



MARSDEN
H O L D I N G

Caring for Your Workplace

CODE OF CONDUCT

For all Marsden Holding, L.L.C. companies

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Introduction

The growth and success of the Marsden Holding companies and their subsidiaries and operating divisions (hereinafter referred to as “the company” or “the companies”) - are in large part attributable to the principles underlying their operations since their inceptions. These companies were each founded with a commitment to respect, honesty, integrity, ethics and quality. We are proud to say our reputations and cultures still firmly reflect those principles. The companies will endure and prosper by continuing to adhere to the values and standards that have served them well.

Each employee (employee is meant to include executives, managers and associates alike) is a custodian of the companies’ reputations. This Code of Conduct was developed to uniformly convey the companies’ core values and ethical standards, which we ask all employees to endorse, embrace, and embody in all business practices. The Code also reaffirms our commitment to the highest standards of ethical and professional conduct and offers guidance on acting or making decisions for the companies without compromising their integrity. We deeply appreciate each employee’s effort to operate within the guidelines contained in this Code as they conduct their daily responsibilities.

No guidelines can be all-inclusive, however, and the responsibility for conducting oneself appropriately rests with each of us. Our general rule of thumb is to check with someone else who knows or who has had more experience the first time we encounter a situation that is new to us – even when we *think* we know what to do. **There is no substitute for personal integrity, use of good judgment and asking for help or counsel when we are not clear on how to proceed.**

Guiding Principles & Obligations

Company

To serve the best interests of our customers, employees, suppliers, owners and the communities in which we operate, we must transact our business fairly, honestly and in a manner that meets the highest ethical and legal standards. It is the companies’ policy to comply with all federal, state, and local laws, rules and regulations. The companies will respect the rights and safeguard the well-being of all employees, business associates, and customers. And, finally, the companies and all of those in leadership roles will not knowingly enter into business relationships with any party that may violate any aspect of this Code of Conduct.

Management

The companies’ executives and managers are accountable for creating a work environment that fosters adherence to the Code of Conduct. They are also responsible for enforcing it. Managers will be receptive and responsive to ethical concerns and issues raised by employees, and, if necessary, seek advice from higher-level authorities in dealing with them. Managers are expected to remain vigilant and sensitive to potential problem areas or perceptions of impropriety and taking appropriate remedial actions

promptly. But, above all, managers will strive to serve as positive role models for ethical conduct at all times.

Employees

Each of us will exercise the highest level of integrity, ethics and objectivity when representing or negotiating on behalf of the companies or when participating in activities that may affect their reputations. We will not misuse the authority or influence of our positions in these relationships, nor become involved in situations that create a conflict of interest between the companies and us, such as employment by, financial interest in, or financial gain from a competitor, supplier, agent or customer.

Generally, any personal or business action that seems inappropriate, regardless of financial gain to the companies or otherwise, should be rejected as contrary to our Code. Inappropriate conduct by employees, or the appearance that the companies condone inappropriate conduct of employees or agents, suppliers, or customers, should likewise be rejected. If you have any doubt about a particular action, ask yourself the following questions:

- Does my action feel like the “right thing” to do?
- Could my action withstand public scrutiny?
- Is my action consistent with the companies’ ethical reputation?
- Would I do it to my family or friends?
- Would I feel ok if someone did it to me?
- Would the most ethical person I know do it?

If your answer to each question is not an unqualified “yes”, seek further guidance before proceeding.

The bottom-line is that we must all work together to keep the companies operating as entities with which we are proud to be associated.

Workplace Standards

Employee Health & Safety

The companies consider people to be their most important asset. This value drives our commitment to the personal safety and health of each employee. It applies nearly equally to our business associates and the general public with whom we come in contact. **Safety is never to be compromised in favor of financial savings, productivity, nor any other perceived business advantage.** We are all responsible for ensuring that internal safety and health standards are adhered to and that the companies are in compliance with all applicable laws and regulations. This is a responsibility that we take very seriously and regard as a top priority. Everyone in management and leadership roles is expected to be familiar with the company’s safety requirements, promote a safety culture and ensures

through their own proactive vigilance that every associate is trained to work safely and ensure the safety of the general public with whom we or our work comes into contact.

