



Code of Business Conduct and Ethics

Owner	CEO		
Approver	Board of Directors		
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Employees	Management	Directors	Contractors
Consultants			
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Disclosure, Confidentiality and Insider Trading Policy		Non-Discrimination and Harassment Policy	
Anti-Corruption Policy		Health and Safety Policy	
Whistleblower Policy		Corporate Travel and Expense Policy	
Document Purpose			
The purpose of this document is to define the Code of Business Conduct and Ethics for Orogen Royalties Inc. It defines the standards and values which the Company expects its personnel to follow.			

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1. PURPOSE

This Code of Business Conduct and Ethics (the “Code”) has been adopted by the Board of Directors (the “Board”) of Orogen Royalties Inc. (the “Company”) to define the principles, standards, and values which the Company expects its personnel to follow in carrying out their responsibilities and duties to other employees, the public and other stakeholders. The Policy applies to all personnel of the Company and all of its subsidiaries, affiliates, optioned projects and alliances when the Company is the designated operator, including every Director, Officer, employee, consultant and contractor (the “Personnel”).

The Company expects Personnel to exercise sound judgment when conducting the Company’s business, and act with honesty and integrity. The Company encourages Personnel to refer to this Code frequently to ensure that they are complying with the terms and the spirit of this Code. The Company also understands that this Code does not address every situation or concern one may have about conducting the Company’s business ethically and legally. In these situations, the Company encourages its Personnel to speak with their supervisor or refer to “Asking Questions and Raising Concerns” in Section 24.

The Board is responsible for setting the standards of business conduct contained in the Code and updating these standards to reflect changes in the legal and regulatory framework applicable to the Company. It is responsibility of each Personnel to comply with the Code. Each Personnel is expected to read and become familiar with the Code and will be required to affirm in writing their compliance with the Code. Additionally, all Personnel should read and understand the Company’s *Disclosure, Confidentiality and Insider Trading Policy, Anti-Corruption Policy, Employee Data Privacy Policy, Corporate Travel and Expense Policy, Health and Safety and Whistleblower Policy*.

References in this Code to the Company mean the Company together with its subsidiaries.

2. SCOPE

All Personnel are expected to follow this Code when acting on the Company’s behalf, regardless of location. Any violations of this Code or any other policies established by the Company from time to time, may result in disciplinary action, up to and including termination of service. This Code also applies to all the Company’s subsidiaries and affiliates, as the context requires.

Personnel are expected to seek guidance in any case where there is a question about compliance with both the letter and spirit of the Company’s policies and applicable laws. This Code sets forth general principles and does not supersede the specific policies and procedures that are covered in the specific policy statements, any applicable laws, regulations, security commission and the TSX Venture Exchange (“Exchange”) rules. Any questions relating to the content and application of this Code should be directed towards supervisors, the Chief Executive Officer (“CEO”) or the Chief Financial Officer (“CFO”).

GUIDING PRINCIPLES

All Personnel must:

- i. Act honestly, in good faith, and in the best interests of the Company by demonstrating truthfulness, respectfulness and integrity in all business activities and interactions with the Company's shareholders, employees, competitors, and other stakeholders.
- ii. Exercise care, diligence, and skill in fulfilling their duties and responsibilities.
- iii. Avoid conflicts of interest (see Section 5).
- iv. Exercise the powers associated with their employment, engagement or other relationship with the Company and use the assets of the Company for the purposes for which they were intended.
- v. Act in accordance with all applicable laws, rules, and regulations. Adhere to the ethical standards set out in the Code and follow the Company's policies and procedures. For certainty, if any applicable law conflicts with a policy in this Code, the Personnel must comply with the applicable law. If local custom or policy conflicts with this Code, the Personnel must consult with their supervisor and comply with this Code, unless a waiver is obtained pursuant to Section 22.

3. SPECIAL RESPONSIBILITY OF LEADERS

Personnel who are Directors, Officers, and employees are responsible to promote an ethical and compliant workplace. They must fully understand this Code and be able to explain it with those who report to them and encourage others to come forward with concerns. This includes taking the time to listen to others' concerns and questions, developing a relationship of trust with other Personnel, and reporting acts of misconduct. Such individuals must ensure that the Personnel they supervise feel confident that they can discuss their questions and concerns with them without fear of retaliation.

