



ETHICS POLICY

DCM recognizes the importance of credibility, integrity and trustworthiness to achieve responsible commercial success. DCM is also committed to upholding the highest standards of ethical conduct in all its business dealings with zero tolerance for fraud, corruption and collusion.

This policy was created to ensure that our employees always act with honesty, fairness and respect, and not engage in conduct or activity that may raise questions as to the company's honesty, impartiality or reputation or otherwise cause embarrassment to the company.

The guiding principles of this policy are:

- Employees are responsible for demonstrating neutrality, objectivity and impartiality in the exercise of their duties.
- Employees are required to comply with the laws and regulations that apply to the operations and business practices at DCM and its member companies, anywhere in which their operations are carried out.
- Employees must refrain from dealings that could improperly influence the performance of their duties and responsibilities. Invitations to social events or gifts received by the Procurement department must be reported or remitted to management, who will redistribute the gifts among employees or return them to the supplier(s).
- Employees who are directly involved in the negotiation and execution of contracts and service agreements must conduct themselves properly, avoiding any conduct or facts that may be considered an act of active or passive bribery (corruption), complicity, influence peddling or favoritism.
- Employees must ensure that their personal activities and interests do not conflict with their responsibilities toward DCM and its member companies and will not influence their business decisions.

Employees are invited to contact the Human Resources department if the present policy reveals itself to be incomplete or imprecise in certain situations, or if an employee feels unsure about the required behavior when faced with unusual circumstances.

It is the every employee's responsibility to report any unethical behavior to the Human Resources department. This information will be treated in complete confidence and no measure or sanction will be taken against the employee who reported, in good faith, a possible violation of this policy.

Neil Macrae
President and COO

2018-09-05

Date