Wage and Hour Compliance

People work for our company to support themselves and their families. They depend on the company, its managers and supervisors and the payroll department to pay them on time and accurately for all of their working time. **The company requires strict adherence to federal, state and local laws and to company policies and procedures that define compensable working time and which establish parameters for when and how employees are to be compensated.** Any employee who knowingly and willfully violates the law or company policy and procedures that are designed to ensure timely and accurate payment of wages to employees is subject disciplinary action including immediate dismissal from employment. Ensuring that our employees are paid properly for their hard work is not only a business necessity – more importantly – **it is a moral and ethical responsibility of everyone involved in the process of ensuring our employees are paid accurately and in accordance with the law.**

Equal Employment Opportunity

Fair employment practices serve the best interests of all employees, applicants, and the companies. Accordingly, the companies have adopted Equal Employment Opportunity policies and, in some cases, Affirmative Action Plans. Acknowledging the fundamental rights of all individuals, the companies select and hire employees solely on the basis of their knowledge, skills, abilities, experience, and aptitudes that best meet the requirements of the relevant position, without regard to race, color, creed, religion, national origin, sex, age, marital status, disability, status with regard to public assistance, familial status, affectional orientation/perceived affectional orientation/sexual orientation, veteran status or any other characteristic or status protected by federal, state or local law. All qualified applicants are welcome to apply for jobs in these companies, and no applicant shall be adversely affected by any form of discrimination.

In the same respect, the companies' other personnel practices – including promotion, transfer, reassignment, layoff or termination, compensation, benefits, training and development, and discipline – are administered in a strictly non-discriminatory manner.

Prohibition of Harassment and Intimidation

Employees flourish and grow only when they feel welcome, accepted and secure. With that in mind, the companies are committed to maintaining and enforcing a work environment free from harassment or intimidation. The companies prohibit the harassment and/or intimidation of company employees, subcontractor's employees, job applicants, coworkers, customer representatives, or business associates of any kind because of race, color, creed, religion, national origin, sex, age, marital status, disability, status with regard to public assistance, familial status, affectional orientation/perceived affectional orientation/sexual orientation, veteran status or any other characteristic or status protected by federal, state or local law. Harassment in the workplace includes unwelcome, hostile, or discriminatory behavior or remarks; assignment of inappropriate or the discriminatory/retaliatory assignment of work tasks; sexual behavior that controls,

influences, or affects an individual's career, salary, or job performance; any deliberate unsolicited comments, advances or physical contacts of a sexual nature that are unwelcome; requests for sexual favors; or other verbal or physical conduct that affects a individual's employment opportunities, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment. Individuals instigating sexual, racial, or any other form of harassment are subject to disciplinary action up to and /or including termination.

Prohibition of Violence.

The companies will not tolerate any form of workplace violence. Employees will be subject to disciplinary action up to and including immediate dismissal from employment if they engage in verbally- or physically-threatening or intimidating behavior, making written threats, fighting, joking or talking about committing violent acts, make plans to commit violent acts, physical horseplay, possessing unauthorized weapons of any kind while at work, on company property, or conducting company business, or any behavior that could be reasonably interpreted as the precursor to violence. This list is, of course, not all-inclusive and the companies' reserve the right to determine when its policy has been violated consistent with commonly held beliefs and federal, state and local law.

Proper Participation in Charitable Giving and Fundraising

The companies encourage employees to lead and participate in charitable or fundraising activities. No employees, however, may use the authority or influence of their position to demand contributions from other employees, customers, suppliers or business associates for any company, personal, social, community, or charitable function or usage in the workplace or elsewhere. The companies reserve the right to solicit donations for company-sponsored charities; nevertheless, there will be no repercussions or adverse action for employee non-participation.

Basic Employee Standards

Interpersonal Conduct

The companies are only as good as our employees' collective knowledge, enthusiasm, efforts, and commitment. We must nurture and preserve this asset by maintaining an environment in which individuals treat each other with respect and professionalism, honor the privacy and dignity of others, and foster and celebrate our diversity. We expect all employees to work together in a spirit of cooperation, remaining aware of their obligation to others and to themselves to carry out their responsibilities and to resolve conflicts in a manner of utmost maturity and interpersonal courtesy.

Internal Operating Policies

The companies have established a number of internal operating policies to ensure the proficiency and orderliness of various business functions, the equitable and consistent treatment of employees, and compliance with various legal requirements. Examples include policies addressing standards of conduct, discipline, and termination; software licensing; Computer Network, Internet and Electronic mail usage; workplace drug and

alcohol use, sales and/or possession; leaves of absence; overtime; and training and development. Copies of applicable policies are distributed to employees when hired and/or when new policies are adopted. They are also available from Human Resources and may be posted on the companies' Intranet sites.

