

Anti-Bribery and Corruption Policy

Purpose:

Bribery means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. The purpose of this policy is to prohibit any bribery activity.

The Foreign Corrupt Practices Act of 1977 (FCPA) is a United States federal law that prohibits U.S. citizens and entities from bribing foreign government officials to benefit their business interests.

The FCPA is applicable worldwide and extends specifically to publicly traded companies and their personnel, including officers, directors, employees, shareholders, and agents. Following amendments made in 1998, the Act also applies to foreign firms and persons who, either directly or through intermediaries, help facilitate or carry out corrupt payments in U.S. territory.

Scope:

This policy applies to all GMI employees, representatives under all entities of the GMI group.

Policy:

GMI prohibits all bribery and corruption activities.

Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit. Bribery includes offering, promising, giving, accepting or seeking a bribe.

Government Officials:

GMI prohibits any offering of advantage, pecuniary or otherwise, to a public servant without lawful authority or lawful excuse as an inducement to or reward for unlawful benefits; in exchange for performance or non-performance of any act by any public servant; or expediting, delaying, or preventing any sanction or transaction.

When employees deal with government officials, they must be careful in ensuring that they are not offering any unlawful advantage, gift, or providing any entertainment to the official or his relatives. Employees should consult the CEO and President and report to their managers if they are being requested for or demanded to offer bribes. Employees must not agree to any such request or demand.

Travel Entertainment and Gifts:

No gift or entertainment should ever be offered or accepted by an employee or any family member of the employee of GMI unless it is consistent with customary business practices, not excessive in value and does not violate any laws or regulations. Employees are required to be familiar with GMI Travel Policy. Employees may not offer or accept cash or gifts in exchange for business advantages. If employees receive gifts from those who do business or seek to do business with GMI, these must not exceed customary nominal value. Gifts also include certain services such as, but not limited to, airline flights and hotel accommodation if they are not paid for by GMI. Any gifts or gratuities received which exceed



customary nominal value will require the approval of the President or CEO. If employees of GMI are in any doubt whether any gifts, gratuities or advantage may be in breach, they should consult the President or CEO.