4. CONFLICTS OF INTEREST

- i. All Personnel have an obligation to act in the best interests of the Company at all times. Further, Personnel are required to avoid situations where their personal interests interfere or might appear to interfere in any way with the interests of the Company (a "Conflict of Interest").
- ii. A Conflict of Interest will arise when Personnel must choose between the Company's best interests and their personal interests, including when such Personnel has personal interest in a transaction involving the Company. Any situation where the judgment of such Personnel may be compromised, where he or she shows undue favoritism to any party or where he or she, or a member of his or her family, receives a personal benefit

of some kind, or where it even appears that one of the above is true, is potentially a Conflict of Interest. All Personnel must strive to avoid situations that create a conflict, create the potential for a conflict or create the appearance of a conflict. If a Personnel becomes aware of a transaction or relationship (including those involving family members) that could reasonably be expected to give rise to a Conflict of Interest, he or she should promptly disclose the matter to their supervisor or the Company's CEO or CFO in accordance with Section 5(iii) of this Code.

- iii. A Personnel is considered to have a potential Conflict of Interest if their personal interest or their direct or indirect involvement or influence in the interests of other third parties or organizations compromises or negatively impacts the best interest of the Company.

Pursuant to this Code, significant interest means that, as a result of affiliation with third parties (formal or informal), the Personnel has the ability to influence that organization's decisions to the detriment of the Company. Examples of significant interest that could lead to this outcome include but are not limited to:

- a. Material share position, greater than 1% of issued and outstanding common shares;
- b. Directorship;
- c. Managerial position; and/or
- d. Consulting relationship.

To protect the Company, full disclosure in advance of any potential conflict of interest and, where appropriate, advance approval is from the Board, CEO or CFO necessary, depending on the Personnel and the nature of the external engagement.

- iv. Personnel are expected to avoid both actual and perceived Conflicts of Interest. Since the possibilities for Conflict of Interest are almost limitless and cannot all be covered in this Code, Personnel are expected to exercise professional judgement with the highest ethical standards. Furthermore, Personnel responsible for seeking guidance from appropriate sources before embarking on activities which might create the appearance of a Conflict of Interest.
- v. Where an actual or potential Conflict of Interest may exist, then Personnel must immediately disclose the conflict to: (a) their supervisor, who must then report the matter to the Company's CEO or CFO; or (b) directly to the Company's CEO or CFO. The Company's CEO or CFO must report all conflict of interest matters to the Board. Failure to disclose and report a Conflict of Interest is a violation of this Code.
- vi. If required by the Board, where a Director of the Company has a Conflict of Interest, such Director shall retire from any meeting of the Board while discussion on the applicable material contract or transaction or proposed material contract or transaction of the Company is taking place and shall recuse themselves from voting on the subject under consideration. However, this will not prevent the Board from calling the recused individual into the meeting to answer any questions regarding the matter under discussion, nor shall it release the director from their obligation to inform the Board.

- vii. This Code is meant to protect both the Personnel and the Company. All Personnel are responsible for taking immediate and appropriate action when they become aware of violations of the Code its procedures.

5. USE OF COMPANY RESOURCES

- i. All Personnel are to safeguard and use the Company's resources for legitimate Company business purposes only. The Company and all Personnel will take steps to prevent theft, carelessness and any manner of significant waste that has a direct impact on the Company's assets and profitability. Any suspected incident of fraud, theft, or other irregularity should be reported immediately for investigation in accordance with the Reporting guidelines in Section 21. The Company's equipment should not be used for non-business activities, other than incidental personal use. Any other use requires pre-approval by an immediate supervisor.
- ii. The obligation of the Personnel to protect the Company's assets includes the protection of its proprietary information. Proprietary information includes, among other things: drill results, engineering plans and designs, geological prospects and interpretations, databases and records, business, marketing and corporate development plans, salary information, intellectual property, and any unpublished financial or technical data and reports. Unauthorized use or distribution of this information is a violation of this Code. It may also be illegal and result in civil or criminal penalties. The obligation to preserve the confidentiality of proprietary information continues even after the Personnel cease to have a relationship with the Company. See Confidentiality in Section 9.

