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JPM Group of Companies Ethical Policy Statement.

All employees contribute to reputation the JPM Group of Companies, therefore it is important that all employees adhere to the ethical guidelines. Always follow these principles.

Compliance with Law

All business conducted on behalf of the JPM Group of Companies must be carried out in compliance with all applicable laws and regulations. Be aware of the legal requirements that apply to your job and follow these laws strictly. JPM will not tolerate illegal activity conducted for personal gain or on the company's behalf.

Lack of knowledge of the law will not excuse your non-compliance with this ethics policy. If you have questions or you require assistance with legal matters contact your direct line manager for assistance.

Honesty and Integrity

Consider JPM's reputation and credibility in all of your business relationships. Be honest and honourable in all dealings with other employees, the public, the business community, customers, suppliers and competitors.

Entertainment and Gifts

JPM will not tolerate the giving or receiving of gifts for personal gain or in order to secure any contract, either from an individual or organisation. Always declare any forms of entertainment or gifts that could appear to influence your decision making process.

Any gift, entertainment or benefit that you provide to a business associate must be modest in scope and value. Never provide gifts, entertainment or benefit that contravenes and applicable law or contract term or that is large enough to influence or appear to influence the recipients business decision. Ensure that you record with the accounts department any gifts, entertainment or other benefit.

Consultation fees, Commissions or Other Payments

Never give or receive any payment that falls outside the normal conduct of business. Ensure that all consulting or agency fees, retainers, commissions or other payments are reasonable in the context of acceptable commercial practice and that they comply with the applicable corporate policy.

Dated: 01/03/13

Signed: James P. M. Cabe

Mr. James P McCabe Managing Director



