



Chemours™



Chemours Code of Conduct

Living Our Values.

Chemours Colleagues,

Our core values are the foundation of our culture, anchoring how we use our chemistry to create solutions that the world relies on each day. Through our journey of growth, challenge, and meaningful change, our values—Safety, Integrity, Partnership, Ownership, Respect—remain an immovable cornerstone of who we are.

Today and every day, our goal is to be the company that our customers, communities, and global stakeholders see as their most trusted partner in the industry. To achieve this requires that we all go beyond simply talking about our values, to living our values. It means using them as a framework for our choices and aligning what we do with the high standards we set for ourselves, especially when faced with the pressures of business. Every Chemours employee is responsible for upholding our commitment to our values, no matter the situation.

The Code of Conduct rests on our values and is designed to inform and inspire us all to do our best work while being thoughtful and ethical in everything we do. When we use this tool to guide how we conduct business among ourselves or on behalf of Chemours, we're acting with the level of Ownership that we expect of ourselves and others.

Our values are the most important part of our company's Winning Formula...thank you for all you do to make them real each day.

Sincerely,



Denise Dignam

President & CEO

Improving lives through trusted chemistry

OUR WINNING FORMULA



VALUES-LED CULTURE

We put our values—Safety, Integrity, Partnership, Ownership, Respect—first in every action and decision to produce the best outcomes. Our values are the foundation of our culture and critical to our success.

SUSTAINABLE OPERATIONS

We deliver on our corporate responsibility and sustainability commitments, while maintaining sustainable cost and capital structures.



WORLD CLASS TECHNOLOGY

We lean into challenges and opportunities using science and data to develop high-value solutions.

MARKET LEADERSHIP

We compete to win and strive to be a leader in all that we do — whether that's product innovation, customer service, environmental stewardship, and beyond.





Values Create the Chemistry of Chemours

Chemistry powers our company, but values are what guide us. Our values are simple yet powerful. They're built on the behaviors and feedback of our people.

Our focus on delivering efficiency and results for our customers and our shareholders never overshadows our commitment to ethical behavior in all we do. When we do what's right for our people, customers, shareholders, and communities, success will follow.

ChemOURS Values

SAFETY

We are committed to protecting people and the environment.

INTEGRITY

We do what's right.

PARTNERSHIP

We win through collaboration with the right internal and external partners.

OWNERSHIP

We are each accountable for the company's success.

RESPECT

We treat people well, include others, and value diverse perspectives.



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We Live Our Code

The Chemours Code of Conduct (“Code”) applies to all of us—employees, officers, and directors. Its purpose is to guide us in making thoughtful, ethical decisions on behalf of Chemours, and provide a framework for speaking up when we have concerns. It helps us uphold consistently high standards in everything we do.

This Code guides all of us on ethical matters in our businesses, in our subsidiaries, and in operations where Chemours has a controlling interest. We want our business partners—including joint ventures and third parties—to share our commitment to principled behavior and following the law. We expect them to understand and follow our Code, and to be partners in our commitment to Integrity.

Our spirit of Ownership includes upholding Chemours’ values in our daily behavior and expecting the same of others.

- We lead by example, set high standards in our personal actions, and help make colleagues aware of our Code and its importance.
- We help our colleagues comply with our Code’s requirements and its spirit.
- We refer to this Code to guide our ethical decisions, and ask for help when we are uncertain.
 - We are all responsible for speaking up about issues that concern us.
 - We appreciate employees for raising concerns and value the improvements that can result from speaking up.
- We communicate our Code to third parties working on behalf of Chemours, including consultants, distributors, vendors, contractors, agents, and subcontractors, and expect them to uphold our values and report concerns regarding potential violations of our Code, company policies, or applicable laws or regulations.

We Speak Up

We all have a duty to protect our culture of Integrity. Everyone must be prepared to say something if they know, observe or suspect any potential violations to our Code, company policies, values or the law.

