



Code of Business Conduct

1. Application

- a. This Code of Conduct and Business Ethics (the “Code” or “CoBE”) is intended to apply to every employee of every Neu Dimension group of company. It is also intended to apply to every director (executive and non-executive)

2. Neu Dimension expects that, throughout your time of service you will:

- a. strive towards a high standard of professionalism
- b. give your undivided loyalty and devotion to Neu Dimension
- c. serve with honesty and integrity, goodwill and courtesy
- d. display group cohesiveness based on oneness of purpose together with a caring attitude for the individual
- e. uphold the duty of care for the interests and reputation of Neu Dimension
- f. display a high sense of discipline, cooperativeness and diligence in carrying out your duties
- g. act consistently to maintain Neu Dimension’s confidence and trust in you;
- h. promote creativity and new approaches in the course of carrying out your work
- i. Comply with applicable laws, regulations and Neu Dimension policies and procedures.

3. Conflict of interest

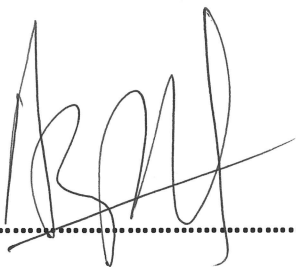
- a. A conflict of interest arises in any situation in which an individual is in a position to take advantage of his or her role at Neu Dimension for his or her personal benefit, including the benefit of his or her family and friends. A conflict of interest can make it difficult for an individual to fulfill his or her duties impartially and correctly
- b. You may not, directly or indirectly, enter into personal transactions or dealings for the purchase or sale of any moveable or immoveable property or for the supply or

purchase of any service from any of Neu Dimension's clients, suppliers, contractors or vendors (or with their agents or representatives)

- c. You must not be involved with the commission or omission of any act which gives an undue advantage to an outside party in its dealings with Neu Dimension without prior approval from Neu Dimension

4. Fighting Corruption and Unethical Practice

- a. You are prohibited from, directly or indirectly, soliciting, accepting or obtaining or agreeing to accept or attempting to obtain, from any party for yourself or for any other party, any bribe or gratification as an inducement or a reward for doing or forbearing to do, or for having done or forborne to do, any act in relation to Neu Dimension's affairs or business
- b. You are prohibited from, directly or indirectly, accepting or obtaining or attempting to accept or obtain facilitation payments from any person for yourself or for any other person subject to this Code. The term "facilitation payments" generally means payments made to secure or expedite the performance by a person performing a routine or administrative duty or function.
- c. You are prohibited from directly or indirectly, obtains any discount, rebate, commission, service, interest, consideration of value or other benefit or payments of any kind), by virtue of his/her position or authority with or on behalf of Neu Dimension



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President