

Code of Business Ethics and Conduct



Logistics with Integrity



agilitylogistics.com

Contacting the Agility Alert Line

If you have a concern that you would like to discuss, you can choose any of the following ways to get in touch with the Agility Ethics Department:

Call Us Toll-Free Worldwide

If you are located in the United States, Canada or Puerto Rico, simply dial 1-800-472-6986 to reach the Agility Alert Line.

If you are located in the Kuwait, simply dial 809-222 (Extension 4200) to reach the Agility Alert Line.

If you are located in any other country please refer to the inside back cover for the appropriate contact information.

Send Us an E-mail

If e-mail is a convenient means of communication for you, please contact us at ethics@agilitylogistics.com.



Our values

We will pursue our mission, vision, and customer promise of personal service with a passion for:

Integrity Building trust with customers, communities, suppliers and one another by doing what is right, keeping our promises, being a good citizen, complying with regulations and laws, and honoring rules of engagement.

Personal Ownership Taking personal responsibility for the outcome by anticipating needs, being resourceful and following through until the job is done.

Teamwork Working across organizational and cultural boundaries to achieve extraordinary performance and deliver personal service to customers.

Excellence Building a culture based on excellence in thought and in execution to better serve customers.

From the Chairman of the Board

Dear Colleagues:

Over the past decade, Agility has grown to one of the leading logistics companies in the world with operations in over 100 countries and more than 30,000 employees. All of you have played a key role in our phenomenal growth and success.

As you therefore know, one of our most valuable assets is our reputation. Our reputation is the result of trust, which comes from the way we interact with and treat our customers, employees, suppliers and competitors. We must do everything in our power to preserve and protect this trust and our reputation.



While our Agility values of Integrity, Personal Ownership, Teamwork, and Excellence support our reputation, this Code of Business Ethics and Conduct sets forth the ethical and legal guidelines that all people within the Agility group of companies must follow to safeguard our reputation. There are no exceptions. This code, together with compliance training, is intended to focus attention on conduct or circumstances that may detract from or compromise our reputation.

Moreover, as a major contractor to the U.S. government in many highly-sensitive contracts around the world, Agility is subject to or has voluntarily agreed to comply with a number of U.S. laws and regulations that are reflected in this Code. Violations of this Code could jeopardize Agility's ability to continue in this very important role.

This Code has my full endorsement, as well as that of the Agility Board of Directors and senior management. Please familiarize yourself with the Code in its entirety and ensure that you fully comply with it.

Very truly yours,

Tarek Sultan Al-Essa

Chairman of the Board
Public Warehousing Company K.S.C.

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I. Our Corporate Policy and Our Code of Business Ethics and Conduct

Our Corporate Policy

The excellent reputation that Agility enjoys today has been earned over a long period of time. It reflects our commitment to complying with all applicable laws and regulations. It also reflects the high standards of business conduct and ethics used by the Company and our personnel in dealing with our customers, suppliers, vendors, governments, local communities, the public, and fellow personnel.

In order to maintain this tradition of excellence, all Agility personnel must continue to adhere to high ethical standards and behave lawfully when engaging in business conduct. This is a fundamental obligation of each Agility employee and is consistent with each employee's personal responsibility for helping to preserve and guard the Company's assets and reputation in the business community.

The international and sophisticated nature of the Company's business makes it particularly crucial that the conduct of all personnel be above reproach. Lawful and ethical business practice is an essential element of the Company's overall business philosophy and must be followed in all business relationships and dealings.

Our Code of Business Ethics and Conduct

As part of the Agility tradition and commitment to ethical business conduct, we have prepared this Code of Business Ethics and Conduct (the "Code").

Who Should Follow the Code?

The Code applies to ALL employees within the Agility Enterprise.

All personnel of Agility have an obligation to familiarize themselves with this Code and all of the applicable laws and specific Company policies and practices related to their positions, and the country or countries in which they operate.

Question: Does the Company really expect personnel to adhere to the Code when to do so may mean losing business or reducing profitability?

Answer: Yes. Agility is genuinely committed to complying with all applicable laws and regulations and to increasing its business, over time, through its reputation for high quality goods and services. Conduct that violates the Code, apart from creating the possibility of both criminal and/or civil liability for both the Company and any involved personnel, is contrary to this overall objective and thus contrary to the Company's mission and long-term profitability.

The international and sophisticated nature of the Company's business makes it particularly crucial that the conduct of all personnel be above reproach.

The Code is also intended to be incorporated into the standard terms and conditions for all contracts with consultants, agents, independent contractors and subcontractors, and each such contract should expressly provide for termination in the event any consultant, agent, independent contractor or subcontractor violates either the Code or any other law or regulation.





The Code is intended to communicate clearly what is, at a minimum, expected of Agility personnel.

Is The Code Comprehensive?

The Code does not address every conceivable kind of business practice and behavior. The Code is intended to communicate clearly what is, at a minimum, expected of Agility personnel. To ensure adherence to the Code and all applicable laws and regulations, the Company has also established a comprehensive corporate compliance program that includes the Code.

When in doubt, ASK BEFORE ACTING.

Questions concerning ethical or legal conduct will inevitably arise in the normal course of business. It is the responsibility of each employee to contact his/her supervisor and/or the Compliance Officer before taking any action that may have ethical or legal consequences for the Company.

This Code is intended to serve as a general guideline for the conduct of personnel. It is not intended to supersede or to replace specific corporate policies and/or divisional policies or work rules already in effect, with which personnel are expected to be familiar. The Code outlines the most fundamental obligations of Agility's personnel. In the unlikely event that the Code conflicts with any other Agility policy, practice or work rule, the Code takes precedence.

Moreover, this Code does not, nor is it intended to, confer any rights or benefits or constitute an employment contract, an assurance of continued employment, or employment other than at-will. Agility retains the right at its sole discretion to change any policy, procedure, term or working condition at any time and in any manner, to the extent permitted by law.

How Is the Code Enforced?

Any personnel found to have violated any provision of this Code will be subject to discipline, including termination of employment.

Supervisors shall ensure that this Code is enforced consistently through appropriate disciplinary measures, including termination of employment, and shall promptly report any violations or suspected violations to the Compliance Officer.

Violations include not only a failure to comply with applicable laws and regulations, but also a failure by responsible management to detect, report, and/or correct any offense.

Code violations that involve violations of applicable laws and regulations may also be referred for criminal prosecution and may result in the institution of civil actions to reimburse Agility for any losses or damages resulting therefrom.

How Do You Report Violations?

Any Agility personnel member who becomes aware of any issue or practice that involves a potential violation of an applicable law or of any provision of this Code has an affirmative responsibility to report the matter immediately to his/her supervisor or the Compliance Officer. While we are confident that supervisors will handle the information in a confidential and professional manner, we realize that there are some circumstances in which employees may not be able to approach their immediate supervisor directly. If employees do not feel comfortable reporting such violations to their immediate supervisors, they may report the issue confidentially and anonymously by using the Agility Alert Line.

Personnel may report violations anonymously.

Protection and Responsibilities of Personnel Who Report Violations

It is a violation of this Code and of Agility policy for any personnel member to retaliate in any way against any person for reporting in good faith any suspected violation.

All personnel shall cooperate fully with the Compliance Officer, any representative of the Office of General Counsel, and any other representatives of Agility who are conducting any investigation, audit, inquiry or other review on its behalf.

Needless to say, personnel have a responsibility to provide complete and truthful answers to any questions that may be posed to them by Agility representatives in the course of their review, or the investigation of any alleged Code violation.

Question: Can I get into trouble for reporting apparent violations to others higher up the line?

Answer: Agility encourages personnel to ask questions about ethical or legal issues and requires its personnel to report actual or suspected violations. Reasonable steps will be taken to protect anonymity and confidentiality if requested by the personnel member. Retaliation of any kind against a personnel member as a result of his or her good faith reporting of an actual or suspected Code or law violation is strictly prohibited. Abuse of reporting procedures for harassment or other improper purpose is itself a violation of the Code.

The Agility Alert Line is available for all compliance-related Matters at:

Tel. +965-809-222
(Extension 4200) (Kuwait)

Tel. +1-800-472-6986
(United States)

All other international callers should refer to the back cover of this Code to find the number that applies to their region or country.



Our Commitment to Employees

We will respect the dignity of each Agility employee.

Agility is an equal employment opportunity employer and does not discriminate on the basis of race, color, religion, sex, age, national origin, sexual preference, disability, or any other factors prohibited by applicable law.



II. Employment Practices

Discrimination

Generally, applicable laws in the jurisdictions in which Agility operates prohibit discrimination in any employment decision. Thus, they prohibit discrimination in recruiting, interviewing, selection, hiring, promotion, training, transfer, employment upgrading, supervision, termination, layoff, compensation, benefits, and education opportunities.

This policy applies to all personnel actions and to participation in Company administered activities. The Company will make reasonable job-related accommodations for any qualified personnel member with a disability when notified by the personnel member that an accommodation is needed.

