



## **CODE OF CONDUCT FOR DIRECTORS, OFFICERS AND EMPLOYEES**

### **I. INTRODUCTION**

Altius Renewable Royalties Corp. Committed to Ethical Business Conduct

1. Altius Renewable Royalties Corp. and its subsidiaries and affiliates (collectively, “ARR” or the “Corporation”) are committed to conducting business with people in the same respectful manner and applying the same ethical principles and standards that we would expect and seek from others. The directors, officers, employees, and consultants designated by ARR and its subsidiaries (each such person a “Company Representative”) represent the Corporation and are expected to always act in a manner that enhances the reputation of the Corporation for honesty, fairness, competency, and professionalism. The integrity of ARR relies upon the uncompromising personal integrity of each Company Representative.
2. This Code of Conduct applies to all Company Representatives, including anyone retained by ARR in a consulting or similar capacity. It is used to provide a signpost and common reference point for all Company Representatives to help navigate their way through business decisions. In addition, it is the responsibility of each Company Representative to use common sense and apply high personal ethical standards in cases where no corresponding guideline is found in this Code of Conduct. While ARR expects the best from each Company Representative, senior personnel are expected to lead by example.
3. This Code of Conduct should be read and signed in conjunction with other policies referred to throughout this Code.
4. Company Representatives or anyone in a similar capacity will not be retaliated against or be subject to any form of reprisal for raising a concern under this Code in good faith or for participating in an investigation into any such concerns. Retaliation is a serious violation of this Code and should be reported immediately.

### **II. POLICY**

The Code of Conduct

The Board of Directors of ARR intends by this Code to:

1. Establish a Code of Conduct applicable to all directors, officer, employees, and consultants of ARR and its subsidiaries

2. Designate the Corporate Governance Committee of the Board of Directors to monitor the application of the Code of Conduct unless otherwise specified
3. Ensure that the Code of Conduct is the code of behaviour that applies to the work of every Company Representative or anyone in a similar capacity representing the Corporation.
4. Through the Code of Conduct, provide that people who interact with ARR will know the high standard of behaviour that can be expected of each Company Representative and that all transactions and activities will be conducted honestly and fairly.
5. Provide that a Company Representative is in doubt about the interpretation or application of this Code of Conduct or any particular part, they should contact the CEO, the Chair of the Board of Directors or the Chair of the Corporate Governance Committee of the Board of Directors of ARR.
6. Provide that Violations of the Code of Conduct will not be tolerated, and consequences can be expected. Serious violations may include termination of employment directorship or office, legal action, or criminal prosecution.

### III. GUIDELINES

#### Code of Conduct – Fundamental Principles

1. Scope and Application
  - (a) The Code of Conduct applies to each Company Representative while an employee, director, officer or consultant of ARR or Great Bay Renewables (“GBR”) and, in certain instances, such as those governing confidentiality of information, even after an individual ceases to be employed by or act in such capacity on behalf of ARR.
  - (b) Former Company Representatives are expected to continue to respect and ensure the confidentiality of all information brought to their attention while employed at or acting as a director, officer, or consultant of ARR and refrain from using any item of confidential information to their advantage, to the advantage or detriment of a third party or to the detriment of ARR.
2. Compliance with the Code of Conduct and the Law
  - (a) The Code of Conduct is an integral part of ARR’s corporate culture.
  - (b) Compliance with the Code of Conduct is integral to the way in which ARR conducts its business. Therefore, it is a condition of employment, directorship, holding office, or acting as a consultant for any Company Representatives.
  - (c) Further, Company Representatives shall comply with all laws, regulations, and requirements applicable to the Corporation’s business regardless of the jurisdiction in which they are working or conducting business in on behalf of the Corporation. Oral agreements entered into

by Company Representatives are no less binding than written agreements so particular care should be taken in this regard.

- (d) If a Company Representative is unfamiliar with the laws, that person should conduct him/herself in an honourable manner. However, ignorance of the law will not be a defence. Company Representatives should use their best efforts to familiarize themselves with applicable laws and/or seek guidance from internal or external counsel or the CEO.
- (e) If a Company Representative commits or condones an illegal act or gives the appearance of being engaged in illegal or improper conduct or instructs or encourages another Company Representative or supplier to do so, the Company Representative may be immediately terminated from employment, directorship, or other relationship with ARR.
- (f) Also, the Corporation prohibits any harassing conduct, including behaviour that can be construed as intimidating or offensive. All Company Representatives must ensure that they do not engage in any discriminatory behaviour as set out in applicable Federal or Provincial Human Rights Codes.

