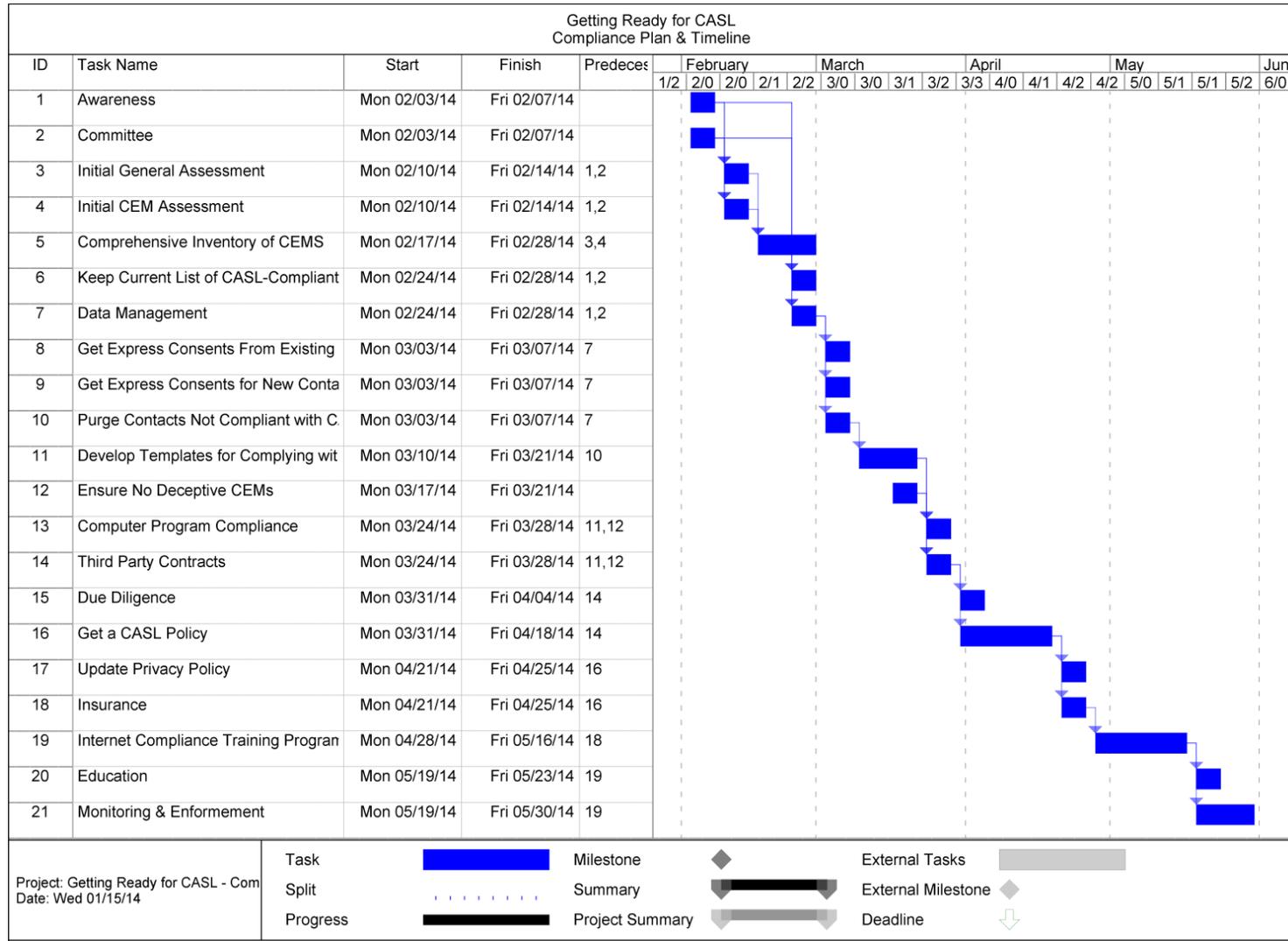


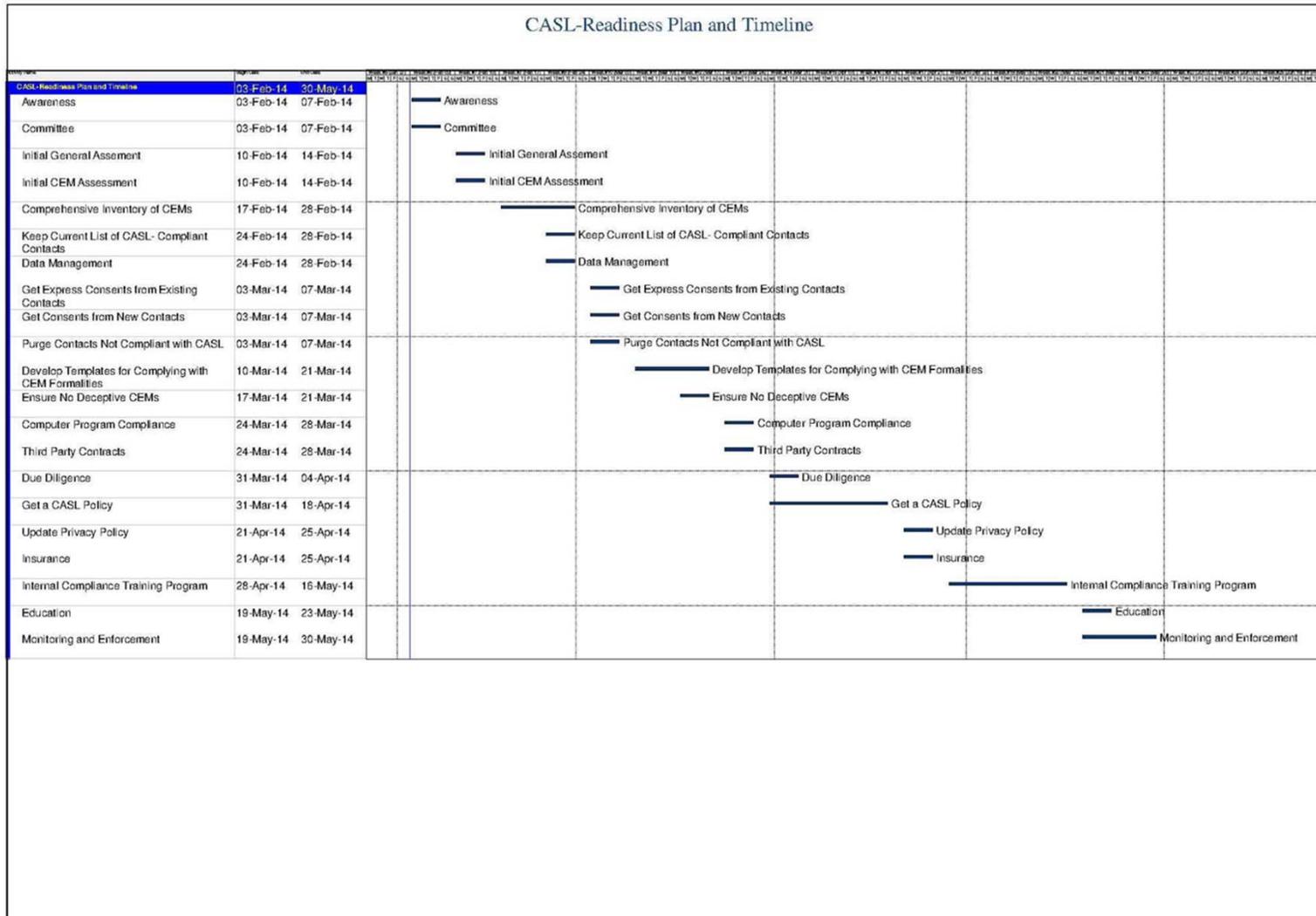


CANADA'S ANTI-SPAM LEGISLATION COMPLIANCE PLAN OVERVIEW

CASL COMPLIANCE PLAN - GANTT CHART



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1. **Awareness (Week 1)** - raise with senior management CASL-readiness need and compliance deadlines
2. **Committee (Week 1)** - establish CASL-Readiness Committee to include senior management responsible for marketing, customer, supplier and public relations, privacy, legal compliance, risk management, human resources and information technology
3. **Initial General Assessment (Week 2)** - determine generally how CASL applies to the company's operations and advertising & marketing activities particularly
4. **Initial CEM Assessment (Week 2)** - review company's electronic communications to determine where CEMs are generated

5. **Comprehensive Inventory of CEMs (Weeks 3 and 4)** - complete comprehensive inventory of all current contact lists to determine whether consent is express, implied or CASL exception applies - to be updated every 6 months; generally determine all the ways the company sends CEMs to various recipients
6. **Keep Current List of CASL-Compliant Contacts (Week 4)** - establish procedure for maintaining list of recipients who gave implied consent (so they can be upgraded to express consent, or removed if implied consent expires)
7. **Data Management (Week 4)** - develop robust database management system to record, update and track all express and implied consents

8. **Get Express Consents from Existing Contacts (Week 5)** - upgrade existing database of company's customers, suppliers, partners etc. to CASL-compliant express consents before July 1, 2014 9.
9. **Get Express Consents for New Contacts (Week 5)** - devise ethical means to obtain express consents from new company customers - e.g., opt-in express consent mechanism on company webpage
10. **Purge Contacts Not Compliant with CASL (Week 5)** - scrub database lists of CEM recipients where consent is required but cannot be obtained; develop protocols for evergreen scrubbing

