

Code of Business Conduct

The application of the laws of fair competition is complex and sometimes ambiguous. When questions arise as to them or compliance with the Modification of Final Judgment, consult your Legal Department.

Misuse of Nonpublic Information (Insider Trading)

“It is illegal, as well as against the policy of the SBC companies, to use or improperly disclose material nonpublic information (also known as ‘inside information’) for personal or other unauthorized purposes.”

It is illegal, as well as against the policy of the SBC companies, to use or improperly disclose material nonpublic information (also known as ‘inside information’) for personal or other unauthorized purposes. One such form of misuse is the purchase or sale of securities of a company while in possession of such inside information.

Examples of nonpublic information that may be material include declaration of dividends, plans to issue or buy back securities, financial information or announcements of earnings. Nonpublic information about other companies that may be material includes pending acquisitions and negotiation of joint ventures or contracts which are important to a vendor, even if not significant to an SBC company. Employees should not consider any inside information public until it is published in a newspaper or through other forms of mass media.

Criminal sanctions may apply against even those employees who receive no tangible benefit from a disclosure.

Inside information should not be discussed with co-workers or disclosed outside the company, unless the person receiving the information has a business-related need to know.

Any employee having a question on the proper course of action regarding inside information should consult the Legal Department.

Conflict of Interest

Our policy concerning suppliers is to award business on merit, without favoritism and at the lowest overall cost.

Gratuities

Gifts, loans, unusual hospitality (excesses in the case of meals or refreshments) or any other thing of monetary value from or on behalf of a supplier, that could influence actions, or give the appearance of being capable of influencing actions, should not be accepted or offered by an employee of any SBC company.

Acceptance of Gratuities

Any such gratuity of this nature that is received should be promptly reported by the employee to his or her supervisor and then returned to the donor, if possible, or disposed of in another appropriate manner.

Acceptance of a meal, refreshments or other hospitality in the normal course of business relations is ordinarily not considered as being capable of influencing actions or as giving the appearance of being capable of influencing actions, and as such is permitted as a courtesy and, when practical, should be on a reciprocal basis.

Further, receipt of any hospitality in the normal course of business relations which if purchased by the employee would be voucherable under the expense guidelines of his or her company is not considered as being capable of influencing actions and is permitted unless the receipt of same would give the appearance of being capable of influencing actions.

Aside from these limited exceptions, acceptance of any gratuity, even a gratuity of low cost, is discouraged. To assure that conflicts of interest are avoided, an employee must report to his or her supervisor: the acceptance from or on behalf of a supplier of any meal or refreshment hospitality of a total value in excess of \$50, or which is repetitive in nature, or rendered at a point in time so as to make it appear unusual; the acceptance of any other gratuity or hospitality valued in excess of \$25.

The preceding is not intended to encourage acceptance of any gratuity (and does not preclude a supervisor from establishing a strict prohibition within his or her organization).

The overriding consideration to be kept in mind is that employees are not to use their company positions for personal gain or benefit, nor conduct themselves in such a way as to give the appearance that an SBC company is subject to influence in its business decisions.

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Offering of Gratuities

While the giving of customary promotional items to customers is not prohibited, employees are prohibited from offering or providing favors or anything of monetary value, including gifts and loans to employees and/or representatives of federal, state or local governmental entities. Even the appearance of impropriety in such situations should be avoided. While providing hospitality in the nature of meals or other entertainment may be permitted under certain circumstances, it is imperative that you contact your supervisor and/or the Legal Department for approval prior to engaging in, or agreeing to engage in, any such actions. Because civil and criminal liability, both personal and corporate, may result from violations of governmental regulations, if you have any questions whatsoever concerning the appropriateness of certain conduct, you should contact your supervisor and seek legal advice.

If a supervisor suspects that a subordinate has accepted or provided a gratuity that could influence actions or have the appearance of being capable of influencing actions (“kickbacks”), he or she must report such suspicion to his or her company’s Legal Department.

Other Activities

Employees of SBC Communications Inc. or any subsidiary should have no relationship, financial or otherwise, with any supplier or competitor that might be construed as a conflict of interest, or that might even appear to impair their independence of judgment on behalf of their company.

This means no assistance should be given to anyone outside the SBC family of companies in a way that is competitive with an offering of any SBC company.