In interacting with a prospective personnel member, Agility personnel are generally prohibited from asking questions that may identify an employment applicant as a member of a particular race, color, religion, national origin, sexual preference, or disability group. Some examples of what personnel are prohibited from asking are:

- 1) Race, creed, religion, color, national origin, ancestry, age, or marital status;
- 2) Applicant's birthplace or the birthplace of his parents, since those facts may identify national origin or ancestry;
- 3) Photographs, since they may identify race, color, or national origin;
- 4) Other physical characteristics that may identify a person as a member of a particular race, color, or national origin (e.g., color of eyes or hair);
- 5) Private organizational affiliations or political affiliations, clubs, social

fraternities, societies, lodges or other organizations excluding professional, trade or service organizations, since they may identify religion or creed;

- 6) An applicant's citizenship, except to the extent necessary to determine whether the applicant's status permits him/her to work in the relevant country of employment;
- 7) Questions regarding an applicant's military service, other than questions regarding his/her work experience while in the military (if applicable); or
- 8) Whether an applicant has an arrest record, though you may ask whether an applicant has ever been convicted of a crime.

It is important to remember that the legal restrictions on what may be asked extend to verbal questioning during an interview. The point is, do not ask for any information for which you are not legally permitted to ask.

It is important to be aware not only of what applicable laws prohibit, but also of what they permit. Agility may, for example:

- 1) Select only qualified applicants for a job regardless of race, creed, color, etc. We must, however, be able to document the reasons for our decision;
- 2) Differentiate in pay and promotions on the basis of merit;
- 3) Pay different amounts based on seniority; or
- 4) Pay different amounts for jobs that are different.

The point is that differential treatment is allowed, but not on the basis of any of the prohibited factors such as race, color, religion, sex, national origin, age, etc.

Harassment

Agility is committed to providing personnel with a workplace that is free from harassment based upon race, color, religion, sex, age, national origin, physical or mental disability, sexual orientation, marital status, or any other factor prohibited by law. Harassment includes, without limitation, verbal harassment (derogatory statements, slurs, epithets), physical harassment (assault, physical interference), visual harassment (cartoons, drawings, postings, emails), and mental harassment (innuendo).

Sexual harassment in any form is strictly prohibited. Sexual harassment includes unwelcome sexual flirtations, advances or propositions; verbal abuse of a sexual nature; subtle pressure or requests for sexual activities; unnecessary touching of an individual; graphic or verbal comments about an individual's body; sexually degrading words to describe an individual; a display in the workplace of sexually suggestive objects or pictures; sexually explicit or offensive jokes; or physical assault.

Question: Can I comment on a co-worker's appearance?

Answer: Innocent comments regarding an individual's appearance are not, in and of themselves, inappropriate. For example, it is not improper to tell a personnel member that a particular dress or suit looks nice. However, the manner in which comments are made, or their content, if sexually suggestive or otherwise offensive, can run afoul of the law.

Question: A co-worker's birthday is coming up and several of us want to surprise her at work by hiring a birthday greeting service that uses male models to convey a "suggestive" birthday greeting. Can we do that?

Answer: Such a greeting is inappropriate. Agility is committed to providing personnel with a workplace free of sexual, racial or other harassment. While your friend may or may not appreciate your gesture, such a display may be offensive to others and is obviously not in keeping with the Company's goal of assuring a work environment that is neither hostile nor offensive to any personnel member.

Question: I received, via the Internet, a series of jokes that have a sexual orientation. Can I share these jokes with fellow personnel via e-mail?

Answer: No. Apart from violating the Company's internal policies regarding personal use of Company e-mail, transmittal of the joke similarly could serve as a basis for an allegation of harassment, depending upon the content of the material. Jokes that are of a sexual orientation or that make fun of an individual or group of individuals based on race, national origin, religion, or other protected categories can be considered a basis for harassment. Personnel and supervisors must be sensitive to the fact that what may be humorous to one personnel member may well be offensive to another.



Agility is committed to providing personnel with a workplace that is free from harassment based upon race, color, religion, sex, age, national origin, physical or mental disability, sexual orientation, marital status, or any other factor prohibited by law.

Similarly, racial and other forms of harassment, including racially derogatory language or conduct, create a hostile or offensive workplace and will not be tolerated.

In addition to subjecting the Company to potential liability, personnel who engage in sexual harassment or any other type of discrimination or harassment, and others who condone or permit it, may also be subjecting themselves to personal liability.

Apart from being unlawful, harassment and discrimination are extremely disruptive and contrary to Agility's mission. The Company will take action to see that harassment and discrimination do not occur. Violations of this policy will result in disciplinary action, including termination of employment where appropriate.

If you believe harassment has occurred, or if you have questions regarding these laws, you should consult your supervisor or the Compliance Officer, or contact the Agility Alert Line. All reports will be investigated, and appropriate corrective action will be taken.

There will be no retaliation or other adverse action taken against you for the exercise of your obligation to report occurrences of harassment. Complaints will be handled confidentially, except as necessary for investigation and resolution. Personnel can make reports anonymously.

Protection for Complainants

It is against policy to discriminate against someone because he/she has opposed an unlawful discriminatory or harassing practice or because he/she has made a charge, testified or participated in an investigation, proceeding or hearing involving a discrimination or harassment charge.

For example, if an applicant should mention that he/she is engaged in litigation against a previous employer arising out of alleged discrimination or harassment, you should neither discuss the matter further nor base your evaluation of the applicant on this knowledge.

Obviously, it is prohibited to retaliate against a personnel member who has complained about a discriminatory or harassing practice, or against another personnel member who has supported the complaint.





Substance Abuse

Agility is committed to providing a safe work environment that is free from the effects of alcohol and drug abuse. The possession, distribution, or use of any illegal drugs on Agility premises is strictly prohibited. The abuse of alcohol or other medications in the workplace is also a violation of this Code.

The possession, distribution, or use of any controlled substances on Agility premises is strictly prohibited.

Similarly, use of controlled substances, the misuse, or abuse of alcohol or medication away from the Company's premises in any manner that may impair a personnel member's ability to perform assigned duties, threatens their safety or the safety of others, or otherwise adversely impacts the Company's business is not in the best interest of the Company and is a violation of this Code.

III. Health, Safety and Security of Employees

Agility is committed to providing its employees a safe, healthy, and productive workplace, which minimizes the risk of preventable accidents, injury and exposure to health risks. In cases in which Agility provides residential facilities, we ensure that these facilities also provide their inhabitants with a safe and healthy living arrangement, in accordance with applicable local laws and regulations. Safety is especially important in contingency and other high-risk locations, which are subject to significant corporate safety and security guidelines. Each work location has safety rules that must be followed. Agility companies comply with all health and safety laws, as well as our own internal health and safety policies that go beyond what the law requires.

Having safety rules is not enough, though. Our commitment to safety means that each employee needs to be alert to safety risks as he/she goes about his/her job. All Agility employees, and the employees of other companies working on Agility premises, must be familiar with the health and safety requirements associated with their jobs. A safe and secure work environment also means a workplace free from violence. Threats (whether implicit or explicit), intimidation and violence have no place at any Agility company and will not be tolerated. Weapons are not

permitted in the workplace under any circumstance, without express permission from the Office of the General Counsel.

You should be familiar with and follow your company's policies regarding health, safety and security. Employees are urged to bring any unsafe practices—including threats or intimidation—to the attention of their supervisor or manager, the Compliance Officer, or to call the Compliance Hot Line.

Forced Labor:

Agility expressly prohibits and will not tolerate the use of involuntary, forced or bonded labor, including slavery, prison labor, or labor demanded of employees because of their debt.

Agility personnel shall not:

- Ask employees or prospective employees to pay for or give anything of value, in return for employment.
- Require employees to leave their official identity papers, including passports, drivers licences or any other form of government issued ID without employees' voluntary and explicit consent, or as required by law.
- Unreasonably restrict employee movements, or stop employees from leaving their place of work at the end of a shift.

Agility will not work with any agency or recruiting company who requires prospective employees to pay a fee in violation of any local or federal laws.

Employees are reminded that Agility prohibits any of its employees from receiving anything of value from anyone engaged in the recruitment of employees. Any violation of this policy may be grounds for immediate termination.

Child Labor:

Agility is committed to the adherence to the minimum age provisions in applicable laws and regulations where we conduct business. Agility prohibits the employment any person under the age of 15 with the following two exceptions:

- a) In cases where the local minimum age law stipulates an age above 15 for work or mandatory schooling, the higher age will apply.

Agility believes in respecting the confidentiality of its employees' personal information.

- b) In cases where the local minimum law is set at 14 years of age, the age of 14 will apply, in accordance with developing-country exceptions under the United Nations' International Labor Organization (ILO) Convention 138.

Work Hours and Wages:

Agility's practice is to compensate employees competitively relative to the industry and local labor market. It is Agility's policy to operate in full compliance with applicable wage, work hours, overtime, and benefits laws of the jurisdictions in which we operate.

