

**DOREL SPORTS
COMPLIANCE EXPECTATIONS STATEMENT
April 2018**

Dorel Sports is committed to conducting business in accordance with the highest ethical standards and in compliance with all applicable laws and regulations. This includes laws prohibiting bribery and corrupt practices, transactions with sanctioned countries and prohibited parties, related payments and money laundering.

Dorel Sports expects the same of you, as a distributor or other business working with or for Dorel Sports. We have prepared this Compliance Expectations Statement to help you understand and meet these standards. If there is any inconsistency among applicable laws, regulations and this Statement, the highest standard should be applied.

You must comply with all laws and regulations applicable to you or to Dorel Sports, or that are in effect in the countries in which you are located or are doing business, including anti-bribery laws and trade controls as set out below.

A violation of the standards set out in this Statement or applicable laws or regulations may result in criminal or civil penalties, and the termination or non-renewal of your role as a distributor or other business working with or for Dorel Sports.

If any uncertainty arises regarding these matters, you should raise the issue with one of your regular contacts at Dorel Sports, or with the Dorel Sports management team.

Key Terms

“Dorel Sports” means the various affiliated companies that comprise the Dorel Sports Segment of the Dorel Group, the ultimate parent of which is Dorel Industries, Inc.

“Anti-bribery laws” means the US Foreign Corrupt Practices Act, Canadian Corruption of Foreign Public Officials Act and UK Bribery Act, and all other applicable laws and regulations relating to bribery, corruption, or related money laundering.

“Money laundering” means transactions related to the proceeds of illegal activities, or relating to the funding or financing of terrorism.

“Trade controls” means US, Canadian and EU (a) sanctions, embargoes and other restrictions on transactions with specified countries or territories, companies, individuals or other parties, (b) export controls, and (c) anti-money laundering laws and regulations.

Anti-Bribery Compliance

In all transactions relating to Dorel Sports or its products, you must not make, authorize, offer or promise to make any payment, gift or transfer of anything of value, to or for the use or benefit of any government official or any other individual in order to:

- (a) Induce such individual to act or fail to act in violation of a legal duty.

- (b) Cause such individual to abuse or misuse their position, or to use their influence with a government to affect or influence any act or decision of such government.
- (c) Cause such individual to abuse or misuse their position.

You must not provide or accept inappropriate or excessive entertainment or gifts to or from any individual associated with Dorel Sports, when doing so might compromise, or appear to compromise, your or such individual's objectivity in making business decisions.

All financial transactions relating to Dorel Sports or its products must be accurately recorded in your books of account in a timely manner, and your accounting procedures must be supported by appropriate internal controls.

Trade Controls

Unless compliance with an embargo on any country listed in paragraph (a) below violates laws or regulations in the country in which you are located or doing business, you must not directly or indirectly sell Dorel products to, or engage in other transactions relating to Dorel Sports in or with:

- (a) Cuba, Cuban companies or nationals, Iran, Iranian banks, North Korea, Syria or Crimea (a peninsula on the Black Sea between Ukraine and Russia)
- (b) The governments of these countries or Crimea, or the government of Venezuela, or any entity owned or controlled by these governments

In any transaction relating to Dorel Sports or its products, you must not deal with any party included in the US SDN List, Consolidated Sanctions List, Denied Persons List or Entity List, searchable at <http://apps.export.gov/csl-search>, in the Canadian Consolidated SEMA Sanctions List at <http://www.international.gc.ca/sanctions/consolidated-recapitulative.aspx>, or in the EU financial sanctions list at <http://eeas.europa.eu/topics/sanctions-policy/8442>.

You must not engage in any transaction relating to Dorel Sports or its products that involves any other violation of trade controls imposed by the United Nations, United States, Canada or the European Union, including extending commercial credit to entities owned or controlled by the Venezuelan government, or specified Russian companies and banks.

Interactions with Regulators

In any interactions with government agencies or officials or regulatory agencies, relating to Dorel Sports or its products, you must:

- (a) Obtain all approvals required under applicable laws and regulations prior to placing Dorel Sports products in the relevant market
- (b) Comply with all applicable laws and regulations, including those of the country in which the regulatory approval or authorization is being sought
- (c) Develop and advocate any statement to a regulator on the basis of sound science and reliable evidence, and in a manner that meets their reasonable requests