We are all expected to adhere to these policies. An exception to policy is rarely permitted, and, if so, only with the advance approval of a company President or designee or the Chief Executive Officer or their designee. If a question arises about the existence or interpretation of a governing policy, associates should check with the Human Resources Department. Proven violations of published policies are subject to disciplinary action up to and including the termination of the violating employee's employment.

Dishonesty

We may not commit or contribute to acts of dishonesty, such as fraud, theft, embezzlement, or misappropriation of corporate assets, against the companies or their customers, suppliers or other employees. Acts of dishonesty nearly always result in termination of one's employment.

Conflicts of Interest

Upholding the highest standards of integrity, honesty and fair dealing requires us to avoid any possible conflicts of interest between the company and us. We must also avoid even the appearance of a conflict of interest. A conflict of interest occurs whenever the prospect of direct or indirect personal gain or benefit (or the gain or benefit of a family member or employees) could influence one's judgment or actions in the conduct of company business. Conflicts of interest can take many forms, not all of which can be addressed by this Code. A few examples follow and others are described in the "Business Relationships" section.

Outside Employment

We may not engage in full or part-time employment, a consulting relationship, or a business venture outside of the companies if it competes with any of the companies, provides services to competitors, or interferes with our ability to meet the performance expectations of our position. Likewise, we may not perform outside work or solicit such business on company premises or while working on company time, nor use the companies' computers, equipment, telephones, materials, or other resources for such activities, without specific authorization by a company President or the CEO.

Business Ownership

Partial or full employee ownership of a business enterprise that conducts commerce with the companies, such as a company vendor, consulting firm, service provider, etc. must be disclosed in writing to the CEO. Unreported ownership interests of this nature are considered Code of Conduct violations even if there is no direct evidence that the business relationship has been misused or manipulated for personal gain.

Dealing in Competition with the Companies

We may not take personal advantage of, or make available to others, any information pertaining to a business opportunity in which it is known or could reasonably be known that the company would be interested, such as a new account start, newly created division or any other opportunity.

An Employee who owns or has an ownership interest or who intends to acquire an ownership interest in an entity which provides any services that are the same or similar services as those that any of the companies provide may have a Conflict of Interest. Employees are therefore required to report such current and/or future involvement to, and obtain the prior written approval of their Division President and the CEO if they intend to remain employed with the company and desire to continue to engage in the conflicting activity.

Business Relationships

Gifts and Entertainment

Exchanging courtesies, such as modest gifts and entertainment, is a common business practice designed to create goodwill and establish trust in a business relationship. When executed with good judgment and moderation, the occasional exchange of gifts and entertainment is appropriate and enhances our relationship with clients and suppliers. These courtesies, both **given and received**, should be:

- consistent with customary business practices of our industry commonly employed in the place and time where they are offered or accepted;
- reasonable in cost, amount, quantity and frequency
- in good taste
- not perceived as influencing or giving the appearance of influencing, decisions or the business judgment of the recipient; and
- able to withstand public scrutiny without damaging the companies' reputations.

In addition, courtesies that are **given**, must be documented and supported in accordance with company policies and IRS requirements, as well as have supervisory approval. These guidelines apply even when no reimbursement from the company is sought.

The term "entertainment" includes, but is not limited, to meals, performances, trips, equipment rental fees, and charitable and sporting events, including golf, social engagements, plays, concerts and sports games. Any entertainment given or received must be moderate, infrequent and comprise a reasonable extension of a business relationship. All travel and related expense subsidies **received** may be accepted only after the prior written approval of the company's President.

The term "gift" applies to promotional items, products, gift certificates, mementos, goods, services, etc. All gifts **received** must be reasonable within the context of standard business practices. If any doubt exists with respect to the appropriateness of the gift,

one's supervisor should be consulted prior to accepting it. Cash may never be given nor accepted.

Fees and Commissions

We must never solicit, accept, or offer, either directly or indirectly, gratuities or payments in cash or in kind that could be construed by an independent third party as bribes, kickbacks, or inappropriate commissions. This includes the improper exchange of money, goods, loans, special privileges, personal favors, benefits or services. Company employees should report any solicitation of them by employees of customers or suppliers to their immediate supervisor or the company's President.

