

The Freeman Company

# *code of conduct*

INTEGRITY | MAKE IT PERSONAL<sup>SM</sup>



# *At Freeman, we recognize our success is driven by how our customers, our people, and our communities perceive and experience Freeman.*

We want everyone who works with us to understand our family's and company's values and commitment to unquestioned integrity and operating with the highest standards of ethical conduct in everything we do. This is especially important as we continue to grow globally and achieve our vision to own the category of brand experience.

We also fundamentally believe an ethical, respectful and professional environment is the type of environment where our people want to work. As we grow and attract new people to the Freeman team, we set the bar high. We hold ourselves to the highest standards of conduct in how we treat one another and how we work together to deliver exceptional service and performance.

Because your commitment to understanding these expectations and living them every day is critical to our company's success, our theme for the Freeman Code of Conduct is "Integrity: Make it Personal." We want our people to know, understand and demonstrate personal accountability for high standards of ethical behavior.

This Code will help you understand our family and company values, which drive how we do business at Freeman. It includes topics to help ensure we are compliant with laws and regulations as well as enterprise-wide policies. It is also important to understand the policies included within the Code cover all Freeman locations, regardless of where you work or what role you have in the company. Our people are expected to follow both the spirit and the letter of the policies contained within.

If you have a question or think anyone is violating the Code, speak up. Talk to your manager or Human Resources, or report an issue to the Legal Department at [legal@freeman.com](mailto:legal@freeman.com). You may also share concerns anonymously through our Ethics Hotline. Remember, our non-retaliation policy means you don't need to be afraid to report potential issues. It is our collective obligation to speak up.

**Thank you for contributing to the legacy of integrity we enjoy at Freeman.**



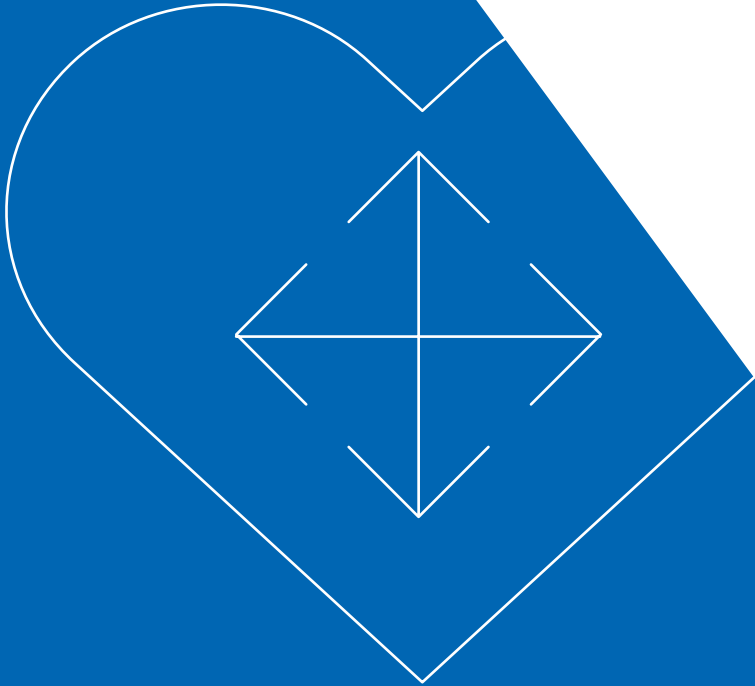
**Carrie Freeman Parsons**  
CHAIR | FREEMAN



**Bob Priest-Heck**  
CEO | FREEMAN



**Phil Molyneux**  
PRESIDENT | FREEMAN



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# Our Core *values*

## Integrity

We define a person of integrity as someone who is honest, direct and trustworthy. People of integrity do the right thing and possess an authentic sense of humility that demonstrates a healthy self-knowledge. Integrity is the first and foremost of the Freeman values because without it, nothing else matters.

## Empathy

In order to fulfill Freeman's purpose of connecting people in meaningful ways, we must strive to listen, to understand, and to be sensitive to the perceptions and feelings of others. Empathy is essential to possessing a "servant's heart," which promotes emotionally healthy work environments for our colleagues, and nurtures positive relationships with clients that last a lifetime.

## Innovation

Freeman is never content with the status quo or what others consider "good enough." Our innovation is fueled by an unquenchable curiosity that results in the creation of something that delivers lasting value to others. Innovation is a way of thinking. It's a journey that begins with two profound, yet simple questions: "What if?" and "Why not?"

## Enthusiasm

Our founder, Buck Freeman, often quoted Ralph Waldo Emerson, who said, "Nothing great was ever achieved without enthusiasm." Authentically optimistic and enthusiastic people are a joy to behold and a gift to any enterprise. Enthusiasm inspires confidence, which is the essence of leadership and is indispensable in times of challenge and adversity.

## Performance Excellence

While effort and good intentions are encouraged and appreciated, our clients pay for results. At Freeman, performance excellence begins with a commitment to setting and exceeding the highest professional standards. Performance excellence is ensured by a deep sense of personal accountability for delivering consistently measurable results that define success for our clients and for Freeman.

