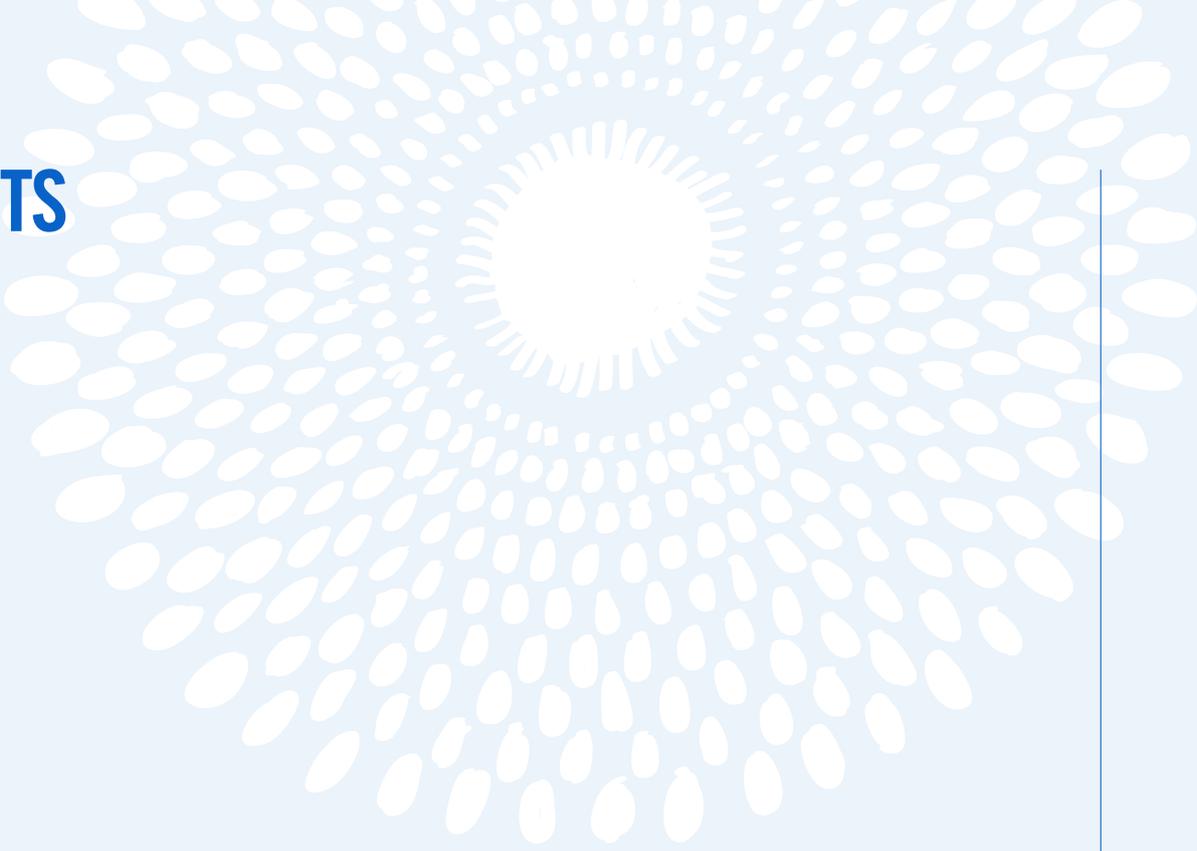


BIMA

PROTECTING THE FUTURE OF EVERY FAMILY

**CODE OF CONDUCT
DEC 2016**

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**BIMA'S MISSION:
TO CREATE A WORLD WHERE EVERYONE CAN
ACCESS THE SERVICES THEY NEED TO PROTECT
THE FUTURE OF THEIR FAMILY**



A MESSAGE FROM THE FOUNDERS

4

Dear Colleagues,

At BIMA we are committed to creating a fairer world, in which everyone can access the services they need for a safer financial future.

From day one, our commitment to fairness, integrity and transparency has been core to every aspect of our business; it has shaped our culture and been key to our global success.

Today, with a network of employees and customers spanning countries, continents and cultures, it's more important than ever that we are clear in our commitment to good, ethical practice across our organisation.

