



2017 ETHICS & COMPLIANCE POLICY  
BESPA GLOBAL, LLC  
*and affiliated series*

BESPA GLOBAL, LLC will conduct its business honestly and ethically wherever we operate in the world. We will constantly improve the quality of our services, products and operations and will create a reputation for honesty, fairness, respect, responsibility, integrity, trust and sound business judgement. No illegal or unethical conduct on the part of officers, directors, employees, consultants working on behalf of the company or company affiliates is in the company's best interest. BESPA GLOBAL, LLC will not compromise its principles for short-term advantage. The ethical performance of this company is the sum of the ethics of the men and women who work here. Thus, we are all expected to adhere to high standards of personal integrity.

Officers, directors, employees and consultants working on behalf of the company must never permit their personal interests to conflict, or appear to conflict, with the interests of the company, its clients or affiliates. Officers, directors, employees and consultants working on behalf of the company must be particularly careful to avoid representing BESPA GLOBAL, LLC in any transaction with others with whom there is any outside business affiliation or relationship. Officers, directors and employees shall avoid using their company contacts to advance their private business or personal interests at the expense of the company, its clients or affiliates.

No bribes, kickbacks or other similar remuneration or consideration shall be given to or accepted from any person or organization in order to attract or influence business activity. Officers, directors, employees and consultants working on behalf of the company shall avoid gifts, gratuities, fees, bonuses or excessive entertainment, in order to attract or influence business activity.

Officers, directors, employees and consultants working on behalf of the BESPA GLOBAL, LLC will often come into contact with, or have possession of, proprietary, confidential or business-sensitive information and must take appropriate steps to assure that such information is strictly safeguarded. This information – whether it is on behalf of our company or any of our clients or affiliates – could include strategic business plans, operating results, marketing strategies, customer lists, personnel records, upcoming acquisitions and divestitures, new investments, and manufacturing costs, processes and methods. Proprietary, confidential and sensitive business information about this company, other companies, individuals and entities should be treated with sensitivity and discretion and only be disseminated on a need-to-know basis.

Officers, directors, employees and consultants working on behalf of the company will obey all Equal Employment Opportunity laws and act with respect and responsibility toward others in all of their dealings.



Officers, directors, employees, and consultants working on behalf of the company will remain personally balanced so that their personal life will not interfere with their ability to deliver quality products or services to the company and its clients. Officers, directors, employees and consultants working on behalf of the company agree to disclose unethical, dishonest, fraudulent and illegal behavior, or the violation of company policies and procedures, directly to management.

Violation of this Code of Ethics and Compliance can result in discipline, including possible termination. The degree of discipline relates in part to whether there was a voluntary disclosure of any ethical violation and whether or not the violator cooperated in any subsequent investigation.

Good ethics is good business.