

Ethics in Trade Policy

Policy #: RM HR PWP 370

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1. PURPOSE

To outline Rambler Metals and Mining Canada Incorporated's (Rambler) explicit position on the value of human rights and ethics in all aspects of trade. This policy establishes clear expectations and guidelines to ensure understanding among all participants in the practice of trade of any type with Rambler.

2. OVERVIEW

Rambler does considerable trade within the local, provincial and Canadian Economy. A portion of the trade that we do is through international customers and suppliers. For all levels of trade, we must ensure that all business entities meet or exceed Ramblers ethical practices and human rights awareness and compliance.

3. RESPONSIBILITIES

Management/Employees/Suppliers/Customers: All parties are expected to know and abide by the information contained herein and to be knowledgeable of the principles contained within the *Canadian Human Rights Act* and the *Canadian Charter of Rights and Freedoms*, as well as any pertinent legal trade documentation.

4. ETHICS IN TRADE

Ethics and compliance measures in the trading chain addresses the following potential issues:

- **Bribery:** is the act of giving gifts (money, goods or other forms of recompense) to a person of a company to influence the behavior of that person in the favour of the giver of the bribe.

Gifts which are otherwise available to everyone on an equivalent basis, and not for unethical purposes, is not bribery. For example, offering a discount to all purchasers equally is not a bribe. Offering a discount to one purchaser after receiving a special gift would however, be considered a bribe.

Bribery is not good for ethical business practices as it bypasses check and balances put in place to ensure best value is achieved for the company. Without these safeguards, the company may pay more for products and services which will, in the end, be passed on to the consumer and have a negative effect on the company's bottom line;



- **Solicitation and extortion:** Solicitation is the act of asking for or trying to obtain something from someone and is legal. However, when combined with the threats of obtain those products or services from a person by force, intimidation, or illegal means is called extortion and is considered a serious crime. As with bribery, this practice bypasses company safeguards to good business practices with the added threat of violence or illegal action to not carry out the action by the extorter;
- **Ethical practices in employment:** It is required of all business partners of Rambler to abide by, and champion human rights in all their employment practices. This would include not creating barriers to employment based on discriminatory practices (please refer to the Rambler Human Rights and Freedoms Policy #RM HR PWP 210) or doing business with or being involved in any way with modern slavery.

Forms of modern slavery in industry (including but not limited to):

- forced to work through mental or physical threat or abuse;
- dehumanised, treated as a goods and bought and sold as property;
- When a person's freedom is limited or eliminated for the purposes of forced employment.

types of modern slavery in industry (including but not limited to):

- Forced Labour: When a person is forced to work against their will under the threat of any form of punishment;
- Bonded Labour: When people are forced to work to pay off debt owed to a company, usually under substandard and illegal or unobtainable ability to repay the debt;
- Human trafficking: Trade in humans for the purpose of exploitation, using violence, threats or coercion towards forced labour;

5. REPORTING POSSIBLE ETHICS VIOLATIONS

Integrity in business is one of the fundamental foundations that contributes to a business' success. Honesty is a major part of integrity and an essential part of addressing issues that arise. It is required of all employees and business partners to report possible violations in ethics and human rights immediately.

These types of violations should be reported by scheduling a confidential meeting (in person or via phone) with a Human Resources representative to go through the concerns, and to initiate an inquiry into the matter once validated.

6. 360 DEGREE ETHICAL SOURCING AND PURCHASING

Respect for human rights and freedom is a fundamental requirement for the sustainability and success of Rambler. We are committed to ensuring that our employees, and all people, are treated with respect and dignity throughout the entirety of our business dealings, from ensuring that any entity involved in trade with Rambler matches exceeds our requirements for ethics in trade.