That's why we are proud to launch this Code of Conduct which sets out the high standards of practice that we all have a responsibility to uphold, to ensure that BIMA remains a trusted name and a place we all love to work. We expect every employee to share that commitment and to comply with this code in every aspect of their work and in every situation they may encounter during their employment.

Through this code, we aim to create an environment that safeguards the integrity, self-respect and security of every member of our worldwide team and, in turn, protects the BIMA's reputation. The code of conduct also helps us make sound decisions in difficult situations, offers support and guidance for appropriate, ethical behaviour. But, should you ever find yourself in a situation that feels unethical, uncomfortable or confusing, this code is not the only source of help and guidance available to you: I urge you to contact your local HR, management team or BIMA's global team.

Our private whistleblowing channel, at ethics@milvik.se or What's App +447460757164 was set up to allow the confidential reporting of unacceptable behaviour. If you have concerns about the behaviour of someone you work with, we ask that you share those concerns with us, and help to make BIMA a safe and happy place to work.



You'll find more information on our whistleblowing procedures, in section 6 on page 19.

Wherever you are in the world, and whatever your role, we trust you'll take the time to read our Code of Conduct and use it as your guide to a happy and successful future with us.

GUSTAF AGARTSON
Chief Executive Officer

MATHILDA STRÖM
Deputy CEO

SECTION 1 BIMA CORE VALUES

We are proud of our core values. They reflect who we are as a company, and guide us in our decision-making, and in our interactions at every level. We expect every employee to adopt and uphold them.

BIMA's three core values are:



RESPECT

At BIMA we believe every interaction is an opportunity to demonstrate and earn respect. Respect is the basis of strong relationships. And the ability to build strong relationships determines both BIMA's success and our success as individuals within the company.



**GIVING RESPECT
TO OTHERS IS THE
BEST WAY TO EARN
IT BACK**

Giving respect to others is the best way to earn it back. So, we are honest and patient in our dealings with our customers; we never lie to make a sale, or fail to treat customers with courtesy. When we earn their trust, we are rewarded with their loyalty.

We adopt the highest standards of integrity in our work with our partners; we are conscious to maintain BIMA's good name and exemplary work ethic at all times; allowing those partnerships to prosper.

We treat our colleagues with kindness and civility; respecting boundaries and political, religious or cultural difference, enabling our teams to grow strong, attract the best talent, and achieve more, together.

OWNERSHIP

Taking ownership means caring about BIMA and understanding that every one of us can impact the future of the business. The strongest members of the BIMA team are those of us who are committed to the company and passionate about our work.

It means doing our bit to make BIMA bigger and better: If we see an opportunity for improvement or growth, we act on it; If we have a good idea, we work hard to drive it forward; If we see a problem, we search for the best solution; And if we have valuable knowledge, we share it wherever it can make the greatest difference.



**EVERY ONE OF US CAN
IMPACT THE FUTURE
OF THE BUSINESS**

THINK BIG, START SMALL

We understand the power of thinking big and starting small. That's how BIMA began.

We have always focussed on innovation, with the ambition of creating new and better ways for people to access vital services. Generating new products, technologies and ways of getting things done is key.

We approach every new project in the same way; we start with a small pilot, work hard to get it right, then scale it up.



**EMBRACE NOVEL IDEAS AND
RELISH THE CHALLENGE OF
BREAKING NEW GROUND**

Our team members embrace novel ideas and relish the challenge of breaking new ground, even if it's hard work.

We are patient and tenacious: we don't give up if an idea doesn't work perfectly the first time. We share what we've learned and work together to improve.

And we are ambitious. We always strive to do better than we did yesterday and always looking to take our best ideas to the next level.

As your employer, BIMA is committed to creating a work environment where you are safe, free from harassment or discrimination, and where you are treated with respect. These are your rights as an employee, and they are protected by the law.

In this section we set out the rules we have put in place to fulfil our responsibilities as your employer.

A. DISCRIMINATION

BIMA is committed to unbiased treatment and equal employment opportunities for all individuals, on the basis of qualifications and expertise and without irrelevant regard for age, ethnicity, gender, religion, sexual orientation, social status, marital or maternity status, political opinion, disability or health conditions.

“
OUR DIFFERENCES MAKE
US STRONGER

Subjecting someone to negative treatment because of who they are or what they believe, is negative discrimination. In practice, this could mean refusing to hire, work with or promote someone because you have different religious or political beliefs from them, or because they are of a different gender, social status, ethnicity or sexual orientation from you. BIMA considers discrimination of any kind to be unacceptable.

