



## LUITPOLD'S COMPLIANCE HOTLINE

**1-800-398-1496**

Available 24 hours a day, 7 days a week.

Reports to the Compliance Hotline may be made on an anonymous basis.

The primary mission of Luitpold Pharmaceuticals, Inc. is to provide safe, effective, high quality pharmaceutical products. Consistent with this mission, Luitpold is committed to ethical business practices and compliance with applicable Federal and State laws and regulations. The Code of Conduct and Compliance Program policies and procedures are designed to reinforce your understanding of Luitpold's Compliance Program. By adhering to the standards and principles within this Code of Conduct, you enable Luitpold to continue to achieve its goal of providing excellent service to our customers in a legal and ethical fashion.

Any questions? Call Jean Poulos, Compliance Officer at extension 168.



## *Code of Conduct and Compliance Program Summary*



November 2004



## *An important message from the President of Luitpold Pharmaceuticals, Inc.*

The primary mission of Luitpold Pharmaceuticals, Inc. ("Luitpold") is to provide safe, effective, high quality pharmaceutical products meeting all Local, State and Federal regulations in conformance with Luitpold's stringent internal quality standards. We have remained true to this mission for many years and will continue to do so. Consistent with this mission, Luitpold is committed to ethical business practices and compliance with applicable Federal and State laws and regulations.

As such, Luitpold has prepared a comprehensive Code of Conduct and policies and procedures implementing its Compliance Program. These materials, along with various other materials, form the framework for Luitpold's Compliance Program. The Code of Conduct and Compliance Program policies and procedures are designed to reinforce your understanding of Luitpold's Compliance Program, and to assist you in navigating the various compliance obligations of the highly regulated industry in which we do business. By adhering to the standards and principles within this Code of Conduct, you enable Luitpold to continue to achieve its goal of providing excellent service to our customers in a legal and ethical fashion.

Each employee will be given a copy of the Code of Conduct and Compliance Program Summary, and will be required to review and become familiar with their contents. The Compliance Program policies and procedures will be available to all employees for their review. They will be located in the office of the Compliance Officer in the Regulatory Affairs Department. Luitpold will provide you with training regarding the Code of Conduct and its Compliance Program. You will be required to annually certify that you have read and understand the contents of the Code of Conduct. This is important.

The Compliance Officer will be in charge of Luitpold's regulatory compliance efforts, and will chair Luitpold's Compliance Committee, which includes members from Luitpold's senior leadership team from various different departments. The Compliance Officer will be a resource for employees with respect to compliance matters, and will be available to address any employee questions.

I am very excited about these enhancements to our Compliance Program and look forward to working with each of you to ensure we operate in a compliant and ethical manner. Please join me in reaffirming Luitpold's ongoing commitment to compliance.

Mary Jane Helenek  
President & CEO



## *Luitpold's Commitment to Compliance*

### *Code of Conduct*

Luitpold Pharmaceuticals, Inc. (hereinafter "Luitpold" or the "Company") is committed to conducting its business with integrity and in compliance with applicable federal and state laws and regulations. Failure to comply with these laws and regulations could result in serious criminal, civil, and administrative sanctions to individual employees and to the Company. Luitpold can meet its commitment to compliance only through the efforts of its managers and employees (collectively referred to as "employees"), each of whom must perform his or her duties on behalf of Luitpold with honesty and integrity. Although each individual ultimately is responsible for his or her own conduct, Luitpold is committed to maintaining a working environment that fosters conduct consistent with these ideals and that permits Luitpold to meet the highest ethical standards in conducting its business. *WE WANT YOU TO ASK QUESTIONS WHEN IN DOUBT AS WE STRIVE ALWAYS TO DO THE RIGHT THING!*

To this end, Luitpold has adopted this Code of Conduct to describe the standards its employees must meet. These standards are based on:

- Full compliance with all federal and state laws, rules, and regulations.
- Business conduct in accordance with the highest ethical standards.
- Every employee's pledge to share this commitment to compliance by:
  - Receiving appropriate education and training with respect to applicable federal and state laws and regulations and the Company's policies and procedures;
  - Communicating any compliance concerns through appropriate channels, including the Compliance Officer; and
  - Immediately reporting alleged instances of known or suspected fraud and abuse to an appropriate supervisor or the Compliance Officer.
- Treatment of Luitpold's customers with the utmost courtesy and professionalism.