## Collaboration

We believe collaboration can flourish when we are open-minded and respectful of what others have to offer. Working together openly, fluidly, and with a collective concern for growth and success of all is central to the character of our people and fundamental to the vitality of our Freeman culture.



*our code* and your role

The Code establishes a fundamental set of standards and defines how we conduct our business with the highest integrity and ethics. It applies to all individuals employed by or engaged to provide services to any Freeman-owned company, including employees, officers, temporary and casual employees, independent contractors and consultants. Although employment by Freeman is subject to the terms and conditions established by your local business entity, you are also required to abide by the global standards set forth in this Code.

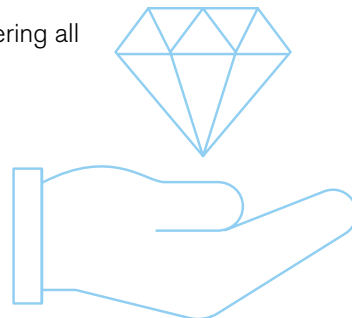
Only Freeman's Chief Executive Officer and Chief Legal and Administrative Officer may waive a provision of the Code pertaining to an employee.

It is the responsibility of each employee to apply common sense, together with your own highest personal ethical standards, in making business decisions where there is no stated guideline in the Code. You should not hesitate to ask questions, voice concerns or request clarity on gray areas about whether any conduct may violate the Code.

### **Your Role**

Your role and personal commitment to integrity and ethical behavior is critical to living our values. It is imperative you put integrity and ethics first by:

- Acting ethically and with integrity in all business dealings
- Seeking assistance from Freeman's Human Resources and Legal Department, if needed
- Knowing and following the Code, Freeman policies and procedures and the law
- Reporting all alleged, potential or actual violations of the Code, policies and the law
- Fully cooperating with investigations and answering all questions truthfully



### **Making Good Decisions**

Recognizing ethical issues and doing the right thing in all Freeman business activities is your responsibility. When engaging in business activities for Freeman, consider the following:

- Is it the right thing to do?
- Is it consistent with Freeman's Code, the company policies, laws and regulations?
- How will this appear to others – such as your manager, Freeman Leadership, our customers or the general public?
- Should I seek additional input before I proceed?

### **Consequences for Violating the Code**

Because how we conduct business is so critical to our brand, we take all violations of our Code seriously. Employees who violate our Code or any of our policies will be subject to disciplinary action, up to and including termination.

Employees who knowingly make a false allegation to the Ethics Hotline or management or deliberately provide false information will be subject to discipline. Employees who refuse to cooperate in an investigation or fail to take appropriate action after receiving a report of a suspected violation will also be subject to disciplinary action.



## ★ **Speak Up - Asking Questions and Reporting Concerns**

Freeman is committed to conducting business with the highest standards of ethics, honesty and integrity. To continue to do so, we need to know and understand whether problems exist so we may resolve them promptly. Freeman provides multiple resources for reporting allegations of misconduct. We will review and investigate every allegation as appropriate and, if justified, will implement disciplinary actions or other remedies. So, you are expected to promptly report any concerns you in good faith believe may be a violation of the Code. Options for reporting concerns or allegations of misconduct include:

- Your direct supervisor or any member of management
- Human Resources
- A member of the Legal Department
- Freeman's Ethics Hotline

Freeman's Ethics Hotline is operated by a third-party service provider and allows you to report concerns and allegations anonymously should you feel uncomfortable reporting in other ways. The Ethics Hotline allows a report to be made confidentially 24 hours a day, seven days a week — using a toll-free telephone number or online via the web. The Ethics Hotline does not record or trace calls or use any identity tracking technology.

### **Ethics Hotline Contact Information**

**US AND CANADA 1-855-342-6939**

**MEXICO 01-800-253-0373**

**UNITED KINGDOM 0808-234-6721**

**WEB <https://freemanco.tnwreports.com>** →

For all other countries please report your concerns to the Ethics Hotline by using the above web address.

When you report incidents through the Ethics Hotline via telephone, an operator will ask questions to obtain the details of your concerns and will document the call. You should provide as much detail as you can when raising a concern, including the parties involved, relevant dates and specific conduct at issue. Due to confidentiality and other reasons, Freeman generally does not disclose the specifics of any internal investigation. You will receive a report number you can use later to add details or check the status of your report and learn whether an investigation has been closed.





## **Commitment to Non-Retaliation**

Any employee who reports an alleged violation will be treated with dignity and respect and will not be subjected to any form of discipline or retaliation for making a report in good faith. Retaliation against anyone who provides information or otherwise assists in an investigation regarding any conduct the employee believes in good faith constitutes a violation of applicable laws or regulations, our Code or Freeman's policies and procedures is prohibited and will, in itself, be treated as a violation of our Code.

# q & a



**Q** I'm not certain if what I observed is an ethical issue, but it doesn't feel right. What should I do?

**A** Contacting a manager first with questions, concerns or advice is always recommended. If you are still unclear or would like additional guidance, contact your Employee Relations representative, a senior leader at Freeman or the Legal Department. Additionally, you can also contact our Ethics Hotline.



