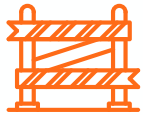

FreeBalance Integrity Compliance Program

Updated February 2018

FreeBalance Integrity Compliance Program Summary



Prevent Wrongdoing



Detect Violations



Respond to Incidents

Management Responsibility

Leadership	Internal Controls	Remediation
Risk Assessment	Investigations	Disciplinary Measures
Policies	Hotline	
Training		
Business Partner Due Diligence		

Please click on any box for information about this element of our integrity compliance program.

Compliance Function at FreeBalance

FreeBalance Integrity Compliance Program Summary



Prevent
Wrongdoing

The Integrity Compliance Program is designed to prevent wrongdoing that violates the program.



Detect
Violations

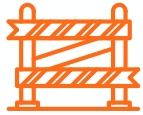
In recognition that not all risks can be eliminated, the Integrity Compliance Program has controls and measures in place to detect violations.



Respond to
Incidents

An incident arises where there is a recognized possibility of violation of the ICP. The company will respond to all incidents in accordance with compliance processes and take remedial actions.

Management Responsibility



Prevent
Wrongdoing



Detect
Violations



Respond to
Incidents

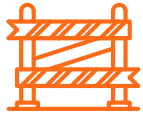
Management Responsibility

Managements holds the to set the compliance “Tone from the Top” and to guide all team members in relation to the compliance program.

Responsibility for compliance to the Program lies with every employee. The Compliance function provides the tools and processes supporting ethical conduct at all levels in the Company.

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Compliance Function



Prevent
Wrongdoing



Detect
Violations



Respond to
Incidents

Compliance Function

All Compliance related activities are within the responsibility of our Chief Compliance Officer, who reports to the CEO as well as to the Board of Directors. The Chief Compliance Officer will be able to answer all questions regarding the FreeBalance Integrity Compliance Program and can be contacted:

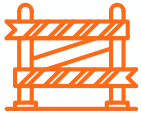
integrity@freebalance.com

+ 1 800 263 4031

Mail to Canada Headquarters

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Leadership



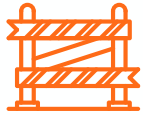
Prevent
Wrongdoing

Leadership

Every FreeBalance employee is part of the compliance leadership. Setting the Tone at the Top at FreeBalance is a responsibility of all managers across the company on a daily basis and all employees need to ensure that the FreeBalance values are reflected in our daily actions.

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Risk Assessment



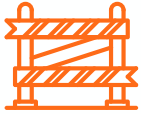
Prevent
Wrongdoing

Risk Assessment

Regular assessment of our compliance risk exposure allows us to evaluate the effectiveness of our Integrity Compliance Program as well as measures taken to mitigate those risks. Whether it is the risk of fraud, corruption or any other misconduct, we will only be able to effectively prevent occurrence if we all are aware how these risks affect us in our business activities in various markets, countries and regions.

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Policies



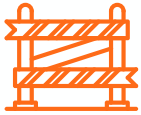
Prevent
Wrongdoing

Policies

The FreeBalance Code of Conduct as well as the Anti-Corruption Policy form the regulatory basis of our Integrity Compliance Program. All our employees and business partners are required to confirm adherence to these policies by providing corresponding attestations. We have zero tolerance for corruption, bribery, kickbacks, fraud, collusion and facilitation payments.

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Training



Prevent
Wrongdoing

Training

All staff are required to participate in training on Code of Conduct and the Anti-Corruption Policy during their first week of employment. Ongoing re-training is provided to keep awareness fresh. We may require certain business partners to participate in compliance related training sessions where they don't already have a compliance program in place.

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Business Partner Due Diligence



Prevent
Wrongdoing

Business Partner Due
Diligence

We conduct thorough due diligence before contracting with third parties, including business partners, subcontractors and key vendors. We require all business partners to adhere to our Code of Conduct and Anti-Corruption Policy. We are monitoring our business partner's conduct and have zero tolerance for compliance violations.

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Internal Controls



Detect
Violations

Internal Controls

Our internal controls are designed to detect and prevent problematic or even fraudulent transactions. Along with other finance and accounting procedures we are protecting the Company's assets and are reducing the risk of corrupt payments being made.

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Investigations



Detect
Violations

Investigations

All genuine complaints and substantive allegations of violations of our Code of Conduct or Anti-Corruption Policy will be investigated under the guidance from our Chief Compliance Officer, following a clear investigation protocol. The results of such investigations will be presented to Executive Management and the Board of Directors as appropriate, ensuring confidential and anonymous communications are protected.

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Hotline



Detect
Violations

Hotline

Every FreeBalance employee is required to report suspected violations of the Code of Conduct or the Anti-Corruption Policy to the Chief Compliance Officer. Reporting options:
integrity@freebalance.com
+ 1 800 263 4031
Mail to Canada Headquarters
Skype or WhatsApp too!

Retaliation against whistleblowers is strictly prohibited.

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Remediation



Respond to
Incidents

Remediation

We are committed to continuously improve the effectiveness of our Compliance Program. We assess root causes for incidents and constantly challenge existing controls and processes designed to prevent such incidents.

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Disciplinary Measures



Respond to
Incidents

Disciplinary Measures

FreeBalance has zero tolerance for violations of the Code of Conduct and the Anti-Corruption Policy. Violations by employees will lead to disciplinary action up to and including dismissal.

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