6. WORKPLACE

The Company is committed to:

- i. Providing a healthy and safe workplace in compliance with applicable laws, rules, and regulations. All Personnel must be aware of the safety issues and policies that affect their job, other employees, and the community in general.
- ii. Foster a diverse, equitable, and inclusive working environment. The Company recognizes that a diverse and inclusive team will generate multiple perspectives free of conscious or unconscious bias and discrimination and lead to effective decision making and improved business outcomes.

7. CORPORATE OPPORTUNITIES

- i. Opportunities which become available to a Personnel by reason of his or her employment, engagement or other relationship with the Company must be disclosed to the Company and be treated as if belonging to the Company. Personnel are prohibited

from using the Company's property or information for personal gain, taking personal advantage of opportunities that are discovered through the use of the Company's property or information, or competing with the Company. Personnel owe a duty to the Company to advance its legitimate interests, before their own.

- ii. Personnel must disclose and seek approval from the Board or the CEO when he or she is considering accepting or involved in external professional opportunities or activities. External professional activities are activities which involve the same kind of specialized skills and knowledge that the Personnel practices in their employment with the Company, such as consulting, private contracts, professional practice, directorships on boards, acting as an officer of a company whose business relates to the interests of the Company, and teaching at institutions. External professional activities do not include participating as a committee member or a member of the executive of a professional or industry organization, acting as director on a board at the Company's request or activities unrelated to duties and responsibilities with the Company (such as volunteer or community). Personnel are expected to avoid Conflicts of Interest when participating in external professional activities.

8. CONFIDENTIALITY

- i. All Personnel are required to maintain and protect the confidentiality of all information and materials entrusted to them by the Company or persons with whom the Company does business, except when disclosure is authorized by the Company's Board, CEO or CFO, or is required by laws or regulations. The obligation to preserve confidential information continues even after the Personnel cease to have a relationship with the Company.
- ii. Personnel have access to sensitive and confidential corporate information. Confidential information includes any information obtained or developed through the Company's business that has not been made public by the Company. Release of such information may be illegal or harmful to the Company, its Personnel, and other persons or entities with whom the Company does business. The Personnel must exercise care when dealing with confidential information to ensure that such information not be released to anyone inside or outside of the Company who is not authorized or legally entitled to receive it. Treatment of confidential information must be in accordance with the Company's *Disclosure, Confidentiality and Insider Trading Policy*.
- iii. Personnel must also maintain the confidentiality of all personal information provided to, or held by, the Company and ensure that such personal information is not disclosed to other Personnel unless it is reasonably required by them to perform their jobs. The Personnel must not disclose such personal information to third parties unless required by applicable laws, rules or regulations (and then only to the extent required) or unless the informed consent of the relevant individual has been obtained. Personal information must be dealt with in accordance with all applicable privacy laws.

- iv. The foregoing obligations of confidentiality are subject to the Company's *Whistleblower Policy* which protect the right of the Personnel to provide information to governmental and regulatory authorities. Notwithstanding any other provision of this Code, any other Company policy or any agreement relating to the Personnel, Personnel are not required to seek the Company's permission or notify the Company of any communications made in compliance with applicable whistleblower laws, and the Company will not consider such communications to violate this or any other Company policy or any agreement between the Personnel and the Company.

9. HEALTH, SAFETY, ENVIRONMENTAL & CORPORATE SOCIAL RESPONSIBILITY

The Company is committed to managing and operating its assets in a manner that is consistent with the values of fairness, transparency, respect, and health, safety, the environment, and corporate social responsibility. All Personnel also have a responsibility for maintaining a safe and healthy workplace. Violence and harassment in the workplace are not permitted. Personnel are expected to be free of alcohol and drugs that could impair their judgment or affect their ability to perform their job safely.

It is the Company's policy to comply with applicable health, safety and environmental laws and regulations. Personnel are also expected to act in the same manner. Refer to the *Health and Safety Policy* for additional guidelines.

10. FAIR DEALINGS

- i. Personnel are required to deal fairly with the Company's customers, suppliers, competitors and other employees in an ethical and business-like manner. No Personnel should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.
- ii. The Company complies with and supports laws that prohibit restraints of trade, unfair practices, or abuse of economic power. Personnel must not enter into arrangements that unlawfully restrict the Company's ability to compete with other businesses, or the ability of any other business to compete with the Company. Personnel are also prohibited from entering or discussing any unlawful arrangement that may result in unfair business practices or anticompetitive behaviour.
- iii. The Company will make full, fair, accurate and timely disclosure in periodic reports and documents required to be filed by the Company under applicable securities laws in accordance with the Company's *Disclosure, Confidentiality and Insider Trading Policy*.