**Freeman and**

*our employees*

## **Diversity, Inclusion and Non-Discrimination**

Freeman actively creates and promotes an environment that is inclusive of all people and their unique abilities, strengths and differences. As we continue to grow, embracing diversity in every aspect of our business is vital to our long-term success. Freeman affirms the principle of equal employment opportunity without regard to any protected characteristic, including but not limited to:

- Race
- Religious creed
- National origin / ancestry
- Color
- Sex or gender
- Sexual orientation
- Gender identity or expression
- Age
- Mental or physical disability or medical condition
- Pregnancy
- Marital status
- Military and protected veteran status
- Genetic information
- Political affiliation
- Any other characteristic protected under federal or state law or local ordinance

Freeman does not tolerate discrimination in any aspect of the employment relationship, from recruitment and hiring, through performance evaluations, compensation, and promotions, to the end of your employment relationship with Freeman.

We base employment-related decisions strictly on individual ability, performance, experience, and company and business need. We avoid actions influenced by personal relationships and discriminatory practices of any kind.

Our goal is to compensate our employees – with wages, salaries, and other benefits – in relation to their responsibilities, performance, and experience. Freeman is also committed to adhering to wage and hour as well as minimum-age guidelines provided by applicable laws. In turn, employees must accurately report their hours of work and paid time off in accordance with Freeman policies.

## **Harassment**

Freeman is committed to providing a work environment free of all forms of harassment. Our goal is to create a place where all team members feel safe, welcome and heard. For this to happen, all employees must treat each other with mutual respect and dignity. Harassment is prohibited in any form: physical, verbal and non-verbal. Harassment is prohibited by Freeman policy and the law.

Although “harassment” frequently refers to sexual harassment, workplace harassment may also include harassment based on a person’s race, religious creed, national origin/ancestry, color, sex or gender, sexual orientation, gender identity or expression, age, mental or physical disability or medical condition, pregnancy, marital status, genetic information, political affiliation, military and protected veteran status, or any other characteristic protected under federal or state law or local ordinance.

You must report all instances of harassment, whether you are being harassed yourself or have witnessed harassment of another employee or individual at our workplace, to your manager, another manager, Employee Relations, the Legal Department, or the Ethics Hotline. Your report will remain confidential to the greatest extent possible and retaliation is not tolerated for any report made in good faith.

## Professional Conduct

You are always expected to conduct yourself in a professional, respectful manner consistent with Freeman's values and culture of integrity. Unprofessional conduct or behavior at the workplace or while representing Freeman at another worksite that negatively affects the company's business interests or reputation and/or violates law is prohibited.

### ★Something to Think About

*Unprofessional behavior in the workplace may not amount to acts of unlawful discrimination or harassment; however, unprofessional behavior can escalate into illegal or unethical situations. It can also destroy trust, damage relationships in the workplace or tarnish our relationships with others. For this reason, unprofessional behavior is a violation of our Code.*

## Safety and Security

Threats or acts of violence against you, temporary employees, independent contractors, customers, clients, suppliers, or other persons and/or property will not be tolerated. Immediately report potential threats or acts of violence to your manager or Risk Management at [risk@freeman.com](mailto:risk@freeman.com). In case of an emergency, contact local law enforcement.

## Substance Abuse

Freeman requires employees to work free from the influence of any substance, including drugs and alcohol, that may prevent them from conducting work activities safely and effectively.

## Theft

Theft of any amount will not be tolerated. No employee may commit theft, fraud or embezzlement, or misuse company labor or property. This extends to activities such as falsifying expense reports and misrepresenting information for personal gain.

## Employee Information Privacy

Freeman respects the privacy of our employees. We will collect and handle personal employee information only for business reasons consistent with applicable laws. Access to personal employee information is limited only to those who have a legal right to view the information, and then only on a need-to-know basis for the performance of their job. Those who are responsible for personal information are advised on a regular basis of their duty to protect this information.

## Proprietary and Confidential Information

In carrying out Freeman's business, employees, officers and the Board of Directors often learn confidential or proprietary information about our company, its customers, prospective customers, or other third parties. Employees, officers and the Board of Directors must maintain the confidentiality of all information entrusted to them, except when disclosure is authorized or legally mandated. Confidential or proprietary information includes, among other things, any non-public information concerning Freeman, including its businesses, financial performance, results or prospects, and any nonpublic information provided by a third party with the expectation the information will be kept confidential and used solely for the business purpose for which it was conveyed.

## Protecting Customer / Third-Party Information

Keeping customer information secure and using it appropriately is a top priority for our company. We must safeguard any confidential information customers or third parties share with us. We must also ensure such information is used only for the reasons for which the information was gathered, unless further use is allowed by law. Customer or third-party information includes such things as name, address, phone numbers, financial information, etc. We do not disclose confidential or proprietary information about a third party without their written approval unless legally required to do so (under a court-issued subpoena, for example).

## **Global Privacy**

As an international company, Freeman is subject to a myriad of global compliance obligations. It is your responsibility to collect, store, transmit and retain sensitive or confidential information in compliance with all applicable laws and Freeman policies.

