

# **PURSUIT** **CODE OF ETHICS**

This Code of Ethics sets out the minimum ethical standards for all directors, officers and employees of Pursuit and its divisions and affiliates (referred to collectively as “the Company”). The Company is committed to enforcing these standards through effective internal systems reporting structures and The Company’s Always Honest compliance program. Violators will be subject to disciplinary action.

The Company’s directors, officers and employees, in conducting the business of the company, will:

- Obey the law, including all applicable rules and regulations, and conduct themselves with honesty and integrity.
- Avoid engaging in any conduct where their personal interests interfere or appear to interfere with those of the Company.
- Advance the legitimate interests of the Company when the opportunity arises and avoid competing with the Company directly or indirectly or using the Company property, information, or their positions with the Company for improper personal gain.
- Respect the rights of and deal fairly with the Company’s customers, suppliers, competitors and employees.
- Not offer or accept bribes or kickbacks either directly or indirectly.
- Report to work in condition to perform their duties, free from the influence of alcohol or illegal drugs.
- Keep honest and accurate records and reports of company information.
- Make full, fair, accurate, timely and understandable disclosures in reports and documents that the Company provides to any governmental authority and in all other public communications made by the Company.
- Respect the diversity of the Company’s employees and not engage in wrongful discrimination or harassment.
- Preserve the confidentiality of non-public company information and any other information entrusted to them in confidence by the Company or its customers, except when disclosure is authorised or is legally mandated.
- Not use or share confidential information for stock trading purposes or any other purpose except to conduct the Company’s business.
- Protect the Company’s assets and ensure their proper and efficient use, including property, equipment, products and other tangible assets, and proprietary information such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing

and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports.

- Maintain a safe and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions.
- Promptly report concerns regarding accounting, auditing and internal controls matters on a confidential basis to the Chief Compliance Officer, the “Always Honest” Hotline, the head of Internal Audit, or the Chairman of the Audit Committee of Pursuit’s Board of Directors. Such reports will be investigated by the Company under the direction of the Board’s Audit Committee.
- Promptly report work-related activities by company personnel that violate the law, this Code and any other company policy. Reports of violations may be made to a supervisor, the Chief Compliance Officer, an executive officer of the Company, the Law Department or a member of the Company’s Compliance Committee, or by calling the toll-free “Always Honest” Hotline (1-800-443-4113) to make anonymous or confidential reports. Reports of violations by executive officers or senior financial personnel must be made to the Chief Compliance Officer or the Chairman of the Audit Committee of Pursuit’s Board of Directors.

## **Retaliation**

The Company does not permit retaliation of any kind for reports of misconduct made in good faith. If you have questions about this Code, the Company’s compliance programs or whether conduct may violate this Code, the law or a compliance program, you should consult with a supervisor, the Chief Compliance Officer, an executive officer of the Company, the Law Department or a member of the Company’s Compliance Committee.

## **Waivers**

Waivers of this Code may be made only upon written request submitted to and approved by the Company’s Board of Directors. Changes in or waivers of the Code will be promptly disclosed as required by applicable law or regulation.