11. DISCRIMINATION AND HARASSMENT

The Company recognizes the diversity of its workforce and is committed to providing a working environment in which all persons are treated with respect and dignity. The Company will not tolerate discrimination, intimidation, or harassment on the basis of race, color, religion, disability, national origin, genetic information, sex (including pregnancy), age, sexual orientation, gender (including gender identity and expression), marital status, protected veterans' status, citizenship status or any other characteristic protected by applicable law. Personnel should follow the procedures set out in the Company's *Non-Discrimination and Harassment Policy* when another person's conduct makes them uncomfortable and should report matters concerning discrimination or harassment in accordance with the *Non-Discrimination and Harassment Policy*, as applicable.

12. USE OF EMAIL AND INTERNET SERVICES

- i. Email, mobile devices, and internet services are provided by the Company to assist the Personnel in carrying out their work. Incidental and occasional personal use is permitted, but never for personal gain or any improper purpose. Personnel may not access, send or download offensive content, sexually explicit messages, unwelcome propositions, derogatory messages based on racial or ethnic characteristics, or any other messages that could be viewed as harassment.
- ii. Messages (including voicemail and text messages) and computer information sent, received or created by the Personnel are considered the Company's property and all Personnel should recognize that these messages and information are not "private". Unless prohibited by law, the Company reserves the right to access and disclose those messages and information as necessary for its business purposes.

13. COMPLIANCE WITH LAWS

The Company operates within a complex framework of Canadian, United States and Mexican law, as well as laws and regulations of securities commissions and the Exchange. All Personnel are expected to comply with the applicable laws, rules and regulations of Canada, the United States, Mexico, and any other country in which the Company carries on business and applicable regulatory rules. No Personnel is ever expected to commit or condone an illegal act, or to instruct other Personnel to do so on behalf of the Company. Where law does not govern a situation or where the law is unclear or conflicting, all Personnel are expected to seek advice from supervisors or other appropriate personnel. The CEO, CFO or the Company's corporate counsel of the Company can assist Personnel in determining applicable legal requirements.

14. INSIDER TRADING

Trading of publicly listed securities or their derivatives based on insider information, or inducing others to do so, is illegal and may result in significant civil and criminal penalties. Insider information includes information that is not public and could materially affect the price of the Company's shares. The Company has adopted *the Disclosure, Confidentiality and Insider Trading Policy* governing the trade of the Company's securities or the securities of any counterparty to a potential material transaction by the Personnel. Each Personnel is expected to read and become familiar with this policy.

15. FINANCIAL RECORDS AND INTERNAL CONTROLS

Personnel must maintain the integrity of the Company's financial records and ensure full, fair, accurate, timely and understandable disclosure of financial information. All assets, liabilities and transactions must be accurately and completely reported in the books and supported by necessary documentation. No asset, liability or transaction is to be concealed from management or the Company's internal or external auditors. The Company's financial statements and the books, records and accounts on which they are based must appropriately reflect the Company's activities and conform to applicable legal and accounting requirements and to the Company's system of internal controls. The Company is committed to complete, accurate and balanced disclosure of material information in a timely manner and in compliance with regulatory requirements.

The financial managers of the Company will conduct themselves in accordance with the *CPABC Code of Professional Conduct of the Chartered Professional Accountants of British Columbia*.

All Personnel have a responsibility to ensure that the Company's accounting records do not contain any false or intentionally misleading entries. Personnel may not directly or indirectly:

- i. Make or cause to be made a false or misleading statement; or
- ii. Omit any material facts in connection with the audit of financial statements, the preparation of any required reports, or any other work that involves the filing of a document with the applicable regulatory authorities.

16. ANTI-CORRUPTION AND ANTI-BRIBERY

The Company is committed to complying with legal requirements and the Company's *Anti-Corruption Policy*. The Company has a zero-tolerance approach toward bribery, corruption, and facilitation payments in all forms.

