

CODE OF ETHICS

A. INTERNAL CONDUCT AND PRACTICES

1. **Adherence to the Law:** In all pursuits on behalf of the company, _____ employees are expected to abide by all established laws and refrain from illegal activities.
2. **Conflicts of Interest:** _____ employees are expected to avoid activities or influences that conflict with, compete with, or interfere with the performance of their duties or that give the appearance of doing so.
3. **Financial Responsibility:** Use of _____ funds by employees is for legal and ethical business purposes only, and all transactions are properly and accurately recorded.
4. **Confidentiality/Privacy:** _____ employees will respect and treat as confidential all information available from company records or received in the course of employment.

B. EXTERNAL RELATIONS AND PRACTICES

1. **Business Relations:** The interaction between _____ employees and clients, customers, vendors, and the public at large is conducted openly, honestly, and according to the highest standards of business conduct.
2. **Business Practices:** _____ employees will not engage in any business practice that violates legal or ethical standards.
3. **Political and Community Service Activities:** Employee participation in political or charitable activities (including contributions of time or money) occurs on the employee's own time and in no way reflects the position of the company.

C. COMPLIANCE PROCEDURES

1. **Reporting Violations:** It is the responsibility of all _____ employees to bring violations, or suspected violations, of the Code of Ethics to the attention of their supervisor or the corporate ethics officer.
2. **Penalties:** _____ employees who fail to comply with the company's Code of Ethics are subject to disciplinary action, which may include termination.