We also speak up when we have questions or concerns. We talk to each other and to our managers, Human Resources, Ethics & Compliance, or members of the Chemours Legal or Assurance Services teams, and if we prefer, we can use the Ethics Hotline.

- We raise a concern if we believe there has been a possible violation of our Code or of any law or regulation and cooperate fully should there be a company investigation.
- We do not tolerate threats, intimidation, or retaliation against anyone who in good faith raises a concern or reports suspected misconduct. Speaking up about a good faith concern is always the right thing to do.
- We expect our contractors, agents, distributors, and other business partners to uphold the principles of our Code when working with or on behalf of Chemours.

WE FIND SOLUTIONS TOGETHER

At Chemours, no one should face an ethical dilemma alone. Immediate managers are often our first and best resources because they are the most familiar with individual roles and duties. Anyone who is uncomfortable speaking to a direct supervisor can address concerns in many other ways, including:

- Business, Function, or Site Leadership.
- HR, Legal, or Assurance Services team members.
- A member of the Ethics & Compliance team or Ethics Champion.
- The Chemours [Ethics Hotline](#).

THE CHEMOURS ETHICS HOTLINE

The Chemours Ethics Hotline is:

- Operated by an independent company.
- Open 24 hours a day, seven days a week.
- Available in multiple languages.

You may contact the Ethics Hotline anonymously. Reports will be kept confidential to the fullest extent possible consistent with the law and good business practices.

Ethics Hotline (US & Canada): 1 844 499 4607

For countries outside of the US & Canada or to submit your concern online, [click here](#).

“Speaking up is vital to our culture and our continued success. Everyone at Chemours should feel empowered to ask questions and raise concerns.”



Denise Dignam
President and CEO

How to Consider an Ethical Issue

When facing an ethical dilemma, we ask ourselves the following questions:



Is it the right thing to do?



Is it legal?



Is it consistent with the letter and the spirit of our Code of Conduct?



Would I feel good if my action appeared in the news or on the Internet?

We must be able to answer “yes” to all of these questions. If you have any doubt, stop and seek guidance from the resources listed in this Code.

SPEAK UP

At Chemours, no one should face an ethical dilemma alone. If you know of, see, or suspect any violations of our Code of Conduct, company policies, values, or the law, do not hesitate to speak up. We do not tolerate retaliation or intimidation for reporting a suspected violation. [Learn more.](#)

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We Abide by Laws and Regulations

Regardless of where we work, we act with Integrity and follow all applicable laws, rules and regulations.

- While we are not expected to be experts in all areas of the law, each of us is responsible for learning, understanding, and complying with laws that apply to our location and role.
- If we are uncertain about which laws or regulations apply to us, or how best to follow them, we should seek assistance.

Because no Code of Conduct can cover every possible situation, Chemours relies on each of us to embody our Values, use good judgment and speak up if we have a question or see conduct that we believe falls below our high ethical standards. We may have company policies and procedures that go above and beyond the applicable laws, rules and regulations. In these situations, we should always follow Company policy.



SPEAK UP

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We Believe in a Fair Marketplace

Our responsibility to conduct business ethically extends to our relationships with customers, suppliers, competitors, regulators, and shareholders. We always compete within legal boundaries on the basis of price, quality, and service, and we expect our business partners to do the same.

- We follow all antitrust and competition laws in countries where we operate.
- We do not enter into agreements or understandings that interfere with fair trade, including:
 - Fixing or controlling prices and credit terms.
 - Rigging bids.
 - Boycotting suppliers or customers.
 - Allocating products, territories, customers, or markets.
 - Limiting the production or sale of products.
- We gather competitive data responsibly, using publicly available information.
- We always do our best to treat customers, suppliers, and competitors fairly. We do not engage in misleading or deceptive trade practices.
- We make sure we have the required approvals before accepting any external invitation to share Chemours expertise or information.

WE ASK BEFORE WE ACT.

We consult Chemours legal advisors before meeting with competitors, developing price communications, participating in trade association meetings, or collaborating with third parties in research or manufacturing.



