

## **POLICY FOR COMPLAINTS**

All Company employees and third parties are encouraged to report any complaints regarding the Company's business practices including, but not limited to violations of law, the Company's Code of Ethics or Conflicts of Interest Policy, as well as issues relating to accounting matters, internal accounting controls, or auditing matters. The following procedures have been designed to facilitate an employee's or a third party's ability to file such a complaint:

1. Call the Company's business practices complaint hotline at 1-877-888-0002. An operator will be available 24 hours a day seven days a week to receive your complaint and prepare a summary. Employees will not be required to provide their name or any other information that could be used to identify them. Third parties filing a complaint will be asked to identify themselves. All complaints will be provided with a complaint identification number ("CIN"). All complaints will be kept in a secure location where access will be limited to the operators, the Compliance Officer and the members of the Audit Committee. Any person reporting a complaint is asked to call again in two weeks to clarify any uncertainty and answer any questions that may have arisen since reporting. The reporting person need only refer to his or her complaint using the CIN and may continue to remain anonymous.
2. A summary of your complaint will be forwarded to the Compliance Officer. The Compliance Officer is responsible for reviewing, processing and resolving complaints by employees and others on the matters described above. The Compliance Officer will review your complaint within five business days. Any subsequent investigation will be within the discretion of the Compliance Officer.
3. The Compliance Officer will refer complaints submitted to other personnel as he or she determines to be appropriate or as required under the directives of the Audit Committee. The Compliance Officer will forward a copy of any complaint that relates to accounting issues, internal accounting controls or auditing matters to the Audit Committee for review. The disposition of any such complaint will require the action of both the Compliance Officer and the Audit Committee.
4. Periodically, the Compliance Officer will review the complaints received during the most recent quarter and determine whether there is any pattern of misconduct that needs to be addressed.
5. To ensure that all employees are aware of this process, this memorandum must be reviewed by each new employee upon commencement of employment, and will be circulated annually to all Company employees. In addition, posters providing the number for the business practices complaint hotline will be maintained in the Company's common spaces. To ensure that third parties are aware of this Policy, it will be posted on the Company's web-site.