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Code of Conduct

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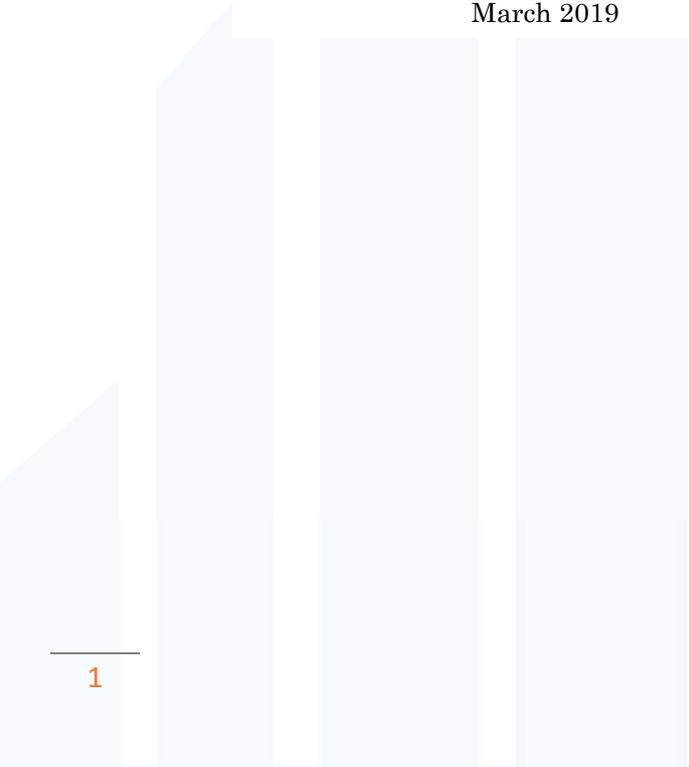
A large, light blue graphic consisting of several vertical bars of varying heights, resembling a bar chart, positioned in the lower-left area of the page.

Table of Contents

TABLE OF CONTENTS	2
CEO STATEMENT	3
OUR AMBITION	4
IN RELATION TO OUR WORKPLACE	5
FAIR TREATMENT OF OUR EMPLOYEES	5
RESPECT FOR BASIC HUMAN RIGHTS	5
CHILD LABOUR	5
FORCED LABOUR	5
FREEDOM OF ASSOCIATION	5
PROHIBITING MOBBING AND HARASSMENT	6
SAFETY AND HEALTH	6
DRUGS AND ALCOHOL	7
PREVENTION OF WORKPLACE VIOLENCE	7
WEAPONS	7
IN RELATION TO PROTECTING CORPORATE ASSETS	8
ACCURATE ACCOUNTING	8
PAYMENTS AND EXPENDITURES	8
SECURITY OF PROPERTY AND INFORMATION	8
IN RELATION TO THE MARKET PLACE	9
CONFLICT OF INTEREST	9
PRIVACY AND INFORMATION SECURITY	9
SAFEGUARDING INFORMATION	10
IN RELATION TO OUR PRINCIPALS AND BUSINESS PARTNERS	11
BRIBERY AND CORRUPTION	11
EXCHANGING GIFTS AND ENTERTAINMENT	11
COMPETITORS	11
INTERNATIONAL TRADE REGULATIONS AND EXPORT CONTROL LAWS	12
MONEY LAUNDERING	12
IN RELATION TO OUR COMMUNITIES	13
PROTECTING THE ENVIRONMENT	13
COMMITMENT TO OUR COMMUNITIES	13
POLITICAL ACTIVITIES AND CHARITABLE DONATIONS	14
SOCIAL MEDIA	14

CEO Statement

We strive to develop and realize large infrastructural projects in developing countries, whereby these infrastructural projects will be combined with the social and economic development of a region and with long term support of social projects for these particular areas.

The basis of our approach is to take the responsibility and the financial and operational risks for the realization of these large infrastructural projects away from local or federal governments. This is not done to belittle local stakeholders, but to prevent that one local problem is replaced by an even more devastating new problem.

Federal or local governments will be the principals and ultimate beneficiaries of these projects. Up to the moment that the construction of these projects have been finalized and the ownership and daily operations have been fully transferred, governments must be free to act in the best interest of the country and its people by maintaining a straight forward business-like approach towards project developers, project management and project contractors. We do not want that butchers should inspect their own meat and therefore governments should have a critical, monitoring role and have a clear task in the inspection and final approval of what has been accomplished.

This Code of Conduct will describe the core values of our company for our employees. It might give them the tools and resources they need to deal with legal and ethical dilemmas and to maintain the level of reliability, quality and service that our partners, customers, suppliers and other stakeholders have come to expect.