B. HARASSMENT

Every employee has the right to be treated with respect and dignity and the right not to be subject to physical, sexual, psychological or verbal harassment or abuse. BIMA considers harassment of any kind to be unacceptable. The types include but are not limited to:

SOCIAL HARASSMENT When unwelcome remarks or jokes are made about a person or their beliefs, that isolate them from the rest of the team

FINANCIAL HARASSMENT When a person is made to fear losing their job or their commission, or is forced to hand over their money

PHYSICAL HARASSMENT When a person is subjected to unwelcome and/or violent contact, such as punching, grabbing or pushing

SEXUAL HARASSMENT When a person is subjected to inappropriate remarks about their body, unwelcome sexual advances, such as sending or requesting photographs, or unwelcome physical contact of a sexual nature, such as kissing, patting or groping

“
EVERYONE SHOULD
FEEL SAFE AT WORK

WHAT SHOULD I DO IF I EXPERIENCE DISCRIMINATION OR HARASSMENT AT BIMA?

If an employee feels that they have been subject to discrimination or harassment they should refer to the company's grievance procedures and/or consult their manager or local HR manager for guidance.

C. CONSENSUAL RELATIONSHIPS

Romantic or intimate relationships between mutually consenting colleagues are permitted, but must be reported to HR.

If your HR manager believes the relationship presents a potential conflict of interest for you or your partner, they have the right to move you or your partner to another team or department.

If you are in a consensual relationship with a colleague, you must treat them as you would any other member of the team. You must not give your partner preferential treatment – for instance, you must not give them privileged access to sales lead information. And, out of respect for your other teammates, you must not engage in displays of affection or intimate activity with your partner while at work.

SECTION 3 WORKING CONDITIONS AND EMPLOYEE RIGHTS

A. TERMS OF EMPLOYMENT

All employees should know the basic terms and conditions of their employment, and these should be covered in an employment contract.

Your contract should outline your pay and your entitlement to any other employee benefits. Where relevant, it also covers the rules for termination of your employment (whether you resign, are dismissed or made redundant), and your responsibilities regarding company property, including intellectual property.

Pay and terms must be fair and reasonable, and in line with national laws or standards for comparable jobs; whichever is higher.

BIMA PROMISES TO DEFEND YOUR RIGHTS

Working hours must comply with national laws and may not be excessive. You are entitled to breaks in the workday as set out in your employment contract.

You should have access to all of the benefits promised to you under the terms of your employment contract and those that are required according to the local laws.

B. FREEDOM OF ASSOCIATION

All employees are free to peacefully and lawfully join workers' associations of their own choosing, and should have the right to bargain collectively.

BIMA will never interfere with your right to join or form a trade union nor will we discriminate against members of a union. We promise to allow representatives of the union to carry out their functions in ways that don't disrupt the regular operation of the business.

C. SAFETY OF THE WORKPLACE

Your safety is a priority concern for the organisation and BIMA has taken steps to provide a safe work environment.

BIMA ensures that all offices meet the required health and safety standards of the market. Members of the team have been trained to deal with health and safety issues.

We are committed to protecting the personal security of our employees in the field. Local managers will make all reasonable considerations and take all reasonable precautions in deciding when and where field work will be carried out.

Team members must report to work free from the influence of any substance (i.e. alcohol and natural or synthetic drugs) as this poses a safety risk to the rest of the team. BIMA has a zero tolerance policy with regard to the use of illegal substances.

WHAT SHOULD I DO IF I'M INVOLVED IN A WORKPLACE ACCIDENT? As a victim, a witness or the cause of an accident, you have a duty to report it to the local HR and/or health and safety officer. You must provide an honest account of your actions and the actions of anyone else involved.

D. NO FORCED OR CHILD LABOUR

There may be no use of forced labour, including prison labour, indentured labour, bonded labour or other forms of forced labour. Employees shall not be required to lodge deposits of money or original identity papers with their employer.

No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher. In cases where local legislation stipulates a higher minimum age, the higher limit shall apply.

