

ANTI-BRIBERY & CORRUPTION CODE OF CONDUCT

1. Purpose

The purpose of this code is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

2. Policy statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as a reward for action which is illegal or a breach of trust. This includes accepting anything of material value to gain a commercial, contractual, regulatory or personal advantage.

It is our code to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by Canadian laws, including the Canadian Corruption of Foreign Public Officials Act 1998, in respect of our conduct.

Bribery and corruption are punishable by up to fourteen years imprisonment. If we are found to have taken part in corruption, we could also face fines, be excluded from tendering for contracts and face damage to our reputation. We, therefore, take our legal responsibilities very seriously.

3. Scope

3.1 **Who is covered by the code?**

In this code, **third party** means any individual or organization you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This code applies to all individuals working at all levels, including senior managers, officers, employees (whether permanent or temporary), consultants, contractors, summer students, interns, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **employees** in this code).

This code covers:

- Bribes;
- Gifts and hospitality;
- Facilitation (foreign officials) payments;
- Political contributions;
- Charitable contributions.

3.2 **Bribes**

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

3.3 **Gifts and hospitality**

Employees must not offer or give any gift or hospitality:

- which could be regarded as illegal or improper, or which violates the recipient's policies; or
- to any public employee or government officials or representatives, or politicians or political parties; or
- unless approved by Senior Management.

Employees may not *personally* accept any gift or hospitality from any business partners. Such gifts shall be accepted and distributed fairly to all staff as per Senior Management approval.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

3.4 **Facilitation payments and kickbacks**

Our strict policy is that facilitation payments must not be paid.

Facilitation payments are made for the purpose of expediting or facilitating the performance of a public official for routine governmental action, and not to obtain or retain business or any improper business advantage.

3.5 **Political Contributions**

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

Employees may personally make political contributions provided they are not used to concealing bribery and are legal and ethical under local laws and practices.

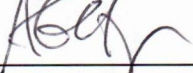
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All employees are responsible for the success of this code and should ensure they use it to disclose any suspected danger or wrongdoing.

Employees are invited to comment on this code and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to Human Resources or Senior Management. This document may be amended at any time.

Management Endorsement:

Signed on original document



Greville Hampson

President