Since each employee has a primary obligation to his or her employer, any form of outside activity, including employment or self-employment, must be kept totally separate from, and not interfere with, his or her company employment. No outside activity should involve the use of company assets, funds, materials, facilities or the services of other company employees unless properly authorized. No employee should use proprietary or other confidential or private company information in any outside activity.

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Employees should avoid any outside activity that could adversely affect the independence and objectivity of their judgment, interfere with the timely and effective performance of their duties and responsibilities, or that could conflict, or appear to conflict, with the best interests of any SBC company.

If an actual—or even an alleged or potential—conflict of interest develops, it should be promptly reported by the employee to his or her supervisor or Legal Department.

Circumstances which may indicate the existence of a conflict of interest or a potential conflict include:

- ◆ When an employee or a member of his or her immediate family has an opportunity to make personal gain due to the employee's ability to influence dealings with a supplier to or competitor of any SBC company;
- ◆ When an employee or a member of his or her immediate family has any other relationship that would render the employee's impartiality toward such a supplier or competitor questionable.

In examining these conditions as to whether a conflict or potential conflict exists, reference to the employee's immediate family includes the employee's spouse, children, children's spouses, and the father, mother, sisters, and brothers of the employee or the employee's spouse.

Each employee is under an affirmative obligation to bring to his or her supervisor's attention any situation which could involve a possible conflict of interest. The supervisor should gather the relevant facts and forward this information in writing to the Legal Department for an opinion to be rendered by the Legal Department as the legal representative of SBC but not as representative of the employee. Such a request should be made in sufficient time as to allow for a response prior to the employee engaging in the questionable activity. As with all code violations, failure to eliminate or report a conflict of interest may result in disciplinary action, up to and including dismissal.

“Privacy of communications has been basic to the telecommunications business, not only because it is a requirement of the law, but because the American public has placed its trust in the integrity of our people and equipment.”

Privacy of Communications

Down through the years, privacy of communications has been basic to the telecommunications business, not only because it is a requirement of the law, but because the American public has placed its trust in the integrity of our people and equipment.

With the ever-increasing volume of data transmission over the network, that trust has taken on a special significance. Today the responsibility extends to protect not only the privacy of conversations on the network, but also the flow of information in data form.

The rules for privacy, however, have not changed. They are as simple and inflexible as ever—simple because they are so logical, and inflexible because to violate any one of them could tarnish a reputation that has been earned over many years by millions of communications industry people. The rules are:

- ◆ No transmission, either by voice, data or other non-voice communication, is to be tampered with or intruded upon.
- ◆ No conversation between customers, or transmission of data or other non-voice communication, should be listened to or monitored, nor should its existence or contents be divulged, except as required in the proper management of the business.
- ◆ No one should use, personally or for the benefit of others, information from any communication.
- ◆ Communications arrangements with customers, and information about billing records, equipment or circuits, as well as any other customer information in company data bases, are not to be disclosed to any unauthorized person.
- ◆ If a law enforcement organization, or any other government authority, asks for information that should be kept private either by law or by company regulation—the request should be referred immediately to Security personnel.

Proprietary Information

Much information developed by SBC companies is proprietary, confidential or private (collectively referred to as proprietary) and is intended solely for internal purposes. As a valuable business asset, such information must be protected, since unauthorized disclosure could give unfair advantage to others, expose the Corporation and its companies to fraud and malicious damage, and compromise privacy of communications and employee privacy.

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In addition, as a result of your job responsibilities you may obtain access to the proprietary information of an outside entity. Such proprietary information may include, but is not limited to, a competing contractor's confidential information, governmental classified information or a supplier's procurement sensitive information. In the event your receipt of such information is inadvertent, you should immediately notify your supervisor and seek assistance from your Legal Department. If your access to this information is pursuant to any other contractual agreement, you will in all probability be bound by a nondisclosure provision in connection with that agreement. It is your responsibility to obtain a copy of that provision and to abide by the obligations and requirements which bind the Company in such situations.

When dealing with the federal government, unless the information itself expressly states that SBC or its subsidiaries are authorized to receive it, company employees shall not request or receive competitive or otherwise restricted information from a federal government employee acting in his/her official capacity without first obtaining either (a) written assurance from a federal government employee that SBC or its subsidiaries are authorized to receive the information, or (b) oral assurance of such authorization to receive followed by the preparation and retention of a memorandum of the transaction.

If you have any questions as to the applicability of a nondisclosure provision and/or what your obligations as a company employee are with regard to such information, contact your supervisor or the Legal Department for guidance.