WHY WE SPEAK UP

Think about your customers, our shareholders and those who depend upon us in our communities. We are each accountable for Chemours' success. Speaking up means we're doing right by them now and in the future.

SPEAK UP

At Chemours, no one should face an ethical dilemma alone. If you know of, see, or suspect any violations of our Code of Conduct, company policies, values, or the law, do not hesitate to speak up. We do not tolerate retaliation or intimidation for reporting a suspected violation. [Learn more.](#)

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We Stand Firm Against Corruption

Our commitment to Integrity means we all play a part in the effort to eliminate bribery and corruption worldwide. We follow anti-bribery and anti-corruption laws and expect our business partners, agents, and other third parties acting on our behalf to do the same. Because corruption—or even behavior that could appear to be unethical—can take many forms, it is important to be aware of situations that must be avoided.

- We do not offer, pay, or accept bribes, kickbacks, or other improper payments or benefits under any circumstances, whether dealing with commercial or governmental customers or suppliers.
- We are conscientious when dealing with foreign officials to avoid even the appearance of impropriety. This includes any officer or employee of a foreign government or public agency, or any person acting in an official capacity for or on behalf of any entities.
- We understand the fact that a bribe that is paid through a third party does not eliminate the potential for criminal or civil liability.
- We do not use illegal or inappropriate means to win business or obtain preferential treatment for Chemours. This includes improperly securing favorable tax or customs treatment, receiving permits or regulatory approvals, or bypassing laws or regulations.
- We discourage the giving and receiving of gifts.
 - We ensure that any permissible gift or entertainment has a clear business purpose and will not be seen as an attempt to improperly influence an official decision.
 - We understand that inappropriate “gifts” can include anything of value, including, but not limited to, favors, services, meals, gifts, entertainment, travel, charitable contributions, sponsorships, offers of employment, or other profitable opportunity.
 - We seek guidance from our legal advisors if we are unsure whether a recipient is a government employee or official.
 - Regardless of local practice, we do not make “facilitation payments” or small bribes to individuals to secure a routine government service.



WHY WE SPEAK UP

It's about Integrity. You can always speak up if you have a question about something you—or someone else—is doing. It's the right thing to do.

SPEAK UP

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We Stand Firm Against Corruption

In addition to avoiding situations that could put us at risk, we follow these principles to demonstrate our commitment to ethical business practices:

- We can demonstrate the business purpose of our relationships and show that our payments are consistent with the value of goods or services provided.
- Our books and records accurately reflect the value and nature of all transactions.
- We regularly evaluate business partners and stop working with them if we suspect corrupt or other unethical practices.

For more information, please refer to the Chemours Anti-Corruption Policy and the Chemours Gift & Entertainment Policy.



SPEAK UP

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We Do Not Engage in Insider Trading

We may have access to non-public information (“inside information”) about Chemours that could affect the value of Chemours or other companies’ securities. Trading in Chemours securities when we have inside information or sharing inside information with others can be illegal and result in severe individual penalties.

- We do not discuss inside information about Chemours or any other company except as required by our regular employment duties, and we do not post inside information on social media.
- We do not spread false information about Chemours or any other company.
- We do not trade Chemours securities or the securities of any other company based on inside information.
- We direct outside inquiries about Chemours to Corporate Communications, Investor Relations, or authorized managers.

For more information, please refer to the Chemours Insider Trading Policy.

SPEAK UP

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We Keep Complete and Accurate Records

We keep good and accurate records because it embodies our commitment to Integrity and Ownership, ensures the company complies with applicable law, and builds trust with stakeholders. That's why at Chemours, we ensure our financial and non-financial information is recorded promptly, accurately, and securely.

- Our records—including time records, expense reports, invoices, financial entries, benefit claims, and production and Safety records—are carefully reviewed, authorized, recorded, and reported.
- We ensure that all records accurately and fairly reflect the underlying transaction.
- We are focused on ensuring the integrity, accuracy, and completeness of the business data that we process.
- We follow our internal record-keeping policies to ensure that transactions are recorded accurately and promptly, and are supported by all necessary documentation.
- We follow the law and our retention policies when producing, storing, or destroying records and documents.
- We obtain the necessary Chemours approvals and follow company processes when responding to requests for information from a government or regulatory agency.