WHAT ARE MY RIGHTS, AND WHAT SHOULD I DO IF I FEEL I'VE BEEN UNFAIRLY OR ILLEGALLY TREATED BY BIMA? Your local HR manager can provide information on your legal rights as an employee. You can also use external sources such as the local bureau of employment, HR/recruitment companies and the Internet. If you feel your treatment by BIMA has been unfair or illegal, follow the whistleblowing procedures set out in Section 6. You may also file a complaint with the local labour office and/or legal authorities.

SECTION 4 CONFIDENTIALITY AND DATA PROTECTION

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As a member of the team, you will be privy to sensitive information regarding our business, our partners and our customers. This section describes your responsibility to keep this information confidential and secure, and to respect the proper channels of communication when you do have to share such information.

A. TREATMENT OF CONFIDENTIAL INFORMATION

Confidential information is any information that you create, develop, receive, use or learn in the course of your BIMA employment.

Confidential information also includes internal intellectual property, such as technology, products or training materials belonging to BIMA, a partner or a supplier.

BIMA must honour Non Disclosure Agreements and partnership agreements by preserving confidential information our partners share with us.

You are responsible for keeping all confidential information secure and may not use it for personal benefit. You may not share it with members of the media, with people online via websites or social media sites, in written documents or through mobile communications. When sending work-related information electronically to a teammate or partner, you must use your BIMA email – you may never use a private email address (for instance Gmail, Yahoo or Hotmail) for sending BIMA related information.



OUR CUSTOMERS AND PARTNERS TRUST US TO KEEP THEIR INFORMATION SAFE

On no account must any confidential information be shared with people outside of BIMA, without express written permission of the country manager.

If you leave your role at BIMA (whether you resign, are dismissed or made redundant) you may not take any customer or personnel data, or confidential information with you. And you may not share any confidential information which you gained during the course of your employment with us.

CAN I USE A CUSTOMER'S CONTACT DETAILS FOR NON-WORK PURPOSES?

Customers give their contact information (i.e. phone number and address) to BIMA in order to register or receive information about our products. It is an abuse of their trust to use the information for any other purpose, including (but not limited to) attempting to befriend them. It is against BIMA's rules to use customer information in this way, and could be considered harassment by the customer.

CAN I TALK ABOUT MY JOB WITH FRIENDS? HOW DO I KNOW WHAT IS AND ISN'T OK TO SHARE?

If BIMA has already shared the information with external parties via public channels (in customer marketing or policy documents, on BIMA websites or social feeds, in approved marketing, pitch or award materials) then it's ok to talk about it. But all other information should be considered confidential. If you are in doubt, you should consult with your closest manager or HR manager.

B. DATA PROTECTION

BIMA complies with applicable data protection regulations when determining how we use and share data when delivering our services. We factor these strict data privacy requirements into the design of new services, offerings and distribution models.

You must protect personal data physically and electronically. Do not place personal data on unencrypted computers and removable media (flash drives, backup drives, CDs).

You must ensure that you have secure passwords on all laptops and other portable media devices (e.g. phones, tablets, etc.).

Ensure that hard copies of personal data regarding customers and employees (including financial information, telephone number, beneficiary information and health information) are stored in secure environments and only for as long as reasonably necessary.

WHAT IF I ACCIDENTALLY SHARE CONFIDENTIAL INFORMATION ABOUT BIMA OR OUR CUSTOMERS AND PARTNERS?

If you accidentally share confidential information – perhaps by emailing information to the wrong person, or losing confidential documents - you must declare it immediately to your direct manager and (if applicable) your country manager.

SECTION 5 ETHICAL BUSINESS CONDUCT

BIMA is fully committed to building an ethical business. We want the BIMA name to stand for integrity, so that our teammates, partners and customers know that they can trust in us.



WE RUN AN ETHICAL BUSINESS THAT IS ENTIRELY FREE FROM CORRUPTION

We believe that any and all forms of corruption will harm our business, the industry we work in and the countries in which we operate. Therefore, we operate a zero tolerance policy when it comes to bribery and corruption, and we comply with the highest global standards for doing business.

This section describes the importance of following all the laws, rules and regulations that ensure that our business is corruption-free.

A. MISSELLING AND FRAUD

Most of our customers have never bought an insurance product before. We are responsible for ensuring that the customer fully understands what he or she is buying, before we sell a product.