Access to proprietary information should be limited to those having a "need to know." Any disclosure to others or the receipt of the proprietary information of others should be in accordance with company policy.

There are various FCC rules stating how the SBC companies may use customer proprietary network information such as: billing name and address, number and type of access lines, technical characteristics or class of service, and records of usage or calling patterns. There are also special FCC rules concerning the methods by which the SBC companies can offer enhanced services, CPE and cellular mobile services. All employees must understand these rules and abide by them; not only in internal dealings, but in our dealings with others.

Access to classified national security information is restricted to those with proper government clearance and a "need to know." Unauthorized disclosure of such information is a violation of law.

When you leave or retire from your company, all documents and records containing proprietary or classified national security information must be turned in to your company. Even after employment ends, you have a continuing obligation to safeguard and not divulge such information.

Questions on whether certain information is proprietary, and the conditions under which it can be released, should be discussed with your company's Proprietary Information Coordinator or your Legal Department. Questions on appropriate security safeguards to protect proprietary and classified national security information should be discussed with Security personnel. Any compromise, or even suspected compromise, of any such information should be immediately reported to Security personnel.

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Financial Reporting

When a company engages in public financing, that company assumes an obligation of public trust and a commensurate level of accountability to the public. One of the most fundamental obligations of a public company is the full and fair disclosure of corporate information, including financial results.

SBC managers are responsible for reliable financial reporting. This is facilitated by the maintenance of a system of internal accounting controls that provides reasonable assurance that financial transactions are recorded timely, accurately and fairly and in conformance with Generally Accepted Accounting Principles (GAAP).

Intentional or reckless conduct, whether by act or omission, that results in misrepresentation of financial information may be construed as fraudulent financial reporting. Employees must not engage in any activities which undermine the integrity of financial information for any reason, including incentives for personal gain or perceived pressures to satisfy valid corporate objectives, such as expanding market share, meeting budget commitments, increasing earnings, satisfying investor expectations, etc.

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Financial statement disclosure is so important that Congress, in enacting the Foreign Corrupt Practices Act in 1977, imposed internal accounting controls and record keeping requirements to ensure that public companies meet their financial disclosure obligations. This law requires that a company's books and records accurately and fairly reflect transactions in reasonable detail, and that a company's internal accounting controls provide reasonable assurances that:

- ◆ Transactions are carried out in an authorized manner.
- ◆ Transactions are reported and recorded to permit correct preparation of financial statements, and to maintain accurate records of assets.
- ◆ Access to assets is in accordance with management's authorization.
- ◆ Comparisons of existing assets versus recorded accountability are made periodically, and appropriate action taken to correct discrepancies.

Violations of this law can result in fines and imprisonment, or both, for individual employees, and penalties against their company.

Allegations or suspicions of fraudulent financial reporting, or any questions regarding this law or on the adequacy of your company's internal accounting controls, should be referred to your Legal Department.

Company Funds

Every employee who has control over company funds and associated records and materials is personally accountable for their safekeeping. This includes coins removed from coin telephones, cash, checks and money orders and items such as credit cards, toll tickets and tapes. There are no exceptions to this rule.

When spending company money, or personal money that will be reimbursed, the employee involved should make sure his or her company receives proper value in return.

Anyone approving or certifying the correctness of any voucher or bill should have reasonable knowledge that the expense and amounts involved are proper.

This entire subject is covered in detail by company practices and instructions. They should be strictly followed.

Questions on the appropriate use of company funds, or personal funds for company business, should be discussed with your supervisor, or if necessary with a member of your Legal Department or Security personnel.

“When spending company money, or personal money that will be reimbursed, the employee involved should make sure his or her company receives proper value in return.”

“Except as specifically authorized, corporate funds may not be used for political purposes.”

Political Contributions

Except as specifically authorized, corporate funds may not be used for political purposes. Authorization requires approval by the Chairman of the Board of SBC Communications Inc. after a determination by the Senior Executive Vice President and General Counsel of SBC that the expenditure is lawful.

No employee is to be subjected to any pressure, direct or implied, that infringes on his or her right to decide whether, to whom, and in what amount he or she will make a personal political contribution.

Any personal political activities shall be conducted by employees during non-company time and with non-company supplies, materials and facilities.