IV. Employee Confidentiality

Agility believes in respecting the confidentiality of its employees' personal information. This means that access to personal records should be limited to personnel who have appropriate authorization and a clear business need for that information. Employees who have access to personal information must treat it appropriately and confidentially.

Personal information is never provided to anyone outside of Agility without proper authorization from the Office of the General Counsel.

Agility's commitment to employee confidentiality is not a license to engage in inappropriate personal activities at work. Company computers, for example, are intended only for official use, not for outside business activities or personal use.

Our Commitment to Shareholders

We will treat the investment of our shareholders as if it were our own, and we will avoid any impropriety or any appearance of impropriety in the performance of our duties.

V. Company Property, Records & Confidential Information

Company Property

Agility owns various kinds of property in order to conduct its business. Theft, removal, or destruction of corporate property, equipment or materials is prohibited. Unauthorized personal use of business equipment is also prohibited. Agility, as governed by applicable law, has the right to access and review all communications, records and information created at work or with Company resources. This may include such things as Intranet or Internet activity, e-mails, voicemail and telephone activities.

Agility assets may be removed from Company premises only for purposes of conducting Agility business and only when properly authorized. For example, the removal of items such as tools, computer equipment or software, typewriters or other corporate assets, where no business purpose is intended, is prohibited. Any questions relating to the use of Company property should be directed to your supervisor or to the Compliance Officer.

Company Records

The integrity of Agility's record keeping and reporting systems must be respected at all times.

All corporate records for which personnel are responsible shall be true, accurate and complete.

Agility records must accurately reflect and be a fair presentation of the activity they record in accordance with the Company's policies and in a manner that will reflect the nature and purpose of the activity. No false or inaccurate entries shall be made in Agility records for any reason.

Records referred to herein include, without limitation, the following: timecards or other time-reporting documents, travel and business meeting expense reports, and accounting or other financial records.

No "off-the-books" or improper records shall be established for any purpose.

Personnel who are authorized to make expenditures on behalf of Agility must ensure that their records comply with the Company's accounting and purchasing policies and that all transactions are disclosed and recorded properly.

Record Retention

Agility has adopted specific document retention policies with which all Agility personnel must comply. The definition of the kinds of documents or records covered is extremely broad, reaching not only hardcopy documents and records, but also all mechanical, electronic, or magnetic records, correspondence, memoranda, electronic mail (e-mail), invoices, contracts, agreements, orders, notes and drafts.

Before corporate records are destroyed, responsible personnel must consult with their supervisors to assure compliance with the Company's record retention schedule.

Documents relevant to any pending, threatened, or anticipated litigation, investigation or audit should not be destroyed for any reason until expressly authorized by the responsible representative of the Office of the General Counsel.



Agility has adopted specific document retention policies with which all Agility personnel must comply.

Electronic Resources

Access to the Internet/ Agility Intranet

Agility provides certain of its personnel access to the public Internet and Agility Intranet for the purpose of assisting and facilitating business information transfers and communications. Such access is provided for appropriate and legitimate business purposes only.

Access to the Company's electronically - networked resources is permitted only when authorized by Agility management and when such use is in accord with the Company's guidelines for electronic security.

Use of the Internet and Company Intranet must conform to Agility's policies and practices as well as to this Code.

Agility considers the following, without any intended limitation, to constitute inappropriate use:

- 1) Unauthorized access or attempts to access another personnel member's computer system or e-mail;
- 2) Transmission of Agility confidential or proprietary business information to any unauthorized person or organization;
- 3) Clear text transmission of proprietary or confidential Agility business information to authorized persons or organizations outside Agility without data encryption;
- 4) Any use that violates Agility policies or practices or this Code including, but not limited to, the Company's specific policies regarding the use of electronic mail, internet access, solicitation, and racial, sexual or other harassment;

5) Any intentional use that knowingly restricts or inhibits any other user from using the Internet;

6) Knowingly posting or transmitting any illegal, unlawful, threatening, abusive, defamatory, sexually explicit or otherwise objectionable information or material of any kind;

7) Knowingly posting or transmitting any software containing a virus or other harmful component;

8) Knowingly downloading, uploading, posting, publishing, transmitting, reproducing or distributing without authorization any information, software or other material that is protected by copyright without first obtaining permission of the rights holder; and

9) Duplicating or copying any Company software in violation of Agility's licensing agreements or using any 'bootleg' or hacked program without proper licensing permission.

Agility, as governed by applicable law, has the right to access and review all communications, records and information created at work or with Company resources. This may include such things as Intranet or Internet activity, e-mails, voicemail and telephone activities.

Electronic Mail

Electronic mail, or e-mail, is an increasingly important method of communication. Electronic mail sent or received by Agility personnel is treated no differently than other business records or correspondence and are subject to inspection or disclosure without notice.

There are several considerations that Agility personnel should bear in mind when using Company e-mail:

1) E-mail can be forwarded to additional and unintended recipients without the knowledge of the original sender. In addition, it can be easily altered and forwarded to others in its modified form;

2) E-mail communications can create a permanent record, and deleting a message from your mailbox does not assure that the message has been eliminated or that it and attached information cannot be retrieved by other means; and

3) E-mails, despite their medium, should be considered "documents" for all intents and purposes. They are, as a result, subject to document subpoenas in both civil litigation and criminal investigations and, once created, are generally subject to the Company's document retention policy.

As a general rule, never transmit e-mail messages that you do not want individuals other than your intended recipient to see.

Communications that may constitute a violation of any Agility policy (for example, workplace harassment and discrimination) are an improper use of e-mail and are prohibited.

Questions or concerns pertaining to electronic mail, including any suspected violations, should be directed to your supervisor, the Group Information Technology Department, or the Compliance Officer.



Personnel are expressly prohibited from divulging any customer information to anyone outside of Agility without the prior consent of the customer, unless necessary to comply with a subpoena, court order or other lawful process.



System Integrity

Personnel shall not share or divulge personal passwords used to access any Agility computer or database. In addition, personnel shall not use or distribute software that may damage or disrupt the work environment.

Personnel are expressly prohibited from accessing, without express authorization, any system or database containing confidential information, including employee or personnel records; information pertaining to stock ownership or participation in employee stock option or other incentive programs; and personal electronic mail, personal pager and voicemail messages of other personnel.

Unauthorized access to such information is a significant violation of the privacy rights of fellow personnel, and has the potential of being extremely disruptive to Agility's mission. Approval for access to this information must come from the Chairman's office.

Confidential Information

Consistent with each personnel member's existing and continuing obligation of confidentiality, personnel may not (either during or after employment) give or release, without proper authority, to anyone not employed by Agility, any confidential or proprietary information acquired during their employment with the Company.

Disclosure of confidential information can be harmful to Agility and could be the basis for legal action against the Company and/or the personnel member responsible for the disclosure.

Confidential and proprietary information is one of the Company's most valuable assets and should be treated as such. The preservation and security of such information must comply with Company policies and related applicable laws and regulations.

Trade secret and confidential corporate information includes, without limitation:

- Personnel records;
- Internal telephone lists and directories;
- Passwords;
- Organizational charts;
- Engineering data;
- Financial data;
- Sales figures;
- Planned new services, processes, and/or products;
- Advertising or marketing programs or promotions;
- Lists of actual or potential customers and suppliers;
- Wage and salary or other personnel information;
- Capital investment programs;
- Projected earnings;
- Changes in management or policies;
- Test data;
- Suppliers' pricing; and
- Contract terms.

Personnel are to protect Agility's confidential and proprietary information entrusted to them by following approved Company security standards and policies.

Customer Information

Personnel are expressly prohibited from divulging any customer information to anyone outside of Agility without the prior consent of the customer, unless necessary to comply with a subpoena, court order or other lawful process. For purposes of the Code, such information shall include, without limitation, customer names, account numbers, addresses, and billing information. Any request for such information should be forwarded immediately to your supervisor and to the Compliance Officer before any information is disclosed.



Question: The representative of a significant customer has asked me if I could provide him with a list of our current customers. May I do so?

Answer: No. Confidential and proprietary information of this sort is an extremely valuable asset and must not be shared with others outside the Company. This includes customer lists, financial information, trade secrets and pricing information, but also less obvious information such as internal phone lists and directories, wage and salary information, and organizational charts. This incident should be reported to the Compliance Officer.

VI. Conflicts of Interest, Gifts, and Meals & Entertainment

Conflicts of Interest

The potential for a conflict of interest exists when an individual's position with the Company presents an opportunity for personal gain apart from the normal benefits of employment and compensation by Agility.

The potential for a conflict of interest also exists when a personnel member's personal interests are (or appear to be) inconsistent with those of the Company and create conflicting loyalties that could cause (or be seen as causing) a personnel member to put personal interests before the interests of the Company.

Do not participate in or attempt to influence any action where your own interest may be in conflict, or appear to be in conflict, with the interests of Agility.

