

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

This policy outlines the Company's commitment to complying with the laws and regulations and ensuring that all business is conducted ethically and in accordance with its values. This policy applies to all directors, employees, consultants, and employees of contractors and suppliers that provide services to the Company (Employees).

Employees must avoid personal, financial or other interest which may conflict with their duties and responsibilities to the Company. Any interest which may constitute a conflict of interest must be promptly disclosed to the employee's direct supervisor or an appropriate senior manager.

Employees must not offer, promise, give, demand or accept any undue advantage, whether directly or indirectly, to or from:

- A public official
- A political candidate, party or party official
- A community leader or other person in a position of public trust, or
- Any private sector employee in order to obtain, retain or direct business or to secure any other improper advantage in the conduct of business

The Company prohibits the giving or receiving of gifts, or invitations involving travel, accommodation and entertainment in circumstances which could be considered to give rise to undue influence.

The Board is informed of any material incidents reported under the policy.