By following these rules everyone within our company will help ensure that together we do the right thing and that all of us will never be embarrassed to tell our family, colleagues, the media and the public what we have done.

Let this code guide us as we work together toward our mutual goals: to produce lots of agricultural products to fight starvation; to start economic activities and create jobs; to develop social projects to improve the standard of living of the needy; and to realize all of this in good harmony with our environment and the local residents.

Ir. G.A.L. (Bert) de Jong
CEO



Our Ambition

INTINCO aspires to become the first professional, successful and attractive development company in the world that has managed to bring the overall economic activity and the standard of living of a developing country on a higher level, by initiating large infrastructural projects in combination with establishing long term social projects in these developing countries.

We aspire to work with the best professional companies to develop and realize a wide range of infrastructural projects in the field of logistics, utilities, power generation, social housing, et cetera, because we would like to improve the lives of millions of people by indirectly giving them access to basic necessities of life on a daily basis and for an affordable price.

In addition to our own infrastructural projects, we strive to develop multiple social projects in the region, which will directly contribute to the standard of living of the local citizens. All this will create thousands of jobs for men and women and boost the local economy.

In order to prepare children and young adults for jobs that will be created, we want to offer specialized secondary education in combination with on the job practical training for boys and girls at the moment they have finished grammar school. The combination of working and learning for the local youth, will in time generate a healthy middle class in the region, which is a key factor for long term economic growth.

All our projects should be embedded in the local communities and benefit the local economy as much as possible. We will encourage our partners to hire and train local workers, work in a sustainable way to save the environment and to respect and support the local culture and its traditions, as much as we will do.

And finally we want to accomplish that our strategy will be acknowledged and used all around the world as a blue print on how to bring economic development and a higher standard of living by developing and realizing infrastructural projects in a professional way without major delays or disastrous budget overruns.

In Relation to our Workplace

Fair Treatment of our Employees

INTINCO is committed to the fair and equitable treatment of all of our employees. Applicants for employment and employees are evaluated based on their individual job qualifications and professional skills, and without regards to race, colour, gender, sexual orientation, national origin, age, religion, disability, veteran status or marital status.

We comply with employment labour laws in the countries where we operate.

Respect for Basic Human Rights

At INTINCO, we respect and protect basic human rights wherever we operate. We also adheres to the SA8000 standard as it applies to workplaces SA8000 is a leading authoritative and independently verified standard of human rights, which is based on the fundamental standards of the International Labour Organization and the UN Declaration of Human Rights.

Child Labour

We comply with child labour laws globally including those governing family companies.

Forced Labour

We will not engage in, or support the use of forced labour; human trafficking; or physical punishment or abuse of workers. provide anything of value to a foreign government official to obtain or retain business.

Freedom of Association

We foster a workplace environment that fully respects the rights of our employees. This includes the right of all personnel to join trade unions and other organizations of their choice and to bargain collectively. As such, employees who choose to be represented by a trade union will not be discriminated against, and will be afforded all legal protections to which they are entitled. We also respect the right of our employees to refrain from such activities.

Prohibiting Mobbing and Harassment

We do not tolerate harassment of any conduct that creates a work environment that is considered intimidating, hostile, offensive or inappropriate, or any behaviour against an employee that results in reducing the employee's ability to perform his or her work. This behaviour can include any harassment or threats that humiliate, ridicule, or isolate the employee. This can be any type of bullying or psychological intimidation. Furthermore, unwelcome sexual flirtations, advances or propositions, graphic comments about an individual or sexually explicit or offensive jokes, unnecessary touching, and any other unwelcome verbal or physical conduct of a sexual nature is prohibited.

Harassment will not be tolerated, regardless of whether you are on company premises or are engaged in off-hours business related functions, such as holiday parties or business travel. Harassment may be ground for immediate dismissal, and it can subject both you and the company to severe legal penalties.

We all have a duty to foster a mobbing and harassment-free work environment by speaking out when a co-worker's visitor's or customer's conduct makes us uncomfortable. We strictly prohibit retaliation against employees who report discrimination or harassment. We do not provide anything of value to a foreign government official to obtain or retain business.

Safety and Health

Safety is a hallmark of INTINCO. We provide our employees with a clean and safe place to work and are committed to eliminating work related injuries. Our goal is to be regarded as the safest company in our industry.

Injury prevention is both a company and individual responsibility. We ask you to do your best to work safely by using the safety equipment provided to you, by following our safety rules. By operating machinery properly, and by reporting or correcting potential unsafe conditions. In return, we will do our best to provide you with the tools, training and materials to carry out your job in a safe manner.

Think, act and work safely – for yourself, for your family and for your co-workers. By taking these simple actions and applying common sense, you will help us to maintain a safe and healthy work environment.