Individual political contributions made by employees should be made directly to the candidate or campaign by check. Employees shall not collect candidate or campaign contribution checks from co-workers for forwarding to such candidate or campaign.

Company Property

Protection of company property and services is vital to our businesses. How well we protect them from theft, fraud or negligent misuse affects the rates or prices our customers pay and our companies' earnings.

Furnishing services to be used for illegal purposes is prohibited. When an employee has knowledge that such service is being furnished, or discovers or suspects that an unauthorized connection has been made to company facilities, the information should be promptly reported to his or her supervisor or to Security personnel.

Company property should not be used for personal benefit, or any other improper purpose. Except with proper authorization, it should not be sold, loaned, given away or otherwise disposed of, regardless of condition or value.

The use of telephone service should be in accordance with company instructions. Unauthorized personal calls should not be made from or charged to company official stations, switchboards, testboards, terminals or other facility locations, nor should coin telephone upper housing keys be used to place calls in an unauthorized manner.

Company Records

Company business records must always be prepared accurately and reliably, since they are of critical importance to your company's meeting its financial, legal and management obligations.

All reports, vouchers, bills, payroll and service records, measurement and performance records and other essential data should be prepared with care and honesty.

Records containing personal data on customers and employees are confidential. As such, they are to be carefully safeguarded and kept current, relevant and accurate. They should be disclosed only to authorized company personnel having a "need to know," or pursuant to lawful process in accordance with your company's procedures governing the permissibility and means of disclosure. Should you have any questions about disclosure, consult with your Legal Department or Security personnel before disclosing.

Each employee must strictly observe document retention guidelines. This includes normal retention based on regulatory requirements. Additionally, certain documents are to be retained for extended periods of time. These extended periods of retention may be due to court orders and/or document production requests in litigation. Questions concerning legal requirements for document retention may be referred to the Legal Department.

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Computer Systems

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Accordingly, it is imperative that the hardware, software and data accessed or processed using computers and stored in them and elsewhere be adequately safeguarded and used for properly authorized company business purposes only.

Office automation systems and microcomputers allow data to be easily moved between offices, and between the office and home. The portable storage devices and data used in these systems must be physically and logically (access controlled) secured. These devices, systems and magnetic media are to be used for company business purposes only. In addition, all documentation relating to a company's acquisition of a software license and its use of the license must be accurately maintained in a timely fashion and in a manner capable of verification.

All license agreements with software providers must be honored. No unauthorized copying, borrowing, publication or use of copyrighted material is proper.

Violations or suspected violations of computer security measures, controls or software licensing agreements should be reported at once to Security personnel. Any violations of this Section can lead to disciplinary action, up to and including dismissal.

Suspected Wrongdoing/Fraud

Any wrongdoing/fraud must be identified and investigated promptly. In some cases, insurance requires this; in every case, good business practice demands it.

Wrongdoing/fraud include such things as forgery of business records or checks; deliberate misrepresentation of facts, assets or records; misappropriation of assets; disappearance of furniture and equipment; irregular handling or reporting of money transactions; and deliberate misrepresentations of facts, assets or records in order to deceive someone who relies on the representation. Wrongdoing/fraud also include other fraudulent or dishonest acts, whether in the service of one's company or otherwise, and whether the act is committed prior to or during employment with one's company.

If you suspect an irregularity exists, notify your supervisor or, if appropriate, Security or Legal Department personnel.

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Each employee is covered by a fidelity bond which protects his or her company against loss of money, security and other property resulting from fraudulent or dishonest employee acts. It does not relieve the employee of personal liability.

Espionage and Sabotage

The importance of preventing disclosure of any company information that could be of value to saboteurs and espionage agents, including those engaged in industrial espionage, cannot be overstated.

Such information includes security procedures, marketing plans and strategies, new business ventures, product development information, location of physical plant facilities, circuit layout information, emergency rerouting and service restoration procedures and classified national security information. As mentioned in the section on proprietary information, access to classified national security information is restricted to those having proper government clearance and a "need to know."

Any attempt by an unauthorized person to obtain sensitive information, or gain access to secured company locations, should be reported at once to Security personnel.