## IV. RESPONSIBILITY

Company Representatives have a personal responsibility to operate in a safe and environmentally respectful manner with minimal risk to themselves and to others and with honesty and integrity. Company Representatives should refer to ARR's ESG Policy for further information regarding ARR's approach to environmental and social risks.

### 1. Health and Safety

- (a) Health and safety is every Company Representative's responsibility and activities will be conducted in a manner that meets the highest health and safety standards and is consistent with ARR's own policies and procedures.
- (b) ARR strives to adopt and uphold leading health and safety standards. Operations will be conducted in a manner that protects the health and safety of Company Representatives and people in communities where ARR operates.
- (c) The Corporation also expects any contractors to uphold the same set of health and safety standards. ARR is prepared to stop any activity that does not comply with internal or legislated health and safety legislation, policies, or procedures.

### 2. Environmental Policy

- (a) All Company Representatives will conduct their activities in a manner that minimizes environmental risk and promotes environmental stewardship. ARR is committed to protecting the environment and to showing environmental leadership in all of its operations.
- (b) ARR will conduct all of its operations in a manner that ensures full compliance with the applicable environmental legislation and government requirements.

- (c) Any breaches or potential breaches of corporate policies or programs must be brought to the immediate attention of the chair of the Corporate Governance Committee.
- (d) When conducting due diligence on potential royalty acquisitions, ARR considers environmental stewardship as part of the due diligence standard, expecting that operators of any potential royalty asset will uphold the same compliance standards.

### 3. Risk Policy

- (a) Company Representatives should expect to operate in an environment in which major risks have been identified and mitigative measures established to minimize those risks.
- (b) ARR will seek to adopt procedures to address and minimize risk components related to strategic initiatives, organizational structure, financial instruments, fraud, ESG risks, including those related to climate change, reputation, information technology, hazards, operating in the United States, industry risks, risks relating foreign currency fluctuations, and international considerations.

## V. HONESTY AND INTEGRITY

All transactions between Company Representatives and the public will be conducted in a manner that does not compromise or call into question the integrity or reputation of the Corporation.

### 1. Accounting and Financial Matters

- (a) ARR relies on the integrity of its financial information to conduct its business. The Corporation prides itself on compliance with the highest standards regarding the recording and presenting of all of its transactions. In order to maintain that standard, all employees who process and record company information will do so with strict adherence to applicable laws and standards.
- (b) The integrity of ARR's record keeping and reporting systems must be maintained in accordance with an established set of internal control procedures and in compliance with all applicable accounting principles, laws, rules, and regulations.
- (c) Company Representatives with responsibility for record keeping will not employ any accounting method that distorts records or reports of the financial condition of ARR. Company Representatives must not create any false or artificial financial records.
- (d) All funds, assets and payments must be properly recorded and disclosed based on systems approved by the Corporation's Audit Committee. No payment will be approved without adequate and accurate supporting documentation and authorization.
- (e) The use of any funds or assets for any unlawful or improper purposes is strictly prohibited and those responsible for the accounting and record-keeping functions will ensure enforcement of all proper procedures.

- (f) Company Representatives with responsibility for reporting financial information shall provide information that is accurate, complete, objective, timely, and understandable and that complies with all applicable laws.
- (g) No Company Representative shall fraudulently influence, manipulate, or mislead any independent public or certified accountant or any other person engaged in the performance of an audit of ARR with the purpose of making these financial statements misleading.
- (h) Honesty and integrity of those who represent ARR must form the basis of all of ARR's relationships with financial institutions, contractors, government regulators and others. The damage that could be done to ARR if financially misleading statements are issued can have serious legal consequences for both ARR and the Company Representative.

## 2. Fair Dealing

- (a) All business dealings undertaken on behalf of ARR, including with its security holders, competitors and employees, must be conducted in a manner that preserves ARR's integrity and reputation.

