

ANTI-CORRUPTION AND BRIBERY POLICY

Ethical Conduct and Compliance with Laws: The Company's policy is to conduct business with integrity, fairly, impartially, in an ethical and proper manner, and in compliance with all applicable laws and regulations. In conducting our business, integrity must underlie all relationships, including those with customers, suppliers, communities, and employees. In this connection, employees are required to have the strength to do what they believe to be right in difficult situations.

Anti-Corruption: The anti-corruption policies and measures set out below are necessary to protect the business, resources, and reputation of the Company.

(i) Employees must under no circumstances offer, promise, give or authorize the giving, directly, indirectly or through third parties, of any bribe, kickback, illicit payment, benefit in kind or any other advantage to a Government Official or Government Entity, private sector customer, supplier, contractor, or any other person or entity, as an inducement or reward for an improper performance or non-performance of a function or activity. Facilitation payments (also referred to as grease payments; that is, payments or gifts made to a government or public official to speed up, or secure the performance of, a routine, governmental action which the official is already obliged to perform such as issuing permits, immigration controls, providing services or releasing goods held in customs) could also create bribery risks. Accordingly, employees should not make any facilitation payments on Company's behalf.

(ii) Similarly, employees must not under any circumstances solicit or accept, directly or indirectly, any bribe, kickback, illicit payment, benefit in kind or any other advantage from any Government Official or Government Entity, customer, supplier, contractor, or any other person or entity that is intended to induce or reward an improper performance or non-performance of a function or activity.

Gifts and Hospitality: While it is recognized that the giving or receiving of gifts and hospitality may help in the building of business relationships, good judgement must be exercised at all times. The offer and receipt of gifts or hospitality must be avoided whenever they could affect or be perceived to affect the outcome of business transactions or dealings or are not reasonable and bona fide. Employees should avoid giving or receiving gifts or hospitality which are excessive in value, given too often, or leaves the employee or (as the case may be) the other person in a position of obligation or possible perceived obligation. Gifts or hospitality in the form of cash or cash equivalent are prohibited.

"Gifts" include tokens of appreciation or respect, and "hospitality" includes business meals, business travel, entertainment, or invitations to or sponsorship of events, functions or other social or entertainment gatherings, in connection with matters related to any Company's business.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Company or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.