## **Proper Use of Company Resources**

Freeman provides an array of resources to employees so they may perform their jobs. This includes physical assets such as equipment, supplies, inventory, materials and cash. It also includes information and technology resources such as e-mail, computers, computer applications, networks, the internet, the intranet, cell and smart phones, other wireless communication devices, telephones and voice mail systems.

Inappropriate or illegal use of these resources will result in disciplinary action, up to and including termination of employment.

Improper use includes:

- Hacking
- Excessive use of technology resources for personal purposes
- Pirating software or video / audio files
- Soliciting
- Sending inappropriate or harassing e-mail
- Accessing inappropriate web sites (such as those advocating hate, violence, sexually explicit material or promoting illegal activities)
- Distributing confidential, proprietary or trade secret information outside the company

Freeman reserves the right to monitor and inspect, without notice, the use of company resources.



# q & a

**Q** Can I use company assets for personal use?

**A** All company resources must be used in a manner that reflects positively on Freeman and all who work here. Occasional, limited personal use of these resources is permitted, but it should not interfere with your work performance, or the work performance of your colleagues.

## **Examples of misusing company resources?**

- Use of our company facilities for personal gain
- The excessive use of company resources for personal purposes, such as surfing the internet
- Excessive, non-business related use of social media
- The taking of office supplies or equipment for personal consumption
- The personal use of our company vehicles without express authorization
- The unauthorized copying of computer software programs
- Excessive use of our company-issued credit card(s) for personal purchases

Electronic media such as smart phones, tablets, data storage units or thumb drives are provided for employees to perform their job responsibilities. Each employee has the responsibility to protect these systems and the data that is contained on them from misuse, improper access, damage, and theft. Keep in mind, even when use of Freeman's electronic media for limited personal purposes is permitted, such use is not private. Anything sent or received using our company's electronic media may be reviewed by Freeman and others at its discretion and direction.

## **Manage Records Properly**

Our records are our corporate memory, containing data and information critical to the continuity of our business. Records consist of all forms of information created or received by Freeman, whether originals or copies, regardless of media. Examples of company records include paper documents, e-mail, electronic files stored on disk, tape or any other medium (CD, DVD, USB data storage devices, etc.) that contains information about our company or our business activities. All records are the property of Freeman and should be retained in accordance with our Records Retention Policy. We are responsible for properly labeling and carefully handling confidential, sensitive, and proprietary information and securing it when not in use. We do not destroy official company documents or records before the retention time expires, but do destroy documents when they no longer have useful business purpose. Refer to the Records Retention Schedule for more specific retention and destruction guidelines.



## Social Media

At Freeman, we encourage communication among our employees, customers, partners and others – and web blogs, social networks, discussion forums, wikis, video and other social media can be a great way to stimulate conversation and discussion. It is particularly important to remember the following:

- The Code, Freeman's Social Media Policy, and other Freeman policies apply to your online conduct and activity just as much as they apply to your offline behavior
- Do not use social media for confidential, substantive or direct business communications with customers
- Respect others' intellectual property rights, including copyrights and privacy/publicity rights, particularly when using photographs or video content
- Unless you are an official Freeman spokesperson, you are not authorized to speak on behalf of Freeman or represent that you do, unless you are authorized to do so by Freeman's Corporate Communications department
- Do not make any politically oriented commentary or statements using any of Freeman's social media accounts or platforms
- When using your personal social media account(s) to discuss Freeman-related topics, identify yourself as a Freeman employee, and make it clear your opinions are your own and do not necessarily reflect the views of Freeman
- Do not disclose any confidential information through any social media platform
- Do not make abusive, objectionable or inflammatory posts

# q & a



**Q** I've noticed every time I walk past my colleague's desk, she's on social media sites. At first I didn't think it was an issue, because she seemed to be getting her work done. Recently, however, she has been missing deadlines and often comments or laughs loudly about things she sees online, which disrupts others in our area. Is this a problem?

**A** In this case, your coworker's use of company assets for personal reasons could be excessive and may need to be addressed. Freeman's policy allows for the personal use of company assets, such as company computers and internet connection, as long as the use is not excessive or inappropriate. Your leader should determine if the use is inappropriate by considering the following:

- Is it negatively impacting job performance?
- Is the duration or frequency excessive?
- Does it prevent the employee from producing their best and most efficient work?
- Do the web-sites being visited contain inappropriate or offensive content?



