

Ethical commitment of the executive team

Important notice

This statement is part of the direction we, members of the Board of Directors and members of the Executive Committee (known as «Executives»), have taken regarding ethics in the conduct of our business and our business practices. Not only is this a reflection of our commitment to obeying the law, but also the best ethical standards.

The Code of Ethics and Conduct explains the fundamental principles of this commitment, and therefore they should be read in conjunction with this policy.

Honesty and ethics

Respect and integrity

We are the ambassadors of respect and integrity. We always behave responsibly and demonstrate courtesy, honesty, civility and respect for all other members of CIMA+, for our clients, for our suppliers and for our partners.

Ethics

In order to support the objectives of CIMA+ we will, at all times, perform our duties in a manner that promotes ethics in our leadership.

We must:

- Undertake our responsibilities in a vigilant manner and in the best interests of CIMA+ so as to avoid any perceived impression of personal benefit;
- When the opportunity arises, promote the legitimate interests of CIMA+ ahead of our own interests;
- Proactively promote ethical behavior among subordinates and peers, and maintain relationships based on good faith;
- Conduct ourselves in a manner that is above reproach, free of any ties, and synonymous with objectivity and moderation;
- Be loyal and honest with other Executives, and at no time can we be guilty of a breach of trust or unfair practices;
- Preserve the confidentiality of all communications and discussions;
- Act with caution, skills and diligence;
- Use corporate assets and resources in a responsible and fair manner, in the best interests of CIMA+.

Preventing conflicts of interest

We must avoid any actual or perceived conflicts of interest, and should never engage in any conduct that is detrimental to CIMA+ or its reputation. Such a conflict would exist when an Executive puts his or her own personal interests ahead of those of CIMA+ or its clients, or when an obligation or situation arising from an Executive's personal activities or financial affairs may adversely influence the Executive's judgment in the performance of his or her duties to CIMA+.

We do not solicit or accept gifts, favors or any courtesies from related parties, clients or firms with which CIMA+ does business. For this purpose, a «gift» or «favor» includes any gratuitous service, loan, discount, money or article of value. This does not include articles of nominal value normally used for sales promotion purposes, ordinary business meals or reasonable entertainment consistent with local, social or business customs, provided they are obtained sporadically and in compliance with laws.

We do not perform work or render services for companies that compete with either CIMA+ or the companies with which CIMA+ does business, nor do we knowingly make significant investments in such companies without the appropriate approval of CIMA+'s Board of Directors.

If we think that we have been placed in a situation in which there is a conflict of interests, we must inform the President and Chief Executive Officer and the Board of Directors.

Compliance with laws, rules and regulations

We are aware of the responsibilities linked to the role we have within the organization, and of the importance of compliance with the letter and spirit of applicable laws, rules and regulations and to promote it.

We defend our company against the risk of collusion and corruption through an effective internal corporate compliance program.

Ethical compliance

Responsibilities

We have a duty to be role models of appropriate business conduct and to ensure that the principles and policies related to the Code of ethics and conduct, and other CIMA+ guidelines and policies, are upheld.

We are committed to implementing all necessary measures to protect staff members who report any breaches of these practices.

Declaration

If we have knowledge of any violation or suspected violation of ethics, we will personally inform the President and Chief Executive Officer and the Board of Directors.

If we do not comply with this declaration or the company Code of ethics and conduct, in every respect, our conduct will be a matter for consideration and review by the Board of Directors of CIMA+.