For the purposes of this Code, bribery offence includes bribes, kickbacks, and extortion:

- i. A bribe is an inducement or reward offered, promised or provided in order to gain commercial, contractual, regulatory or business or personal advantage.
- ii. An inducement is something which helps bring about an action or desired result.
- iii. A business advantage means that the Company or Personnel is placed in a better position (financially, economically, or reputationally, or in any other way which is beneficial) either than its competitors or than it would otherwise have been had the bribery or corruption did not take place.
- iv. Kickbacks are payments of any portion of a contract made to the Personnel of another contracting party or the utilization of other techniques to channel payment to public officials, political parties, party officials or political candidates, to employees of another contracting party, or their relatives or business associates.
- v. Extortion means to directly or indirectly demand or accept a bribe, facilitation of payment or kickback.

All Personnel are strictly prohibited from:

- i. Offering, promising or making a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given. Inappropriate offers include cash or cash equivalents, shares, stock options, loans, payment of travel expenses or charitable or political contributions.
- ii. Requesting or agreeing to receive or accept a payment, gift or hospitality in the expectation or belief that a business advantage will be awarded, or as a reward for an advantage already granted.
- iii. Acceptance of payment, gift or hospitality with the expectation or hope by the third party that a business advantage will be given, or to reward a business advantage already received. There are many instances when Personnel are presented small gifts because of their work or the position they hold at the Company. Tokens of appreciation of insignificant value (less than US\$100) may be accepted at the discretion of the Personnel. However, when gifts of significant value are offered, a written approval from the CEO is required. Consideration should be made on the source, value, purpose and frequency of offering. Any potential for conflict of interest to the Company should be grounds for denial of the request to accept the gift.
- iv. Bribing an individual in public office or public service.
- v. Making any additional payments to a public official to expedite or secure routine non-discretionary governmental actions (a facilitation payment).
- vi. Threatening or retaliating against another individual who has refused to commit or refused to collude to commit a possible bribery offence or one who has raised concerns under the *Anti-Corruption Policy*.

- vii. Engaging in any other activity that might lead to a breach of the *Anti-Corruption Policy* or any applicable anti-bribery or corruption laws.

Those paying a bribe may subject the Company and themselves to civil and criminal penalties. If a Personnel becomes aware of or receives any solicitation for, or offer of, money or a gift, that is intended to influence an official decision or business decision inside or outside of the Company, it should be reported pursuant to the *Anti-Corruption Policy*.

All Personnel are required to comply with the Canadian Corruption of Foreign Public Officials Act and the U.S. Foreign Corrupt Practices Act and with local anti-bribery and anti-corruption laws in the jurisdictions in which the Company conducts business. Personnel are also expected to comply with the Company's additional policies, programs, standards and procedures related to anti-corruption compliance. Refer to the Company's *Anti-Corruption Policy* and procedures implemented in respect of such policy for more information.

17. ANTI-MONEY LAUNDERING

The Company prohibits money laundering and any activity associated with money laundering or the funding of terrorist or criminal activities by complying with the requirements under the Bank Secrecy Act (BSA). Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the proceeds appear to have derived from legitimate origins or constitute legitimate assets. Generally, money laundering occurs in three stages:

- i. Cash first enters the financial system at the "placement" stage, where the cash generated from criminal activities is converted into monetary instruments, such as money orders or traveler's checks, or deposited into accounts at financial institutions.
- ii. At the "layering" stage, the funds are transferred or moved into other accounts or other financial institutions to further separate the money from its criminal origin.
- iii. At the "integration" stage, the funds are reintroduced into the economy and used to purchase legitimate assets or to fund other criminal activities or legitimate businesses.

The Company's policies, procedures and internal controls are designed to comply with all applicable BSA regulations and Financial Industry Regulatory Authority ("FINRA") rules and are reviewed and updated on a regular basis to comply with changes in regulations and business. The policies include the following:

- i. Providing information to law enforcement agencies and other financial institutions when requested.
- ii. Identify and verify new vendor accounts.
- iii. Maintain all accounting and banking records.

All Personnel are strictly prohibited from engaging in money laundering or suspected money laundering activities. Personnel must follow internal control procedures that were designed to identify and prevent involvement in any money laundering activities. All Personnel are required to report any suspected money laundering activities to their immediate supervisor, CEO or CFO.

18. AUTHORITY

Personnel do not have the authority to enter into any contracts, commitments, binding transactions, agreements, licenses, leases, or other legally enforceable obligations unless authorized to do so by the Board, CEO or CFO.