- 11. Develop Templates for Complying with CEM Formalities (Week 6 and 7)** - establish procedures and forms to ensure all CEMs the company sends comply with formalities and that unsubscribe requests are implemented without delay (maximum 10 days)
- 12. Ensure No Deceptive CEMs (Week 7)** - establish procedures to ensure CEMs are not deceptive
- 13. Computer Program Compliance (Week 8)** - develop consents, disclosures and notices to computer users about the installation of computer programs to run the company's products (if applicable to the company)

- 14. Third Party Contracts (Week 8)** - establish checklist and process to review/revise contracts with third parties to require compliance with CASL; ensure marketing lists from third party providers contain “representation & warranty” that the list will be maintained in compliance with CASL; ensure outsourced e-marketing company contracts are CASL compliant
- 15. Due Diligence (Week 9)** - establish due diligence procedures for company’s directors, officers and employees including development of a CASL policy and preparing to roll out an internal compliance training program with monitoring and enforcement

- 16. Get CASL Policy (Weeks 9, 10 and 11)** - establish and implement a CASL-readiness and compliance policy (to fulfill due diligence obligations)
- 17. Update Privacy Policy (Week 12)** - assess the company's Privacy Policy and update if necessary
- 18. Insurance (Week 12)** - consider and, if thought fit, obtain insurance for liability arising from CASL violations
- 19. Internal Compliance Training Program (Weeks 13, 14 and 15)** - develop internal compliance guidelines and procedures, forms and policies, training and operational controls

- 20. Education (Week 16)** - train company's personnel about CASL and implement/monitor policies for compliance
- 21. Monitoring and Enforcement (Weeks 16 and 17)** - establish procedures for monitoring the company's compliance and responding to violations