

CODE OF ETHICS FOR CHIEF EXECUTIVE AND SENIOR FINANCIAL OFFICERS

This section of the Code sets forth the Company's Code of Ethics for the Chief Executive and Senior Financial Officers ("Code for Senior Officers"). The standards set forth in this section are applicable to all officers, directors and employees, but have special relevance to the Chief Executive Officer, the President/Chief Operating Officer and the Chief Financial Officer (together, the "Senior Officers").¹

The Company is committed to conducting our business in accordance with applicable laws, rules and regulations and the highest standards of business conduct, and to full and accurate financial disclosure in compliance with applicable law. This Code for Senior Officers, applicable to the Senior Officers, sets forth specific policies to guide you in the performance of your duties.

As a Senior Officer, you must not only comply with applicable law. You also must engage in and promote honest and ethical conduct and abide by the Code and other Company policies and procedures that govern the conduct of our business. Your leadership responsibilities include creating a culture of ethical business conduct and commitment to compliance, maintaining a work environment that encourages employees to raise concerns, and promptly addressing employee compliance concerns.

Compliance With Laws, Rules And Regulations

You are required to comply with the laws, rules and regulations that govern the conduct of our business and to report any suspected violations in accordance with the section below entitled " Code for Senior Officers."

Conflicts Of Interest

Your obligation to conduct the Company's business in an honest and ethical manner includes the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. No Senior Officer shall make any investment, accept any position or benefits, participate in any transaction or business arrangement or otherwise act in a manner that creates or appears to create a conflict of interest unless the Senior Officer makes full disclosure of all facts and circumstances to, and obtains the prior written approval of, the Board of Directors.

Disclosures

It is Company policy to make full, fair, accurate, timely and understandable disclosure in compliance with all applicable laws and regulations in all reports and documents that the

1 This Code for Senior Officers is intended to satisfy the requirements of section 406 of the Sarbanes-Oxley Act of 2002 and the Securities and Exchange Commission's regulations promulgated pursuant thereto. Amendments to the Code for Senior Officers will be disclosed as required by law or regulations.

Company files with, or submits to, the Securities and Exchange Commission and in all other public communications made by the Company. As a Senior Officer, you are required to promote compliance with this policy and to abide by Company standards, policies and procedures designed to promote compliance with this policy.

Compliance With Code For Senior Officers

If you know of or suspect a violation of applicable laws, rules or regulations or this Code for Senior Officers, you must immediately report that information to the Chief Financial Officer or to any member of the Board of Directors. *No one will be subject to retaliation because of a good faith report of a suspected violation.*

Violations of this Code for Senior Officers may result in disciplinary action, up to and including discharge. The Board of Directors shall determine, or shall designate appropriate persons to determine, appropriate action in response to violations of this Code for Senior Officers.

Waivers Of Code for Senior Officers

If you would like to seek a waiver of the Code for Senior Officers you must make full disclosure of your particular circumstances to the Chief Financial Officer. Amendments to and waivers of this Code for Senior Officers will be publicly disclosed as required by applicable law and regulations.

No Rights Created

This Code for Senior Officers is a statement of certain fundamental principles, policies and procedures that govern the Company's Senior Officers in the conduct of the Company's business. It is not intended to and does not create any rights in any employee, customer, supplier, competitor, shareholder or any other person or entity.

ACKNOWLEDGMENT FORM – CODE OF ETHICS FOR CHIEF EXECUTIVE AND SENIOR FINANCIAL OFFICERS

I have received and read the Code of Ethics for Chief Executive and Senior Financial Officers, and I understand its contents. I agree to comply fully with the standards, policies and procedures contained in the Code for Senior Officers and the Company's related policies and procedures. I understand that I have an obligation to report to the appropriate person, as set forth in the Code for Senior Officers, any suspected violations of the Code for Senior Officers that I am aware of. I acknowledge that the Code for Senior Officers is a statement of policies for business conduct and does not, in any way, constitute an employment contract or an assurance of continue employment.

Printed Name

Signature

Date