



# LMGC Business Code of Conduct

Our Foundation

## LMGC Commitment and Values

The LMGC commitment is to put our customers first by providing excellent service and great managed solutions experiences. By focusing on our customers and being a responsible member of our communities, we will produce a solid return for our shareowners, create meaningful work for ourselves and provide something of lasting value for society. As a result, LMGC's positive reputation and good name will spread both within the industry and abroad.

In order to keep this commitment, we need to always honor our core values:

### Integrity

Integrity is at the heart of everything we do. We are honest, ethical and upfront because trust is at the foundation of our relationships with our customers, our communities, our stakeholders and each other.

### Respect

We know it is critical that we respect everyone at every level of our business. We champion diversity, embrace individuality and listen carefully when others speak.

### Performance Excellence

We hold ourselves to a very high standard of performance. We prize innovative ideas and the teamwork it takes to make them realities. We never stop asking ourselves how we can make the customer experience better, and every day, we find an answer.

### Accountability

We take responsibility for our actions as individuals, as team members, and as an organization. We work together, support one another and never let the customer — or our coworkers — down.

Great companies are judged by what they do, not by what they say. To be the best, we're going to keep pushing ourselves in new and exciting directions. These values will guide our every action.

# A Message to all Employees

LMGC has established a reputation as a leader in the Disaster Relief industry and as an ethical corporate citizen. I'm proud that we are respected as a company that not only delivers great performance to customers and shareholders, but also adheres to high ethical standards and contributes to the well-being of the communities we serve. We are transforming ourselves from the inside out by revamping our processes, systems, and culture around the demands of the competitive marketplace.

It is imperative that, as we do so, all associates across all LMGc units continue to uphold the LMGc commitment and core values: put customers first, perform with intent to receive a letter of recommendation, act with integrity, treat people with respect, be accountable, and raise our standards of performance. This means that we also have to do more than simply follow the law: instead, we have to do the right thing — and we have to do it every day. Ethical conduct is the foundation of any lasting business success. For LMGc to succeed and win in the competitive marketplace, our brand must stand for integrity, trust and solid ethical standards.

Each of us contributes to LMGc's success in unique ways, but we share a collective responsibility to "do the right thing" and behave ethically at all times. To give us the tools we need to continue to manage our business with integrity, we have updated the Code of Conduct. It is intended as a resource to help guide us in acting responsibly, ethically and lawfully.

I urge you to thoroughly review the LMGc Code of Conduct that follows and discuss it with your co-workers. Of course, the Code cannot address every situation, and issues will continue to evolve as our business grows. When necessary, you can and should seek assistance and discuss concerns with your direct manager or his/her superior.

Our company will continue to win in the marketplace by putting our customers first, acting with integrity, and by making compliance and proper business conduct the foundation of our daily routine.

Sincerely,



Blake Linnekin, President

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**Our Commitment:**  
**Customers First**

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**Our Core Values:**

- Integrity
- Respect
- Performance Excellence
- Accountability

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# Introduction:

## Our Expectations and Values

### Sustain a Culture of Integrity

This Code of Conduct is a statement of our principles and expectations that guide ethical business conduct at LMGC. LMGC requires all employees and associates to use their judgment, to be accountable for their actions and to conduct business with integrity.

This Code of Conduct reflects our changing business environment and has been approved by the LMGC Board of Directors. It applies to everyone who acts on behalf of LMGC and its controlled subsidiaries and affiliates — including employees, executive officers, agents, consultants, contingent workers and interns. In addition to governing conduct among employees, this Code governs conduct between employees and customers, competitors and the numerous business providers (including suppliers, vendors, contractors and agents) who assist LMGC everyday. Because we want our business providers, customers and investors to understand how we do business and what they can expect of us, this Code appears on the LMGC website.

You may never violate this Code or any company policy simply because a supervisor directs you to do so. If you receive such a request, you should advise your supervisor that the request violates the Code. If your supervisor refuses to modify his or her request, you should contact the LMGC CEO immediately.

Failure to comply with any provision of this Code or company policy is a serious violation, and may result in disciplinary action, up to and including termination, as well as civil or criminal charges. These consequences may apply not only to employees and associates who violate the Code, but also to those who condone misconduct, fail to report or take reasonable measures to prevent, detect and address misconduct, or seek to retaliate against those who in good faith report potential misconduct.

### Set the Tone at the Top

#### Build Trust and Credibility

We earn credibility with our customers, business providers and co-workers by keeping our commitments, acting with honesty and integrity, and pursuing our company goals solely through honorable conduct.

**This Code of Conduct applies to everyone who does business for or on behalf of LMGC (for example: employees, interns, affiliates and in-house contractors).**

If you are a supervisor, you have the added responsibility of creating an open and supportive environment where employees feel comfortable asking questions and raising concerns. Ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example.

## Speak Up

### Do the Right Thing Because it's the Right Thing to Do

At LMGC, everyone should feel comfortable to speak his or her mind, particularly with respect to ethical concerns. You must report suspected and actual violations of this Code and company policy. LMGC will investigate reported instances of questionable or unethical behavior.

In deciding whether a violation of the Code has occurred or is about to occur, you should first ask yourself:

- Would I feel uncomfortable describing this conduct at a staff meeting? To my family? To the media?
- Will this conduct hurt LMGC in the long run? Will it cause LMGC to lose credibility with its customers, business providers or investors?
- Will this conduct hurt other people such as other employees, investors or customers?
- Will this conduct subject me, my co-workers or the company to legal fines or criminal charges?

If the answer to any of these questions is "yes" or even "maybe," you have identified a potential issue that you must report.

## Where to Report

### You are Accountable

Any LMGC employee may submit an anonymous or confidential complaint or inquiry, by calling the LMGC CEO or by e-mail at [ethics@LMGC.com](mailto:ethics@LMGC.com).