Drugs and Alcohol

Our health and safety demands that each of us report to work, or attend company events free from the influence of any substance that could impair our work performance or create an unsafe working environment. These substances include, but are not limited to, alcohol, illegal drugs, or other intoxicants.

Prevention of Workplace Violence

Workplace violence, including threats, intimidation, and retaliation is strictly prohibited. Any behaviours or activities that risk the security of INTINCO employees, visitors, or property must be reported immediately to your supervisor.

Weapons

The possession of deadly weapons while engaged in company business or while on the company property is prohibited unless the possession of a firearm is pre-approved and is integral to the performance of your job (for example, that of security personnel).

In Relation to Protecting Corporate Assets

Everyone working for INTINCO has a duty to safeguard the Company's assets against theft, loss or misuse. These assets belong to the company and are valuable resources. They provide our employees with their means of livelihood. These assets include information, as well as money, equipment, supplies, facilities and materials.

Accurate Accounting

Every individual involved in creating, transmitting or entering information into INTINCO's financial records, is responsible for doing so accurately, completely and with appropriate supporting documentation. Compliance with established accounting procedures and controls is necessary at all times.

Payments and Expenditures

No undisclosed or unrecorded fund or account shall be directly or indirectly established for any purpose. No direct or indirect payment or expenditure on behalf of INTINCO shall be authorized or made with the intention or understanding that any part of such payment or expenditure is to be used for a purpose other than that described by the documents supporting the payment or expenditure. All entries made in the financial records of the company shall fairly and accurately reflect the facts and circumstances of any payment or expenditure made by the company.

Security of Property and Information

Every employee with access to company money, information or property has an absolute responsibility to manage these assets with the highest level of integrity and to avoid any misuse of such assets. It is our policy to terminate and prosecute violators of this requirement.

Fraud, theft, embezzlement or other improper means of diverting corporate funds is, of course, illegal as well as unethical. Preventing the theft, misuse or misappropriation of company property by others should be a concern of every INTINCO employee.

Such losses can often be limited through normal precautions, through handling company assets in a prudent manner and through compliance with our established internal control procedures and processes.

In Relation to the Marketplace

Conflict of Interest

We have an obligation, when conducting business, always to act in the best interest of INTINCO. A conflict of interest arises when our personal interests interfere – or appear to interfere – with our ability to objectively and effectively perform our job. We also avoid any interest, investment or association that might interfere with our ability to exercise our best judgement, or act in the best interests of INTINCO while performing our jobs. No family member should be hired into or hold a position that places him or her in direct decision-making authority over another family member, and we should avoid indirect reporting relationships with family members that could create perceptions of preferential treatment or favouritism. We do not compete with INTINCO, or take a company business opportunity for personal gain.

Examples of conflicts of interest include:

- Hiring a family member as a vendor, without disclosing the relationship, without going through the appropriate bidding process and without removing yourself from the vendor selection process
- Accepting a free vacation or airplane ticket from one of our vendors, in appreciation for the business that we have provided the vendor.
- Working for another company or your own company, if the hours or demands of the job interfere with your ability to fulfil your job duties for INTINCO.

Privacy and Information Security

Information is one of the our most valuable assets. In our work we have access to private and confidential information of the company, which may include:

Proprietary information, such as:

- Intellectual property, such as trade secrets, copyrights and patents
- Business plans, including marketing, sales and other strategic initiatives
- Unpublished financial data and reports
- Confidential information entrusted to us by vendors, suppliers and business partners

Employee information, such as:

- Personnel records
- Wage and salary data
- Employee health information
- Personal e-mail, voicemail or text messages of fellow employees

Customer and consumer information, such as:

- Names and contact details
- Account information
- Banking information

Safeguarding Information

At INTINCO, we respect the privacy of our employees contractors, customers and consumers. Confidential information must be diligently safeguarded against unauthorized disclosure – from your first day as an employee and even after you leave the company.

We are committed to ensuring that we are properly collecting, using, storing, disclosing and disposing of confidential information, including employee and customer data.

In Relation to our Principals and Business Partners

Bribery and Corruption

We want to be successful on the merits of our performance, our knowledge and our people, never through bribery or the corruption of government officials. Bribery is against the law everywhere in the world. The INTINCO policy prohibits employees from using improper, unethical or questionable business practices while conducting business on its behalf.

A bribe does not have to be cash; it could also take the form of providing lavish entertainment to a foreign official or paying more than fair market value for the property of a foreign official or other party to a commercial transaction.

For all INTINCO employees it is strictly prohibited to directly or indirectly offer, promise or provide anything of value to a foreign government official to obtain or retain business.