Outside Affiliations

Outside affiliations provide a common avenue for conflict of interests. While it is not possible to describe every outside affiliation in which a conflict of interest may arise, some common scenarios include:

- 1) The personnel member has a substantial personal or family investment in an enterprise that has a business relationship with Agility as a supplier, vendor, jobber, agent, consultant, customer or competitor;
- 2) The personnel member holds a second job or other position that affects his or her on-the-job performance for Agility; or
- 3) The personnel member receives compensation as an employee or consultant of, or accepts loans, cash or materials from, a supplier, vendor, jobber, agent, consultant, customer or competitor of Agility.

Outside affiliations can create conflicts in various ways. For example, personnel with an interest in an outside company that does business with Agility may secure personal gain or favor by influencing dealings between Agility and that party. The personnel member's interest in the outside company may influence his or her judgment in making sound business decisions solely on behalf of Agility. The outside interest may also place the personnel member or Agility in an embarrassing or ethically questionable position in the eyes of the public and reflect adversely on the integrity of the personnel member or the Company.

The rules prohibiting conflicts of interest can also apply when a family member or friend of a personnel member has an interest in an outside entity affiliated with Agility. Such arrangements should be disclosed and discussed with your supervisor, or the Compliance Officer.

Question: My husband and I have a small business that sells, installs, and maintains computer equipment. We are interested in becoming an Agility vendor. Can I work full-time for the Company and be a vendor?

Answer: No. Such a relationship would constitute an impermissible conflict of interest. If, however, the business was owned solely by your spouse, he could bid on a project, so long as he did not use the fact of your employment in any way to influence the selection process, and you do not participate at any level in reviewing or approving the work performed. Even that relationship, however, should be disclosed and discussed with your supervisor or the Compliance Officer.

Question: I am thinking of getting a second job. Does this create a conflict of interest?

Answer: A second job does not, in and of itself, violate the conflict of interest provisions of the Code. However, your primary obligation must remain with Agility. If a second job or other outside interest interferes with your ability to fully and satisfactorily meet the requirements of your position with Agility, a conflict may exist. Because conflicts of interest are so fact-specific, personnel should discuss any concerns they have with their supervisor or the Compliance Officer.



Insider Trading

Personnel shall not participate in any transaction (whether buying or selling) in Agility stock or in the shares of any other issuer while in possession of material nonpublic information that has become known to the personnel member in the course of conducting Agility business.

Similarly forbidden are purchases or sales of stock by another person, on the basis of such information, for the benefit of or at the request of the personnel member.

Agility personnel are also prohibited from advising others as to the desirability of buying or selling securities on the basis of material, non-public information.

Whether information is "material" depends upon whether it would be important to an investor in determining whether to trade in the security or would likely have an impact on the price of the security in the market. While not an exhaustive list, the following types of information are generally considered "material": earnings projections, significant acquisitions and divestitures, major contracts or new business, financial results, and significant new processes or product discoveries. Other facts, depending on their nature, may also be material.

Question: As part of my job, I recently received information about a potential new account that, if obtained, will significantly affect Company revenues. Can I use that information and purchase stock in the Company in my personal account?

Answer: No. You are strictly prohibited from trading in stock based upon material, non-public information. The information you received would be important to an investor in determining whether to trade in the security or would likely have an impact on the price of the security in the market.

The restrictions of this section apply until the information has been publicly disclosed and adequately disseminated over a sufficient period of time so that the market has had a chance to react.

Question: I just learned through my job that a customer is on the verge of announcing an important new contract. May I purchase the customer's stock in my own account?

Answer: No. Restrictions on trading based upon inside information extend to the purchase or sale of any stock based upon material, non-public information. You should wait until the customer publicly announces the new contract before trading.

The Code does not prohibit minimal holdings of stock or other securities in publicly traded companies that may compete or do business with Agility. A "minimal" investment for these purposes is one in which your holdings are less than 1% of the outstanding shares in the particular company. However, even in these "minimal investment" situations, any trading based on material non-public information is strictly prohibited.

Any employee who may have what he or she believes to be inside information, and who wishes to discuss the nature of the information, should contact the Compliance Officer before trading (or tipping anyone else to trade) in a security of any company.

Gifts, Meals and Entertainment

Even the innocent exchange of gifts or provision of meals or entertainment can be misinterpreted.

Depending upon the relationships involved, the exchange of gifts or provision of meals or entertainment can be seen as attempts to influence an employee into directing business to a particular supplier, vendor, jobber, agent, consultant, customer or competitor.

In order to avoid both real and perceived conflicts of interest, the following standards shall apply to the receipt of gifts, meals and entertainment by Agility personnel.

Gifts

Do not encourage or solicit any gift, gratuity, or other personal benefit or favor.

Personnel shall not encourage or solicit, either on their own behalf or on behalf of members of their family or friends, any gift, gratuity, or other personal benefit or favor of any kind from a current or anticipated supplier, vendor, jobber, agent, consultant, customer or competitor of Agility.

Gifts include anything of value, including money, merchandise and products, and also discounts on personal services and purchases.

Personnel are strictly prohibited from accepting gifts of money and are discouraged from accepting any unsolicited gifts.

Personnel may never accept gifts of money.

Personnel may, however, accept **unsolicited non-monetary** gifts provided they are items of nominal value and do not go beyond common courtesy and accepted business practice. Any gift having more than a nominal value which exceeds an amount as is ordinary and customary in the industry in the country where you are operating, even if unsolicited, must be reported to the Compliance Officer. Extravagant gifts must be reported to the Compliance Officer, and politely returned to the sender.

When considering accepting an unsolicited gift, you should ask yourself the following questions:

- 1) Is the gift or promotional item intended to induce me to place my personal interest above that of my employer?
- 2) If my supervisor were aware of the gift, would he/she object?

3) If I accept the gift, will it lead me to give special treatment to a particular third party?

4) Have I received gifts in connection with this particular third party on a more than infrequent basis?

If the answer to any of these questions is "yes," you should first discuss whether to accept the gift with your supervisor or the Compliance Officer.

If you are unsure if a gift is appropriate, contact the Compliance Officer.

Question: Is it a violation of the Code to accept gifts of candies, fruits, etc. from outside organizations, including law firms, copy services, and other customers or vendors during holidays and on infrequent other occasions?

Answer: The Code plainly prohibits the solicitation of such gifts. However, as discussed above, the infrequent receipt of an unsolicited gift having a nominal value is generally allowed. Gifts of food or other perishables having more than a nominal value which exceeds an amount as is ordinary and customary in the industry in the country where you are operating should be shared with co-workers. Extravagant gifts should be reported to the Compliance Officer, and politely returned to the sender.

Meals and Entertainment

Do not encourage or solicit meals or entertainment from any individual or company.

Personnel shall neither encourage nor solicit, either on their own behalf or on behalf of members of their family or friends, meals or entertainment from any individual or company doing business or seeking to do business with Agility. Examples of such meals and entertainment include tickets or passes to sporting events or other cultural events, trips, free accommodations, and complementary meals.

From time to time, however, personnel may accept unsolicited business entertainment, such as an occasional meal or social event, but only under the following conditions:

- 1) The entertainment occurs infrequently;
- 2) The entertainment arises in the ordinary course of business; and
- 3) The entertainment is reasonable (that is, involves amounts similar to that which the employee is accustomed to spending for personal entertainment) and takes place in a setting that is appropriate and fitting in light of its business purpose.

As a general rule, entertainment should not exceed amounts as are ordinary and customary in the industry in the country where you are operating.

Question: I have been offered an opportunity by an Agility supplier to attend an all-expense paid seminar at a resort. May I accept?

Answer: Seminars of this sort have increasingly come under increasing scrutiny. If the seminar is convened for a legitimate business purpose attendance may be permitted under the following conditions:

- 1) Obtain seminar materials and the program agenda, and have them approved by your supervisor in advance.
- 2) You should pay for your own travel and accommodations to the event, and be reimbursed as per the travel policy.
- 3) Seek the agreement of your Compliance Lead or Legal Counsel in advance.

Our Commitment to Fair Dealing

We will reflect honesty, integrity and ethical behaviour in our business dealings, and will compete lawfully and ethically in our markets.



VII. Business with Third Parties and Antitrust Compliance

Principles of fair competition are basic to all of our operations and are central to the Company's interactions with suppliers, vendors, customers and government representatives.

Conducting Business with Suppliers, Vendors, Jobbers, Agents, Consultants, and Customers

The following standards will serve as guidelines for Company personnel in conducting business with suppliers, vendors, jobbers, agents, consultants, and customers:

All business dealings must be fair and lawful.

All purchases and sales of goods and services by Agility are to be made on the basis of quality, service, price, suitability, and similar relevant and lawful factors. The use of false or misleading statements in the conduct of business with third parties is strictly prohibited.

