

## Company Business Ethics Policy Statement

We are committed to the highest standards of ethical conduct and in order to further promote ethical and responsible business conduct we have developed this Business Ethics and Conduct Policy (BEACP).

This is to be applied in all our business relationships.

The BEACP provides all employees of MindSafety International Limited (referred to as the "Company") and all third parties that represent the Company, such as consultants, representatives, distributors, foreign joint venture partners or third parties (collectively, "Representatives") with an important resource to guide them in making the right choices when dealing with matters relating to Business Ethics.

The BEACP addresses those areas in which we must all act in accordance with law or regulation, and also establishes the responsibilities, conditions, guiding principles and procedures to ensure employees and representatives act appropriately on the Company's behalf.

In addition to adhering to the conditions and procedures set out in the BEACP, employees and Representatives are required to comply with the laws of the countries in which they reside or do business.

All employees are responsible for their own adherence to the BEACP, and managers are also required to consider whether the actions of their own staff and representatives are also in accordance with the BEACP.

All Representatives are in their own right responsible for both their and their staff's adherence to the BEACP.

Fundamentally, the success of our approach depends upon our management and employees understanding the Company's values, applying judgement and reason in an open environment and having the confidence that the Company will help and support them over difficult issues.

The Company actively supports these aims, specifically designed to recognise differing roles and responsibilities.

All employees will be required to understand basic ethics as a minimum. In all cases, where there is suspicion or evidence of non-compliance to the BEACP, action will be taken to remedy the noncompliance.

The Company requires employees to advise their manager, who should inform the Director of Compliance or another member of the Compliance Team, when they become aware of violations of our policies.

Unethical behaviour will not be tolerated and the Company will take action in all cases up to and including dismissal of employees in breach of the BEACP and termination of contractual relationships with Representatives.

The Board of MindSafety International Limited is fully committed to ensuring that the company complies both with the letter and spirit of the principles in the BEACP.

For that reason, David Samuel has been appointed as Director of Compliance for the company with the responsibility and authority to oversee and drive our Compliance Programme.



---

David Samuel  
MindSafety Chief Executive Officer

Dated: 1st January 2019