

## **CODE OF BUSINESS ETHICS**

For a business to succeed, it must earn the respect and confidence of those it aspires to serve.

The most significant factor in earning this respect and confidence is to act and conduct business in an ethical manner. Unethical business practices foster ill-will between customer and community, not only toward a particular business firm, but toward business as a whole. We at MCLICI International have made a commitment to display leadership in ethical decision by following these fundamental practices:

### **Equality**

We shall recognize the individual rights of all members of the community in accordance with the Canadian Charter of Rights and Freedoms, and display a fair sense of justice.

### **Truth**

We shall make accurate claims to our customers, use only competent testimonials, and strive to be open about all aspects of the products or services we offer.

### **Honesty**

MCLICI International will not tolerate corrupt behaviour by or on behalf of its members, employees, customers, suppliers or business partners.

We shall uphold the principle of fair play and be vigilant against conduct which has the intent, capability, or effect of being deceptive towards our customers.

Through the strict application of its internal rules, policies and procedures:-

- MCLICI International prohibits practices which seek to increase sales other than through legitimate sales and marketing efforts;
- MCLICI International seeks to maintain the confidentiality of its employees', customers', suppliers' and business partners' commercial and personal information;
- MCLICI International employees, agents and other representatives are prohibited from giving or receiving money or gifts which could be construed as bribes;
- MCLICI International seeks to conduct its business activities in an environmentally safe and sustainable manner;
- MCLICI International places high priority on the health and safety of its employees and others affected by its business activities;

### **Integrity**

As one of its core values, MCLICI International believes that integrity in its dealings with others is a pre-requisite for sustainable business growth and successful, long-standing relationships.

We shall not merely abide by the law in a technical way but will strive to serve our customers with honest values, avoiding all devices and schemes which prey on human ignorance or gullibility.

MCLICI International competes in its various markets vigorously but honestly and fairly in accordance with this Code of Business Ethics and competition laws applicable in the relevant jurisdictions. In particular:

- MCLICI International will not favour any one customer or supplier over another, other than on strictly commercial grounds;
- MCLICI International will not engage in restrictive trade practices or other forms of anti-competitive behaviour;
- MCLICI International's employees will not divulge confidential or proprietary information relating to MCLICI International or its customers in their contacts with competitors;
- MCLICI International's employees will not seek to damage the reputation or standing of third parties, particularly our competitors.

### **Cooperativeness**

We shall support a healthy marketplace for all through cooperation with customers, other businesses, and every person who would benefit from an ethical, free-market system.

### **Self-Regulation**

We will honour all commitments and guarantees, and seek to resolve any disputes in a fair and expeditious manner. We will investigate and fully inform the consumer of any health, environmental, safety or other hazards posed by the normal use of our products or service.

As a MCLICI International policy statement, this Code of Business Ethics is intended to be incorporated into the contracts of all MCLICI International consultants, agents, suppliers and business partners where relevant and appropriate. In addition all relevant senior managers of the Group are required to confirm annually in writing their understanding and acceptance of this Code of Business Ethics.