Personnel who regularly deal with suppliers, vendors, jobbers, agents, consultants, customers, and competitors of Agility must be familiar with and comply fully with all laws governing such relations. Personnel engaged in government contract work must also be fully familiar with and abide by the specific rules and regulations governing relations with public agencies generally, and government procurement specifically.

Any questions concerning the applicability of these laws to particular situations should be addressed to the Compliance Officer.

Personnel must not consider reciprocity.

Reciprocity—favoring suppliers and vendors merely because they are also customers—is a harmful practice and a hindrance to ensuring the purchase of the best available

materials or services at competitive prices. Personnel should never attempt to "tie" the purchase of goods or services to a purchase by Agility from the same customer.

Towards these ends, personnel should always remain alert to the fact that some companies may have multiple relationships with Agility, as in the case of a supplier that is also an Agility customer. In any dealings, it is important for personnel to understand the precise relationship involved.

Information about other companies received in the course of business must be treated carefully.

When working with sensitive information about other companies, personnel should use that information only for the legitimate business purposes of Agility and make it available only to those Agility personnel having a legitimate need to know. In presenting such information, the identity of the organization or individuals should be disclosed only if necessary for business reasons.

Adverse information relating to other companies that has no legitimate business purpose should not be retained.

Personnel should avoid offering, accepting or exchanging gifts, gratuities, or any other benefit or favor.

Personnel shall not offer gifts, gratuities, or any other benefit or favor to a current or anticipated supplier, vendor, jobber, agent, consultant, or customer of Agility in connection with the purchase or sale of goods or services.

Personnel may, however, offer **non-governmental** entities or their representatives non-monetary gifts of a nominal value—such as pads, pens, magnets, hats, T-shirts or related

promotional items, provided such gifts have the Agility logo on them, and do not exceed US \$500 in value.

Personnel may also, in the ordinary course of business, occasionally provide reasonable business meals or entertainment to representatives or personnel of **non-governmental** entities with which Agility does business or seeks to do business. This may include, for example, an occasional meal, social event, or invitation to an Agility-sponsored promotional event.

The place and type of entertainment offered or provided to organizations or their representatives doing business with the Company and the amount of money spent must be reasonable and appropriate and in all cases must be adequately documented on an appropriate Agility expense reimbursement form.

Meals or entertainment exceeding amounts as are ordinary and customary in the industry in the country where you are operating, received by any one person over the course of 12 months must receive advance written clearance from the Compliance Officer.

When considering giving a gift, gratuity, or any other benefit or favor to a current or anticipated supplier, vendor, jobber, agent, consultant, or customer of Agility, you should ask yourself the following questions:

1) If my supervisor were aware of the gift or promotional item, would he/she object?

2) Am I offering something of value in order to obtain special treatment for Agility?

3) Have I provided gifts or promotional items in connection with this particular customer on a more than infrequent basis?

If the answer to any of these questions is "yes," you should first discuss whether to offer the gift with your supervisor or the Compliance Officer. These policies apply regardless of whether

Company funds or personal funds are used to provide the gift, gratuity, benefit or favor.

Question: I have a time-share at an apartment in Miami. May I offer it to a customer for a weekend, even though I will not be present?

Answer: No. Since you will not be present, no opportunity to discuss business or otherwise further a business relationship with the customer exists. As a result, this form of entertainment would not appear to be business-related and would, instead, be considered an extravagant gift. Even if you were present, the value of the proposed entertainment may in any event be unreasonable, and the nature of the entertainment belies any apparent business purpose.

"Under-the-table" payments are strictly prohibited.

Personnel and their families are strictly prohibited from encouraging, soliciting or accepting any form of "under-the-table" payment, "kickback," bribe, rebate or other improper payment in connection with any actual or potential sale or purchase of goods or services.



Conducting Business with Governments

From time to time, Agility has business and regulatory contacts with different governmental agencies and representatives in many countries around the world. Special considerations apply with respect to interactions with governmental agencies and representatives.

Do not offer, give, or transfer anything of value to any official, employee, or agent of any governmental entity.

Personnel shall not offer, give, or transfer anything of value to, or accept anything of value from, any official, employee, or agent of any governmental entity with which the Company does business, is seeking to do business, or has a regulatory relationship. This prohibition applies both to transfers made directly, and to transfers done through intermediaries such as partners or family members.

For these purposes, items of value shall include both tangible and intangible benefits, including money, goods, services, entertainment (beyond what is normal for the industry), or promises of future beneficial treatment given or offered as an inducement to contract or to obtain a particular outcome.

In rare cases, facilitating payments may be allowed. Facilitating payments are small payments to a public official necessary to expedite or secure performance of a routine, non-discretionary governmental action. Such payments may include fees for obtaining official documents, processing governmental papers, and providing postal or utility services.

Facilitating payments never include payments made to assist in obtaining or retaining business or to obtain an improper business advantage.

With the exception of de minimis amounts paid in the normal course of business in order to expedite or secure customs clearance and other freight forwarding functions, facilitating payments are discouraged and can be made only with the prior written approval of the Compliance Officer.

For any questions on what constitutes

"de minimis," please contact the Compliance Officer.

Do not discuss the potential for future employment at Agility with any official, employee, or agent of any governmental entity.

Complex rules govern when a government employee may discuss potential future employment with a business that contracts with the government. An offer of future employment may also constitute a thing of value and violate applicable anti-bribery statutes. Personnel must obtain approval from the Compliance Officer prior to engaging in any such discussion.

Properly maintain and present information to governmental entities.

Special disclosure and record-keeping requirements imposed by governmental entities reinforce the importance of personnel maintaining accurate and proper records, including, but not limited to, cost and pricing data and time-keeping and expense records. Improprieties, such as manipulation or falsification of records, are strictly prohibited.

A section detailing the procedures and restrictions in conducting business with the U.S. government can be found later in the Code.

Antitrust / Competition Compliance

Agility is subject to the antitrust laws of the various jurisdictions in which it conducts business. Antitrust laws generally prohibit agreements, understandings and actions that may restrain trade or reduce competition. A prohibited agreement or understanding can be inferred from circumstantial evidence and does not require explicit promises or assurances. For this reason, personnel must not only act within the law but must also avoid doing anything that may give rise to the appearance of collusion or improper action.

Personnel should be familiar with the various forms of anti-competitive practices and avoid any such practices. Due to the complexities of antitrust laws, personnel

should consult with the Compliance Officer with any questions about the possible application of antitrust laws to their activities.

Agreements Among Competitors

Do not enter into any collusive arrangement or understanding with a competitor and refrain from any discussions towards that end.

Absent express approval of the Compliance Officer, personnel shall not enter (or attempt to enter) into any agreement, express or implied, with a competitor concerning pricing, terms of sale, allocations of customers or territories, customer/supplier boycotts, or other similar agreements.

It is also never permissible to "team" or work with other companies in order to limit competition.

Teaming and joint venturing should only occur where neither party individually has all the skills, background, requirements or financial capacity necessary to effectively compete, but together they do. To make certain teaming arrangements do not violate antitrust laws, any teaming arrangement, including establishment of joint ventures, new subsidiaries, limited liability companies or prime/subcontractor teams, must be reviewed by the Office of the General Counsel.

The following standards will serve as guidelines in interactions between personnel and competitors:

- 1) Personnel should always exercise independent judgment and, to the extent possible, avoid even the appearance of collusion with a competitor. All pricing decisions shall be made independently of competitors, relying on costs, general market conditions and competitive prices;



2) Personnel shall not enter into discussion with any competitor, without prior approval of the Compliance Officer, on the following subjects: prices or discounts, output levels, warranties; terms or conditions of sale or credit; costs, cost coverage, margins or profits; bids or intentions to bid; sales territories or customers; or other matters on which agreement would be inappropriate;

Question: A competitor has been actively soliciting one of my best accounts. Can I discuss with him the possibility of a mutual agreement not to call on one another's key accounts?

Answer: Absolutely not. Understandings or agreements between competitors concerning the allocation of customers are routinely determined to be illegal in various countries and are prohibited.

Trade Associations

3) During trade association meetings, personnel should confine all discussions to the subjects for which the meeting was convened or to explicit agenda items. Personnel should contact a supervisor or the Compliance Officer in advance with any questions about likely sensitive topics of discussion and topics that should be avoided and insist that the meeting be attended by counsel, if necessary;

4) Personnel shall immediately exit meetings (including social gatherings) where forbidden subjects are discussed with competitors. Personnel should make a point of their departure so others will remember, and promptly report the incident to the Compliance Officer or by calling the Agility Alert Line;

5) Personnel shall not provide information about Agility pricing policy, terms and conditions, costs, marketing plans, market surveys and studies, or any other proprietary or confidential information to a competitor. Personnel should also not obtain similar information directly from a competitor. It is generally appropriate to obtain

such information from public sources and customers. Personnel should document the source from which they did obtain such information; and

Question: We have just hired a former employee of a competitor, who has offered to show me a price book that he took from his former job. What should I do?