Use of Company Capabilities and Relationships for Personal Benefit

We must all avoid situations that might take unfair advantage of others or create conflicts of interest. The engagement of other employees or the companies' customers or suppliers for one's personal benefit must be made on the basis of fair and mutually acceptable compensation for such goods and services. We should not enter into any financial or business transactions with a supplier, competitor, customer or any of their employees that are not officially arranged by or condoned by the company. Furthermore, the transactions engaged in must be consistent with the standard practices and terms applied to conducting business with the general public and must not pose a conflict of interest. Likewise, we should not jointly own property with any supplier, competitor, customer, or any of their employees. If a potential conflict of interest situation might arise, associates are required to report the transaction to, and obtain the prior written approval of, a Division President and the CEO.

Government Relationships

Relationships with Governmental Officials

No gifts, entertainment, gratuities, favors, corporate funds, or other assets may be paid or furnished, directly or indirectly, to a government official, employee, or politician that may be perceived as being provided for the purpose of advancing a business interest of the companies, other than fees and charges required by law.

Company employment shall not be offered to or discussed with any present federal, state or local government employee (or a member of his/her immediate family) who is in a position to directly or significantly influence a proposed transaction, which involves any of the companies.

Political Contributions

No corporate funds or other assets may be paid or furnished, directly or indirectly, to a political party or political candidate or incumbent. No political contributions by individual employees may be made in the name of any of the companies, or be reimbursed by the companies, directly or indirectly. However, there is no intent to discourage employees from supporting their own parties and candidates as long as they do so on their own time and with their own personal funds.

Information & Recordkeeping

Confidentiality of Inside Information

We may not, for our own benefit or for the benefit of any other person or business, use or disclose to others any of the companies' or their customers' confidential or proprietary information including, but not limited to, customer lists, customer contact information, information regarding the needs of customers or prospects, pricing information, sales data, business plans, marketing strategy, operating (cleaning, securing, cash management, routing, etc.) methods, design information, financial tools and data, information regarding company compensation structure, or any other information that is not readily accessible by or made available to the public.

In addition, we may not disclose any personal and confidential employee information, including their personal health information, to others, either inside or outside the company, unless it is a lawful practice established by management as necessary to performing our officially-assigned job responsibilities or the employee has authorized its release. Such personal and confidential information includes, but is not limited to, his/her social security number, home address and telephone number, birth date, compensation, marital status, dependent or beneficiary data, medical, dental, or vision claim or diagnosis information, performance issues, etc. We will respect others' rights to privacy at all times.

Not all confidential proprietary or personal information will necessarily be labeled as such. Regardless of whether the information to which employees have access is expressly designated as confidential and proprietary or personal, we must hold all such information in confidence if, under the circumstances, we know or have reason to know that the company considers it confidential, or that disclosure of such information could be damaging to the company or an employee. All employees have an affirmative obligation to maintain the confidentiality of such information at all times, both during and after their employment.

Accounting Systems

The companies will comply with all laws relating to the accurate and complete maintenance of corporate financial books and records. All transactions will be fully disclosed and documented. No funds or property may be used for any unlawful, improper, or unethical purpose. No undisclosed, unrecorded, or concealed funds or assets may be established, and no false, artificial, or misleading entries may be made in the companies' financial books and records for any purpose. All company financial books and records will be maintained in accordance with generally accepted accounting principles (GAAP), company fiscal procedures, and all local and national laws governing the maintenance of corporate books and records.

Compliance Procedures

Questions and Violation Reporting

This code provides a basic set of guidelines regarding the standards of integrity and business conduct that we are expected to understand and follow. But it does not address every situation or specify every rule or policy, nor is it a substitute for our responsibility and accountability to exercise good judgment and obtain guidance when needed.

Our commitment to ethics is a shared responsibility. Because minor issues can evolve into larger problems, we ask each of our employees to have the courage to voice ethical concerns as soon as they arise. Doing so serves our collective interest.

AUDIT COMMITTEE

We have established an Audit Committee to review the company's compliance with Generally Accepted Accounting Principles (GAAP) guidelines. Any reports of unethical, criminal or practices that are not consistent with GAAP should be reported to the Audit Committee directly by contacting the CEO, Guy Mingo, at 651-523-6703 or by making a report through *OpenLine* as described below.