- Sale and promotion of Luitpold products through truthful, accurate information.
- Appropriate disciplinary action for those employees who violate these standards and Company policies and procedures.
- Encouragement of employees to raise compliance concerns and a prohibition against retaliation for raising bona fide compliance concerns.

As part of Luitpold's commitment to its Code of Conduct, each Luitpold employee must certify that he or she (1) has read, understands and will comply with the Code of Conduct and Compliance Program Summary, and (2) will retain a copy of this Code of Conduct and Compliance Program Summary for future guidance. These certifications must be renewed by each employee on an annual basis. New employees must execute identical certifications within seven (7) days of commencing work for Luitpold. The "Employee Certification" form is contained at the back of this Code of Conduct and Compliance Program Summary.

### *Code of Conduct Principles*

The Code of Conduct provides a high-level overview of the expectations that Luitpold has for its employees. Because employees will be responsible for complying with this Code, Luitpold has put together the following Code of Conduct Principles that outline and summarize the basic concepts underlying Luitpold's Code of Conduct and its Compliance Program. These Principles must be carefully reviewed and closely followed by all Luitpold employees. Supplemental information relating to these Principles will be provided through periodic formal and informal training and education programs. Additionally, many principles are expanded in great detail in Luitpold's written Policy Manual and Standard Operating Procedures. Any employee who has questions concerning these Principles should seek guidance from Luitpold's Compliance Officer.

### *Compliance with the Law and High Ethical Business Standards*

Luitpold operates in a heavily regulated industry and is subject to a large number of federal and state civil and criminal laws and regulations. Violation of these laws and regulations can result in harm to the public, severe financial penalties, exclusion from participation in government health care programs (such as Medicare and Medicaid) and—in some cases—criminal fines and/or imprisonment. Luitpold's Code of Conduct and Compliance Program are designed to prevent and detect such violations. Accordingly, it is critical that all employees comply with the laws and regulations in the United States and any other country in which the Luitpold does business that are applicable to Company's business, and with all Compliance Program policies and procedures. Employees of the Company shall adhere to the high standards of business ethics as set forth in the Code of Conduct and in the Compliance Program policies and procedures, and



acknowledge that such compliance is a condition of employment and is a factor that will be considered in his or her performance evaluation.

### ***Compliance with Law and Regulations***

While one of the objectives of Luitpold's Compliance Program is to educate all Luitpold employees about the basic requirements of these laws and regulations, Luitpold does not expect any of its employees to become experts in these areas. For precisely this reason, where an employee is not sure whether a particular activity or practice violates the law (or any of the Compliance Program policies and procedures), the employee should not—under any circumstances—“guess” as to the correct answer. Instead, the employee should seek appropriate guidance from his or her supervisor or the Company's Compliance Officer. Luitpold employees will not be penalized for asking compliance-related questions. To the contrary, Luitpold is intent on creating a culture in which every employee is comfortable asking the questions necessary to ensure that he or she understands and performs his or her tasks and obligations in full.

### ***Accuracy and Integrity of Books and Records***

The Company must keep accurate books, records, and accounts and must accurately reflect the nature of transactions and payments. This includes, but is not limited to, financial transactions, expense reports, activity reports, and other documents used in the normal course of business. Assets and liabilities of the Company must be recorded in the regular books of account. No undisclosed or unrecorded fund or asset shall be established in any amount for any purpose. No false or artificial entries shall be made for any purpose. No payment shall be made, nor purchase price agreed to, with the intention or understanding that any part of such payment is to be used for any purpose other than that described in the document supporting the payment.



To this end, the Company maintains and monitors a system of internal accounting controls. The Company records and reports facts accurately, honestly, and objectively and does not hide or fail to record any funds, assets, or transactions. Employees are accurate and honest in reporting or recording our business expenses, time worked, research test results, production data, expense reports, and all other business-related activities.



### ***Confidential Business Information***

The Company safeguards confidential and proprietary information regarding its business and scientific operations. Such confidential information includes both confidential information of the Company as well as third party confidential information disclosed to the Company or its employees by others. Employees understand that the disclosure of the Company's confidential business information, whether intentional or accidental, may adversely affect the financial stability and competitive position of the Company and their job security as employees.



Due to this risk of harm to Luitpold, employees who learn confidential business information about the Company, or other companies or persons with whom the Company does business, shall not disclose that information to third parties, including family or friends, and shall not purchase or sell property, stock, securities, or other interests based on that information. In addition, employees owe a continuing obligation of confidentiality after leaving the Company's employment, including compliance with the Company's confidentiality agreements.