We are always honest with our customers and we treat them with respect. We would never lie about our product or mislead a customer to make a sale; we make sure our customers meet all of the sign-up criteria and that they can answer the key product awareness questions that will be asked on the follow-up QA call. We understand that wilful misselling is a violation of our customers' trust, and is grounds for dismissal.



WILFUL MISSELLING IS A VIOLATION OF OUR CUSTOMERS' TRUST, AND IS GROUNDS FOR DISMISSAL

WHAT CONSTITUTES MISSELLING? AND WHAT IF IT'S THE ONLY WAY I CAN HIT MY SALES TARGETS? Misselling is when someone lies about a product or service to make a sale, or misleads the customer by leaving out important information. For instance, they might sell to someone who is too old to qualify for the product. Misselling is never justified, no matter what pressure you are under. If you are struggling to sell, ask your team leader and sales manager for extra coaching and support.

B. DEALINGS WITH PARTNERS

We must all work together to adhere to the terms of our partnership agreements; work must be delivered in line with signed Service Level Agreements and commercial terms must be honoured.

We treat our partners fairly; we negotiate profit share agreements that deliver value to all parties, we are transparent with our shared costs and honest in our reporting and evaluation.

We are mindful of our partners' reputation when working under their brand/co-branded initiatives. BIMA team members are expected to meet the standards of behaviour and quality requested by the partner.

The people working at our partner organisations are to be afforded the same level of respect that we show to each other.

WHAT IF HONEST REPORTING WILL JEOPARDISE A PARTNERSHIP? Even if results are poor and partners are unhappy, you must report your results openly and honestly. If you have failed to reach an agreed target, sit down with the partner to discuss the reasons for failure and how we intend to improve.

C. BRIBES AND FACILITATION PAYMENTS

A bribe is a payment or gift made to persuade a person to perform an illegal or unethical action. BIMA will never pay or accept bribes.

Facilitation payments are small amounts paid to public officials to secure or speed up the performance of a routine or necessary action; securing a work permit, for instance. BIMA considers facilitation payments to be another form of bribery.

“
**A BIMA TEAM MEMBER
 MUST NEVER TAKE A
 BRIBE**”

Personal kickbacks are another type of bribery, where someone is paid for performing an action like arranging an introduction or buying supplies. As part of the BIMA team, you may never pay or accept kickbacks.

No matter how big or small the sum, no matter how commonplace these payments are in some markets, and no matter the consequences to our business and operations, you must never make such a payment.

This policy applies to payments made directly and indirectly, through a consultant or another intermediary. We request that BIMA team members inform partners and suppliers of our zero tolerance policy on facilitation payments and make clear that partners may not pay bribes on BIMA's behalf.

We accept that our refusal to pay bribes may cause us delays or cost us opportunities. It's essential that BIMA maintains its business integrity.

We expect managers to identify areas where there is a high risk of facilitation payments (requested or expected) and prepare measures to manage this risk. Concerns and difficulties, relating to bribes and facilitation payments, should be reported to Group Legal, who will support managers in addressing them.

WHAT SHOULD I DO IF A LOCAL OFFICIAL DEMANDS PAYMENT FOR MY TEAM TO CONTINUE SELLING IN THEIR AREA? Never pay the money they are demanding. BIMA always secures the necessary permits before we start selling in the field. So, you can quickly resolve this issue by asking your sales manager to meet with the official and present the permits in question. If you are regularly asked for payment by local officials, you may carry a copy of the permits with you.

D. GIVING AND RECEIVING GIFTS

We understand that the exchange of gifts is often part of local culture and tradition, and can help to foster a good business relationship with partners and suppliers. But at BIMA we believe there is a point where such gifts and courtesies become an act of corruption.

You may only give or receive gifts that are of low value; any gifts that you give or receive with a value over US \$15.00 must be declared to your local HR and finance officers, and included on the global gifts and hospitality register. If you plan to give or receive a more expensive gift (e.g. gift to celebrate the anniversary of a partnership) approval must be given in writing by the country manager and the CFO.

- Do not give or receive gifts in cash, or gifts that are easy to convert to cash, like gift cards, refundable items or discounts.
- Do not accept personal discounts or other benefits from suppliers or customers if they are not available to the general public or your BIMA peers.
- Do not accept gifts where there is an expectation of something in return.
- No gift, given or received, should be larger than warranted. Meals in unnecessarily expensive restaurants and tickets to events without any business purpose, are not acceptable.
- Do not accept or offer gifts that are not given in an open and transparent manner, or if there is reason to believe it is given with the intent to improperly influence business decisions.
- Familiarise yourself with and comply with the gift policies of partners and suppliers.
- Take responsibility for considering the value of the gift and reporting it accordingly.

