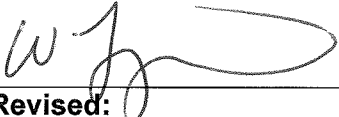
	FLINT ENERGY SERVICES LTD	
	Business Integrity Policy	
	Policy #: Business Integrity-001	Created by: Lisa McDonald
	Applicable to: All salaried and hourly personnel, direct service providers, contractors, and executive officers	Approved by: W. J. (Bill) Lingard 
Created: October 1, 2007	Revised:	

1.0 Purpose

Flint is committed to high standards of ethics and conduct. To ensure compliance to these standards, it is critical that Flint have an effective and consistent protocol for response to allegations of fraud and/or irregularities.

This policy clearly states Flint’s position on fraud and irregularities and establishes the process and roles and responsibilities that must be adhered to for the investigation, reporting, and correction of fraud and/or irregularities.

2.0 Definitions

Fraud: Fraud is a deliberate and/or unlawful misrepresentation or concealment of facts to benefit or cause loss to an individual or group of individuals. Fraud may include, but is not limited to:

- Misappropriation of Flint's assets
- Unethical behavior associated with using one’s position or association with Flint for personal advantage (e.g. collusion with vendors for personal benefit).
- Authorizing or receiving remuneration for time not worked.
- Authorizing or receiving payment for goods and/or services not received or performed.
- Altering or incorrectly reporting information for personal gain or for the advantage of another or for Flint.
- Unauthorized use of Flint assets and resources for personal gain or for the advantage of another (ex. Using expense accounts for personal purposes).

Irregularity: An irregularity is an activity that disregards Flint’s policies or procedures. In addition to non compliance with corporate policies, irregularities would include (but are not limited to) violations of Code of Ethics, non-compliance with safety, health, and/or environmental regulations and statutes.

Employee: All salaried and hourly personnel, direct service providers, contractors, and executive officers.

3.0 Principles

- 3.1 Fraud, including fraud that benefits Flint, will not be tolerated.
- 3.2 Employees who commit, aid and abet a fraud and/or irregularity will be subject to disciplinary and/or corrective action up to and including termination.

- 3.3 Any losses incurred through an act of fraud will be recovered from the responsible person(s) to the extent possible.
- 3.4 All employees have a duty to report suspected fraud or irregularities per the procedure in this policy.
- 3.5 All employees involved in an investigation of suspected fraud or irregularity maintain their rights in accordance with Flint policies and/or labour agreements as applicable.

4.0 Procedures

- 4.1 Employees should report suspected instances of fraud or irregularity to their immediate supervisor or the next appropriate level of management (refer to the table below). In certain circumstances, it may be appropriate for employees to report directly to the Internal Audit Manager or through the Whistleblower Hotline (refer Whistleblower Protection Policy, and section 5 of this policy).
- 4.2 It is the responsibility of supervisors or relevant managers/executive to ensure that the suspicion of fraud or irregularity that is reported to them is immediately reported to their divisional executive **and** the Internal Audit Manager.
- 4.3 All instances of suspected fraud and irregularities that result in loss are to be reported by the appropriate divisional executive at the monthly executive meeting. The nature of the fraud and/or irregularity, along with the course of action is to be disclosed by the Corporate Secretary and minuted at the next meeting of the Audit Committee.

If an employee suspects:	Then the employee should report the incident to:
Any person, or incident	Their immediate supervisor or next level of management
Their immediate supervisor or next level of management	Their divisional executive
Their divisional &/or another member of executive management	The Corporate Secretary and the Internal Audit Manager
The Corporate Secretary &/or the Internal Audit Manager	Chair of the Audit Committee through the Whistleblower Hotline.

4.4 Investigation

Management together with the Internal Audit Manager will determine the appropriate investigative action depending on the nature of the irregularity.

4.5 Action

The Internal Audit Manager and VP Human Resources will provide guidance related to disciplinary action required as a response to the irregularity investigation. The Chief Executive Officer will make the final determination of the course of action.

4.6 Documentation

- I. All reported incidents of fraud and/or irregularities will be documented by the individuals responsible for the investigation. Documentation will be labeled "Strictly Confidential" and must include the following as a minimum:
 - I.1 The original report of the incident
 - I.2 A summary of the investigation