## 3. Entertainment, Favours and Gifts

- (a) Company Representatives shall not undertake any activity that would provide inappropriate benefits to themselves or others by way of entertainment, favours, or gifts.
- (b) Anyone who undertakes business with ARR has access to the Corporation and its employees on equal terms.
- (c) Therefore, Company Representatives shall not solicit or accept benefits, entertainment or gifts that are of a monetary nature (e.g. cash, loans, securities, secret commissions).
- (d) They may accept modest gifts, hospitality or other benefits normally associated with their official duties and responsibilities if these items:
  - (i) are not cash, loans, or equivalent compensation;
  - (ii) are within the bounds of appropriateness, as a normal expression of courtesy or within the acceptable standards of hospitality extended to prospective employees, suppliers, contractors, joint venture partners or colleagues;
  - (iii) would not bring suspicion on the Company Representative's objectivity and impartiality; and
  - (iv) would not compromise the integrity of ARR.
- (e) Further, the Company Representative should, in appropriate instances, inform the donor of any gift, hospitality or other benefit, that ARR is under no obligation to give additional business or any business to that donor.
- (f) If a Company Representative receives inappropriate gifts, they should be returned to the donor citing the Code of Conduct as the reason for the return.

- (g) In addition, Company Representatives should be frugal and modest in all aspects of business expenses, entertainment, and gifts that they provide.
- (h) Any Company Representative experiencing or witnessing conduct not in compliance with this Code of Conduct or having reasonable grounds for believing that such conduct has occurred, should immediately report the incident to the CEO or Chair of the Corporate Governance Committee.
- (i) If a Company Representative is unsure whether particular conduct violates the Code of Conduct, that person should contact the CEO or the Chair of the Corporate Governance Committee regarding that matter.

#### 4. Outside Activities, Non-profit and Political Organizations

- (a) ARR encourages and supports its Company Representatives to participate in activities outside of employment such as public service or charitable activities as long as they do not interfere with a Company Representative's responsibility to ARR.
- (b) ARR is supportive of a Company Representative's involvement in any non-profit and/or political organizations as long as that person:
  - (i) speaks publicly about that organization as a private individual;
  - (ii) does not imply that he/she is representing ARR in dealings with that organization;
  - (iii) does not solicit internally for donations on behalf of that organization unless prior approval is given from the CFO;
  - (iv) receives written approval of the CFO before accepting an appointment to any other position of authority in an organization that might be in conflict with the interests of ARR;
  - (v) does not seek reimbursement from ARR for any personal contribution to a public service, charitable or political organization;
  - (vi) does not use ARR's funds, facilities, or assets as payment to a political party, unless previously authorized by the CFO in writing.

#### 5. Public Officials

- (a) For the purpose of this Code of Conduct "Public Official" means any person holding, representing or acting on behalf of a person holding a legislative, administrative or judicial office, and any person employed by, representing or acting on behalf of a governmental entity or enterprise thereof, public international organization, any political party or party official, or any candidate for any political office or any official or employee of any public hospital, agency or health care institution
- (b) All dealings among Company Representatives of ARR and Public Officials must be conducted in a manner that does not compromise the integrity or reputation of any Public Official, the

Company Representative or ARR. The CEO or one of his or her designates, should generally conduct any dealings with senior Public Officials. This section should be read in conjunction with ARR's Anti-Corruption Policy.

- (c) The above section regarding entertainment, favours, and gifts, also applies to any public official. In addition, any participation, whether directly or indirectly, in any improper profit-sharing arrangements, illegal gratuities, indirect contributions, improper inducements or other similar payments to any Public Official is expressly prohibited.
- (d) Even the appearance of impropriety in dealing with public officials is unacceptable. Therefore, in order to avoid any misunderstandings, Company Representatives should not engage in any dealings with domestic or foreign public officials if uncertain of the consequences of the outcome, and should consult with the CEO, the Chair of the Board of Directors or Chair of the Corporate Governance Committee on any question they may have about uncertain transactions.
- (e) Company Representatives should also not engage in lobbying activities as described in any applicable federal or provincial lobbying legislation without obtaining prior approval of the CEO and satisfying all registration requirements under applicable legislation.