WHAT SHOULD I DO IF A CUSTOMER ASKS FOR A GIFT OR MONEY IN RETURN FOR MAKING REFERRALS? Customers should only refer their family and friends to BIMA if they believe in the value of our products. When asking for or accepting a customer referral, you must make it clear that, while you are grateful, you cannot pay for it or give the customer any gifts in return.

A PROSPECTIVE SUPPLIER WANTS TO TAKE ME OUT FOR DINNER OR SOME OTHER ENTERTAINMENT TO PITCH THEIR BUSINESS TO ME; CAN I GO? Yes, so long as you inform the local HR and finance managers that you are going, and disclose the amount they paid afterwards. When it comes to choosing a supplier, this company must still take part in the formal procurement process and can only be chosen if they meet the standards and budget requirements of the brief.

E. FINANCIAL REPORTING

It is essential that the integrity of our financial books and records be resolutely maintained. All team members must ensure that their reporting is transparent and truthful.

BIMA funds, assets and liabilities must be fully and properly recorded on the company's books and records.

All employees must comply with BIMA's accounting principles, procedures, and controls, and no false, artificial, or misleading entries in any books or records of the company shall be made for any reason whatsoever.

All employees must be cooperative and transparent with our external and internal auditors.



**BE HONEST AND
TRUSTWORTHY
WHEN DEALING
WITH CASH**

IS IT EVER OK TO KEEP THE CASH FROM A FIELD SALE, AND NOT REGISTER THE CUSTOMER IMMEDIATELY? I WILL PAY THE MONEY TO BIMA EVENTUALLY.

No. This is completely unacceptable and has serious consequences for the customer, the team and the business.

Delaying the customer's registration is an abuse of their trust and it causes inconsistencies in our own financial records. It also breaks the terms of our government-issued licence. As a consequence of breaking these terms, BIMA could be forced to stop trading, and close its operation in this country.

If you are struggling with money, speak to your team leader who may be able to help with a salary advance.

WHAT IF OUR ACCOUNTS DON'T BALANCE BECAUSE OF A MISTAKE I MADE? Always report honestly. If you have made an innocent mistake (like accidentally overpaying a supplier, in cash) your team will understand. They can help you fix the mistake and put systems in place to ensure it won't happen again.

IS IT OK TO USE DONOR FUNDING FOR PARTS OF THE BUSINESS THAT AREN'T COVERED IN THE PROJECT SCOPE? No. Donor funding must only be used for activities outlined in the project scope. If you see a new opportunity that will better help us to reach the donor's targets, you should arrange a meeting with the donor to renegotiate the terms.

F. CONFLICTS OF INTEREST AND USE OF BIMA ASSETS

A conflict of interest is when your self-interest and your professional interest clash, undermining your ability to be impartial. Or when your responsibility to a third party (such as a friend, a family member, or another business interest) impedes you in performing your duties on behalf of BIMA, its partners or its customers.

No outside interests (for yourself or a third party) should ever conflict, or appear to conflict, with the decisions you make on behalf of BIMA. Potential conflicts might include (but are not limited to):

- Hiring, promoting or directly supervising a family member or close friend.
- Accepting an officer or director position with an outside business or not-for-profit organization.
- Running for political office.
- Having controlling financial interests in a company with which BIMA has a relationship or partnership.



REPORT ANY CONFLICTS OF INTEREST TO YOUR MANAGER

In all of the examples above, it is possible that there is no conflict of interest. But wherever there may be a conflict, or a perceived conflict, employees must refer to their HR manager for advice.

Employees must not use BIMA resources, such as phones, computers, software or offices to service other interests. For instance, you are not permitted to use your BIMA computer to run your own business.

WILL I BE JUDGED FOR THE PERFORMANCE OF TEAM MEMBERS WHO I INTRODUCE TO THE COMPANY? FOR INSTANCE, A FAMILY RELATION WHO I REFERRED TO THE SALES TEAM? No. We only want to know that you are related to them so that we can ensure that they are treated the same as any other employee. So long as you have nothing to do with their misconduct, it won't affect your future with BIMA.