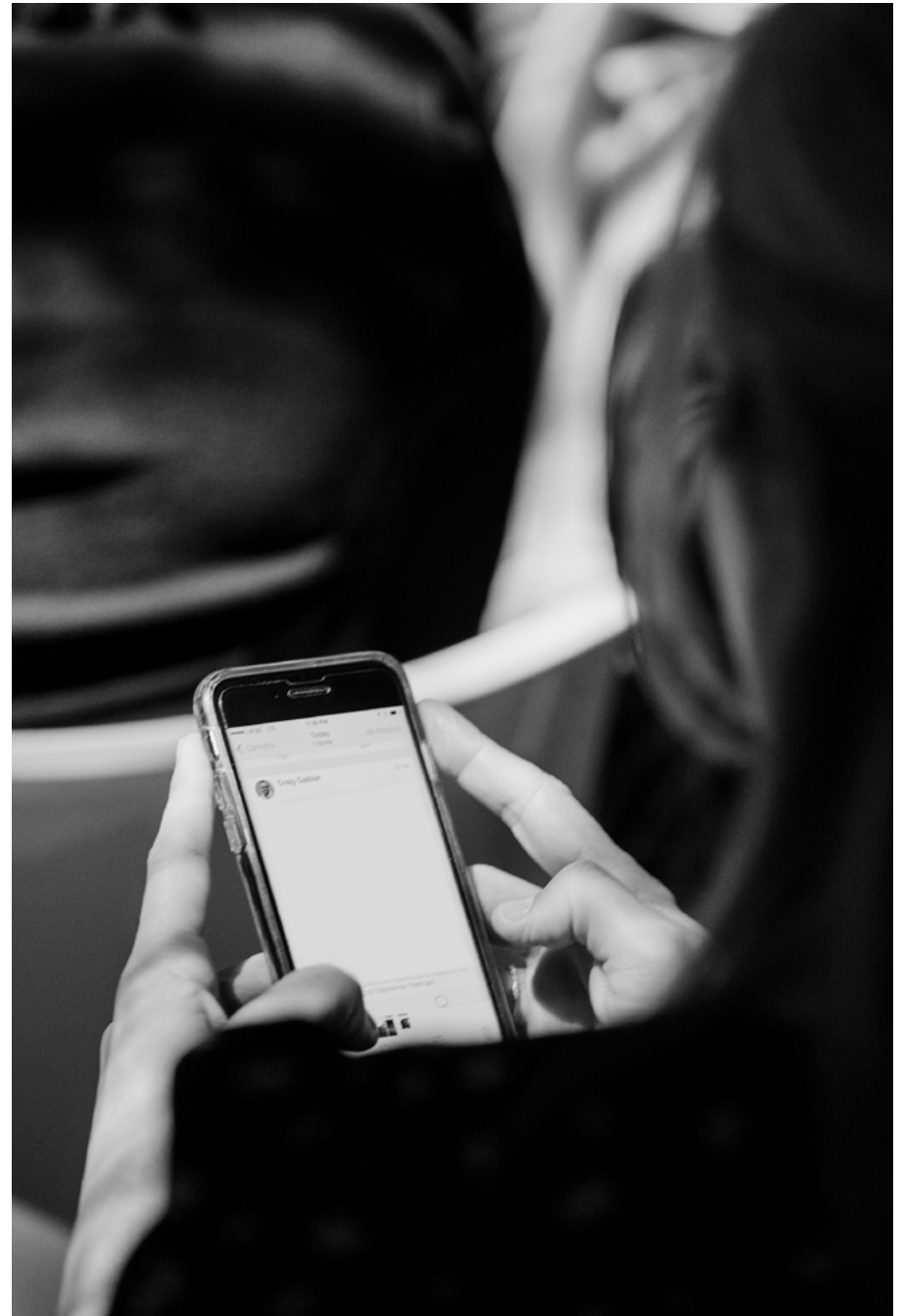
## **Media Policy**

In an age of 24-hour news cycles where information flows instantaneously, managing the reputation and protecting the brand of Freeman among its key global audiences is vital to the organization's success. As such, it is critical that our communications with external audiences are managed in a coordinated way with Corporate Communications and appointed Freeman spokespersons.

- Employees should not communicate externally about Freeman prospects, customers or performance policies, or disclose unpublished sensitive information, without appropriate approval from the SVP Communications.
- All requests from the media should be documented accurately (name, outlet, phone and/or e-mail address) and passed on immediately to the SVP Communications or personnel with communications responsibility. This includes formal requests for interviews and quotes as well as inquiries, and includes all media – TV/radio, newspapers, magazines, local/national, trade media, blogs and internet sites. No employee shall supply a quote to a customer or client or for use on a web-site, press release, or other form of communication without advanced, express approval from the SVP Communications.
- Only authorized staff may speak with the media with prior approval. No employee should speak or accept an appointment to speak with the media without the approval and advice of the SVP Communications or communications staff.

## **Protecting Intellectual Property**

Our intellectual property is among our most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties. Intellectual property includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, and other intangible industrial or commercial property. We must protect and, when appropriate, enforce our intellectual property rights. We also respect the intellectual property belonging to third parties. It is our policy to not knowingly infringe upon the intellectual property rights of others.





