

CODE OF ETHICS

The Company will conduct its business honestly and ethically wherever we operate. We will constantly improve the quality of our services, offerings and operations and will create a reputation for honesty, fairness, respect, responsibility, integrity, trust and sound business judgment. No illegal or unethical conduct on the part of officers, directors, employees, contractors or affiliates is in the company's best interest. The Company will not compromise its principles for short-term advantage. The ethical performance of this company is the sum of the ethics of the men and women who work here. Thus, we are all expected to adhere to high standards of personal integrity, by the following:

- Officers, directors, employees and contractors of the company 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 other similar remuneration or consideration shall be given to any person or organisation in order to attract or influence business activity.
- Officers, directors, employees and contractors of the Company will often come into contact with, or have possession of, proprietary, confidential or business-sensitive information and must take appropriate steps to assure that such information is strictly safeguarded.
- Officers, directors, employees and contractors will refrain from gathering competitor intelligence by illegitimate means and refrain from acting on knowledge which has been gathered in such a manner.
- Officers, directors, employees and contractors will obey all Equal Employment Opportunity laws and act with respect and responsibility towards others in all of their dealings.
- Officers, directors, employees and contractors will remain personally balanced so that their personal life will not interfere with their ability to deliver quality offerings or services to the company and its clients.
- Officers, directors, employees and contractors agree to disclose unethical, dishonest, fraudulent and illegal behaviour, or the violation of company policies and procedures, directly to management.

Violation of this Code of Ethics can result in discipline, including possible termination. The degree of discipline relates in part to whether there was a voluntary disclosure of any ethical violation and whether or not the violator cooperated in any subsequent investigation.

Russ Hill
Group CEO
18/1/2017