Business Ethics Policy

January 2012

Competentia is committed to conducting its business activities honestly and in full compliance with the laws and regulations of the countries where we do business.
This policy provides guidelines for business conduct at Competentia and is the basis for all Competentia personnel to conduct Competentia business. Personnel encountering situations not addressed specifically herein should apply the highest ethical standards.

Statement of Policy
The following Code of Ethics has been prepared to provide Competentia personnel, as well as our clients, suppliers and the general public, with a statement of the Company's commitment to the standards and rules of ethical business conduct. Violation of this Code of Ethics by employees can result in disciplinary action, including possible termination.

Code of Ethics

- Competentia will, at all times, conduct its business ethically wherever we operate in the world. We will constantly improve the quality of our services and will create a reputation for honesty, integrity, and sound business judgment.
- The ethical performance of the Company is the sum of the ethics of the men and women who work for us. Thus, we are all expected to adhere to high standards of personal integrity.
- Competentia personnel must never permit their personal interests to conflict, or appear to conflict, with the interests of the Company or its clients.
- No bribes, kickbacks or similar remuneration or consideration shall be given to any person or organization in order to attract or influence business activity.
- Competentia personnel may come into contact with proprietary or confidential business information and must take appropriate steps to assure that such information is safeguarded. Proprietary and confidential business information about Competentia, other companies, individuals and entities should be treated with sensitivity and only be disseminated on a need-to-know basis.
- Competentia personnel shall not trade securities of another corporation, the value of which is likely to be affected by an action, of which the employee is aware, by the Company and which has not been publicly disclosed.
- Competentia personnel will seek to report all information accurately and honestly, and as required by applicable reporting requirements.
- Competentia personnel will refrain from gathering competitor intelligence by illegitimate means.
- Competentia personnel will comply with all Equal Employment Opportunity laws.
- Competentia personnel agree to disclose unethical, dishonest and illegal behavior, or violations of Company policies, directly to the Chairman.

Rev. #	Prepared by	Date prepared	Approved by	Date approved
00	BB	20Jan2012	JS	20Jan2012