Answer: Unless the pricing information has been widely distributed to customers or is otherwise publicly available, it likely constitutes proprietary information and you should not accept it. The new employee should be advised to destroy the material or return it to his former employer, and the incident should be reported to the Compliance Officer.

6) Personnel shall not attempt to obtain confidential information or trade secrets from a competitor or competitor's customer through practices such as deceit, industrial espionage, trespassing, wiretapping, stealing, hiring a competitor's personnel, or any improper solicitation of confidential data.

Question: I would like to learn the prices of a competitor's products. May I contact the competitor posing as a prospective customer?

Answer: No. Agility personnel are strictly prohibited from seeking to obtain competitive information through improper means, including deceit. Masquerading as a customer plainly falls within this proscription. Pricing information may, however, be obtained through legitimate channels, including customers (unless the information was provided to them under a confidentiality agreement) or through the services of various reputable firms that conduct market analyses. From whatever source you obtain the information, you should make certain to document it in case questions arise later.

Monopolization

Do not make any representations that suggest any anti-competitive intent.

While Agility does not have, nor does it strive to have, a monopoly in any area of business, it may nevertheless be accused of illegal monopolization.

Personnel must not make oral or written statements that exaggerate the Company's position, that might suggest a predatory intent, or that might be taken as an expression of intent to monopolize, to capture a dominant share of the market, or to drive competitors out of business.

Personnel must not make oral or written statements that suggest the Company can project sales or profits without reference to marketplace conditions. Personnel also must not express sales objectives in negative terms, such as to "crush" a competitor's business. Such rhetoric must always be avoided.

The Code is not intended to summarize applicable antitrust laws, which are complex and subtle in their application to any particular situation. Any employee who has questions about the application of antitrust laws to any situation should ask before acting. Information regarding apparent or suspected violations of these laws should be reported immediately to your supervisor or the Compliance Officer.

In summary you must be particularly careful about dealing with competitors, and must not discuss with any competitor:

- Prices;
- Price changes;
- Discounts;
- Costs;
- Warranties;
- Confidential information, such as details of sales, revenue, contract terms, or business opportunities;
- Terms of sale; or
- Marketing initiatives

When in doubt seek advice

Speak to your Compliance representative or General Counsel if you have any questions or concerns about the competition policy.

Our Commitment to Working with Our Local Communities

We understand the impact that we have on the communities in which we do business, and we want to make positive contributions for the betterment of those communities.

Community Service:

Agility is committed to creating opportunities for employees to give back to the community in ways that go above and beyond commercial obligations alone. The company offers employees a number of avenues to participate in voluntary community initiatives on the country, regional, and corporate level. We believe that getting involved helps grow our company, our local communities, and our future.

Agility's approach is grounded in building long-term relationships with reputable and effective non-profit partner organizations. We strongly support the principles of humanity, neutrality, and impartiality in our response to service, and do not work with organizations that discriminate on the basis of race, religion, or politics.

Agility is committed to the preservation and protection of our natural environment, and promoting and maintaining a safe workplace.

VIII. Environmental, Health & Safety Compliance

Agility is committed to the preservation and protection of our natural environment, and promoting and maintaining a safe workplace. In this regard, all aspects of its operations shall be conducted in strict conformance with all applicable laws and regulations, as well as with all Agility corporate policies and best practices pertaining to workplace safety and protection of the environment.

Agility's commitment also includes implementing controls to prevent pollution and harmful emissions, reducing over-consumption of physical resources and energy, and minimizing waste.

The existence of any suspected discharge or any other unsafe workplace condition should immediately be reported to your supervisor or to the Compliance Officer.

IX. Political Activities

Personnel are encouraged to participate in civic and political activities. This is a way in which all of us can practice good citizenship and make meaningful contributions to our communities.

However, any political activities should be on the employee's own time and at his/her own expense and should not otherwise interfere with the conduct of Agility business.

Agility personnel may not make any political contribution on behalf of the Company or using corporate funds. A personnel member may make personal political contributions to a candidate or political action committee only with non-reimbursable personal funds.

Except as otherwise specifically approved in advance by the Office of the General Counsel, personnel are prohibited from using any Agility property or facility, or

the working time of any Agility personnel member, for any political activity.

Question: A close personal friend is running for public office. Can I campaign for her and solicit support for her campaign while at work?

Answer: No. While Agility encourages personnel to be politically active, Agility property cannot be used in that connection without the prior approval of the Compliance Officer. Moreover, your participation in such activities must not interfere with your job and must be conducted during your own time.



Our Commitment to the Global Workplace

Agility is proud to be a leader in the global workplace on a number of issues. It is a privilege to be able to offer our products and services in numerous countries around the world, and to have the unique opportunity to help the citizens of those countries raise their standard of living and improve their lives. With that privilege to conduct business throughout the world comes an obligation to respect the laws that govern global business and the government officials worldwide who enforce or enact those laws.

X. International Business

A substantial portion of the business of Agility has an international dimension. Specific laws and regulations apply to the conduct of international business. Personnel involved in foreign business transactions must be fully familiar with and strictly follow such provisions.

While by no means an exhaustive survey, Agility personnel involved in international business matters must, at a minimum, be aware of applicable anti-boycott provisions, export regulations, trade embargoes, anti-corruption laws, and general criminal laws in force at the time. This is a particularly complex area. Personnel should seek expert assistance early, and often, by contacting the Compliance Officer for details and up-to-date information and guidance.

Anti-Boycott Regulations

The U.S. anti-boycott regulations impose sanctions, including civil and criminal penalties and loss of tax benefits, for certain actions considered supportive of such boycotts.

The anti-boycott regulations of the U.S. Department of Commerce and the Internal Revenue Service prohibit U.S. companies and foreign business concerns controlled by U.S. companies from engaging in unsanctioned boycotts with respect to products or services. Although the anti-boycott regulations are complex and extremely broad in terms of the activities proscribed, they generally prohibit businesses and individuals from taking any action in support of a boycott of any foreign country where the boycott is not recognized by the United States.

Prohibited conduct includes requests by a customer to refrain from doing business with the government, businesses or citizens of a particular country; requests to provide certain information relating to the Company's business in such country; or requests to take any other action in support of a boycott not recognized by the United States. The U.S. anti-boycott regulations impose sanctions, including civil and criminal penalties and loss of tax benefits, for certain actions considered supportive of such boycotts.

Export Regulations and Trade Embargoes

The export regulations and laws regarding trade embargoes impose significant civil and criminal penalties for the import and/or export of certain goods.

U.S. export regulations prevent U.S. exports of certain goods to countries without a license, or exporting goods to sanctioned countries, entities or individuals. Alongside trade embargoes, they are used to protect the United States economy and enhance its security, by prohibiting the import or export of certain goods such as arms, munitions or goods made from endangered species.

Agility personnel must observe all applicable export and embargo regulations. This area is exceedingly complex. Personnel facing these issues should be in regular contact with the Compliance Officer, to ensure they have up-to-date information. In addition, personnel must be on alert for and promptly report any customer that appears to be diverting goods during shipment in order to disguise the place of origin of the goods, misreporting the true nature of goods being shipped, or in any way attempting to evade import/export regulations or trade embargo rules.



Agility personnel must observe all applicable export and embargo regulations.

Anti-Corruption Laws

Personnel are strictly prohibited from offering, authorizing, giving or promising anything of value to a governmental official that could be perceived as an inducement or bribe to help Agility in its business. This excludes, however, facilitating payments such as de minimis amounts paid in the normal course of business in order to expedite or secure customs clearance and other freight -forwarding functions, facilitating payments are discouraged and can be made only with the prior written approval of the Compliance Officer.

The United Nations and a number of other regional organizations have enacted conventions prohibiting bribery of foreign officials. For instance, the 35 signatory countries to the Organization for Economic Cooperation and Development Convention on Combating Bribery of Foreign Officials have enacted anti-bribery laws. Personnel must familiarize themselves with the applicable anti-corruption legislation for their area of operations. Because of the complex and dynamic nature of international business, personnel should direct questions in this area to the Compliance Officer.

In order to minimize the risk of corruption, personnel must be extremely cautious when choosing partners, representatives, consultants and agents.

The U.S. Foreign Corrupt Practices Act ("FCPA") is one example of anti-bribery legislation. It prohibits companies and their personnel from offering, paying or authorizing payment of any money, or other thing of value, directly or indirectly, to a foreign official.

The FCPA is a federal criminal statute that contains two sets of provisions—provisions prohibiting bribery and provisions requiring companies to maintain adequate internal accounting controls to monitor potential corrupt practices.

The anti-bribery provisions of the FCPA prohibit companies and their personnel from offering, paying or authorizing payment of any money, or other thing of value, directly or indirectly, to a foreign official in order to influence any act within his/her official capacity, or to induce him/her to assist in obtaining or retaining business for the Company.