When keeping records, we do not:

- Make false or misleading entries or reports.
- Omit or conceal payment amount or purpose.
- Keep undisclosed or unrecorded funds, accounts, or assets.
- Knowingly allow illegal activities to occur.

For more information, please refer to the Chemours Records and Information Management Policy.

SPEAK UP

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We Obey International Trade Laws

We obey the trade laws of the United States and all countries in which we operate, including laws concerning:

- The import, export, re-export, or transfer of goods, services, or technology.
- Government licenses or other approvals required to conduct transactions.
- Sanctions prohibiting transactions with specific countries, companies, or individuals.
- Product classification, valuation, and labeling.

We follow all Chemours policies and processes when conducting international transactions.

- We report requests to boycott other countries or companies.
- We take note of and comply with Chemours business travel advisories.
- We monitor transactions and screen our business partners as applicable to ensure our activities do not involve sanctioned countries or regions, companies, or individuals.
- We are careful to avoid the possible diversion or re-export of our products or technologies to companies or individuals with whom we ourselves would not do business.
- We do business only with companies and business partners who obey international trade laws and Respect Chemours policies.

For more information, please refer to the Chemours Global Trade Compliance Policy and the Chemours Trade Sanctions Policy.

SPEAK UP

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We Act in the Best Interests of Chemours

A conflict of interest occurs when an individual's private interest interferes with the interests of Chemours. It is important to not only avoid conflicts of interest, but also to disclose any situation that could even appear to create a conflict of interest.

A conflict can arise:

- When we take actions or have interests that may make it difficult to perform our work objectively and effectively.
- When we, or members of our families, receive improper personal benefits as a result of our positions in the company.
- When we, or members of our families, receive loans or personal guarantees from the company.
- Working for competitors, customers, or suppliers while an employee of Chemours.
- Doing business with relatives, especially those who are government officials.
- Engaging romantically with someone in a reporting relationship.
- Accepting gifts or entertainment from suppliers, customers, agents, or others seeking to do business with Chemours.
- Making investments (or having close relatives make investments) that could influence or appear to influence our judgment.
- Serving as a board member of another commercial or for-profit organization.
- Pursuing business opportunities we discover through Chemours for personal gain.

We speak up and seek answers from our management when we have a concern about a potential conflict of interest.

We disclose to our supervisor situations that might create a conflict—or even the appearance of a conflict—where we, our families, our friends, or our business associates might profit based on our association with Chemours.

Furthermore, our executive officers immediately disclose any transaction or relationship that may result in a conflict of interest to the General Counsel and, if applicable, the Audit Committee.

For more information, please refer to the Chemours Conflicts of Interest Policy.



WHY WE SPEAK UP

We want the right people involved in making decisions. We may not know every aspect of our business, but when we speak up, the right Partners and teams can weigh in and make the right call.

We Spend Money in the Best Interests of Chemours

In the spirit of Ownership, we each have a duty to use Chemours resources with care. That's why we monitor our spending for the company carefully, and speak up if we see Chemours funds misused.

- We do not use Chemours' assets, information, property, or influence for personal gain.
- We use company funds efficiently and make sure Chemours receives full value for our spend.
- We understand the Gift & Entertainment policy, and seek guidance or approval before giving or accepting anything of significant value.
- Unless an authorized Chemours event, we support our personal community activities on our own time, with our own resources, and not as representatives of Chemours. We obtain authorization before making any donation in the name of Chemours.



SPEAK UP

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We Respect Privacy and Keep Personal Data Safe

It is our responsibility to handle personal data in a secure manner, and to observe all applicable laws, policies, and precautions to keep it safe.

