



Code of Ethics

INTRODUCTION

ATEC-3D's reputation and credibility is based upon its total commitment to ethical business practices. To safeguard the ATEC-3D reputation, each of us must conduct ourselves in accordance with the highest ethical standards and also be perceived to be acting ethically at all times.

ATEC-3D's Statement of General Business Principles sets out the company's objectives and its responsibilities to various stakeholders. Several key Business Principles have been integrated into this Code of Ethics to illustrate ATEC-3D's expectations for individual employee conduct in support of these principles.

The conduct required by this Code means:

- acting with honesty and integrity and being open in dealings with customers, employees, shareholders, and others with whom ATEC-3D does business;
- treating others with fairness, dignity, and respect to create and protect a trusting environment free from harassment and discrimination; and
- striving for excellence and professionalism, taking pride in what we do individually and as part of a team.

It is ATEC-3D's intent that all business be conducted in accordance with its Business Principles and Code of Ethics and you will never be expected to achieve business performance at the expense of violating any aspect of the Business Principles or the Code of Ethics. You have the right and the responsibility to report suspected violations of ATEC-3D's Business Principles or Code of Ethics. Employees making such reports in good faith will have the full support of the company.

EMPLOYEES

ATEC-3D will respect the human rights of its employees, treat them with dignity and respect, provide safe work conditions, and promote the development and best use of employee talent and equal opportunity employment. ATEC-3D will protect the confidentiality of employee records.

Actions which constitute harassment or discrimination in the workplace will not be tolerated and any report of such actions will be investigated and dealt with appropriately.

Employees must contribute to building and maintaining work conditions which are safe, fair, respectful and free from discrimination and harassment for all individuals.

CUSTOMERS, SUPPLIERS, CONTRACTORS AND JOINT VENTURE PARTNERS

ATEC-3D will deal openly and honestly with its customers, suppliers, contractors, and joint venture participants. The ability in these relationships to effectively promote the integral elements of ATEC-3D's Business Principles and Code of Ethics must be weighed as an important factor in the decisions you make to pursue, enter into, or remain in such relationships

BUSINESS PRINCIPLES

ATEC-3D insists on honesty, integrity and fairness in all aspects of its business and expects the same in its relationships with all those with whom it does business. The direct or indirect offer, payment, solicitation, or acceptance of bribes or kickbacks in any form is unacceptable. ATEC-3D employees must avoid conflicts of interest between their private financial activities and the conduct of ATEC-3D business. All business transactions on behalf of ATEC-3D must be reflected accurately and fairly in the accounts of the company, in accordance with established procedures, and are subject to audit.

ELEMENTS:

CONFLICT OF INTEREST

Responsibilities

You must avoid any activity or arrangement that could compromise, or appear to compromise, your judgement or objectivity in the performance of your duties with ATEC-3D.

It is critical that you conduct your employment activities objectively. This ability is compromised if you have personal interests or obligations that conflict or compete with ATEC-3D's legitimate business interests.

It is equally important to avoid apparent conflicts of interest - where a reasonable observer might assume there is a conflict of interest, and therefore a loss of objectivity in your dealings on behalf of ATEC-3D.

Further Guidance

The following are situations you should avoid:

A significant direct or indirect (through a family member, friend, or acquaintance) financial interest in a business or company that deals with ATEC-3D (competitor, supplier, customer, dealer or agent). You should interpret "significant" to mean that you have the ability to influence the management of the business or company in which you have the interest, or that the interest could influence how you perform your duties with ATEC-3D.

Employment by, or contracting your services to, a business or company that deals with ATEC-3D.

Commercial dealings directly between yourself as a representative of ATEC-3D and family members or friends who are employed by a business or company that deals with ATEC-3D.

Use of your position with ATEC-3D to obtain personal benefit for yourself or family and friends.

You must disclose any existing or potential conflict of interest with which you are directly or indirectly involved by presenting a written report of the details to your manager. This will ensure that proper steps are taken to obtain further advice respecting the propriety of the activity, or prospective activity, with which you are involved or may become involved.

GIFTS, ENTERTAINMENT OR BRIBERY

Responsibilities

Consistent with maintaining a high degree of objectivity in the performance of your employment duties, you should not give or accept gifts, entertainment, or any other personal benefit or privilege that could in any way influence, or appear to influence, your involvement in ATEC-3D business dealings.

This does not preclude giving or receiving gifts or entertainment which are customary and proper in the circumstances, provided that no obligation could be, or be perceived to be, expected in connection with the gifts or entertainment.

It is unacceptable to directly or indirectly offer, pay, solicit or accept bribes or kickbacks in any form. Any attempted transaction of this nature should be immediately reported to your manager.

