

ODENL is committed to conducting business ethically and transparently.

To accomplish this, we:

- Do the right thing, whether or not anyone is watching
- Follow our Code of Conduct
- Prohibit and safeguard against any form of bribery or corruption
- Follow relevant laws and regulations
- Communicate expected behaviors to all employees, suppliers, contractors and other business partners
- Conduct due diligence on our business partners to ensure alignment with our Code of Conduct
- Provide training on our Code of Conduct and anti-corruption program
- Promote a speak-up culture without fear of retaliation
- Provide methods for our people to raise good faith concerns
- Evaluate our anti-corruption program for effective implementation and continual improvement
- Uphold our anti-corruption program with independent oversight by the Audit Committee of our Board of Directors
- Enforce this Policy, our Code of Conduct and our anti-corruption program



Anne Sobo
Country Manager