- We vigorously protect all personal data.
- We handle the personal data of our employees, customers, vendors, and third parties with care and according to applicable law, the Chemours Privacy Policy, and our contractual obligations.
- We use personal data only as necessary for business purposes and share it on a limited, “need-to-know” basis and in compliance with applicable law, our policies, and our contractual obligations.
- We protect personal data from unauthorized access, use, or disclosure.
- In the event of a potential data breach, we promptly assess, escalate, and address the situation.

For more information, please refer to the Privacy Matters page on the Chemours Catalyst.

SPEAK UP

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We Respect One Another

At Chemours, we Respect and treat one another with fairness, courtesy, and dignity. We embrace the power of inclusion and teamwork as a key part of our values.

- We believe that a diverse workforce is central to a vibrant, engaging, and creative workplace.
 - We do not tolerate retaliation or intimidation for good faith reporting of a suspected violation.
- Equal opportunity is part of our respectful workplace, and work-related decisions are never based on age, sex, race, color, religion, national origin, sexual orientation, gender identity and expression, marital status, disability, or any other characteristic protected by applicable laws.
 - We Respect all international codes and standards regarding human rights across our operations, and expect the same of our suppliers, partners, and customers.
 - We follow all applicable human rights, labor, and employment laws.
- We do not tolerate abuse or harassment of any kind, including sexual or racial harassment, or actions that are intimidating, discriminatory, or offensive.
- We engage in Respectful interactions with one another, and we understand that the most Respectful way we can treat one another is through honest and open dialogue.

For more information, please refer to the Chemours Human Rights Policy and the Chemours Non-Retaliation Policy.



WHY WE SPEAK UP

It comes down to Respect. All of us would want a colleague to speak up with questions or concerns about our work or choices. So trust that others will appreciate and Respect you if you were to do the same.

SPEAK UP

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We Protect Company Assets

We all must take Ownership for protecting Chemours' assets. This includes both physical items and information. We also protect Chemours intellectual property, such as brands, inventions, copyrights, and trade secrets.

We can identify and avoid potential risks, whether we are at a Chemours site or working from a remote location, by:

- We review and follow security policies at our workplace and when we travel.
- We are conscientious about protecting company assets against damage, misuse, loss, or theft.
- We guard our intellectual property and Respect the intellectual property rights of others.
- We secure and do not share our passwords and user ID credentials and defend against cyberattacks and other malicious activity.
- We understand that company assets, such as workplaces, equipment, computers, phones, and access to Internet and email, are intended for business purposes. As company equipment and systems are subject to monitoring, we do not expect privacy when using these assets, except as required by law.
- We do not visit Internet sites with offensive content, and we minimize the use of company assets for personal use.
- We do not use company resources to reproduce, display, distribute, or store materials that violate any party's trademark, copyright, licensing, or other intellectual property rights.
- We do not engage in unauthorized use of company trademarks, copyrights, licenses, or other intellectual property rights.
- We share Chemours assets outside the company only when authorized to do so. Trade secrets or other confidential information may be shared only under a written agreement with the consent of our legal team.



WHY WE SPEAK UP

The world is changing fast. You can raise a question about any aspect of our operations, from financials to data privacy, and the right people will look into it.

SPEAK UP

At Chemours, no one should face an ethical dilemma alone. If you know of, see, or suspect any violations of our Code of Conduct, company policies, values, or the law, do not hesitate to speak up. We do not tolerate retaliation or intimidation for reporting a suspected violation. [Learn more.](#)

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We Protect Company Assets

Further, when following our asset protection policies:

- We do not share business information on social media or other public forums.
- When handling confidential information, we encrypt it and share it only with authorized parties.
- We dispose of assets according to company procedures.
- We speak up and report any loss (or potential loss) of Chemours' information or assets.

For more information, please refer to Chemours Social Media Policy & Guidelines.

SPEAK UP

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We Protect Our Reputation

Chemours' public reputation of honesty and Integrity is critical to our long-term success. To uphold our reputation for Integrity, our public communications are accurate, consistent, and responsible.