*governments* and communities



## **Antitrust and Fair Competition**

Typically, the countries in which Freeman operates have laws and regulations to prohibit unlawful restraint of trade, usually referred to as antitrust or competition laws. These laws are designed to protect consumers and markets against unfair business practices and to promote and protect healthy competition. Freeman commits to observing applicable antitrust and competition laws around the world. Antitrust or competition laws vary from country to country, but generally, these laws prohibit agreements or actions that reduce competition without benefiting consumers. Among those activities generally found to violate antitrust or competition laws are agreements or understandings among competitors that:

- Fix or control prices, including a reseller's prices to its customers
- Structure or orchestrate bids to direct a contract to a certain competitor or reseller or anti-competitively influence pricing (bid rigging)
- Boycott suppliers or customers
- Divide or allocate markets or customers
- Limit the production or sale of products or product lines for anti-competitive purposes

Agreements like those listed above are against public policy and Freeman policy. We must never engage in discussions of such matters with representatives of other companies. You should promptly report to the Freeman Legal Department any instance in which employees or third parties initiate such discussions. Contracts or other arrangements that involve exclusive dealing, tie-in sales, price discrimination, or other terms of sale may be unlawful under applicable antitrust or competition laws. You should not enter into such arrangements without the approval of the Freeman Legal Department. Requests for the issuance of exclusivity certificates are generally prohibited and should also be raised to the Freeman Legal Department for further review and approval.

**Antitrust and competition laws are complex; please seek advice from the Freeman Legal Department on any related questions.**

## **Obtain Competitive Information Fairly**

Gathering information about our competitors, often called competitive intelligence, is a legitimate business practice. Doing so helps us stay competitive in the marketplace; however, we must never use any illegal or unethical means to get information about other companies. Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows, and information publicly available on the internet. You may also gain competitive information appropriately from customers and suppliers (unless they are prohibited from sharing the information) and by obtaining a license to use the information or actually purchasing the ownership of the information. When working with consultants, vendors, and other partners, ensure they understand and follow Freeman policy on gathering competitive information.

## **Anti-Money Laundering**

Money laundering is a global problem with far-reaching and serious consequences. Money laundering is defined as the process of converting illegal proceeds so funds are made to appear legitimate, and it is not limited to cash transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation and can expose Freeman and individuals to severe sanctions. Our company forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Anti-money laundering laws of the United States and other countries and international organizations require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions.

## **Anti-Corruption / Anti-Bribery**

The United States and many other countries have laws to prohibit bribery, kickbacks, and other improper payments. No Freeman employee, officer, agent, or independent contractor acting on our behalf may offer or provide bribes or other improper benefits in order to obtain business or an unfair advantage. A bribe is defined as directly or indirectly offering anything of value (e.g., gifts, money, or promises) to influence or induce action, or to secure an improper advantage. The Foreign Corrupt Practices Act and other U.S. and international laws prohibit payment of any money or anything of value to a foreign official, foreign political party (or official thereof), or any candidate for foreign political office for the purposes of obtaining, retaining or directing of business. We expect all employees, officers, agents, and independent contractors acting on behalf of Freeman to strictly abide by these laws.

"Anything of value" is very broadly defined and can include such things as:

- Cash
- Gifts
- Meals
- Entertainment
- Travel and lodging
- Personal services
- Charitable donations
- Business opportunities
- Favors
- Offers of employment

Facilitation payments are generally requested in connection with obtaining ordinary licenses, work permits, processing of visas and other similar customary governmental services. Facilitating payments of a reasonable and customary amount paid to lower-level government officials in foreign countries to perform non-discretionary functions or services that they are obligated to perform are not illegal under United States law as long as payments are customary in a particular

country and are the only feasible way to obtain government services or action to which Freeman is legally entitled. However, such facilitating payments may not be legal under local law. Legal advice concerning any such proposed payment must be sought in advance from, and be approved by, Freeman's Chief Legal & Administrative Officer before any payments are made. Freeman can pay for bona fide business expenses and certain gifts for third parties, but only if done without corrupt intent and according to Freeman's Anti-Bribery Policy. Freeman's Anti-Bribery Policy provides specific guidelines to ensure you comply with applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and UK Bribery Act.

### **Business Courtesies You May Extend**

Furnishing meals, refreshments, entertainment, and event access in conjunction with business discussions with nongovernment personnel may be appropriate as long as the offering of such courtesies does not violate any policies of the recipient's organization, any contractual agreement with a customer, Freeman's Travel and Expense Reimbursement Policy, or the Anti-Bribery Policy. You are responsible for familiarizing yourself with any such standards, agreements, and policies and for complying with them. Freeman prohibits giving anything of value (including charitable donations or sponsorship of events), directly or indirectly, to any private individual, firm, or entity as a means of improperly inducing business. Employees who seek or approve expenditures for meals, refreshments, or entertainment must use discretion and care to ensure these events are reasonable and modest in cost, not lavish or extravagant, justified by a legitimate business purpose, and not offered improperly to influence the recipients' business judgment.

Freeman's standards and the applicable laws for dealing with government employees and employees of state-owned enterprises are more stringent than standards for private sector company employees. In dealing with government employees and officials, it is our general policy that nothing of value will be given to such individuals. Limited exceptions that may apply are covered in the Anti-Bribery Policy. You are responsible for being familiar with the rules

and regulations of the government entities with which you interact. Contact Freeman's Legal Department if you have any questions about your activities and interactions with the government. In any case, business courtesies must be small enough not to appear to influence the judgment of the recipient, secure unfair preferential treatment, or gain an improper advantage. A final test of appropriate business courtesies, even if allowed under the law, is whether public disclosure would be embarrassing to Freeman or the recipient.

