INFORMATION BARRIERS POLICY

This DREAMLINE COMMODITIES LTD. Information Barriers Policy can be set up when a potential conflict of interest exists to prevent the flow of confidential information between selected individuals who are under the “need to know” basis on each side of the information barrier (Chinese Wall Procedure).

1. When an Information Barrier is required, the Company employee responsible for the information treatment control, at first shall:

* inform the Compliance Unit of the fact,
* reach agreement as to whether an Information Barrier can operate,
* provide written proof of each client’s knowledge and approval of the erection of an Information Barrier,
* provide the Compliance with a complete list of the Company employees under the “need to know” basis on each side of an Information Barrier and notify promptly if any amendment.

(!!!) No individual is to act on both sides.

2. The Compliance Department maintains a comprehensive list of all situations where Information Barriers exist to protect the interests of one client as against another.

3. The Company employees forming the specific and separate teams representing each client must take full responsibility for maintaining the confidentiality of its client’s position vis-à-vis those individuals acting for the other party (internally and outside the Company, after working hours).

4. There is to be no sharing of secretaries or other support staff between the two separate teams. Either team, however, will be able to request factual information from our data base.

5. Respective files are to be kept entirely separate and secure to maintain confidentiality as between the individuals representing each client. Electronic access is to be restricted so that only those individuals nominated can gain access.

6. There is to be no internal communication between teams on the instruction and, where practical, the teams representing each client should not be co-located. If this is not possible, each team will be physically separated or will make use of separate meeting rooms to conduct client’s business to ensure that client confidentiality is preserved (Chinese Wall Procedure).

7. The detailed arrangements set up on a case-by-case basis to cover paragraphs 4, 5 and 6 above will be communicated in writing to each client and to the Compliance Department, upon confirmation of instructions.

The Compliance Department will undertake checks from time to time to ensure that Information Barriers are being operated properly. Any transgressions from the procedures set out above, whether or not they result in a client complaint, will be subject to disciplinary action.