

# OUR COMMITMENT TO BUSINESS ETHICS AND AVOIDING CONFLICTS OF INTEREST



## Business Ethics

Polarcus is committed to conducting business in a fair, honest and ethical manner to ensure the long-term interests of all our stakeholders are managed responsibly.

Polarcus employees and representatives shall never give, offer or authorize the offer of, whether directly or indirectly, anything of value such as money, goods or services to a potential customer or government official to obtain any improper advantage.

Polarcus employees and representatives shall never offer, pay, solicit, or accept any bribes in any form, either directly or indirectly.

Polarcus employees and representatives shall ensure all suppliers of services acting on our behalf will be knowledgeable of this Commitment.

All financial transactions shall be properly recorded in the Company accounting system and the accounting procedures must be supported by necessary internal controls. All Polarcus accounting records are subject to internal and external independent auditing.

Polarcus shall comply with all applicable laws and regulations, including those governing economic sanctions.

## Avoiding Conflicts of Interest

A conflict of interest may arise when an individual's private interests intersect with their professional obligations. Though the situation may not involve nor imply any wrong-doing or inappropriate activities, a conflict of interest situation may compromise, or be perceived as compromising, the Polarcus Core Values or Commitments.

Polarcus employees are expected to avoid any actual or apparent conflict between our individual private interests and the interests of the company. They shall strive to identify all perceived conflicts of interest and then manage, or if possible, eliminate the conflict.

The Company directors, management and employees must disclose their outside professional activities and any financial interests in outside entities that they and their immediate family members may hold that may affect, or cause to have an effect, on the business of the Company.

Polarcus fully supports an open-door policy from the CEO and throughout the organization where any work-related concerns are discussed freely and openly without any fear of retribution.

If an employee has reasonable grounds to believe that reporting of an incident would lead to retaliation against them, has implications of bribery, corruption or financial irregularity, or where a previously submitted report regarding the same irregularity has not been corrected, the employee can formally voice their concerns via one of the following options:

[whistleblower@polarcus.com](mailto:whistleblower@polarcus.com): An email will automatically be sent to the CEO and a nominated Polarcus Board member to action.

[whistleblower.board@polarcus.com](mailto:whistleblower.board@polarcus.com): An email will automatically be sent to the Chairman of the Polarcus Board of Directors and one other nominated Polarcus Board member to action.

The Polarcus 'whistleblower' communication mechanism can also be used by any other stakeholder (including but not limited to third party personnel and client representatives) who wish to raise a concern or report.

*Reports can be submitted anonymously by email or in writing if the sender feels more comfortable with that approach.*



Duncan Eley, CEO