

CODE OF ETHICS
AND
STANDARDS OF PRACTICE



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Preamble

Our Mission is to efficiently help our partners achieve all their Direct Marketing goals and to better manage their Customer Relationship.

This code of ethics acknowledges that the establishment and maintenance of high standards of practice are essential to holding our client's confidence.

We are involved in an information-based industry thus it is essential to set and maintain the highest standards of confidentiality

This code applies to all employees and directors of ONTEL.

1. Application:

- i. The purpose of this code is to meet the highest Canadian standards of practice.
- ii. Ontel recognizes an obligation to practice to the highest standards of honesty, truth, fairness and accuracy.

2. Specifics:

a) Honesty and integrity :

- i. All our offers must be clear and truthful and shall not misrepresent our services. We shall not mislead any of our clients in any way.
- ii. The offer shall contain clear and conspicuous disclosure of the following terms:
 1. The exact nature of the services offered.
 2. The price, the terms of payment.
 3. A confidentiality agreement.
 4. A warranty agreement (if applicable).

b) Governing legislation :

- i. We shall be cognizant of and conduct ourselves according to the laws of Canada.
- ii. We must be protective of the consumer's right to privacy thus we will use data provided only in authorized manner.

c) Objectivity :

- i. We are objective in forming our professional opinion and the advice we give hence we shall divulge any partnership we may have that could affect our objectivity.

d) Professional conduct :

- i. We bring appropriate skills and capabilities to every client assignment.
- ii. If we do not have the required qualifications, we will suggest that clients contact an external consultant of their choice.
- iii. We will respect and maintain the information provided unless required by court order.
- iv. We will refrain at all times from declaring any fact or making any statement that may tarnish or discredit our client reputation or Ontel's.

e) Respect each other :

- i. We will ensure that our communication is professional and constructive to foster communication and teamwork among our employees.
- ii. Ontel promotes a work environment free of all discrimination or harassment. We will not tolerate any form of discrimination or harassment.
- iii. We shall not be involved in the disparagement of any person or group based on race, national or ethnic origin, colour, religion, sex, age or mental or physical disability.
- iv. We shall take the necessary steps to create and maintain a healthy and safe work environment.
- v. At all times we may not possess or take illegal drugs or be under the influence of such drugs in the workplace.

f) Respect for confidentiality :

- i. We will abide by the Canadian Privacy Act regarding the collection, the retention and the disposal of information.

g) Protecting computerized data :

- i. All information circulating on Ontel's electronic network belong to Ontel.
- ii. The information provided by our client is his and cannot be used otherwise than a contractual context.
- iii. At the end of each mandate, we shall not retain any data provided by our clients.