

INSIDER TRADING POLICY

- a. Directors, employees and third parties who have access to non-public information that may affect the share price of the Company ("Insiders") are not allowed to buy or sell the shares of the Company. Such Insiders are also not allowed to induce anyone else, by giving advice or in some other manner, to undertake such trading. Such Insiders are required to abide by all applicable laws relating to insider trading and observe all closed period requirements.

- b. The Company has established strict requirements that prohibit persons who have access to material or price-sensitive non-public information through their roles from sharing or using that "inside information" to buy or sell stock or other securities of the Company while in possession of that information.