Under the FCPA, a foreign official is any person acting in an official capacity on behalf of a foreign government, agency, department, instrumentality, or international organization. Also included under the term "foreign official" are foreign political parties and officials of any such parties, or any candidate for foreign political office or his/her representative. The definition is intentionally broad and includes various individuals who may be acting "on behalf of" the foreign government, including consultants and engineers retained solely in connection with a specific project.

Besides violating the FCPA, such transactions may also result in the violation of local criminal laws, such as anti-bribery laws.

The FCPA does not prohibit, however, certain facilitating payments made to foreign government employees whose duties are essentially ministerial or clerical. Facilitating payments may include routine payments made in connection with obtaining permits, licenses, work orders, and the like. However, it is often difficult to determine whether such payments are appropriate, even when they appear to be sanctioned by local authorities or are consistent with local custom. With the exception of de minimis amounts paid in the normal course of business in order to expedite or secure customs clearance and other freight - forwarding functions, facilitating payments are discouraged and can be made only with the prior written approval of the Compliance Officer. For any questions on what constitutes "de minimis," please contact the Compliance Officer.

The FCPA also creates an exception for expenditures incurred by or on behalf of a foreign official that are related to the promotion or demonstration of products or services. For example, reimbursement of expenses, including meals, lodging and business entertainment, incurred in bringing a foreign official to the United States for a tour of Agility facilities, for meetings, or for other legitimate business reasons may be appropriate under the FCPA. In all such cases, you must receive prior written approval from the Compliance Officer before extending any offers or invitations.

Under the accounting standards provision of the FCPA, any payment, if required to be made, must be properly recorded in the accounts. Obviously, the recording of such payments in any way that would conceal their true nature would be a violation of the FCPA accounting standards, as well as of the Agility's Code of Business Ethics and Conduct. No fictitious invoices, documents, etc. shall be involved in any transaction. No accounting record or document shall be falsified in any manner that may obscure or disguise the true nature of the transaction.

Question: Can we treat a Government official to a golf game after a scheduled meeting?

Answer: No, this activity is not reasonably associated with a legitimate business purpose and likely would be viewed as extravagant and thus unlawful under the FCPA and many anticorruption laws in jurisdictions where Agility does business.

Personnel must familiarize themselves with the FCPA and all other applicable anticorruption laws. In this regard, contact the Compliance Officer.

In summary, personnel should question and further investigate any "sensitive transactions," those transactions that could appear to be illegal, unethical, immoral or reflect adversely on the integrity of management. These transactions may violate various laws and subject the Company and its officers and directors,



and any personnel involved, to fines, imprisonment and civil litigation. As a general rule of thumb, if it doesn't feel right, it probably isn't. In such cases, conduct further inquiry about the transaction, and consult your supervisor or the Compliance Officer to seek guidance before such a transaction is executed.

Of course, if you suspect that a violation of the FCPA has occurred, immediately report it to your supervisor or to the Compliance Officer.

U.S. Economic Sanctions

The U.S. Government maintains economic sanctions against several countries and certain organizations and individuals. The Office of Foreign Assets Control of the U.S. Treasury Department ("OFAC") administers the main U.S. economic sanctions programs against targeted countries, organizations, and individuals. Currently, the most extensive OFAC sanctions programs target Cuba, Iran, Myanmar (Burma), and Sudan. In general, U.S. economic sanctions apply to "U.S. persons," a term that includes U.S. citizens and permanent residents, wherever physically located; companies organized under the laws of the United States or any U.S. state; and persons physically located within the United States, regardless of citizenship.

In addition, OFAC generally prohibits U.S. persons from "approving or facilitating" dealings with sanctioned countries by non-U.S. persons. This term is vague. It is clear, however, that a U.S. person would be considered to "facilitate" dealings with a sanctioned country by changing corporate policies to allow a non-U.S. affiliate to perform a prohibited transaction, or by referring prohibited business to a non-U.S. affiliate. U.S. persons cannot take any actions that support transactions with a sanctioned country.

The penalties for violating OFAC sanctions vary, but can be severe. Criminal penalties can include imprisonment and fines of up to \$1,000,000 for willful violations. Civil penalties are smaller, but are applied much more often. Over a recent two-year period, OFAC fined more than 400 persons for an average amount of just over \$37,000. In addition, OFAC violations may also impose significant political and public relations costs.

It is the policy of Agility that all Agility subsidiaries, affiliates, and branches located in the United States, as well as all U.S. citizen and permanent resident employees and directors wherever located, must comply fully with U.S. economic sanctions. Agility is not itself a U.S. person, and U.S. economic sanctions thus do not apply directly to Agility. However, because Agility owns and controls companies that are U.S. persons, employs many individuals who are U.S. persons, and conducts extensive business with both U.S. companies and the agencies and instrumentalities of the U.S. Government, it is generally the policy of Agility to comply with the terms of U.S. economic sanctions where applicable.

There may be a need, because of local laws in other jurisdictions in which Agility does business, to consider the application of this policy on a case - by - case basis. Therefore, whenever any Agility employee encounters a situation where business may be transacted with a person or entity located in or having the nationality of Cuba, Iran, Sudan or Burma, this transaction should be called to the attention of the Office of General Counsel for review and approval.

Question: I am an Agility employee in the United States and have just learned of an opportunity for the Company to bid on a high-value tender being issued by the United Nations for Sudan. Since Sudan is a sanctioned country can I participate in preparing a bid in response to this tender or should I simply refer the matter to my non-US counterparts in Kuwait?

Answer: In the first instance, refer this matter immediately to the Office of the General Counsel who will review whether Agility has the ability to pursue this matter, in light of the existing OFAC licenses which Agility has, through its offices in the United States or elsewhere. Please remember that OFAC is not obligated to grant licenses in respect of United Nations tenders for work, and there may well be such tenders which OFAC declines to license.

As a general rule of thumb, if it doesn't feel right, it probably isn't.



Agility's personnel must ensure that all goods and services meet contract requirements for delivery, performance, design, manufacture, testing and any other relevant specifications or requirements.

General Criminal laws

Conduct of personnel that violates the criminal laws of any nation will not be tolerated by Agility and personnel who engage in such conduct may face termination and referral for prosecution. Personnel may be subject to prosecution for such conduct in the nation in which the conduct occurs or in any foreign nation with jurisdiction over the personnel member.

The U.S. Military Extraterritorial Jurisdiction Act of 2000 ("MEJA") gives the United States jurisdiction over persons employed by the United States, employed by contractors supporting the U.S. military, or otherwise accompanying the U.S. military outside the territorial jurisdiction of the United States, who commit criminal acts punishable by imprisonment for more than one year if the criminal act had occurred within the territorial jurisdiction of the United States.

The following persons may be subject to MEJA: members of the U.S. military and former members of the U.S. military, civilian employees of the U.S. Government, and contractors and their employees who accompany the U.S. military outside the territorial jurisdiction of the United States. Persons who are nationals of, or resident in, the host country where the offense is committed are not subject to MEJA, regardless of their employment status. Because of the wide reach of this MEJA Act, personnel should address any questions they have in this regard to the Compliance Officer.

XI. Business with the United States Government

Agility frequently bids on and performs contracts for the U.S. government. The unique nature of doing business with the U.S. Government implicates particular statutes and regulations that do not normally apply to commercial transactions. Business conduct that is acceptable in the private sector may violate U.S. Government procurement laws or regulations resulting in harsh consequences.

You may directly or indirectly perform services or work related to one or more government contracts. It is your responsibility to know the terms of the government contract(s) you are working on and all of the policies and procedures related to those contracts.

You may also be required to sign certifications, either internal or to the government, regarding the accuracy of information or Agility's performance under the contracts.

If you have any questions or doubts regarding any aspect of Agility's performance under any government contract, it is your duty to come forward immediately.

The following is a brief summary of the rules and regulations that apply to our work on U.S. Government contracts. These guidelines apply equally to direct contracts with the government as well as subcontracts in which our products and services are being procured by others under contract with the United States.

Violations of these guidelines can jeopardize Agility's ability to participate in U.S. Government programs, result in the loss of a particular government contract, subject Agility's personnel to disciplinary action, up to and including termination, and may also result in prosecution by the U.S. Government. Conduct business with the highest degree of integrity.

Conduct business with the highest degree of integrity.

All personnel must comply with the letter and spirit of U.S. Government contracting laws and regulations. When the U.S. Government is our client, we have a special obligation not only to the U.S. Government and the beneficiaries of U.S. Governmental programs, but also to the U.S. public at large and our stockholders to ensure that we perform with the highest degree of integrity.

Towards these ends, Agility's personnel must ensure that all goods and services meet contract requirements for delivery, performance, design, manufacture, testing and any other relevant specifications or requirements.

Personnel also should not hire or do business with individuals or entities that have been debarred or otherwise excluded from participation in U.S. federal procurement programs. The U.S. Government maintains a centralized database of individuals and businesses that are excluded from receiving or participating in federal contracts at <http://www.epls.gov>.