WHY DO I HAVE TO DECLARE IF I AM RUNNING FOR POLITICAL OFFICE?

Employees are not required to declare their political affiliations. But, if you run for political office, and could conceivably influence policy that affects our business, it is important that you let us know. It is vital to the integrity of the company that BIMA is not perceived to be taking advantage of your elected position.

G. POLITICAL ACTIVITIES

BIMA does not contribute, directly or indirectly, to political campaigns or to political parties or groups. You may make personal donations and/or fundraise for political campaigns, but BIMA will not donate to, sponsor or reimburse for such activities.

You are free to support any political party or group, but you may not campaign for candidates on company property and/or to your BIMA teammates.

Pressurising your teammates to vote for your preferred candidate or party can be considered harassment as laid out in section 2.



**THE BIMA NAME STANDS FOR
INTEGRITY AND TRUST**

WHAT IS WHISTLEBLOWING?

All BIMA team members and consultants should feel safe to raise concerns about an incident that happened in the past, is happening now, or that there is cause to believe will happen in the near future.

We all have a duty to report misconduct when we see it. Failure to report puts your teammates and the company at risk. It can be scary and intimidating to make a report about a teammate, a team leader or a manager. But if you know about unethical behaviour and fail to report it, you may get into trouble yourself.

If you report misconduct through the defined channel (outlined below) and you are telling the truth, you will be protected. BIMA will support Whistleblowers by:

- Ensuring confidentiality – we won't share the name of the person making the report
- Preventing retaliation – you will not be financially punished (e.g. getting fired or demoted) or otherwise treated unfairly (e.g. cut off from the team)

If someone accuses you of wrongdoing, you will be treated fairly and with respect. You will be given a chance to explain your actions.

Once the investigation is complete you will be informed of the conclusions and consequences for all parties.

Whistleblowing is one way to Take Ownership, a core BIMA value; you are looking out for your teammates and protecting the company. Whistleblowing will help us to stop problems before they grow bigger and make sure that BIMA is a company of which we can all be proud.



WHISTLEBLOWING IS A SAFE WAY TO LOOK OUT FOR YOUR TEAM AND THE BUSINESS

WHISTLEBLOWING PROCESS:

A: EMPLOYEE RIGHTS

If you, a team mate or another member of staff are:

- Being harassed or discriminated against;
- Not having employment standards met;

WHISTLEBLOWING PROCESS:

A: EMPLOYEE RIGHTS

If you, a team mate or another member of staff are:

- Being harassed or discriminated against;
- Not having employment standards met;
- Not being given the right to freedom of association or collective bargaining;
- Not working in a safe environment;
- In a position of being forced or child labour; or
- Having employee rights otherwise violated,

Then you should report this by:

- Speaking to your local HR Manager; or
- Sending an email to ethics@milvik.se (only approved persons at BIMA's Global Team have access to this account) or the secure WhatsApp account +447460757164

B: EMPLOYEE CONDUCT

If you feel that one of your teammates or another staff member is:

- Misusing, misappropriating or mishandling company data, confidential information or intellectual property;
- Misselling company products to customers;
- Not adhering to the terms of partnership agreements or SLA's;
- Mistreating partner organisation staff;
- Accepting or paying bribes, kickbacks or facilitation payments;
- Giving and receiving gifts or hospitality not in accordance with the company gifts and hospitality guidelines;
- Falsifying financial records;
- Not declaring potential conflicts of interest; or
- Not declaring political activity,

Then you should report this by the process outlined in section A above. If you know about unethical conduct but fail to report it, you could get into trouble yourself.



**YOU WILL BE TREATED FAIRLY
AND WITH RESPECT**

The Code of Conduct sets out the rules and standards to which employees of BIMA, at all levels, must adhere. Any person accused or suspected of being in breach or violation of this code will be investigated fairly and in accordance with local disciplinary and grievance procedures, as set out in local Codes of Conduct and HR manuals.

An employee found guilty of misconduct will be subject to disciplinary action, ranging from a reprimand to dismissal.

Any incidents of misconduct that constitute illegal action (for instance, in cases of fraud, harassment or violence) will be reported to the police who may decide to conduct their own investigation.



MILVIK AB

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