

Every employee is expected to behave in a manner which is lawful and consistent with the highest ethical standards. Our achievement of the highest reputation for integrity is essential and is not in any circumstances to be sacrificed for the sake of results.

Some examples by way of illustration of specific conduct which this general policy requires:

- Financial and other business transactions must be recorded in a manner as to reflect fairly and accurately the true nature of such transactions.
- There can be no "special funds" or other accounts representing company assets, which are off-the-books" or otherwise maintained outside the Company's normal financial accounts.
- Expense reimbursements are to be only for proper and authorised business expenditures and which are to be accurately described.
- No customer is to be "over-invoiced" to create funds for any unlawful or improper use or for any other reason.
- Discounts and rebates to customers must reflect the true commercial transaction and not be intended to serve any illegal or improper purpose such as kickbacks" or bribery.
- Fees and commissions to consultants, agents and other third parties must be legal, proper and reasonable in relation to customary commercial practice.
- You are required to comply with our financial and accounting control procedures, including those which require specified management authorization and documentation for particular transactions and for remittances of funds or other disposal of our assets.
- You are to be aware of the possibility that an agent, consultant, customer, or other intermediary could use commissions, fees, discounts or other funds received from us in a way which would accomplish what you are not allowed to do.
- All employees are expected to conduct business in a manner consistent with all applicable laws.

We conduct our business with integrity and all employees are expected to conduct business in a manner consistent with all applicable laws.

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