Employees may not disclose the Company's confidential information to any third party after leaving employment except with the prior written consent of the Company, or as required by applicable law.

Employees shall promptly report to their appropriate immediate supervisor or the Compliance Officer any attempt by outsiders to obtain confidential information or any unauthorized use or disclosure of confidential information by other employees.

### ***Fair Competition and Antitrust***

Luitpold is committed to the ideals of free, open, and competitive enterprise. There should be no artificial restraints in the marketplace such as price-fixing, illegal monopolies, boycotts, improper bundling, or tie-ins. The Company avoids situations that could violate the principles of fair competition, and therefore we do not discuss the following with competitors: prices or pricing policies (past, present and/or future), bids, discounts, rebates, chargebacks, promotions, costs, profits, customers, territorial markets, production capacities or plans, distribution or selling strategies, pending research, and the like. The Company complies with all required pricing laws, such as the Robinson-Patman Act, and applicable antitrust laws. We do not engage in unfair or deceptive acts or practices, including false or misleading advertising, or any other form of misrepresentation.

### ***Conflicts of Interest***

Employees acknowledge that their work at the Company is their primary professional responsibility. Conflicts of interest can come up when our personal interests or outside activities influence an employee's ability to act in the best interests of the Company. Employees must disclose to management any conflicts of interest as soon as they arise and must also avoid situations where there may be an appearance of a conflict of interest.

In general, employees must seek to avoid entering into arrangements that cause conflicts of interest, which may include: (1) doing business with family members; (2) having a significant and/or direct financial interest in a competing company, supplier, or customer; (3) having a personal financial or other interest in any transaction involving or made on behalf of the Company; and (4) serving, without the approval of Luitpold's President & CEO, on the board of directors of a customer or competitor. Any situations such as these should be discussed with management or the Compliance Officer for consideration under Luitpold's Conflicts of Interest Policies.

### ***Contracts with Third Parties***

Luitpold sometimes engages the assistance of outside people or organizations to help conduct the Company's business. They may be called agents, consultants, independent contractors, distributors, suppliers, vendors, or the like. We take special care to make sure that these representatives of the Company are qualified, reputable, and do not create conflicts of interest. Vendors and subcontractors shall be selected only on the basis of objective criteria such as quality, cost, experience and service. We expect our agents and representatives to observe the same high standards of business conduct as the Company does.

### ***Gifts and Entertainment***

Employees shall not seek, accept, offer, promise, or give any inappropriate payments, fees, loans, services or gifts from or to any person or firm as a condition or result of doing business with the Company. Luitpold's Business Ethics Policies are intended to permit, however, gifts of reasonable value, normal business meals and entertainment, the exchange of customary reciprocal courtesies between employees of the Company and their business associates, and similar customary and reasonable expenditures to promote general business goodwill.

Reasonable expenditures by Company employees of gifts and for entertainment of business contacts may be made if the expenditures are appropriate and are correctly recorded on the books of the paying entity. However, entertainment or gifts shall not be of substantial monetary value and shall not be offered to influence inappropriately future behavior or

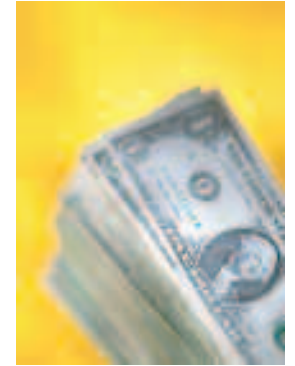


conduct. All sales employees will receive detailed training on these policies.

Employees shall seek advice from their supervisor or, if appropriate, the Compliance Officer if they are in doubt about the propriety of any gifts or entertainment.

### ***Compliance with Medicare/Medicaid Fraud and Abuse Laws and Prohibition against Bribes, Kickbacks, Unlawful Payments***

Employees shall comply with all applicable federal and state fraud and abuse or "anti-kickback" laws and regulations, as well as with the federal and applicable state False Claims Act laws. Employees will receive training on these laws as part of the Company's Compliance Program and should consult with the Compliance Officer (who may confer with the Company's legal counsel, as needed) if they have questions about the application of these laws to their job.