- We distinguish between business communication and personal communication—particularly in forums like social media—and we do not speak individually as representatives of Chemours.
- We adhere to Chemours values in our business communications.
- We recognize that only authorized persons should speak on behalf of the company with the media, the investment community, or government officials, and we contact Corporate Communications, Investor Relations, or Government Affairs for assistance when needed.

SPEAK UP

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We Participate in Political Activities Responsibly

Being part of our communities includes political involvement. As individuals and citizens, we participate in political processes, but we keep our political activities separate from our roles as employees of Chemours.

- We have the right as individuals to personally participate in the political process, including making personal financial contributions to candidates. We are careful to make it clear that our views are our own and not those of Chemours and we avoid campaigning in the workplace.
- We work with Government Affairs to comply with laws regulating Chemours' participation in political affairs and activities—including political contributions and political campaigning.
- We seek approval from Government Affairs before using company funds or resources to support political candidates, engaging in lobbying activities, or using company locations or other assets for political purposes, and we are mindful of anti-bribery and anti-corruption obligations in these activities.
- We inform our managers when we—or our close relatives—seek public office, or if our political activity might have an impact on Chemours or on our jobs.

For more information, please refer to Chemours Guidance on Interactions with Government.

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We Insist on Safety and Sustainable Growth

We are steadfast in our commitment to Safety, and we look out for our colleagues' well-being as well as our own. As individuals, we strive to be role models for working safely, promoting wellness, and caring for our environment. We believe that protection of people and the environment is one of our most significant responsibilities.

- We create and maintain safe work environments, and ensure the stewardship of our products for their intended uses. This care extends to our employees, contractors, communities, customers, and all stakeholders.
- We integrate Safety, health, and care for the environment into our business planning and operating practices.
- We understand our responsibility to follow company policy and regulations that concern Safety, personal protection, environmental compliance, and product stewardship. We expect the same from our business partners.
- We are committed to conducting our business in a manner that Respects the rights and dignity of all people.
- We build relationships based on transparency and trust and continuously uphold our right to operate. We believe strategic alliances and Partnerships with our communities play a significant role in achieving our commitment.

We believe this commitment to Safety and sustainability ensures enduring success for ourselves, our company, our business partners, our shareholders and our communities.

For more information, please refer to the Environment, Health & Safety page on the Chemours Catalyst.



WHY WE SPEAK UP

If we see something unsafe, we speak up. It's how we protect each other on the job. That same mindset of raising a concern in the right way and at the right time should apply to all aspects of our work.

SPEAK UP

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Delivering Trusted Chemistry

At Chemours, our vision is to deliver trusted chemistry that improves people's lives and helps communities to thrive.

Every action and decision we make is guided by our values of Safety, Integrity, Partnership, Ownership, and Respect.