Substance Abuse

The SBC companies are committed to the goal of providing a safe and productive working environment for all employees, and each company has established a policy to address drug and/or alcohol abuse. You should refer to your company's policy. Essentially these policies provide:

- ◆ Employees who are impaired by a prohibited substance while on company premises or during the conduct of their company's business will be subject to discipline up to and including dismissal.
- ◆ The use or possession of any illegal drug while on company premises or during the conduct of company business is strictly prohibited and subject to discipline up to and including dismissal as appropriate under the circumstances. Further, any employee who, while on company premises or during the conduct of company business, manufactures, sells or transfers any illegal drug to any person shall be dismissed.

"Each company has established a policy to address drug and/or alcohol abuse. You should refer to your company's policy . . . violators are subject to discipline, up to and including dismissal."

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- ◆ Employees convicted of or pleading guilty or no contest to criminal offenses committed on company property or during the conduct of company business and involving the manufacture, use, possession, sale or transfer of illegal drugs, or the illegal transfer of prescription drugs, shall report the same to their immediate supervisor within five days of entry of judgment against them. Failure to so report shall be subject to disciplinary action up to and including dismissal.
- ◆ Where specified by a customer and determined appropriate by an SBC company, employees may be required to be drug-free as a condition of employment with respect to the provision of services or products to such customer.

No Discrimination; No Sexual Harassment

Equal Employment Opportunity

It is the policy of the SBC companies to provide equal employment opportunity without unlawful discrimination for all qualified persons.

This includes recruiting and hiring, working conditions, conditions and privileges of employment, compensation, training, upgrading and promotion, lateral movements and terminations of employment including layoffs and recalls.

This policy applies to all employees regardless of race, color, religion, national origin, sex, age, disability or veteran status. Equal opportunity is the responsibility of all employees of all SBC companies.

Policies on Sexual Harassment

SBC companies prohibit the sexual harassment of their employees in any form. All employees are responsible for assuring that the workplace is free from sexual harassment. Such conduct may result in disciplinary action up to and including dismissal.

No supervisor shall threaten or insinuate, either explicitly or implicitly, that an employee's refusal to submit to sexual advances will adversely affect the employee's employment, evaluation, wages, advancement, assigned duties, shifts or any condition of employment or career development.

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Other sexually harassing conduct in the workplace, whether committed by supervisors or non-supervisory personnel and non-employees, is also prohibited. This includes unwelcomed advances related to sexual flirtations or propositions; continual or repeated verbal abuse of a sexual nature; graphic verbal commentaries about an individual's body; sexually degrading words used to describe an individual; and the display in the workplace of sexually suggestive objects or pictures.

Employment At Will Doctrine

The SBC companies observe the legal doctrine referred to as the employment at will rule. This means that neither the Code of Business Conduct as set forth in this booklet nor other SBC company publications concerning compensation, employment conditions or benefits are a contract or assurance of continued compensation, employment or benefit of any kind. The Code of Business Conduct is a statement of guidelines/principles for conducting business and for individual conduct; and it is subject to change. SBC and its subsidiary companies retain the right, subject to any applicable collective bargaining rights of union employees, to discharge any employee at any time for any lawful reason, with or without specific cause and without the necessity to comply with any written or unwritten plan or practice.

Administration of the Code

Each employee of SBC and its subsidiaries is expected to abide by the standards embodied in the SBC Code of Business Conduct. Toward this objective, supervisors and employees have the following responsibilities with regard to the Code's administration.

Every supervisor is required to administer and enforce the Code within their areas of responsibility by:

- ◆ Ensuring that each employee annually receives and reads a copy of the Code and signs a copy of the Acknowledgment Form;
- ◆ Ensuring that employees are aware that they may make a good faith report of a violation or suspected violation of the law or the Code without fear of reprisals;
- ◆ Ensuring that any standards and procedures developed for their areas comply with the Code and are communicated to affected employees;
- ◆ Reporting any possible violations of the Code or situations which could result in Code violations or be perceived as Code violations to a higher level supervisor and/or the Compliance Line.

“Each employee of SBC and its subsidiaries is expected to abide by the standards embodied in the SBC Code of Business Conduct.”

Code of Business Conduct

All employees, supervisory and nonsupervisory, are responsible for:

- ◆ Reading and familiarizing themselves with the Code and signing an Acknowledgment Form to that effect on an annual basis;
- ◆ Keeping a copy of the Code for personal reference;
- ◆ Complying with the standards and procedures set forth in the Code which relate to their areas of responsibilities;
- ◆ Seeking advice and information from their supervisors and/or the Legal Department when uncertain whether particular activities are in compliance with the Code; and,
- ◆ Reporting violations of the Code to the appropriate supervisory personnel and/or through the use of the Company Compliance Line.