## 6. Purchasing and Selling of Securities

- (a) In principle, ARR encourages Company Representatives to consider purchasing shares in ARR in consultation with an independent financial advisor.
- (b) However, securities legislation prohibits individuals with access to inside or internal material or privileged information with respect to a company from trading in the securities of that company or informing others of such information before it has been publicly disclosed.
- (c) As a result, Company Representatives of ARR are prohibited from buying or selling shares of ARR when they have knowledge of material changes or material information that has not been publicly disclosed.
- (d) Such information may be positive or negative and includes quarterly or annual financial results, significant transactions, items impacting the capital structure including new equity investment or material loans, additions or departures of key personnel, proposed mergers or takeovers, material offtake agreements for royalty assets, or other similar transactions.
- (e) These provisions apply also to trading in subsidiaries or associated companies of ARR including Altius Minerals Corporation as well as to shares of publicly traded companies with which ARR may be involved in joint ventures or other business dealings or with which it may be negotiating a material transaction.
- (f) Please refer to the Corporation's Policy on Disclosure, Insider Trading and Reporting Policy, which deals with these matters in greater detail, and which should be read in conjunction with this Code of Conduct.

## 7. Confidential Information

- (a) During the course of business, Company Representatives may gain access to information about ARR or other companies that is not publicly known, or that is confidential, privileged or of value to competitors or that may cause damage to corporate reputation if it is disclosed.
- (b) Company Representatives should take the utmost care to protect any confidential information. Other than in the necessary course of business, Company Representatives of ARR are prohibited from informing individuals of confidential information before it has been publicly disclosed. This prohibition may even include not sharing confidential information with other Company Representatives unless necessary to conduct the business of ARR.
- (c) ARR will disclose material information by various means that will ensure that all those who have an interest in ARR will have equal access to material information. All calls or requests for information from financial media, financial analysts or shareholders should be directed to the Company Representative with responsibility for Investor Relations.
- (d) Please refer to ARR's Disclosure, Insider Trading and Reporting Policy, which deals with these matters in greater detail, and which should be read in conjunction with this Code of Conduct.

#### 8. Use of the Corporation's Property and Assets

- (a) Use of corporate property and assets will be for the sole benefit of the Corporation. Company Representatives should ensure that reasonable care is used to protect corporate property and assets, which are reserved for exclusive use of ARR.
- (b) Company Representatives must honour ownership and intellectual property rights of others. Data and communications dealt with as a Company Representative of ARR are also considered property of the Corporation.

#### 9. Communications

- (a) Representatives should take care to ensure that all business records and communications (including email, texts, and instant messages) are clear and accurate. Please remember that your business communications may be shared or become public through litigation, government investigation, or publication in the media. Potential risks from inaccurate or misleading statements include claims of misrepresentation, breach of contract, securities fraud, unfair disclosure, and competition violations.

#### 10. Drugs and Alcohol

- (a) ARR is committed to maintaining a drug-free workplace. During work hours or on business, do not sell, possess, or be under the influence of illegal drugs (including controlled substances that have not been prescribed for you by your doctor) or possess drug paraphernalia. If you are taking any medication that creates a safety risk (for example, if you are driving or operating heavy machinery), report the situation to HR or your supervisor. Do not operate any ARR machinery or vehicle if the medication affects your perception or responsiveness. Do not report for work while intoxicated. In situations like parties where alcohol is served in the workplace or at social functions, consume alcohol appropriately and not excessively.

#### 11. Respect for all Company Representatives and Communities in which ARR Operates

- (b) ARR's goal is to provide a positive work environment within which Company Representatives and communities in which the Corporation operates are treated with respect and are free from all forms of discrimination and harassment. This section should be read in conjunction with ARR's Anti-Discrimination, Diversity & Inclusion Policy.
- (b) ARR strives to provide a positive work culture and business environment with equal employment opportunities, but without discrimination and harassment. Company Representatives can expect to experience dignity, respect, fairness, open communication, and the protection of their human rights.

If any act of one Company Representative against another is perceived to be discriminatory or harassing, that Company Representative should contact immediately the Chair of the Board of Directors. If the Company Representative wishes to submit a complaint anonymously, a formal complaint can be made through the Audit Committee Chair of ARR.

#### 12. Policy Prohibiting Against Retaliation

- (a) ARR is committed to prohibiting retaliation against those who themselves or whose family members report, oppose, or participate in an investigation of alleged unlawful harassment, discrimination, or other wrongdoing in the workplace. By way of example only, participating in such an investigation includes, but is not limited to:
  - (i) Filing a complaint with a federal or state enforcement or administrative agency;
  - (ii) Participating in or cooperating with a federal or state enforcement agency conducting an investigation of the Company regarding alleged unlawful activity;
  - (iii) Testifying as a party, witness, or accused regarding alleged unlawful activity;
  - (iv) Making or filing an internal complaint with the Company regarding alleged unlawful activity;
  - (v) Providing notice to the Company regarding alleged unlawful activity;
  - (vi) Assisting another employee who is engaged in any of these activities.
- (b) ARR is further committed to prohibiting retaliation against qualified employees who request a reasonable accommodation for any known physical or mental disability and employees who request a reasonable accommodation of their religious beliefs and observances.

