

**Code of Of Conduct  
& Business Ethics**

**Corporate Headquarters  
110 East Broward Blvd.  
Suite 1700  
Fort Lauderdale, FL 33301**

- ◆ **Commitment**
- ◆ **Responsibility**
- ◆ **Integrity**

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**The Overseas Lease Group, Inc. (“OLG”) Cornerstone Values:  
Ethical morals and practices lead to the cornerstone of the OLG CREDO of values  
for all OLG Associates (Employees):**

**Commitment:** OLG Associates are committed to the highest standard of ethical behavior, quality performance and service.

**Responsibility:** OLG Associates are responsible for their actions and to the credible nature of all actions.

**Integrity:** OLG Associates demonstrate the highest integrity during all business transactions with clients, alliances and with each other.

**The OLG Ethics and Business Conduct Credo**

**Compliance with the Law:**

OLG is headquartered in the United States with Associates operating in countries worldwide. All Associates adhere to United States law and local laws within the regions and countries in which they work.

**Governing Company Assets:**

All OLG Associates are committed to keep information correct and confidential as mandated by company security policy, and adhere to accurate records management procedures including but not limited to financial records, client bids, proposals, negotiations, and OLG associates records.

**OLG Ethical Business Conduct:**

All OLG Associates will deal impartially with its clients, suppliers, competitors and fellow Associates.

All OLG Associates must ensure all proclamations, communications, and descriptions while dealing with clients and fellow Associates are forthright, honest and correct.



## **Gifts, Gratuities & Entertainment**

OLG prohibits the offering, attempting, soliciting, or receiving any form of bribe or kickback. Associates should immediately seek direction from the OLG Legal Counsel should they be approached with any such request. As per the law, even the receipt of this type of request is an unlawful, reportable event.

OLG also prohibits the giving of gifts, meals or entertainment regardless of the value to any US Federal, State, or Local Government employee. Promotional items with a value no more than \$20.00 USD bearing the OLG logo may be offered without violating the OLG CREDO.

There are general rules regarding gifts to federal executive agencies whereas modest refreshment items, greeting cards, and other low value items may be acceptable. In adhering to the Foreign Corrupt Practices Act (“FCPA”), OLG prohibits Associates from giving money or any items of value to any foreign official whether directly or indirectly. All OLG Associates must familiarize themselves with the FCPA and strictly enforce all information outlined.

## **Additional Code of Conduct Information**

As a member of the International Stability Operations Association (“ISOA”), OLG abides by the IPOA Code of Conduct. This document may be found via [www.ipoworld.org](http://www.ipoworld.org). (Formerly IPOA)

