand bribes in any form. Bribery means giving, receiving or demanding any payment, including money, gift, reward, advantage or benefit of any kind, in order to obtain, retain or direct business or to secure any other improper advantage. Bribery is illegal in all countries. This rule applies regardless of whether the other party is from the government or private sector.

1.3 Facilitation payments

Facilitation payments are small payments or gifts paid to perform or speed up a routine process that you are already entitled to, e.g. getting goods through customs or applying for a work permit. Bish's does not permit facilitation payments, whether a result of a direct demand or as an implicit expectation. Any local custom or practice to the contrary must therefore, be disregarded as this is not an excuse. The only exception to this rule is when life, limb or liberty is at threat.

1.4 Fraud

Bish's employees must not engage in any kind of fraud against Bish's or any other entity or individual. The definition of fraud varies, but generally, it means deliberately deceiving a person or company to unjustly obtain an unauthorized benefit, such as money, property or services. Examples include theft, embezzlement, procurement fraud, collusion with suppliers, fraudulent expense and travel claims, misuse of Bish's property, wrongful financial records, and cyber fraud.

Fraud is dishonest and entirely contrary to Bish's values and culture. Potential criminal cases will be handed over to the police.



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1.5 Gifts, entertainment and hospitality

Providing or accepting gifts, entertainment and hospitality is legitimate in business relations, if it is legal, reasonable and proportionate. Bish's prohibits the offer or receipt of gifts, entertainment and hospitality whenever it can influence or appear to influence the recipient to make biased decisions.

Bish's has monetary limits for gifts (reference Bish's Anti-Corruption Policy), entertainment and hospitality.

1.6 Conflict of interest

Bish's employees must conduct business activities in the best interests of the company and avoid personal interests to conflict with his or her obligation as an employee. It is important that even the appearance of a conflict of interest be avoided.

1.7 Donations

Donations are something of value given to charitable organizations without charge. In general, Bish's avoids giving/participating in donations. All donations must be approved by one of the following: the Director of Operations, Company Officers, or the Company Owners. Bish's never allows donations to politicians or political parties.

1.8 Government relations

Government relations include all contacts with governments, their agencies and representatives, in national and local jurisdictions around the world. Bish's policy is to remain neutral in situations where opinions on culture, religion or political issues differ. Bish's does not allow contributions to politicians or political parties, and the employment of government employee to perform services for Bish's is prohibited. In addition, Bish's employees must cooperate with any legitimate request for information from government sources.

1.9 Relations with third parties

Bish's works with a wide range of third parties, including customers, suppliers, representing a wide range of compliance strengths and challenges. As a company, we are increasingly being held accountable to legal and ethical standards of the third parties we work with.

Bish's employees must perform all customer and supplier contracts in a fair and ethical manner. We negotiate in good faith, and present clear and accurate information without exaggerating, omitting, or lying about our own products, services or capabilities.