

Code of Ethics Recommendation:

In an effort to publicly present our organization as a viable company with which suppliers and clients feel comfortable in conducting business, we must initiate and comply with a corporate Code of Ethics. This code should require us to conduct our business consistent with our values and in accordance with applicable laws. We should be responsive to the concerns of the communities in which we operate and exercise the highest degree of honesty and integrity in our dealings with others. Business activities in the energy market recently leads us more and more to the belief that these codes should be well defined, implemented, and maintained.

This Code is intended to help each of us understand our responsibilities and make the right choices. These should also stimulate awareness of ethical issues that we may encounter in our daily business activities. While I believe we are too small for a department that handles our ethical issues, I do believe we need to step forward and promote ethics within our organization. Doing the right thing begins with basic honesty and integrity. More than ever, it also depends on our good judgment and sensitivity to the way others see us and how they may interpret our actions. Our advancement within this and other industries, and our job security, both as a company and as individuals, depend on our ability to satisfy properly the needs of our customers. To preserve our corporate reputation in the eyes of our employees, clients, suppliers, and shareholders, I am confident that you will join me in maintaining the integrity that has made our company not only an industry leader, but also a place where we can be proud to work.

To develop and implement this Code of Ethics, the following steps must occur:

1. The corporate board should review and accept the Code as **THE** Code of Ethics for this corporation.
2. The Code should be printed in poster format and displayed in the break room and other shared community display areas.
3. The Code should be printed and distributed for the first time in employee paychecks, included in the Employee Handbook, and available for review on the corporate intranet.
4. A reporting structure should be established so that any employee, client, supplier, or shareholder may report suspected activities to the Human Resources department for review and subsequent action, if required.
5. The consequences of failure to uphold this Code should be equally published and distributed.
6. New employees should receive education regarding this code to promote usage.
7. Violators shall be handled with fairness and equal application.

I appreciate the opportunity to share this code with you, as it has been my privilege to research other organizations and their efforts to improve their organization.

Code of Ethics

1. We will always be truthful in communicating within the company and with our suppliers and customers, while at the same time protecting the company's confidential information and trade secrets.
2. We will be responsible for our words and actions, confirms our commitment to do what we say.
3. Valuing diversity in our global organization, we will seek to develop and use to the fullest their capabilities, creativity, and energy by creating a work environment that enables every employee to perform to his or her potential.
4. We will provide high-quality products and services, while respecting the safety of our fellow workers, suppliers, and clients.
5. We will strictly adhere to the letter and spirit of all laws and conform to locally accepted standards of good corporate citizenship in each country in which we do business.
6. We will promote and sustain a work environment that fosters mutual respect, openness, dignity, and individual integrity. This responsibility includes, among other things, the responsibility to avoid conduct constituting sexual harassment and conduct demeaning to a person's race, religion, creed, or national origin.
7. We will be fair in all aspects of our business dealing with our fellow employees, shareholders, customers, and suppliers.
8. We will solicit employee, suppliers, clients, and stakeholders opinions and value their feedback to continuously improve our organization.
9. We will respect the decision of any person who wishes to provide information as to the lack of respect of these codes. No retribution shall occur as a result of such provision of information.
10. We expect all employees, responsible for making or influencing hiring, promotion, or other career decisions, to support our equal employment opportunity and affirmative action commitments.
11. We will not place ourselves in a position where our loyalty to the company becomes divided such as due to a financial interest in a competitor, supplier, or customer.

Personal Ethical Management

When faced with a business decision, use these questions to determine if your actions are proper:

1. Would I want my actions reported on the front page of a newspaper?
2. Can I defend this action with a clear conscience before my supervisor, fellow employees, and the public?
3. What would my family, friends, or neighbors think of my actions?
4. Will there be any direct or indirect negative consequences for the company?
5. Is anyone's life, health, or safety endangered by this action?
6. Would my action inspire trust?
7. Is my action legal? If legal, is it also ethical? Are my actions honest in every respect?
8. Would my supervisor act this way?

If the answer is "Yes," then the action is very probably consistent with our corporate philosophy.

Consequences

The credibility of this code depends on monitoring, enforcement, and usage of the code. We believe that communication and "whistleblowing" perform a valuable function in maintaining high ethical standards of conduct and reducing the risks to the company, its employees, and stockholders from conduct that does not meet our high standards.

We expect that each employee will support the company's principles of business ethics and behave in a manner consistent with these high standards. We also expect that no employee in a supervisory position will instruct a subordinate to violate the ethical guidelines of the Code.

In the unlikely event that you become aware of actions that appear inconsistent with the Code, or you are instructed by a supervisor or manager to act in a manner that is inconsistent with the Code, you should first attempt to review the matter with your supervisor. If the matter is not resolved, or you feel your manager is the trigger for this action, you should contact the Human Resources department to explain the facts. We encourage employees to bring ethical questions to management's attention so that we can maintain our high standards.

If a summary investigation reveals that such a violation may have occurred, we will take the appropriate action, as we are committed to protecting responsible employees who report violations of the Code of Ethics to management from reprisals or retribution.

At the same time, an employee who participates in or conceals a violation of the Code of Conduct may be subject to disciplinary action, including: counseling, oral and written reprimands, demotions, reductions in salary, leave without pay, monetary fines or penalties, the imposition of probationary status, cancellation of an individual contract, and severance of the employment or business relationship. All such consequences shall be supported by written documentation.

In the case of suppliers or contractual agreements, positive reinforcement of respect for the requirements of a code of conduct includes retention of current contracts and awarding of additional contracts.

References

- Business Integrity Office, Marathon Oil Company. (2001, September 21). Code of Business Conduct. Retrieved February 28, 2002 from the World Wide Web: <http://www.marathon.com/ethics/code.htm>.
- International Labour Office. (1999, May 20). Corporate Codes of Conduct. Retrieved February 28, 2002 from the World Wide Web: <http://www.itcilo.it/english/actrav/telearn/global/ilo/code/main.htm>
- International Organization for Standardization (ISO). (2001, November 21). The Magical Demystifying Tour of ISO 9000 and ISO 14000. Retrieved February 28, 2002 from the World Wide Web: <http://www.iso.ch/iso/en/iso9000-14000/tour/magical.html>.
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