**Policy Title: Ethics**

**Policy Number:**

**Effective Date:**

It is the policy of the company to require employees to adhere to ethical standards in the conduct of business. All employees are expected to conduct business with integrity, to refrain from dishonest or unethical conduct, and to comply with the letter and spirit of all applicable laws.

**Procedures**

Employees should not engage in conduct or activity that may raise questions about the company’s honesty or impartiality, or otherwise create a negative impression of the company. Employees are expected to avoid any activity which might result in, or might reasonably be expected to create, an appearance of influence or favoritism.

**Gifts, favors, or similar items**

Employees may not accept gifts, favors, entertainment, or payments for themselves or others if the offer intends to garner favoritism or influence, or may create an appearance of favoritism or influence. Employees may accept gifts with a value of less than $50 if there is no reasonable appearance of influence or favoritism. Examples of generally acceptable gifts may include:

· Gifts of small value such as calendars, pens, etc.

· Meals provided by customers within the dollar value allowed under this policy.

· Holiday gifts items such as fruit, cookies, or other items.

Other gift items, favors, or entertainment may be permissible with prior approval from [department or person]. However, gifts of cash or other items of direct monetary value (such as stocks or other securities) may not be accepted.

In the same spirit, employees may not attempt to influence others with whom they have business dealings.

**Conflicts of interest**

Employees are expected to avoid any situation which involves or may involve a conflict between their personal interest and the company’s interest. In all dealings with customers, competitors, vendors, or any other business contact, employees are expected to act in the best interests of [company name].

Employees are expected to disclose to [department or person] any potential situation which may involve a conflict of interest. Such conflicts may include, but are not limited to, the following:

The employee or a family member owns or has a significant interest in an organization which does or seeks to do business with or is a competitor of [company name].

Any arrangements or circumstances, including personal relationships, which might dissuade the employees from acting in the best interest of the company.

**Additional Information**

All employees have the responsibility to ask questions if they are uncertain about a particular situation, and to report suspected violations of this policy to [department or person]. Retaliation against employees who report suspected violations will not be tolerated.

Violations of this policy may result in disciplinary action, up to and including termination.

[Insert company-specific information]