Exchanging Gifts and Entertainment

Business Gifts and entertainment are courtesies designed to build good working relationships and goodwill with contractors, vendors, and suppliers. However gifts are not appropriate if they create an obligation, put you in a situation where you appear to be biased, or are given with the intention to influence a business decision.

Gifts and entertainment are permitted if they are:

- Reasonable
- Infrequent
- In good taste
- Unsolicited
- Not cash or cash equivalents

The important thing is to remember that you cannot promise to offer, give or receive anything that would compromise – or even appear to compromise – your ability to make fair, impartial and balanced business decisions.

Competitors

We comply with the competition laws of the European Union and various laws in other countries where we do business. Under these laws certain practices should be avoided, including among others:

- Discussing prices, costs, territories or other sensitive marketing information with competitors.
- Entering in formal or informal agreements with competitors that will result in fixing prices, allocating production, customers or suppliers, adjusting project offers, or dividing territories.
- Agreeing with principles and suppliers to establish transactions under the condition to give more projects for construction to INTINCO.
- Terminating business relationships, pricing projects below cost and certain other pricing and promotion policies, especially when we have a substantial share of the local market.
- Refusing to conduct business with a particular person or business (or causing others to do the same) in order to obtain a better deal.

International Trade Regulations and Export Control Laws

Because we do business in various countries around the world, we need to know and to comply with applicable laws and regulations that govern, restrict or affect our international trade. These laws include anti-terrorism laws, trade restrictions and applicable import and export controls. They are intended to prevent improper activities such as terrorism, the illicit spread of weapons or narcotics trafficking.

Money Laundering

Money laundering involves concealing illegal funds or trying to make those funds look legitimate. Such actions are prohibited.

Examples of money laundering include:

- Making payments in currencies other than as previously agreed or as is typical for the location.
- Making or receiving payments in cash, unless otherwise pre-approved as typical for the location.
- Making or receiving payments from someone not a party to the transaction.
- Making or receiving overpayments.

We want to be successful on the merits of our products, our knowledge and our people, never through bribery or the corruption of government officials. Bribery is against the law everywhere in the world. The INTINCO policy prohibits employees from using improper, unethical or questionable business practices while conducting business on its behalf.

In Relation to our Communities

Protecting the Environment

INTINCO is committed to reducing our environmental impact and protecting natural ecosystems by implementing sound and safe operating practices. We will design, build and operate our facilities and projects in ways that respect public health and the environment, conserve energy, water and raw materials, integrate pollution prevention and make a positive contribution to the surrounding community and to society as a whole. We comply with all relevant environmental laws, rules and regulations in every jurisdiction in which we operate, and we will strive to exceed these by following internationally accepted standards where they exist.

As a company, we are committed to working together continuously with employees, contractors, suppliers, governmental institutions and consumers to:

- Reduce our environmental impact
 - Maximize efficient use of natural resources
 - Reduce, reuse, and recycle
 - Protect biodiversity through conservation
 - Execute environmental and social management systems
 - Implementing construction techniques that ensure the use of durable and sustainable methods
 - Use systems generating renewable energy like biogas production and solar panels
- Enhance livelihood
 - Ensure our employees are trained well and work safely
 - Provide education and on the job-learning opportunities
 - Create jobs
 - Improve the overall health situation.

Commitment to our Communities

As a large (the major) employer in the area, we will respect cultural differences and we will act as a responsible corporate citizen in the communities in which we operate.

INTINCO encourages its employees to become actively involved in community, volunteer and charitable activities, especially those that further benefit our employees' professional growth and development.

At INTINCO, we

- Support projects and organizations that make a positive contribution to our communities

- Carefully examine any requests to the company for charitable donations.
- Closely follow the use and impact of company donations made.
- Do not donate company funds, or make a contribution in the company's name without proper approval of the Board of Directors.
- We do not pressure others to contribute to charitable organizations.

Political Activities and Charitable Donations

At INTINCO, we welcome the opinions and ideas of all people. We each have the right to participate in the political process and engage in political activities. It is important to remember that you may not do anything that would make it appear that INTINCO is supporting a candidate or an initiative.

Social Media

Social media and social networks have changed the way we communicate with each other and with the world. Social media includes: websites, social networking sites, and all forms of online publishing and discussion such as blogs, wikis, file sharing, user generated video, chat rooms, mobile applications and other networks.

Even though the manner and tools through which we are communicating may be different, the following (traditional) communication rules do apply:

- If you wish to make a comment about our company in your personal social media interactions, you must ensure that your post clearly explains you are speaking for yourself and not on behalf of INTINCO.
- Never post confidential information about INTINCO, our colleagues, customers, suppliers, or business partners on any social media sites.
- If INTINCO has authorized you to speak on behalf of the company through social media as a part of your job duties, you must at all times adhere to our guidelines for authorized communications.