Agility is also sometimes provided property or equipment that is owned by the U.S. Government. This property or equipment must be properly accounted for and used only for authorized purposes.

Do not communicate with U.S. government officials "off-line" during the evaluation of a Agility proposal.

The Procurement Integrity Act generally prohibits contractors from communicating with U.S. government officials evaluating their proposal except through well-defined official channels. Agility personnel should refrain from any such "off-line" communication. If you are unsure whether a potential communication is appropriate, you should contact your supervisor or the Compliance Officer before communicating with the U.S. government official.

Account accurately and honestly for all costs, pricing, expenses and claims for payment.

Personnel must fully disclose complete and accurate cost and pricing data that is current up to the date of agreement on price. Agility is frequently required to submit cost or pricing data to the U.S. Government with certifications that it is current, accurate and complete. Full disclosure of all relevant cost and pricing data, as defined by Federal Acquisition Regulations, is required when mandated by the U.S. Government. Note that the

definition of data that must be disclosed is very broad and includes all facts that a prudent buyer and seller would reasonably expect to affect price.

When a U.S. Government contract allows for reimbursement of specific costs, only those costs that are clearly allowable under U.S. Government regulations and reasonable in amount should be submitted to the U.S. Government for reimbursement. Alcoholic beverages, promotional items, donations and entertainment expenses are expressly unallowable.

All labor and material costs must be accurate and charged to the appropriate account. Improprieties, such as charging labor or material costs improperly to the wrong account, charging direct contract effort expenses to an overhead or indirect account, or falsification of time cards or other records will not be tolerated.

All other claims for payment must be truthful. For example, Agility is often required to certify compliance with quality control specifications and testing requirements for our products. Improprieties, such as unauthorized substitution of materials, substandard or nonconforming parts, altering, falsifying or distorting inspection or test documentation, improperly or erroneously recording inspection or test results, or falsely certifying or stating that required inspections or tests were performed will not be tolerated.

Do not offer, make or accept any gift, gratuity, offer for employment, or other personal benefit or favor in connection with a U.S. government contract.

Offering or giving money, fees, commissions, credit, gifts, gratuities, or any other thing of value or compensation, directly or indirectly, to a U.S. Government employee for the purpose of improperly obtaining favorable treatment is a crime and is prohibited.

Agility's policy prohibits personnel offering or giving U.S. Government employees involved in the procurement process anything except: (a) beverages at a business meeting, or (b) light snacks for a business meeting where government employees in travel status are in attendance.

Personnel also should not offer or promise future employment to U.S. Government employees involved in the procurement process. There are many "revolving door" laws that apply to U.S. Government employees and restrict their employment outside the government. In some cases, even discussions of possible employment are prohibited.

Accordingly, clearance must be obtained from the Compliance Officer before even mentioning proposed employment to a current U.S. Government official and before hiring or retaining a current or former U.S. Government official.

These restrictions also apply to interactions with fellow U.S. Government contractors and subcontractors who may be seeking to work with Agility. Other than the customary business courtesies that are reasonable in frequency and value, discussed above, soliciting or accepting any money, fee, commission, credit, gift, gratuity, thing of value or compensation from a higher - tier government contractor, subcontractor, vendor or supplier for the purpose of obtaining or acknowledging favorable treatment under a U.S. Government contract or subcontract is a crime and prohibited by this policy.

Do not solicit, receive or use sensitive or classified information about competitors or the U.S. government in connection with a U.S. government contract.

Agility personnel must not solicit or obtain a competitor's non-public bid or proposal information regarding a U.S. Government procurement for which Agility intends to bid. Such bid or proposal information includes cost and price data and proprietary information about techniques or indirect costs. Personnel also must not solicit or obtain a U.S. Governmental agency's



source information prior to contract award. Source selection information includes government-sensitive information and documents such as source selection plans, technical evaluation plans, government evaluation of proposals and competitive range determinations.

The solicitation, receipt or use of U.S. Government information classified for national security is also strictly prohibited. Agility is not a cleared contractor for handling classified information. Unauthorized possession, use, disclosure, or transmission of classified information may be punishable by fines or imprisonment.

If you know of or suspect any actual or potential security violations or believe that proprietary or source selection information has been revealed to you, you must report it immediately to your supervisor or the Compliance Officer.

The laws which govern our contracts with the U.S. Government give wide discretion to governmental investigators to search out wrongdoing. Many governmental agencies employ their own investigators (e.g., inspectors general, special agents) to supplement work usually performed by local police, the Department of Justice or state district attorney offices.

Agility's policy is to cooperate fully with all legitimate investigations; however, the rules governing the conduct of investigations are complex and therefore require the involvement of the Office of the General Counsel. Any employee who becomes aware of an investigation relating to the Company, its employees, contracts or subcontracts should immediately contact the Office of the General Counsel with this information.

During the course of any investigation, employees have certain rights as individuals. Agility is not in a position to protect these rights for employees, but can assist in locating a personal attorney to counsel employees who are targets of an investigation. Remember: it is perfectly permissible to delay answering any investigator's questions while seeking legal advice regarding your individual rights. The Office of the General Counsel can provide advice regarding the Company's rights. Employees approached either at home or on the job by a government investigator regarding matters that involve work for the Company should follow these guidelines: (i) ask to see identification, and make a note of the individual investigator's name, agency and phone number, (ii) determine the scope of the inquiry, (iii) politely explain the Company's policy—that it is Agility's policy to cooperate, but that it will be necessary to consult with counsel before answering any questions or turning over papers, (iv) immediately contact the Office of the General Counsel, and (v) if the investigator serves a subpoena or other document requesting documents, immediately call the Office of the General Counsel (or contact counsel at home) for advice while the investigator waits.

Always remember that you are under no obligation to answer any questions or produce any documents without legal advice. Once you report contact by an investigator, the Company will promptly respond to the inquiring agency.

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Agility Code of Business Ethics and Conduct

Acknowledgement Form

The Agility Code of Business Ethics and Conduct (the Code) outlines the most fundamental obligations of Agility's personnel, in the unlikely event that the Code conflicts with any other Agility policy, practice or work rule, the Code takes precedence. The Code does not constitute an employment contract. Agility reserves all rights to change or modify this Code at any time to the extent permitted by law.

I understand and agree to adhere to the conditions contained within this Code and to maintain the contents in full confidentiality.

I hereby acknowledge the receipt of the Agility Code of Business Ethics and Conduct and agree to return it back to the Human Resources Department or Global Compliance Division upon departure (resignation/termination) from the Company.

Employee Name (Please Print)

Date

Employee Signature

Return this form to the Human Resources Department

Select the country you are calling from, dial the Access Code and then the Toll Free Phone Number.

The numbers for the Agility Alert Line for employees located elsewhere are:

Calling From:	Access Code	Toll-free Number
Australia (Optus)	1-800-551-155	800-472-6986
Australia (Telstra)	1-800-881-011	800-472-6986
Bahrain	800-00-001	800-472-6986
Bahrain (Cellular)	800-000-00	800-472-6986
Belgium	0-800-100-10	800-472-6986
China - North	108-888	800-472-6986
China - South	108-11	800-472-6986
Denmark	8001-0010	800-472-6986
France	0800-99-0011 or 0805-701-288	800-472-6986
Germany	0-800-2255-288	800-472-6986
India	000-117	800-472-6986
Indonesia	001-801-10	800-472-6986
Ireland	1-800-550-000	800-472-6986
Italy	800-172-444	800-472-6986
Japan (IDC)	00 665-5111	800-472-6986
Japan (JT)	00 441-1111	800-472-6986
Japan (KDDI)	00 539-111	800-472-6986
Jordan	18 800 000	800-472-6986
Korea	(DACOM) 0030-911	800-472-6986
Korea (Korea Telecom)	0072-911	800-472-6986
Korea (ONSE)	0036-911	800-472-6986
Lebanon (Beirut)	426-801	800-472-6986
Lebanon (outside Beirut)	01-426-801	800-472-6986
Malaysia	1-800-80-0011	800-472-6986
Netherlands	0800-022-9111	800-472-6986
New Zealand	000-911	800-472-6986
Pakistan	00 800 01001	800-472-6986
Philippines	105-11	800-472-6986
Portugal	800-800-128	800-472-6986
Saudi Arabia	1-800-10	800-472-6986
Singapore (StarHub)	80-0001-0001	800-472-6986
Singapore (Sing Tel)	800-0111-111	800-472-6986
South Africa	0-800-99-0123	800-472-6986
Spain	900-99-00-11	800-472-6986
Sweden	020 799 111	800-472-6986
Switzerland	0-800-890011	800-472-6986
Taiwan	00-801-10-288-0	800-472-6986
Thailand	1-800-0001-33 or 001-999-111-11	800-472-6986
Turkey	00-800-12277	800-472-6986
United Arab Emirates	0-800-121	800-472-6986
United Kingdom (BT)	0800-89-0011	800-472-6986
United Kingdom (C&W)	0500-89-0011	800-472-6986

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