



ETHICAL BUSINESS CONDUCT PRINCIPLE

Principle Statement :

GTG employees and third parties to which this Principle applies must make good, ethical decisions based on GTG's fundamental values of honesty, integrity, promise keeping, fairness, respect, concern for others, and personal accountability. When the law and GTG's Code of Conduct are silent on an issue, employees must nevertheless make decisions that are legal, ethical, and consistent with the Code of Conduct.

Purpose :

GTG's Code of Conduct cannot anticipate every situation that the company or an employee may encounter. In addition, there may be instances where there is no applicable law or the law does not set a standard high enough for GTG.

This Principle helps ensure that in such situations, GTG conducts business in an ethical, compliant manner. This Principle applies globally to all employees and may apply to those acting on behalf of GTG. See the Compliance Principle for information on when a third party might be covered by the Code of Conduct Principles.

Additional Guidance :

Ethical decision-making requires using common sense and good judgment, considering and evaluating a course of conduct in light of the following guiding Principles:

- Show uncompromising honesty and integrity in all of GTG activities and relationships.
- Avoid all conflicts of interest between work and personal life.
- Respect the dignity and worth of all individuals.
- Encourage individual initiative and innovation in an atmosphere of flexibility, cooperation and trust.
- Promote a culture where promise keeping, fairness, respect and personal accountability are valued, encouraged and recognized.
- Create a safe workplace.
- Protect the environment.

When faced with a decision about the right action to take, employees should be sure they can answer "yes" to the following questions:

1. Am I following GTG's values?
2. Would I want my coworkers, my friends, my family, or the general public to read about this?
3. Does this uphold GTG's reputation for conducting business ethically?

If employees cannot answer "yes" to all these questions, but still believe the proposed action is lawful and ethical, they should review the proposed action with their supervisor, their business unit's assigned legal counsel, or with GTG's Ethics & Compliance Department before proceeding. Moving forward without additional advice could expose GTG to legal risk of legal violations or harm to its reputation.

Penalties:

Failure to make sound ethical decisions using the ethical decision-making guidelines in this Principle will result in discipline, up to and including termination from employment.