- **"Anti-Kickback" Laws and Regulations.** Federal and state laws prohibit payments (in cash or in kind) that are intended to induce the recipient to: (1) refer patients to the individual or entity offering such payment; (2) order, purchase, or lease items or services from the payor; or (3) arrange for, or recommend that others order, purchase or lease items or services from the payor. For example, common business practices such as providing discounts, rebates, or services to customers to encourage the purchase or order of more pharmaceutical items may have potential fraud and abuse law implications if the Company does not document and structure these practices properly. Inappropriate educational or clinical research grants also may have potential fraud and abuse law implications. The penalties for violating such Anti-Kickback laws are severe and may include criminal prosecution, incarceration, substantial fines, and exclusion (debarment) from participation in federal health care programs. Accordingly, Luitpold is committed to conducting its business in compliance with applicable federal and state anti-kickback and patient inducement laws.

To this end, all Company products are sold solely on the basis of quality, service, and price. Employees shall not offer, make, or authorize or receive payment of money or anything of value, directly or indirectly, with improper intent to:

- Illegally influence the judgment or conduct, or create a desired outcome or action by, any individual customer, company or company representative; or



- Gain an improper business advantage involving items reimbursed by a government health care program.

- **False Claims Act.** The Federal False Claims Act is a civil law that prohibits submission, or causing the submission, of fraudulent claims to Medicare/Medicaid, and other federal and state programs. The making of false statements and the submission of false claims are among the federal government's greatest fraud and abuse concerns. False claims that are submitted to a federal health care program intentionally or with reckless disregard or deliberate indifference can subject the Company or individuals to penalties of up to \$11,000 for each false claim it caused to be submitted. The making of a single intentional false statement or the intentional submission of a single false claim to the government can result in criminal prosecution under a separate criminal false claims law with up to five years imprisonment and a fine to the federal government of up to \$500,000. Given these severe penalties, and consistent with Luitpold's commitment to operating with honesty and integrity, employees must ensure that all statements, submissions, and other communications — whether oral or written — with our customers, prospective customers, suppliers and other persons and entities are truthful, accurate, and complete. It also is critical that all documents prepared by Luitpold employees, whether for internal or external review or processing, be truthful, accurate, and complete, and that employees carefully follow Compliance Program policies and procedures relating to document acquisition and retention.

### ***Compliance with Food and Drug Laws and Regulations***

Luitpold employees shall comply with all applicable laws and regulations, including, but not limited to, the Food, Drug, and Cosmetic Act and the regulations of the Food and Drug Administration ("FDA"), and the Prescription Drug Marketing Act, as well as the statutory and regulatory equivalents in jurisdictions around the world. When dealing with the FDA or other government representatives both inside and outside the United States, employees shall be truthful and accurate in all statements that they make. Employees shall seek to comply in full with all such regulatory requirements at all times. Luitpold's policies regarding compliance with food and drug laws and regulations are covered separately in Luitpold's Operations Manual.



### ***Violations, Anonymity, and Non-Retaliation***

All employees are required as a condition of employment to report suspected misconduct. Reports of suspected misconduct may be made to a manager or the Compliance Officer in writing or verbally. If a report is made in writing, the report need not include the identity of the person making the report. However, each employee should understand that often it is easier to assess the issues or concerns raised in a report when there is an ability to ask the reporting employee follow-up questions. Therefore, employees are encouraged to identify themselves when reporting or, if a report is made anonymously, to arrange for the ability of the Company to ask follow-up questions while preserving the reporting employee's anonymity.

In all instances when requested, Luitpold will strive to maintain the anonymity of any reporting employee. It must be understood, however, that there may come a point in time when a reporting employee's identity may become known or may have to be revealed (e.g., if government authorities become involved in the investigation). Finally, whether or not the identity of a reporting employee becomes known or is revealed, under no circumstances will Luitpold take adverse action against a Luitpold employee for reporting actual or potential misconduct in good faith when that employee was not involved in the misconduct in question. Employees who intentionally file false reports will be subject to appropriate disciplinary action.



### ***Compliance Responsibilities***

All employees have a responsibility to comply with the Code of Conduct and Compliance Program policies and procedures. When trying to make a decision or determine an appropriate course of action, employees should always ask themselves:

- Is my action honest and truthful?
- Is my action ethical and legal?
- Does my action comply with the Company's Code of Conduct, as well as with the spirit of the Code?
- How would my action look in the newspaper or on television? Would it appear to be improper, or make me feel embarrassed?