EXTERNAL REPORTING

We have established a relationship with a third-party vendor, EthicsPoint, to provide us with a mechanism for employee reporting, either anonymously or by voluntary self-disclosure, any matter that may be a violation of this Code. We have named this program *OpenLine* for internal communications and branding.

Employee reports can be made via the web by visiting openline.marsden.com or by calling toll-free **888-208-2532**. Reports are taken in English or, if the employee requests it, in another supported language.

INTERNAL REPORTING

Questions, general inquiries, and policy interpretations can be addressed to any of the individuals named below and are welcome and encouraged. If you have information or knowledge concerning any suspected violation of this Code or any activity that could damage the companies' reputations, you should immediately report such information to one or more of the following individuals (choosing one who is not involved in the violation):

- Your supervisor
- The supervisor of the offender
- Vice President or Director of Human Resources of your company
- President of the company for which you work or the Division President

- President and Chief Administrative Officer for Marsden Holding, L.L.C. (Sita Morantz at 651-523-6612 or smorantz@marsden.com)
- Chief Executive Officer for Marsden Holding, L.L.C. (Guy Mingo at 651-523-6703 or gmingo@marsden.com)

Any individual who receives a report of a Code of Conduct violation is required to inform a Division President, the President & Chief Administrative Officer, or the Chief Executive Officer so that they may monitor investigation and resolution of the offense.

The companies will not allow any form of retaliation or reprisal by anyone acting for or on its behalf when they are reporting in good faith any actual or suspected violations of our Code and, to the extent possible, the companies will make every effort to protect the confidentiality of anyone reporting this information.

Discipline and Sanctions

Individuals who violate this Code may be subject to disciplinary actions based on the seriousness of the violation, up to and including termination of employment. In addition, disciplinary measures may be applied to anyone who deliberately withholds information regarding known violations. Legal proceedings may also be commenced, if necessary, to recover the amount of any improper expenditures, any profits realized by the offending associate, and any financial losses sustained by any of the companies.

Annual Acknowledgment

To help keep this Code of Conduct alive, fresh, and in the forefront of every employee's mind, we periodically update it and ask all management, sales and office professional employees to re-read it and communicate it to their subordinates each year. Additionally, we may request them to acknowledge their awareness of and compliance with the Code by signing a written statement of representation as a condition of continued employment. The last page of the Code contains Compliance and Disclosure form that must be completed and returned as instructed.

Guidance for Ethical Conduct

Tips for Ethical Behavior

- Have the courage to right a wrong
- Be honorable and responsible about the use of the companies' and customers' resources.
- Remember that the "means" are just as important as the "ends."
- Never cheat - in cards, business, or elsewhere.
- Be selective about your business partners – pick only vendors, suppliers, subcontractors, etc. who share a commitment to ethical business practices.
- Embrace religious, racial, cultural, creative, and style diversity.
- Be truthful and accept nothing but the truth from others.
- Don't take what isn't yours and don't accept what you haven't earned.

- Make sure every answer you give is as correct as it can be and your opinions are supported with fact.
- If you don't know, defer to someone who does.
- Don't confuse "cutting corners" with efficiency.
- Recognize and reward others' efforts and contributions toward ethical behavior.
- Treat everyone with respect solely because of his or her inherent human worth.
- Accept a few mistakes in oneself and others as long as the errors are infrequent, unintentional, or low in negative impact.
- If someone does something you find offensive, tell them . . . with tact.
- Think about the impact of each action before you take it.
- Do the best job you can – every time.

Handling Ethical Dilemmas

Once in a while we find ourselves in situations that require us to choose between two equally good alternatives – both options appear to be "right." Choosing between competing "rights" is one of the most difficult ethical challenges in the workplace. We're faced with an ethical dilemma whenever we think or say, "**I know it's right to . . . but it's also right to . . .**" here are some examples:

- "I know it's right to be honest, but it's also right to be considerate of other people's feelings."
- "I know it's right to be concerned with short-term beliefs, but it's also right to focus on the long-term impact to the company."
- "I know it's right to hold strong moral and religious beliefs, but it's also right to adhere to the company's policy of tolerance and respect for personal choices."
- "I know it's right to provide job security, but it's also right to have high productivity and performance standards so the company can maintain its profitability and competitive edge."
- "I know it's right to treat everyone equally, but it's also right to recognize and accommodate individual differences."
- "I know it's right to maintain information in confidence when requested, but it's also right to report things that may have a negative impact on the company or other associates."
- "I know it's right to reward loyalty, but it's also right to grant promotions on the basis of objective criteria, such as knowledge, abilities, and scope of responsibility."