19. SOLICITATION

Personnel are expected to refrain from soliciting the Company's clients or employees for their external activities or community involvement unless they have prior permission of the Company.

20. REPORTING

All Personnel should promptly report, as applicable:

- i. Any concerns related to the Company's accounting, internal controls or auditing matters, pursuant to the Company's *Whistleblower Policy*.
- ii. Any concerns related to anti-corruption or anti-bribery matters, pursuant to the Company's *Anti-Corruption Policy*.
- iii. Any concerns related to discrimination or harassment matters, pursuant to the Company's *Non-Discrimination and Harassment Policy*.
- iv. Any concerns related to health and safety matters, pursuant to the Company's *Health and Safety Policy*.
- v. Any concerns related to disclosure, confidentiality, and insider trading, pursuant to the Company's *Disclosure, Confidentiality and Insider Trading Policy*.
- vi. All other violations of the Code:
 - a. To their supervisor who shall then report the matter to the Company's CEO or CFO who shall, in turn, report the matter to the Board.
 - b. In accordance with the Company's *Whistleblower Policy*.

- vii. The Board shall cause an investigation of any reported violations and shall oversee an appropriate response, including corrective action and preventative measures where required, provided that the Board may refer the investigation to the Audit Committee where appropriate. Personnel are expected to cooperate with such investigation.
- viii. The Company will not tolerate any retaliation or reprisal against anyone who in good faith reports a potential breach of the Code or raises a concern with respect to whether certain conduct constitutes a breach. A “good faith” report is one which is made honestly and reasonably, whether or not the person has all of the relevant facts or is sure that a breach has occurred.
- ix. The Code encourages all Personnel to seek guidance when unsure about the best course of action in a particular situation.

21. REQUEST FOR WAIVERS

Requests for waivers from this Code must be delivered to the Board, together with a summary of all relevant facts and circumstances. The Personnel to whom a waiver is granted accepts that public disclosure of the granting of any such waiver may be required by applicable securities laws, regulations, policies or guidelines, including any exchange the Company is listed on.

The Company will disclose to the Company’s shareholders within four business days any waiver with respect to a director or executive officer.

22. VIOLATIONS

Upon determination that a Personnel has violated this Code, the Company will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities. Appropriate action may also be taken to deter any future Code violations. Failure to report a known violation of the Code is itself a violation of the Code.

23. ASKING QUESTIONS AND RAISING CONCERNS

All Personnel have a duty and a responsibility to report in good faith any known or suspected violation of this Code, including any violation of the Canadian federal, provincial and municipal laws and regulations, United States laws and regulations, securities commission and the Exchange rules and the laws of other countries in which it does or corporate or other policies that apply to the Company, or any observed instances of misconduct or pressure to compromise the Company’s ethical standards.

All Personnel are required to:

- i. **Be Proactive:** Personnel are encouraged to act proactively by asking questions, seeking guidance and reporting suspected violations of the Code and other policies and procedures of the Company. If any Personnel believes that actions have taken place, may be taking place, or may be about to take place that violate or would violate the Code, they are obligated to bring the matter to the attention of the Company in accordance with the *Whistle Blower Policy*.
- ii. **Seek Guidance:** The best starting point for any Personnel who are seeking advice on ethics related issues or reporting potential violations of the Code will be their supervisor. Personnel may also raise the matter directly with the CEO or CFO.
- iii. **Communication Alternatives:** All Personnel may communicate with the CEO or CFO by any of the following methods: (i) in writing (which may be done anonymously as set forth below under “Anonymous Reporting”), (ii) email, or (iii) telephone. Any concerns or questions regarding potential violations of the Code, any other policy or procedure or applicable law, rules or regulations involving accounting, internal accounting controls or auditing matters should be directed to the Chair of the Audit Committee.
- iv. **Anonymous Reporting:** When reporting suspected violations of the Code, the Company prefers that Personnel identify themselves in order to assist the Company with the investigation. However, the Personnel should follow the Company’s *Whistleblower Policy* if he or she wishes to report their concerns anonymously.

24. COMPLIANCE CERTIFICATION

Personnel are expected to read and become familiar with this Code when they begin their engagement with the Company and may be required, from time to time, to affirm in writing their compliance with this Code.