Further Guidance

As a guideline, gifts and entertainment are permissible if they:

- are limited in real and perceived value;
- serve a legitimate business purpose;
- occur infrequently;
- can be easily reciprocated;
- are in accordance with the business responsibilities of the individuals involved; and
- would not make you feel uncomfortable if disclosed to your manager.

Any gift or entertainment falling outside these guidelines should have your manager's approval to ensure consistency with the intent of ATEC-3D's Business Principles and this Code.

INTEGRITY OF FINANCIAL INFORMATION

Responsibilities

Shareholders, management, and other interested parties must have complete and accurate financial information in order to make informed decisions.

Many ATEC-3D employees participate in processes that directly impact the integrity of external financial statements and internal management reports. You have a responsibility to ensure that transactions are recorded in ATEC-3D's accounts accurately and promptly and you must immediately report any known inaccuracies.

Misrepresentations that result from intentional acts that may conceal or obscure the true nature of a transaction are clear contraventions of this Code.

Further Guidance

Following are some examples of unacceptable practices:

- Delaying the recording of a transaction due to limited budget funds.
- Advancing the recording of a transaction to make use of budget funds in any one period.
- Falsifying entries amongst:
 - capital and expense accounts,
 - expense features,
 - revenue and expense accounts, and
 - balance sheet accounts.
- Manipulating resources and reserves data.
- Grouping, splitting, or misrepresenting transactions to obscure their true nature.
- Delaying error correction.

If you have any concerns regarding the accounting treatment of a transaction, seek assistance from your manager or ATEC-3D's Group Financial Controller.

If you have a complaint or concern regarding accounting or auditing matters, refer to the "Compliance" section of this Code.

PROTECTION AND USE OF PROPERTY

Responsibilities

All ATEC-3D employees are responsible for the protection of all ATEC-3D property used in carrying out your responsibilities and for taking reasonable steps to prevent the theft or misuse of, or damage to, such property. ATEC-3D property is not limited to physical assets, but also includes corporate information, personal information in ATEC-3D's custody or control, and intellectual property such as patents, trademarks, and technology.

As ATEC-3D may license intellectual property from other companies, all employees must also ensure that property of this nature is protected in accordance with the agreements giving ATEC-3D the right to use the property.

Equipment, tools, materials, supplies, and employee time are to be used only for ATEC-3D's legitimate business interests. ATEC-3D property must not be borrowed, loaned, or disposed of, except in accordance with the appropriate ATEC-3D policies.

BUSINESS CONTROLS

ATEC-3D policies, procedures, and authorities exist to ensure that the business objectives of ATEC-3D are achieved in the proper manner.

Managers must ensure that an effective system of business controls is in place for their area of responsibility.

All employees must ensure that transactions are conducted within their levels of authority and in accordance with prescribed policies and procedures.

CONFIDENTIAL INFORMATION

It is vital that we protect the privacy of ATEC-3D's confidential information. Confidential information includes proprietary, technical, business, financial, joint-venture and customer information that is not available publicly, and the personal information of customers, employees and other individuals. It is all employees' responsibility to know what information is confidential and to obtain clarification when in doubt.

Confidential information must not be disclosed to any person outside of ATEC-3D unless authorized to do so. This includes, as prohibited, any disclosure of confidential information to family and friends. Where confidential information is entrusted to persons outside of ATEC-3D, efforts must be made to ensure the continuing protection and confidentiality of that information. Within ATEC-3D, confidential information should be disclosed only on a "need-to-know" basis.

Confidential information must not be used for unauthorized purposes. Reasonable care must also be taken to protect confidential information against loss, theft, unauthorized access, alteration, or misuse.

Departing ATEC-3D employees who have had access to ATEC-3D confidential information will be reminded of their continuing responsibility to protect it and maintain its confidentiality.

ATEC-3D expects that employees joining it from other companies will not disclose the confidential information of those companies.

INSIDER TRADING

Insider trading legislation imposes obligations on all employees in possession of confidential material information. Penalties for breaching insider trading legislation are severe.

Confidential material information is information which, if disclosed, would significantly affect or would reasonably be expected to have a significant effect on the market price or value of a company's shares or other securities. The information may relate to ATEC-3D or to another company in which ATEC-3D or an associated or affiliated company has an interest, or a company with which a major contract may be concluded.

Every employee who has knowledge of confidential material information is prohibited from informing any other person of that information, other than in the necessary course of business.

Every employee who has knowledge of confidential material information is prohibited from trading in securities of the company to which the information relates until a reasonable time (generally two clear business days) after the information has been publicly disclosed.

TIMELY DISCLOSURE

As a publicly traded company, ATEC-3D has an obligation to comply with the Timely Disclosure Rules pertaining to the disclosure of material changes and material information, as set out by securities legislation and Stock Exchange policies.

Any employee in possession of material information must not disclose such information before its public disclosure and must take steps to ensure that ATEC-3D complies with its timely disclosure obligations.

