

ETHICAL POLICY

Ingleby employees, workers, contractors, officers, partners, advisors and associates herein after named team members should be open and transparent within Ingleby and correct and discrete outside of Ingleby.

Service to Ingleby should never be compromised by personal gain and advantage.

Specifically, each team member must:

- > Act with integrity, including being honest and candid while still maintaining the confidentiality of Ingleby information where required or in Ingleby's interests.
- > Observe fully, applicable governmental laws, rules and regulations.
- > Comply with legal accounting and auditing standards and Ingleby policies to maintain a high standard of accuracy and completeness in Ingleby's financial records.
- > Adhere to a high standard of business ethics, never engaging in unlawful or unethical business practices.
- > Not indulge in any form of dishonest practices, such as bribery, corruption, kickbacks and the provision or acceptance of inappropriate gifts, favours or services.
- > Report on any activities that they are aware of which contravene this policy.
- > Avoid conflicts of interest wherever possible. Anything that would be a conflict for a team member will also be a conflict if it is related to a member of his or her family or a close relative. Examples of conflict of interest situations, if material, includes:
 - significant ownership interest in any supplier or customer;
 - consulting or employment relationship with any customer, supplier or competitor;
 - outside business activity that detracts from an individual's ability to devote appropriate time and attention to his or her responsibilities with Ingleby;
 - the receipt of money, non-nominal gifts or excessive entertainment from any company with which Ingleby has current or prospective business dealings;
 - being in the position of supervising, reviewing or having any influence on the job evaluation, pay or benefit of any close relative; and
 - selling or buying anything to/from Ingleby, except on the same terms and conditions as comparable team members are permitted to purchase or sell.
 - owning and managing private land, and concurrently managing Ingleby land. There should be strict focus on managing these lands separately and keeping the two businesses apart.

With my signature I agree to the above codes of conduct _____

Name/Date: _____