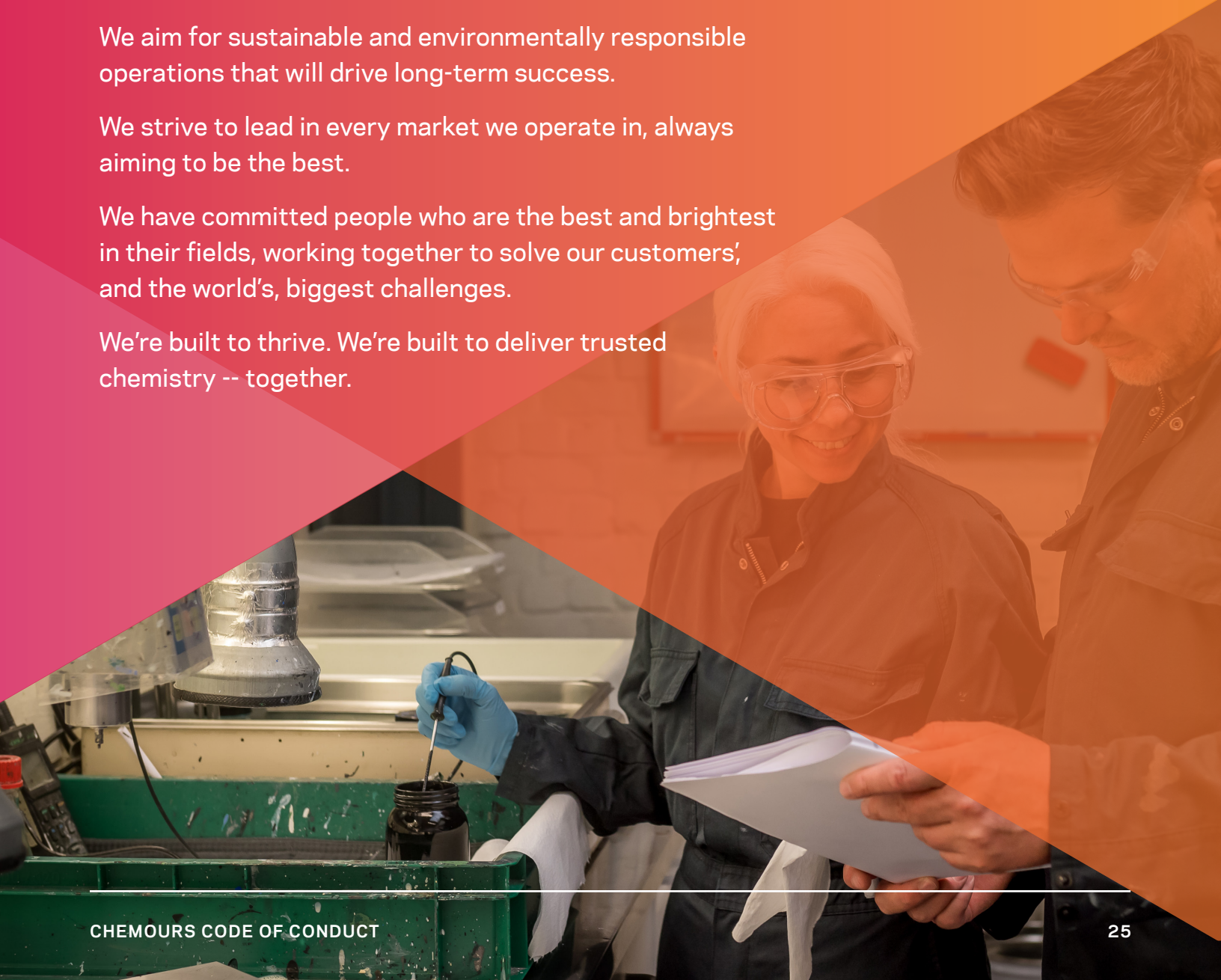
We lean in to challenges and opportunities using science and data to develop high-value solutions.

We aim for sustainable and environmentally responsible operations that will drive long-term success.

We strive to lead in every market we operate in, always aiming to be the best.

We have committed people who are the best and brightest in their fields, working together to solve our customers' and the world's, biggest challenges.

We're built to thrive. We're built to deliver trusted chemistry -- together.



About the Chemours Code of Conduct

The company reserves the right to modify the Code of Conduct as needed. Significant changes to this Code will be communicated broadly to employees and disclosed on the company's website.

Any waiver of this Code may be made only by the Audit Committee of the Board and will be disclosed as required by law.

Our Code does not alter the terms and conditions of employment and is not a contract. It details what is expected of everyone at Chemours and supports us in being responsible and Respectful when conducting our affairs with Integrity. We are all expected to report suspected violations. Failure to comply with our Code may result in disciplinary action up to and including termination.

WE SPEAK UP.

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SPEAK UP

At Chemours, no one should face an ethical dilemma alone. If you know of, see, or suspect any violations of our Code of Conduct, company policies, values, or the law, do not hesitate to speak up. We do not tolerate retaliation or intimidation for reporting a suspected violation. [Learn more.](#)

THE 24/7 CHEMOURS ETHICS HOTLINE:

**Ethics Hotline (US & Canada):
1 844 499 4607**

For countries outside of the US & Canada or to submit your inquiry online, [click here](#)



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