

# BUSINESS ETHICS POLICY

---

## 1. SCOPE

This policy applies to all associates of the ALDO Group Inc. and any affiliated Company ('ALDO Group').

## 2. POLICY

The ALDO Group built its reputation on the values of integrity and honest dealings with all its partners. It is the policy of the ALDO Group to conduct business transactions in an ethical manner without conflict of interest or unjust personal gain. This policy describes the ethical standards expected of all associates and will assist in understanding and avoiding conflictual and unethical situations, while providing guidance on how to proceed, should such a situation arise.

## 3. PROCEDURE

All associates are responsible for maintaining a high standard of ethical and legal conduct in all business transactions and activities. Business transactions and activities include, but are not limited to, any business decision relating to customers, suppliers, associates and competitors. To avoid a conflict of interest, associates should not use their authority for personal gain and should make all decisions with the goals of the ALDO Group in mind.

### A) THE ALDO GROUP'S RESPONSIBILITIES

The ALDO Group is responsible for promoting an ethical environment and educating its associates about our business ethics. The ALDO Group's management team is also responsible for administering this policy, for addressing any issue related to misconduct and for reporting it to the next level of management.

### B) ASSOCIATES' RESPONSIBILITIES

In the event that an associate encounters or becomes aware of circumstances that may appear to conflict with this policy, he/she is responsible for promptly informing his/her direct or indirect manager. Additionally, if a family member is offered or receives any item of significant value, the associate is responsible for advising his/her manager of the situation.

### C) UNETHICAL CONDUCT

The following examples are illustrative of unethical conduct that will not be permitted. This list should be used to guide associates on proper business conduct, but is not intended to be all-inclusive:

- The seeking or accepting of, directly or indirectly, payment of money, services, travel or gifts (excluding reasonable meals in the normal course of business or gifts of a nominal token value), from any individual or representative of any business doing or seeking to do business with the ALDO Group;
- Associate or family member is offered or receives compensation or other items of significant value in order to influence a pending or potential business decision;

- Outside employment or outside interest that results in a conflict of interest or is in competition with the ALDO Group's business;
- The misuse of privileged, confidential or personal information or the revealing of confidential data, personal data, or inside information to outsiders;
- Borrowing of money from customers, individuals or firms with which the ALDO Group does business (excluding loans made in the normal course by banks or other financial institutions);
- The carrying on of the ALDO Group business with a firm in which the associate or any near relative of the associate has a substantial ownership or interest or would receive a benefit without divulging the relationship and obtaining the ALDO Group's prior written approval;
- The misuse of ALDO Group authority or knowledge of ALDO Group affairs for external personal gain;
- Using or permitting others to improperly use the services of the ALDO Group's associates, resources or assets for personal purposes;
- Condoning or failing to report to appropriate ALDO Group authorities the activities of any other ALDO Group associate who is impairing the ability of others to exercise sound ethical judgment;
- Falsifying ALDO Group records or documents;
- Making defamatory or harmful comments about the ALDO Group, its administrators, officers, agents, representatives or associates;
- Any other practices that are construed or accepted by the general business community as unethical or in violation of the law.

**D) ENFORCEMENT**

Any conduct or behaviour that does not comply with this policy or that is viewed as unethical by the ALDO Group may result in legal recourse and/or disciplinary measures up to and including termination.

**ACKNOWLEDGMENT: BUSINESS ETHICS POLICY**

I acknowledge that I have been provided with and understand the ALDO Group's Business Ethics Policy and I agree to comply with this policy.

---

ASSOCIATE NAME (BLOCK LETTERS)

---

ASSOCIATE SIGNATURE

---

DATE (DD/MM/YY)

**ALDO**