

POSITIVE CODE OF CONDUCT

Positive Venture Group (“PVG”) is committed to the highest standards of social responsibility, ethical conduct and safety for our people – and for our clients and suppliers when we are working with them. This Code of Conduct describes PVG’s expectations of its employees and contractors (collectively “PVG Resources”) towards other PVG Resources, clients and suppliers – and in turn the expectations PVG has of its clients and suppliers towards PVG Resources.

PVG Resources are expected to perform with the highest level of integrity and transparency, including when acting on behalf of our clients, and to act in compliance with the laws and regulations of the markets PVG and its clients operate in.

PVG is dedicated to providing its PVG Resources with a safe and professional work environment that is free of discrimination and harassment, including when they are working with our clients and suppliers. PVG is committed to ensuring PVG Resources act in a similarly respectful and professional manner towards and with its clients, suppliers and colleagues.

This Code should be understood as a framework of minimum requirements which are applicable in the vast majority of situations.

PVG seeks to provide a continually welcome and comfortable environment which ensures trust and respect for all clients, visitors, suppliers and PVG Resources. PVG strives to provide each individual with a “Positive Work Experience” including a safe environment to work, regardless of cultural, racial or socio-economic backgrounds, gender, age, sexual orientation, religious beliefs or political leanings.

As an Outsourced Finance company, we view our team as an integral part of our Clients’ teams and we expect our clients to treat our PVG Resources as well as they would treat their own employees.

In order to maintain our longstanding reputation of performance excellence, we have established this Client Code of Conduct Policy to specify our expectations.

EXPECTATIONS OF PVG

PVG is committed to building and preserving a safe, productive, and healthy working environment based on mutual respect for its PVG Resources. In pursuit of this goal, PVG does not condone and will not tolerate physical and verbal acts of violence, harassment, or discrimination against or by any PVG Resource. **If a PVG Resource believes they are being subjected to such negative treatment, they will escalate their concern to their manager and/or HR department and PVG’s VP, Outsourced Finance, who will conduct a formal enquiry into the matter.** This concern will be managed with the highest level of confidentiality to protect the victim.

EXPECTATIONS OF OUR CLIENTS

PVG expects its clients to treat the PVG Resources they interact with in a similar manner to how they treat their employees; with the upmost respect and dignity whether on company property or while working remotely. PVG will not tolerate any forms of harassment, verbal abuse, profanity, threats, intimidation tactics, or any type of violence as outlined by the Occupational Health and Safety Act or other actions that are inconsistent with our Code of Conduct.

Further, our PVG team is committed to providing a high level of Outsourced Finance Services to our clients. To deliver at that level there needs to be clear alignment on client expectations in terms of work delivered and timing of delivery that reflects the scope and rates in the agreements between PVG and the client. PVG expects our clients to clearly communicate their expectations, for these expectations to be reasonable in light of the agreement scope and rate.

CLIENT COMPLAINTS

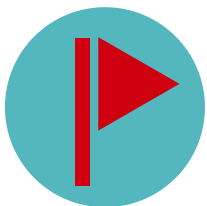
At PVG we value our clients and what they have to say about the service they receive. We take all complaints seriously as they assist us to improve our products, services and client service. We are committed to consistent, fair and confidential complaint handling and to resolving complaints as quickly as possible. We aim to make it easy for people to make a complaint if they are dissatisfied and we will treat all clients making a complaint equally.



RECEIVE FEEDBACK BY E-MAIL

All complaints made by client must be written formally in an email to the VP, Client Success. This ensures the validity of the complaint, as well as the time, date, and complainant.

PVG strives to resolve all complaints within a timely manor. The Client will receive an acknowledgement e-mail from the VP, Client Success within 1 business day of receipt of the complaint. PVG may request more information from the client before being able to resolve the issue. Where appropriate, the acknowledgement email will include PVG's proposed resolution to the complaint.



3 BUSINESS DAYS FOR PLAN OF ACTION

If the complaint cannot be resolved within 3 business days, the Client will receive details of PVG's course of action toward resolving the complaint. Clients will be informed of the progress of their complaint on a regular basis, especially if there are any delays or changes to what has been agreed.

After a complaint has been resolved, it will continue to be monitored for any ongoing trends by VP, Client Success and efforts will be made to resolve any ongoing issues.

We will ensure that clients are informed of any changes to our products or services as a result of their complaint. Where appropriate, clients who have had a complaint resolved will be contacted at a later date to ensure they are happy with how their complaint was handled.



REFER TO THE CHIEF OPERATING OFFICER

If a complaint cannot be resolved by the usual complaint process, it should be referred to the Chief Operating Officer. The COO will then communicate an amended timeframe and proposed next steps for resolution.