When faced with an ethical dilemma, the three best strategies to pursue are:

1. **Compromise** – Craft a course of action that is as consistent as possible with the spirit or objective of both alternatives. In other words, compromise to the extent possible without diminishing the effectiveness of the required action (i.e., seek a short deadline extension on a critical rush project that concerns you until the long-term implications that bother you can be studied, or discuss a suspected ethics violation you were

informed of in confidence with a trusted authority figure instead of filing official charges).

2. **Choose** – If a creative compromise appears impossible, choose the alternative that seems the “more right” of the two. Make your selection by weighing the alternatives against the following criteria:
 - Most compliant with laws, regulations, and company policy.
 - Establishes the best precedent for guiding similar decisions in the future from an ethical standpoint.
 - Best reflects the organization’s values or those of a trusted, respected, honest, admirable individual.
 - Provides the greatest benefit for the most stakeholders.
 - Would be judged most favorable in a public forum.

3. **Consult** – Regardless of your decision on how to proceed, it is always wise to seek advice and counsel from others you respect in the organization. Consult resources such as your manager, department or division head, the president, or human resources for feedback on your thought processes and for an objective opinion.

Self-Assessment Questionnaire

Little things mean a lot when it comes to business ethics. A strong foundation often prevents big problems from occurring. Perhaps surprisingly, the routine daily actions and behavior of individuals represent the largest arena for integrity erosions. Periodically we should evaluate our own ethical make-up to see how we measure up and where we need to improve. The following questionnaire may be helpful.

At any time in the last 6 months, have I . . .

- Knowingly violated an organizational rule or procedure?
- Failed to admit to or correct a mistake I made?
- Been dishonest or manipulated the truth out of self-interest?
- Used or taken company resources for personal purposes?
- “Bad mouthed” the company or management to coworkers?
- Accepted an inappropriate gift or gratuity?
- Shared information that was communicated to me in confidence?
- Used an ethnically derogative term or told an ethnically or sexually oriented joke?
- Failed to perform up to my capability level and/or knowingly delivered poor quality results?
- Called in sick when I really wasn’t?
- Purposely given inaccurate information on a time card, billing sheet, estimate, or report?
- Engaged in negative gossip and/or rumormongering, whether true or false?
- Taken or accepted credit for something someone else did, or falsely blamed someone else for my mistake?

One or more affirmative answers to the preceding questions might indicate a problem. That means a different perspective or behavioral change is needed for compatibility with our company culture. Perhaps some introspection will help. If that's not enough, go back and review the prior two guidance sections or seek advice from your supervisor, manager or a company officer you respect.

Note: Some of the contents of this book were referenced from "Ethics 4 Everyone" by Eric Harvey and Scott Airtam for the Walk the Talk Company.

CODE OF CONDUCT COMPLIANCE AND DISCLOSURE FORM

Acknowledgement and Agreement

I have read the entire Code of Conduct and I have had an opportunity to ask questions regarding its contents. I understand how the content relates to my position with the company. I understand that I am responsible for seeing to it that I follow and, if I am a supervisor or manager of other Company associates, that those who may report to me follow the Code of Conduct.

I agree to abide by the principles of the Code of Conduct and to keep this document for future reference. As of the date of my signature below, to the best of my knowledge, I am not aware of any possible or actual conflicts of interest between the company and me or my immediate family members except as described on this form.

Conflicts of Interest or Code of Conduct Violation

Are you aware of any situations involving you or an immediate family member that might possibly constitute a conflict of interest with the company? ___ No ___ Yes

And/or

Are you aware of any situations where another associate may be in violation of this Code of Conduct? ___ No ___ Yes

If yes, please describe the situation(s) below:

My Certification

I hereby certify that the information supplied on this form is true, correct and complete to the best of my knowledge and belief.

Printed Name / Signature Date

Supervisor Verification (for those who supervise others only)

I hereby verify that I have reviewed the contents of this Code of Conduct with this associate.

Printed Name / Signature Date

RETURN THIS COMPLETED FORM TO HUMAN RESOURCES FOR INCLUSION IN YOUR PERSONNEL RECORD