“All employees share in this responsibility and are to employ environmentally safe practices in the performance of their duties.”

Environmental Compliance/Workplace Safety

SBC and its subsidiaries are strongly committed to preserving and protecting the environment. You must comply with all applicable state, local and federal laws and regulations concerning environmental safeguards. All employees share in this responsibility and are to employ environmentally safe practices in the performance of their duties.

The SBC companies also are dedicated to providing safe workplaces for its employees. Our companies provide training, tools and resources to facilitate compliance with all applicable workplace safety laws. As with regard to environmental compliance, it is the responsibility of all employees to take appropriate safety measures in the performance of their job duties. Employees are to abide by all safety practices and procedures established by their company. Should an employee believe an unsafe condition exists, he or she should immediately report the condition to his or her supervisor in order that it might be investigated and, if unsafe, rectified as soon as possible.

Threats and Violence in the Workplace

Violence, and the threat of violence, are becoming increasingly prevalent in our society. SBC and its subsidiaries are deeply concerned with the safety of their employees in this context. Physical violence or any perceived threat of violence shall be dealt with severely by disciplinary measures, up to and including the immediate termination of the employee. Moreover, the unauthorized possession of any weapon or implement which might be used as a weapon, including but not limited to a handgun, knife, firearm or club, is strictly prohibited on Company premise. Nor is a weapon permitted in a Company vehicle or in the employee's possession while an employee is engaged in Company business outside of Company premises. Any employee who witnesses or overhears prohibited conduct or has concerns regarding his or her own safety or the safety of a fellow co-worker should immediately report these concerns to a supervisor who, in turn, should immediately contact Security and/or the Legal Department. In addition, should an employee have reason to fear for his or her safety at work because of threats or concerns related to a customer or other individual outside of the Company's employment, the matter should be reported to the employee's supervisor and Security and/or the Legal Department should be notified.

“SBC and its subsidiaries are deeply concerned with the safety of their employees.”

Standards of Quality

SBC and its subsidiaries will continue to strive to achieve the highest standards of service and product quality in the telecommunications industry. Our goal is not simply to meet customer expectations but to exceed them. Contractual requirements and ethical considerations will be strictly observed. Practices and/or procedures which would undermine our reputation of quality with the public will be neither condoned nor adopted by any SBC entity.

“Adherence to the highest standards by all employees is the only sure way our companies can merit the confidence and support of the public.”

In Conclusion

This booklet reaffirms the importance of high standards in business conduct. Adherence to these standards by all employees is the only sure way our companies can merit the confidence and support of the public.

Each employee is responsible for his or her actions. For each, integrity is a personal responsibility.

Violations or suspected violations of any of the policies or principles contained in this booklet, or in other company rules and practices, should be promptly reported to your supervisor, Security personnel or your Legal Department, as applicable or, you may contact your Company's Compliance Line to voice your concerns. If you do not know your Company's Compliance Line number, it can be obtained by calling your Company Locator. A caller to the Compliance Line is not required to identify him/herself and is guaranteed that no disciplinary action will be taken against the employee solely as the result of placing the call in good faith. Your Company will investigate any reports made to the Compliance Line and the reporting employee may obtain information as to its resolution.

Should it be discovered that an employee has been arrested for suspected criminal conduct, on or off the job, his/her Company may conduct an independent review of the available facts and determine whether any disciplinary or other employment action is deemed to be warranted in order to maintain a safe and secure working environment.

No one will be permitted to justify an illegal act by claiming it was ordered by someone in higher management. No one, regardless of level, is ever authorized to direct an employee to commit an illegal or unethical act. Any reprisal against an employee because the employee in good faith reported a violation or suspected violation is strictly forbidden.

As a summary of basic principles, this booklet does not include all the rules and regulations that apply to every situation. Its contents have to be viewed within the framework of company policies, practices and instructions, and the requirements of the law. Moreover, the absence of a specific company practice or instruction covering a particular situation does not relieve an employee from exercising the highest ethical standards applicable to the circumstances.

Violations of any of the policies or principles contained in this booklet, or in other Company rules and practices, can result in disciplinary actions, including dismissal and criminal prosecution.

If you have any questions as to what the proper course of conduct should be in any given situation, consult your supervisor or your Legal Department.

Soy Based Inks



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ATTACHMENT K

