



JTM CARGO MANAGEMENT

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Business Ethics Policy

Objectives of the Business Ethics Policy

1. Perspectives: The Ethics Policy of JTM Cargo Management sets forth the values, desired expectations and ethics of service to guide and support all Executive Management, Middle and Lower Level Management, Project Management, Non- Executive Directors, Employees, External Consultants and Maintenance Contractors (hereafter called 'Company Participants') in all their professional activities with the Company. It will also serve to maintain and enhance public confidence and integrity in the Company, and strengthen respect for, and appreciation of, the role played by the Company within the wider local, national and international community.

Confidentiality of Company Information

2. Disclosure: In carrying out the Company's business, Company Participants often learn and have access to sensitive, confidential or proprietary data, information, trade and research secrets, and transactions about the Company, its activities, customers, suppliers or joint venture and joint project partners. This Policy prohibits the unauthorized disclosure or use of sensitive, confidential or proprietary data, trade and research secrets and information about the Company, its customers, suppliers or joint venture and joint project partners.

3. Protection of internal data: No Company Participant entrusted with or otherwise knowledgeable about information of a sensitive, confidential or proprietary nature shall disclose, give or use that data, trade and research secret, information or transactions outside the Company or for personal gain, either during or after employment or other service to the Company, without the valid and proper written Company authorization to do so given specifically by a manager with the authority to release sensitive, confidential or proprietary information, data or transactions. An unauthorized disclosure could be harmful to the Company or helpful to a competitor or third party.

4. Protection of outside data: The Company also works with proprietary data owned by joint venture partners, and suppliers and by customers. The protection of such data is of the highest importance and must be managed with the greatest attention and care for the Company to merit the continued confidence of such parties. No Company Participant shall disclose or use sensitive, confidential or proprietary information owned by someone other than the Company to anyone without Company written authorization, nor shall any such person disclose the information to others unless a need-to-know basis is established and approved.

5. Signed Agreement: All Company staff are required to sign at the time of employment a proprietary information agreement that restricts disclosure of proprietary, trade and research secrets and certain other data and information about the Company, its joint venture partners, suppliers and customers. This Policy applies to all Company Participants without regard to whether such agreements have been formally signed.

Conflict of Interest

6. Private interests: All Company Participants should not have private interests, other than those permitted by these measures that would be affected particularly or significantly by actions in which they participate, within the realm of dealing with the Company.

7. No solicitations: All Company Participants should not solicit or accept transfers of economic benefit, and they should not step out of their official roles to assist private persons in their dealings with the Company where this would result in undue preferential treatment to the persons.

8. Taking advantage: All Company Participants should not knowingly take advantage of, or benefit from, information that is obtained in the course of their official duties and that is not generally available.

Outside Employment and Business Activities

9. Outside activities: All Company Executive Management, Middle and Lower Level Management, Project Management, Non- Executive Directors and Employees, may engage in employment and business activities outside the Company only when they are specifically authorized to do so.

Personal Obligations

10. Performance of duties: All Company Participants must perform all duties to the fullest extent of their capabilities, ensure that all confidential information that is made available to them by virtue of their position is not divulged without written permission, avail themselves of information and material that will improve their effectiveness for all matters relating to the business of the Company.

11. Professional associations: All Company Board Members, Executive Management, Middle and Lower Level Managers, Non-Executive Directors and Employees may improve their effectiveness for all matters relating to the business of the Company by actively participating in all activities of their Professional Association including liaison with other members in the exchange of information as allowed by the Company for their professional development.

12. Perceived conflict: All Board Members, Executive Management, Middle and Lower Level Managers, Non-Executive Directors, and Employees must use their best judgment to avoid situations of real or perceived conflict. In doing so, they must not accept or solicit any gifts, hospitality or other benefits and wards that may have a real or apparent or probable influence on their objectivity in carrying out their official duties and responsibilities or that may place them or the Company under obligation to the donor.

Resolution Procedure and Reporting of Violations

13. Ethics clarification: Any Board Member, Executive Manager, Middle and Lower Level Manager, Non-Executive Director, and Employee who wants to raise, inform, discuss and clarify issues related to this policy should first talk with his or her manager or contact the senior official designated by the Board for ethics issues, according to the procedures and conditions established by the Board.

14. Reporting violations: All Board Members, Executive Management, Middle and Lower Level Managers, Non-Executive Directors and Employees shall report, in person or in writing, any known or suspected violations of governmental laws, rules and regulations or this Ethics Policy to the Company's President, Chief Financial Officer, Compliance Officer, other Executive or head of the Audit Committee.

Applicability

15. Application scope: This Policy applies to all Board Members, Executive Management, Middle and Lower Level Managers, Non-Executive Directors, Employees, External Consultants and Maintenance Contractors working for the Company.

16. Legal action: Any breach of this Policy by anyone may allow the Company and its designated officers to take any legal action including dismissal of service and termination of employment or contract, including any legal actions specified by the laws of the country (state or province, etc.) where the Company operates.