#### 13. Respect for International Trade Laws

- (a) The Corporation abides by the applicable trade laws of all countries in which it operates including economic sanctions, import and export laws. If a Company Representative has

questions regarding such laws, he or she should consult with the Chair of the Board of Directors who will seek appropriate advice.

## VI. CONFLICTS OF INTEREST

1. A conflict of interest may arise where an individual has a personal relationship which may appear to compromise the individual's independence or ability to provide an impartial and objective decision, recommendation, or assessment of facts in any circumstance.

(b) A conflict of interest exists if, without the written consent of the CEO:

(vii) a Company Representative or member of the Company Representative's household, or a trust in which the Company Representative is involved as a trustee or over which the Company Representative exerts influence, has a significant, direct or indirect, financial interest in, or obligation to an existing supplier or a party seeking to establish a supplier relationship with ARR;

(viii) a Company Representative conducts business on behalf of ARR with a supplier of which a relative by blood or marriage of the Company Representative is a principal officer or representative;

(ix) a Company Representative or a member of the Company Representative's household or a trust of which the Company Representative is a trustee or over which the Company Representative exerts influence, accepts gifts of more than token or nominal value from an actual or potential supplier of ARR; or

(x) a Company Representative uses information obtained in the course of his or her employment with the Corporation for improper purposes.

(xi) If a conflict exists, and it has been done without malice and with no failure of good faith, ARR will allow a reasonable amount of time for the Company Representative to correct the situation in order to prevent undue hardship or loss. However, a decision in this regard will be at the discretion of ARR's management, taking into consideration the interests of the Corporation, its Company Representatives, and the overall situation.

(xii) Potential conflicts of interest may at times appear to be ambiguous and it is difficult to establish criteria to address every scenario. Company Representatives should always apply high personal ethics but when in doubt should discuss the matter with the CEO or the Chair of the Corporate Governance Committee.

(xiii) This Code is intended to be comprehensive, but situations involving actual or potential conflicts of interest might arise that are not specifically addressed in the Code. In these instances, Company Representatives should be guided by the general principles espoused in the Code and should consult with the CEO or Corporate Governance Committee for guidance. In the event of a real or perceived conflict of interest with Altius Minerals, the Company Representative should consult with the chair of the Corporate Governance Committee for guidance.

2. ARR, through its Board of Directors, has a responsibility to identify and resolve real or potential conflicts of interest as set out in this Code of Conduct, and to establish minimum conflict of interest standards and procedures with which Company Representatives must comply.
3. In connection with its initial public offering, the Corporation entered into a services agreement with Altius Minerals (the “**Altius Minerals Services Agreement**”) pursuant to which Altius Minerals will provide office space, management and administrative services, including the services of the CEO, CFO and Corporate Secretary of the Corporation. The Corporation has also entered into an investor rights agreement (the “**Investor Rights Agreement**” and, together with the Altius Minerals Services Agreement, the “**Agreements**”) provides that Altius Minerals has been granted certain rights which correspond to its percentage interest in the Corporation, including director nominee rights. The Corporation acknowledges that the Agreements may lead to perceived or actual conflicts of interest.
4. Due to the greater potential for a conflict of interest to arise, the CEO will be required to seek the prior approval of the non-affiliated directors of ARR (being the directors of ARR that are not nominees of Altius Minerals) prior to entering into any transactions with Altius Minerals. Subject to a *de minimus* threshold, those transactions include:
  - a. acquisitions by ARR, or dispositions by ARR to, Altius Minerals;
  - b. transactions involving ARR that may be adverse in interest to Altius Minerals;
  - c. any material amendment to the Investor Rights Agreement or Altius Minerals Services Agreement; and
  - d. other material transactions involving ARR and Altius Minerals.

Non-affiliated directors may grant prior approvals for any of these transactions in the form of general guidelines, policies, or procedures in which case no further special approval will be required in connection with a particular transaction or matter permitted thereby, provided such transactions or matters are conducted in accordance with the pre-approved guidelines, policies, or procedures.

