



(the “Company”)

Code of Ethics

This Code of Ethics (“Code”) has been adopted by the Board of Directors of the Company (the “Board”) in order to promote integrity, honesty and ethical conduct of the Company’s business. This Code applies to all directors, officers, employees and consultants of the Company and its subsidiaries (“Company Personnel”).

Bribery

No Company Personnel shall directly or indirectly give, offer or agree to give or offer a loan, reward, advantage or benefit of any kind to a public official or to any person for the benefit of a public official.

Conflict of Interest

Company Personnel must ensure that no conflict exists between their personal interests and those of the Company, and must also avoid placing themselves in positions that may be perceived as conflicts.

Confidentiality and Insider Trading

Company Personnel will respect the confidentiality of information acquired in the course of their work, duties and responsibilities with the Company, except when authorized or otherwise legally obliged to disclose such information or where such information has already been made available to the public. Company Personnel must comply with applicable laws and regulations regarding trading of securities of the Company when in possession of undisclosed material information regarding the Company’s business.

Fiscal Integrity and Responsibility

Company Personnel have a responsibility to protect the Company’s assets and resources and to help achieve the responsible use and control of all Company assets and resources employed or entrusted in relation to their work, duties and responsibilities, and to ensure that all Company assets and resources are used only for legitimate business purposes.

Company Records and Internal Controls

The Company is required to record and publicly report all internal and external financial records in compliance with applicable accounting principles. As well, the Company must maintain effective controls and procedures so that financial and non-financial information is reported timely and accurately both to Management and in the filings and public disclosures the Company makes. All Company Personnel are responsible for ensuring the accuracy of all books and records within his or her control and complying with all Company policies and internal controls.

Employment Practices and Privacy

The Company is committed to a workplace environment where personnel are treated with dignity, fairness and respect. All Company Personnel have the right to work in an atmosphere that provides equal employment opportunities and is free of discriminatory practices and harassment.

The Company, and companies and individuals authorized by the Company, collect and maintain personal information of Company Personnel. The Company follows procedures to protect information wherever it is stored or processed, and access to personal information is restricted. Personal information will only be released to outside parties in accordance with the Company's policies and applicable legal requirements. Company Personnel who have access to personal information must ensure that personal information is not disclosed in violation of the Company's policies or practices.

Safety, Health and the Environment

All Company Personnel are expected to consult and comply with all Company rules regarding workplace conduct, health, safety and environmental protection. Any unsafe or hazardous conditions or materials, injuries, and accidents connected with the Company's business and any activity that compromises Company security must be immediately reported to the applicable supervisor.

Effective Date

This Code of Ethics was implemented by the Board on October 22, 2014.