

[IMPORTANT: The information and materials contained herein should not be considered or relied upon as legal advice on specific factual situations. Users are urged to consult legal counsel concerning particular situations and specific legal questions.]

Business Ethics and Conduct

The successful business operation and reputation of **[FIRM]** is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of **[FIRM]** is dependent upon our clients' trust and we are dedicated to preserving that trust. Employees owe a duty to **[FIRM]**, its clients, and policyholders to act in a way that will merit the continued trust and confidence of the public.

[FIRM] will comply with all applicable laws and regulations and expects its directors, officers and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate supervisor and, if necessary, with the [Human Resources Manager or Equivalent] for advice and consultation.

Compliance with this policy of business ethics and conduct is the responsibility of every [firm name] employee. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.