Keeping these factors in mind during all business dealings will help assure the continued good reputation of the Company. Failure to adhere to the tenets of these Principles could subject an employee to disciplinary action. For any serious violation, disciplinary action



could result in possible termination. Employees are responsible for seeking advice when needed, as well as for raising any concerns about risks to the Company—preferably before they become actual problems. If an employee reasonably believes that another employee has violated or may violate a law, regulation, or specific Compliance Program policy or procedure, the information must be reported immediately to a manager or supervisor, the Human Resources Director, or for more serious potential violations, directly to the Compliance Officer. The Compliance Officer will determine the best method to promptly investigate alleged violations. By raising concerns, employees allow management the opportunity to address potential problems. This is an important step, because non-compliance can pose very serious risks for the Company and all of its employees.

### ***Disciplinary and Remedial Action***

Employees will be subject to disciplinary action, ranging from verbal warnings to termination of employment and regardless of his or her level or position, if they fail to comply with these Code of Conduct, Compliance Program policies and procedures or applicable laws and regulations. The severity of the disciplinary action, which will be determined by members of senior management (and as appropriate, in consultation with the Compliance Officer and the employee's supervisor), will depend on a variety of factors, including, but not limited to (1) the severity of the violation, (2) whether the violation was committed intentionally, recklessly, negligently or accidentally, (3) whether the employee has committed any other violations in the past, (4) whether the employee self-reported his or her misconduct, and (5) whether (and the extent to which) the employee cooperated with Luitpold in connection with its investigation of the misconduct. Where appropriate, Luitpold also may take disciplinary action against supervisors who fail to detect or report misconduct on the part of employees under their supervision. Any employee who intentionally files a false report of misconduct will be subject to disciplinary action pursuant to this Principle.

In addition to taking disciplinary action, Luitpold will consider and implement as appropriate other remedial measures in the event of a violation of the Code of Conduct, Compliance Program policies and procedures, or applicable laws or regulations.

### ***Compliance Program Summary***

As part of Luitpold's commitment to health care fraud and abuse and regulatory compliance, and in an effort to assist Luitpold employees in meeting their compliance obligations, Luitpold has established a Compliance Program. The Compliance Program is designed to implement the Code of Conduct and prevent violations of applicable laws and regulations and, where such violations occur, to promote their early and accurate detection and prompt resolution through education, monitoring, disciplinary action, and other appropriate remedial measures. Luitpold will review and update, as appropriate, its Code of Conduct and Compliance Program policies and procedures as applicable federal and state laws, regulations, and health care program requirements are modified or clarified.



Luitpold's Compliance Program consists of the following core components:

- Luitpold has developed and implemented (and will continue to develop and implement) written policies and procedures addressing the Company's commitment to compliance and specific policies and procedures addressing areas of potential fraud and abuse (collectively referred to as "Compliance Program policies and procedures").
- Luitpold has appointed a Compliance Officer who will be responsible for maintaining the Code of Conduct and Compliance Program policies and procedures.
- The Luitpold Compliance Officer will chair a Compliance Committee that is responsible for developing, maintaining, and monitoring the Compliance Program.
- Luitpold will provide its employees with compliance education and training with respect to the Compliance Program, both through formal, periodic training seminars and by maintaining an open line of communication between Luitpold employees and the Compliance Officer.
- Luitpold has established procedures that permit (and indeed encourage) Luitpold employees to raise questions or concerns relating to Luitpold's Code of Conduct and its Compliance Program policies and procedures.
- Luitpold has established procedures for (1) receiving reports concerning possible violations of relevant laws and regulations, and Compliance Program policies and procedures, (2) protecting the anonymity of the reporting party, and (3) protecting the reporting party from retaliation.
- Luitpold will monitor compliance on a regular basis through the use of periodic reviews, audits, and other practices.
- Luitpold has established procedures for responding to and investigating possible violations of relevant laws and regulations and for appropriate remedial and corrective actions, if applicable.
- Luitpold has established procedures to avoid employing, contracting with, or retaining individuals or entities that have been excluded or are otherwise debarred from participation in federal health care programs.





## *Implementation of the Compliance Program*

### *Compliance Officer*

The Compliance Officer is responsible for the oversight and implementation of the requisite elements of the Company's Compliance Program, including the Code of Conduct. For purposes of his/her Compliance Program responsibilities, the Compliance Officer reports to Luitpold's President & CEO and the Board of Directors and makes periodic, at least annual, reports on compliance-related matters. The Compliance Officer shall report any significant compliance issues to the attention of the President & CEO immediately, unless the Compliance Officer has a compelling reason not to do so.

