

Cohort plc Statement of Ethical Business Conduct

It is Cohort plc's policy to conduct all our business in an honest and ethical manner. Cohort plc and its group subsidiaries ("**the Cohort Group**") are committed to acting professionally and with integrity in all our business dealings and relationships wherever we operate and to the highest standards of ethical conduct.

We will conduct our business consistently with this in all our dealings with customers, suppliers, partners, employees, shareholders, government and wider society.

The highest standard of behaviour, professionalism and personal conduct is expected from employees, directors and all parties acting on the Cohort Group's behalf.

In addition to their obligations under the relevant Group and subsidiary policies, directors and employees shall at all times:

- act in compliance with all legal and regulatory requirements in the countries in which we operate
- treat all colleagues and business contacts with respect
- refrain from conduct that would bring us into disrepute with customers, suppliers, employees, shareholders, government and wider society
- take personal responsibility for both their own safety and that of others in the workplace.

Failure to meet these standards by any director or Cohort Group employee will be regarded as a serious disciplinary offence.

All Cohort Group employees who become aware of behaviour that is in breach of these standards are expected to bring it immediately to the attention of their immediate manager, or use the Safecall service, the number of which is displayed in all Cohort Group premises. Employees are encouraged to seek advice and voice concerns without fear of reprisal. Further guidance is available at any time from your local HR manager, the Group Head of HR or the Company Secretary.

All policies and management directives within the Cohort Group and its subsidiaries shall be consistent with this Statement.

We expect and require similar standards of behaviour from our suppliers and partners.



Andrew S Thomis
Chief Executive

14 July 2020