### **Business Courtesies You May Accept**

You may accept certain gifts from third parties and Freeman can pay for bona fide business expenses and certain gifts for third parties, but only if done without corrupt intent and according to Freeman's Anti-Bribery Policy. Freeman's Anti-Bribery Policy provides specific guidelines to ensure you comply with applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

Generally, we should limit ourselves to gifts, meals, transportation, or entertainment of nominal value. In particular, the following types of gifts and entertainment may never be accepted, regardless of the value:

- Cash or cash equivalents (i.e. gift cards)
- Any gifts given or accepted or any entertainment provided during a bidding process
- Any gifts that are or could be illegal
- Any gifts or entertainment that is solicited
- Contributions to personal charitable causes

The following are not considered gifts and entertainment and may be accepted as long as such acceptance is permitted under applicable law:

- Gifts that are promotional/branded company giveaways of nominal value
- Mementos or other similar awards provided or paid for by vendors or service providers as recognition for service on a particular matter
- Perishable gifts that are impractical to return and are of nominal value if they are distributed to Freeman's employees for consumption on Freeman's premises
- Business meals, at which the giver is present and business discussions take place or the meal is contiguous to a legitimate business discussion, are permissible if infrequent and the value of the meal is reasonable as judged by local standards
- Local travel to a vendor's place of business as long as the value of the travel is reasonable and the vendor's place of business cannot be reached by major forms of transportation

You should never accept any gift or entertainment if you feel it would affect your ability to act in Freeman's best interests. Before accepting any gift or entertainment, you should ask yourself:

- Will the acceptance reflect poorly on Freeman?
- Is there a valid business reason to accept the gift or entertainment, and does the acceptance accomplish a legitimate business purpose?
- Will the acceptance create a negative impression in the minds of our co-workers or the public?
- Is the acceptance consistent with good business practices?
- Is the value reasonable, given the nature of the event or other context with within which the gift, favor or the like is given?
- Is the expense and frequency of the activity reasonable?



### **Selection and Use of Third Parties / Procurement**

To create an environment where our suppliers, contractors, and consultants have an incentive to work with Freeman, they must be confident they will be treated in an ethical manner. We offer fair opportunities for prospective third parties to compete for our business. The manner in which we select our suppliers and the character of the suppliers we select reflect on the way we conduct business. Please see our Vendor Code of Conduct for more information.

### **Government Customers / Contracting**

When doing business with federal, state, or local governments, we must ensure all statements and representation to government procurement officials are accurate and truthful, including costs and other financial data. If your assignment directly involves the government or if you are responsible for someone working with the government on behalf of Freeman, be alert to the special rules and regulations applicable to our government customers. Additional steps should be taken to understand and comply with these requirements. Any conduct that could appear improper should be avoided when dealing with government officials and employees. Payments, gifts, or other favors given to a government official or employee are strictly prohibited as it may appear to be a means of influence or a bribe. Failure to avoid these activities may expose the government agency, the government employee, our company, and you to substantial fines and penalties. For these reasons, any sale of our products or services to any federal, state, or local government entity must be in accordance with our company policy.

## Avoiding Conflicts of Interest

We have an obligation to make sound business decisions in the best interests of Freeman without the influence of personal interests or gain. Our company requires you to avoid any conflict, or even the appearance of a conflict, between your personal interests and the interests of our company. A conflict exists when your interests, duties, obligations or activities, or those of a family member, are, or may be, in conflict or incompatible with the interests of Freeman.

Conflicts of interest expose our personal judgment and that of our company to increased scrutiny and criticism and can undermine our credibility and the trust others place in us. Should any business or personal conflict of interest arise, or even appear to arise, you should disclose it immediately to your manager, Human Resources or Legal Department for review.

In some instances, disclosure may not be sufficient and we may require the conduct be stopped or actions taken be reversed where possible. As it is impossible to describe every potential conflict, we rely on you to exercise sound judgment, to seek advice when appropriate, and to adhere to the highest standards of integrity.

### Examples of Conflicts of Interest that must be disclosed for further review

- Involvement by you or a family member with a third party that has or could have a competing interest with Freeman
- A work relationship with a family member or someone with whom you have a business, personal or romantic relationship who may have a direct or indirect influence on the terms and conditions of your employment or on the company's business with a customer or supplier
- Opportunities you identify through proprietary knowledge you've gained at Freeman that you wish to pursue on your own

# q & a

**Q** I have a niece who just graduated with a degree in Graphic Design / Marketing. If we hired her, she would not report to me. Can I recommend her for a position?

**A** Some of our best hires come from employee referrals. However, to avoid the appearance of anything improper, you must disclose your relationship to the hiring manager. You should not participate in the hiring process or decision, so that your niece can be evaluated based solely on her merits. If hired, she must not fall within your chain of command.