FOR FURTHER GUIDANCE,

Please refer to ATEC-3D's Corporate Disclosure Policy on the website

HEALTH, SAFETY AND THE ENVIRONMENT

Consistent with its commitment to contribute to sustainable development, ATEC-3D exercises a systematic approach to health, safety and environmental management in order to achieve continuous performance improvement.

To this end, ATEC-3D manages these matters as any other critical business activity, sets targets for improvement, and measures, appraises, and reports performance.

Key activities include risk management, community and other stakeholder consultation, and remediation and restoration.

Employees, contractors, and joint ventures under ATEC-3D's operational control are expected to be conversant and comply with health, safety and sustainable development policies, standards, and procedures.

Wherever possible ATEC-3D prevents, or otherwise minimises, mitigates and remediates, harmful effects of the Group's operations on the environment.

Excellence in environmental performance is essential to our business success. Compliance with all environmental laws and regulations is the foundation on which we build our environmental performance. ATEC-3D supports and encourages further action by voluntary commitments.

ATEC-3D develops standards and builds systems to identify, assess and manage environmental risk. These are applicable at each stage of exploration, development, operation and closure, as well as in acquisition and divestment evaluations, to achieve continuous improvement in environmental performance. ATEC-3D also engages with host communities, governments, customers, suppliers and other relevant parties to the same end.

COMPETITION LAW

ATEC-3D seeks to compete fairly and ethically within the framework of applicable competition laws. ATEC-3D will not prevent others from competing freely with it.

All employees must abide by competition laws intended to ensure and maintain competition in the market place and deal with prohibited trade practices.

POLITICAL ACTIVITIES

ATEC-3D does not make payments or other contributions to political parties, organizations or their representatives or take part in party politics. However, when dealing with governments, ATEC-3D has the right and the responsibility, in the pursuit of its legitimate commercial objectives, to make its position known on any matter which affects ATEC-3D, its employees, its customers, or its shareholders. ATEC-3D also has the right to make its position known on matters affecting the community, where it has a contribution to make.

All employees are free to participate in the political process as a candidate, campaign manager, fund raiser, or volunteer, provided that their involvement is kept separate from their role and responsibilities as a ATEC-3D employee. All employees must ensure that statements made by them in their political activities are clearly delivered as personal opinions and are not able to be construed as ATEC-3D's position.

GUIDING QUESTIONS/ADVICE

In assessing whether a situation might contravene ATEC-3D's Business Principles or Code of Ethics, consider whether:

- the conduct is legal.
- the conduct is in violation of ATEC-3D's policies or procedures.
- the conduct is within ATEC-3D's authorized system of business controls.
- the results of the conduct would be fair in both the short and long term.
- the conduct would meet ATEC-3D's responsibilities to its shareholders, customers, employees, those with whom it conducts business, and society.
- the disclosure of such conduct, internally, would not be of concern.
- the public would consider the conduct to be honest and ethical.

All employees are responsible for using their best judgement in the application of ATEC-3D's Business Principles and Code of Ethics. This Code is not an exhaustive review of the conduct which could be considered to be in violation of ATEC-3D's Business Principles or Code of Ethics.

COMPLIANCE

Failure to adhere to ATEC-3D's Business Principles or Code of Ethics may result in disciplinary action which could include dismissal.

If you have knowledge or are suspicious of any non-compliance with ATEC-3D's Business Principles or Code of Ethics or are concerned whether circumstances could lead to a violation of ATEC-3D's Business Principles or this Code, discuss the situation with your immediate manager. If the circumstances are such that it would be inappropriate to involve your immediate manager, you should contact the General Counsel directly. As a guide, you should follow procedures as set out in ATEC-3D's "Fraudulent or Dishonest Conduct and Whistleblower Policy Statement" available on the ATEC-3D website.

ATEC-3D employees who have complied with ATEC-3D's Business Principles and Code of Ethics and are challenged by external sources will be fully supported by ATEC-3D.

ACCOUNTABILITY

All ATEC-3D Employees must understand and adhere to ATEC-3D's Business Principles and Code of Ethics. They must:

- commit to individual conduct in accordance with ATEC-3D's Business Principles and Code of Ethics;
- observe both the spirit and the letter of the law in dealings on ATEC-3D's behalf;
- recognise ATEC-3D's responsibility to its shareholders, customers, employees, those with whom ATEC-3D does business, and to society. Assess priorities in the context of discharging these responsibilities appropriately on ATEC-3D's behalf;
- conduct themselves as responsible members of society, giving due regard to health, safety, and environmental concerns, and human rights, in the operation of ATEC-3D's business; and
- foster a corporate culture within ATEC-3D based upon ATEC-3D's Business Principles and Code of Ethics.

Effective Date

June 2012