

Accuracy of Books & Records and report results with Integrity

To make responsible business decisions, we require honest and accurate recording and reporting of information. We maintain the highest commitment to recording information accurately and truthfully. The Company records will accurately and fairly reflect the transactions and financial condition of the Company in reasonable detail, and always in accordance with legal requirements and generally accepted internationally accounting principles, practices and procedures.

Internal accounting and financial controls and disclosure controls will be in place and followed to assure that financial and other reports are accurately and reliably prepared and fully and fairly disclose pertinent information.

Dishonest reporting within the Company, or to organizations or people outside the Company, is strictly prohibited. All officers and employees of the Company that are responsible for the preparation of financial reports are required to ensure their accuracy and completeness. The Company prohibits false or misleading entries in its books and records.

Confidential Information

Policy:

Confidential information includes all non-public information that might be harmful to the Company or our employees if disclosed. We must protect the confidentiality of the information handled by the Company, except when disclosure is required by laws or regulations or is authorized by the Board of Directors of the Company. We will take precautions to avoid improper, inappropriate or inadvertent disclosures of sensitive, confidential or privileged information, records or documents. Within the Company, we will share this information only with those employees who have a legitimate business “need to know” the information. We will maintain and protect this information even after termination of employment with the Company. Employees of the Company should guard against unintentional disclosure and take the necessary precautionary steps not to save confidential information where third parties might see it.

Employee Information

As with all confidential information, we have an obligation to protect the confidential information of our employees. Information about our employees, such as salary, Social Security number, age, status, type of leave, banking or other financial information should not be shared with third parties unless required for Company operations. It should also only be shared with other employees on a “need to know” basis.

Intellectual Property and Trade Secrets

We will not disclose information about the Company’s intellectual property and trade secrets to unauthorized third parties or to employees except as may be required for those employees to

perform their job duties.

Proprietary Business Information and “Insider” Information

We will not give confidential or proprietary Company information to unauthorized persons such as competitors, suppliers, or outside contractors without proper authorization. This includes financial information, computer data, and computer programs, as well as descriptions of Company processes or operations. We will not discuss potential business relationships, purchases, mergers or acquisitions or other organizational changes either internally or with unauthorized third parties except on a “need to know” basis.

Passwords

We will protect and maintain the confidentiality and integrity of information used to access our systems, including but not limited to, passwords and other personal security codes. We will keep our passwords and other personal security codes confidential. We recognize that we are each responsible for the actions resulting from the use of our passwords. We will not share our passwords or let others use our computers while we are logged on.

Protection and Proper Use of Company Assets

We have a responsibility to protect the Company’s assets from loss, damage, misuse or theft. The Company’s assets may only be used for business purposes and may never be used for purposes that violate law or company policy.

The Company’s assets include not only physical property, plant equipment, but other tangible assets such as securities and cash, office equipment and supplies, and information systems. It also includes intangible property such as software, patents, trademarks, copyrights and other proprietary information and know-how.

We will safeguard the Company’s intangible assets, such as proprietary information, intellectual property and innovative ideas. Intellectual property rights, including patents, trademarks, copyrights, trade secrets and know-how must be planned for and managed with the same degree of care as any other valuable assets.