## **Immigration Laws**

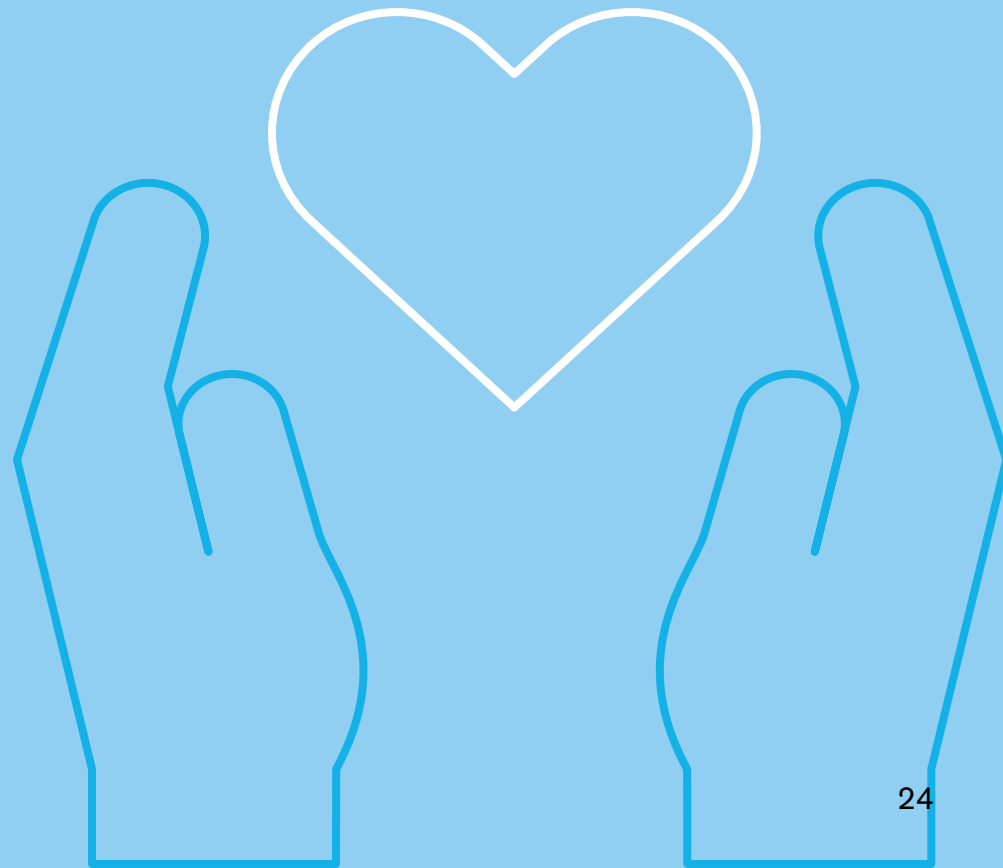
You are required to ensure you, and any employees who report to you, comply with all applicable immigration laws. At all times, Freeman employees must possess proper work authorization for the country they are working in. If you travel internationally on business, you are responsible for obtaining the appropriate visa, if necessary, before entering a host country. Visa requirements apply to all Freeman employees who travel outside of their home countries for business purposes or who work on projects or international assignments outside their home countries for any duration. Personal passports are not acceptable forms of work authorizations. Freeman also prohibits you from allowing contractors or other employees to work on a project without the proper authorization or documentation. If you need information on immigration issues, contact Freeman's Travel & Global Mobility Department.

## **Political Activities and Contributions**

You may support the political process through personal contributions or by volunteering your personal time to the candidates or organizations of your choice. These activities, however, must not be conducted on company time or involve the use of any company resources such as telephones, computers or supplies. You may not make or commit to political contributions on behalf of Freeman.

## **Human Rights**

We are committed to upholding fundamental human rights and believe all human beings around the world should be treated with dignity, fairness, and respect. Our company will only engage suppliers and direct contractors who demonstrate a serious commitment to the health and safety of their workers, and operate in compliance with human rights laws. Freeman does not use or condone the use of slave labor or human trafficking, denounces any degrading treatment of individuals or unsafe working conditions, and supports our products being free of the use of conflict minerals.








# *sustainability*

## **Environment, Health and Safety**

Freeman is committed to conducting its business operations in a manner that protects the health and safety of its employees, visitors, contractors, clients and customers and the public. Freeman promotes innovation at every event we help to produce. We provide solutions to reduce the environmental impact of our products and services, while actively advocating our sustainability message to clients and industry leaders. We are always mindful of how our company interacts with the local and global environment and strive each day to achieve our mission to Rethink, Reduce, Reuse, and Recycle.

A man with a full beard and dark hair is smiling and looking upwards and to the right. He is wearing a dark shirt. The background is a blurred office environment with a blue color cast. There are some circular patterns on the wall behind him, possibly from a light fixture or a decorative element. The overall mood is positive and professional.

At Freeman, ethics means more than merely obeying laws and following policies. Ethics also encompasses “doing the right thing for the right reasons” no matter what our job or responsibilities within the company may be. Any success we achieve, if not achieved ethically, is not success. Thank you for being a part of Freeman and for upholding our culture and our values.

*conclusion*