5. Non-affiliated directors will have sole responsibility for overseeing the provision of services under the Altius Minerals Services Agreement and considering any matters under the Investor Rights Agreement.
6. Circumstances or matters that arise which could create a potential conflict of interest between ARR and Altius Minerals shall be brought to the attention of the Chair of the Board of Directors of ARR.
7. Company Representatives are entitled to privacy in their personal affairs but should strenuously avoid any real or perceived conflict between their personal interests and the interests of the Corporation or their duties to the Corporation. Exercise caution and good judgment in personal relationships with other employees. Personal relationships between superiors and subordinates can create serious conflicts of interests or issues that affect the workplace. To avoid misunderstandings and situations that could be called sexual harassment, if you begin a romantic relationship with a superior or subordinate, you should report it to Ben Lewis, CFO of ARR if you are an ARR employee or to Ray Faust, CFO of GBR if you are a GBR employee.

Superior/subordinate personal and romantic relationships can give rise to troublesome workplace allegations (sometimes after the relationship ends), so it is important to avoid problems from the beginning. Even the appearance of a conflict of interest should be avoided. The reputation of the Corporation or the Company Representative's own reputation may be at stake.

8. A Company Representative's position at ARR should not be used in any way to gain benefit for themselves or their family members, business associates or friends. If it is perceived that a benefit is obtained through favouritism or a conflict of interest, then that benefit will be deemed inappropriate.
9. Company Representatives should avoid situations where they are or appear to be under the obligation or influence of anyone who does business with ARR or who seeks to do business with ARR.
10. Company Representatives may not take personal advantage of opportunities that are presented or discovered as a result of their position with the Corporation through the use of corporate property or information.
11. All personal interests or relationships with any business entity that seeks to do business with ARR should be disclosed to the CEO or Chair of the Audit Committee in writing. Opportunities developed privately may be in conflict if they are related to the Corporation's existing or proposed lines of business.
12. Company Representatives should avoid directly or indirectly providing goods or services to the Corporation or entering into contracts with the Corporation outside of their regular employment relationship. All activities that form an agreement or understanding with competitors to fix prices, rig bids, allocate customers, restrict supply, or hide illegal funds or make them look as though they are legitimate must be avoided.
13. In situations in which Company Representatives appear to be in a conflict of interest, disclosure of that actual or perceived conflict of interest should be made immediately to the Chair of the Board of Directors of ARR who will determine what action should be taken.

## VII. QUESTIONS

If you have any questions about how this Code should be followed in a particular case, please contact the Corporate Secretary.

## VIII. REVIEW

The Corporate Governance Committee will review this Code at least every two years and will make additions, deletions or amendments as required.

## IX. WAIVERS OF THE CODE

Waivers or exceptions to this Code will be granted only in advance and under exceptional circumstances by the Chair of the Board of Directors. Any waiver of this Code with respect to the Chair of the Board of

Directors may be granted only by all of the independent member of the Board of Directors. Any waiver of this Code with respect to a Director or Executive Officer of ARR may be granted only by the Board of Directors. Any such waiver shall be disclosed to the extent and in the manner required by applicable laws or stock exchange rules.

## X. PUBLICATION OF THE CODE

This Code, and any amendments, shall be posted on the Corporation's website ; and SEDAR's website at [www.sedar.com](http://www.sedar.com).

## XI. HISTORY

This Code was adopted by the Board on March 25 2021

Signed



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Chair of the Board of Directors

### SCHEDULE "A"

## ALTIUS RENEWABLE ROYALTIES CORP.

### CERTIFICATE OF COMPLIANCE

Reference is made to the Code of Conduct adopted by the Board of Directors of the Company (the "Policy").

In accordance with the Policy, I, \_\_\_\_\_, hereby certify, represent and warrant to the Company and its subsidiaries as follows (check each applicable box):

- I have reviewed the Policy within the last 12 months, and understand its terms and requirements.
- I have not violated any of the terms or requirements of the Policy.
- I am not aware of any violation or potential violation of the Policy by any Employee or Agent, as such terms are defined in the Policy.

I am not aware of any violation or potential violation of the Code of Conduct by any Employee or Agent, as such terms are defined in the Policy.

In the event you are unable to check the second, third, or fourth box, please provide details of any violation or potential violation of which you are aware:

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[Append additional pages if necessary]

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name