### *Compliance Committee*

The Compliance Committee is chaired by the Compliance Officer and is comprised of senior managers of the following departments: Human Resources, Marketing & Professional Services, Contracts & Chargebacks, and Compliance. The Compliance Committee shall support the Compliance Officer in the fulfillment of his or her responsibilities by, for example, assisting in the analysis of Luitpold's compliance needs, the Company's legal and regulatory exposures, and overseeing the monitoring of internal and external audits and investigations.



### *Employee Responsibilities*

Each employee is responsible for his or her own daily business conduct. Employees shall conduct themselves with integrity and abide by the Code of Conduct. Employees shall seek to do what is right, not just what is required. Employees shall seek advice from the management team if they have questions or doubt. All employees will strive to implement and embed the Code of Conduct and the principles of the Compliance Program in their daily business conduct.

### *Questions Regarding the Code of Conduct*

Employees who have questions regarding the applicability or interpretation of the Code of Conduct, should direct their questions to:

- their manager or supervisor;
- another management employee;
- a member of the Compliance Committee; or
- the Compliance Officer.



## *Reporting of Violations*

If an employee knows of a violation or possible violation of the Code of Conduct, such employee shall immediately report it to any one or more of the following people:

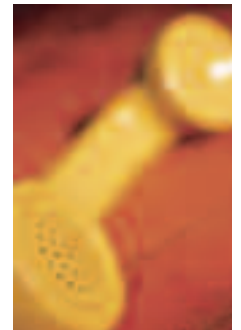
- their manager or supervisor;
- another management employee;
- a member of the Compliance Committee;
- the Compliance Officer; or
- the Compliance Hotline.

Anyone who receives such a compliance report must advise the Compliance Officer as soon as possible by telephone or in writing. Written reports to the Compliance Officer should be addressed to Luitpold Pharmaceuticals, Inc., One Luitpold Drive, P.O. Box 9001, Shirley, New York 11967 and should be marked "CONFIDENTIAL - TO BE OPENED BY THE COMPLIANCE OFFICER ONLY." Telephone reports should be made either directly to the Compliance Officer or to the Compliance Hotline.

There shall be no retaliation for good faith reporting of actual or possible violations of the Code, laws, or Company Policies.

### *Compliance Hotline Access*

Employees may call the Compliance Hotline, which is available 24 hours a day, 7 days a week. Telephone reports to the Compliance Hotline should be directed to **1-800-398-1496**.



Reports to the Compliance Hotline may be made on an anonymous basis if callers prefer.

### *Investigation of Violations*

All reported violations of the Code of Conduct, laws or Company Policies related to Compliance Program issues will be promptly reviewed and investigated, as appropriate, by the Compliance Officer or an appropriate designee and will be treated confidentially to the extent possible and consistent with the Company's legal obligations.



Investigations by the Company of reported wrongdoing involving compliance issues will be directed and coordinated by the Compliance Committee, or in some cases by the Company's legal counsel, as appropriate. Employees are expected to cooperate in such investigations. If the result of the investigation indicates that corrective action is required, the Company will decide what steps it should take, including, when appropriate, legal proceedings to rectify the problem and avoid the likelihood of its recurrence.



***Discipline for Violations***

Disciplinary actions shall be taken as appropriate for:

- Authorization or participation in actions that violate the Code of Conduct, law, or Company Policies;
- Failure to report a violation of the Code of Conduct, law, or Company Policy;
- Refusal to cooperate in the investigation of a potential violation;
- Failure by a violator's supervisor(s) to detect and report a compliance violation, if such failure reflects inadequate supervision or lack of oversight; and
- Retaliation against an individual for reporting a compliance violation.

Disciplinary action shall be appropriate to the misconduct and, when appropriate, may include dismissal. With respect to disciplinary action, principles of fairness, proportionality, and consistency will apply, including, when appropriate, review of a disciplinary decision. All disciplinary actions shall be appropriately documented and coordinated with Luitpold's Human Resources Director.



***Employee Code of Conduct Certification***

I hereby certify that I have been provided with a copy of Luitpold's Code of Conduct and Compliance Program Summary dated November 2004. I have read and understand the Code of Conduct and Compliance Program and will comply with them as a condition of my employment. I further certify that I will retain a copy of the Code of Conduct and Compliance Program Summary for guidance in the future.

\_\_\_\_\_  
Name (Printed)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Please Return to Compliance Officer