### Illegal, Dishonest or Harmful Acts

Illegal, dishonest or harmful acts and acts of hostility or violence should be reported immediately to local law enforcement or a 911 operator and then followed up with a call to Corporate Offices.

### Discrimination or Harassment

If you believe you are a victim or a witness of discrimination or harassment, you must report it to your supervisor or LMGC CEO at 404-380-7420. Additionally, you may also address the suspected discrimination or harassment directly with the person engaging in such conduct if you are comfortable doing so and you believe the conduct is unintentional.

Report all suspected violations of this Code.  
LMGC Ethics Line:

### LMGC Ethics Line: By telephone:

Blake Linnekin, LMGC CEO  
404-380-7420

By Fax:  
888-936-2010

By E-mail:  
[ethics@LMGC.com](mailto:ethics@LMGC.com)

By Mail:  
LMGC Ethics  
2032 Airport Court  
Marietta, GA 30132 USA

## Accounting, Internal Accounting Controls or Auditing Complaints

You must report any concerns or questions you have about the accuracy or integrity of LMGC's financial statements, reporting, accounting, internal accounting controls or auditing matters to the LMGC Ethics Line or Internal Audit at AccountingComplaints@LMGC.com.

## Confidential Reporting and No Retaliation

Reports and complaints will be kept confidential to the extent permitted by law and by the company's need to properly investigate the situation.

LMGC prohibits retaliation against employees who, in good faith, submit or participate in the investigation of any complaints. If you believe you or others are the subject of retaliation for reporting suspected misconduct or participating in an investigation, you must report the matter to the LMGC Ethics Line or the Legal Department.

## Cooperate with Investigations

You must cooperate completely in any investigation relating to LMGC, and must be truthful at all times. You may never interfere with or obstruct an investigation conducted by the company or any government agency. In addition, you may never disclose or discuss an investigation with unauthorized persons.

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Reports and complaints of suspected misconduct are confidential.

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LMGC will not tolerate retaliation against employees who report suspected misconduct, or provide information as part of an investigation.

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- Read the Code
- Understand the Code
- Utilize Available Resources
- Comply with the Code

### Legal Notice

This Code of Conduct is not an employment contract. Adherence to the standards of the Code of Conduct is a condition of continued employment. This Code does not give you rights of any kind, and may be changed by the company at any time without notice. Employment with LMGC is "at will," which means that you or LMGC may terminate your employment for any reason or no reason, with or without notice, at any time. This at-will employment relationship may not be modified except in a written agreement signed by the employee and an authorized representative of LMGC.



## Chapter

Diverse minds, experiences, cultures and perspectives help us better serve our customers.

Harassment or discrimination of any kind is not tolerated.

Q. My supervisor requires the team to meet attendance targets and quality goals. Every month there is another requirement. Isn't this harassment?

A. It is not considered harassment for management to enforce job performance requirements in a fair and consistent manner.

### Maintaining an Inclusive, Fair and Healthy Work Environment

#### Treat Each Other With Respect and Act With Integrity

Key components of our success are a diverse, productive work environment that is free from unlawful discrimination or harassment, and our commitment to fair and honest dealings in all of our transactions. LMGC is committed to creating such an environment because it brings out the full potential in each of us, which in turn contributes directly to our success.

#### 1.1 Diversity and Equal Opportunity Commitment

At LMGC, Diversity means embracing differences and cultivating an inclusive organization that reflects our marketplace and leverages the diversity of employees, customers, associates, and community partners because it's the right thing to do and drives business success.

LMGC is committed to attracting, developing and retaining a highly qualified, diverse and dedicated work force. It is LMGC's policy to comply fully with all laws providing equal opportunity to all persons without regard to race, color, religion, gender, sexual orientation, age, national origin, disability, military service or status, veteran status, marital status, citizenship status, or any other protected category under federal, state or local law. For company business, LMGC will use facilities, sponsor events or maintain memberships only at businesses or organizations that do not have exclusionary membership practices.

#### 1.2 Discrimination and Harassment

LMGC has a policy of zero tolerance for discrimination, sexual harassment or other unlawful harassment based on age, race, color, national origin, religion, gender, sexual orientation, disability or any other legally protected category under federal, state or local law. Harassment includes but is not limited to, racist, sexist or ethnic comments, jokes, gestures, or any action or statement creating an intimidating, hostile or offensive work environment.

#### 1.3 Workplace Violence

We all deserve to work in an environment that is free from violence or hostility. LMGC will not tolerate any threatening, hostile or abusive behavior by employees in the workplace, while operating company vehicles or on company business, or by any persons on company property, and will take immediate and appropriate action against offenders, up to and including termination and referral for criminal prosecution. Damage to property is also prohibited.

Domestic violence can also adversely affect workplace safety. If you are the victim of such violence, you should notify the police and Security of any person who may affect your safety or the safety of your fellow employees. You can also contact the Management for further assistance. Information is available on the LMGC website.

## 1.4 Environmental Health and Safety

LMGC is committed to providing a safe work environment for all employees, and complying with applicable environmental laws and regulations that govern workplace health and safety. You must immediately report to your supervisor all unsafe conditions or work-related injuries, illnesses, and accidents.

You are responsible for performing your job in an environmentally responsible manner, for recognizing environmental issues, and for seeking advice on how to comply with the law. You should also familiarize yourself with LMG C's environmental and safety programs which are available on the LMG C website.

If you believe that an environmental hazard exists, that there has been a release of any hazardous substance, or that environmental guidelines are not being followed, you must immediately report the situation to management.

If you are a supervisor, you must also ensure that your direct reports know the safety practices applicable to each of their jobs and implement and enforce all applicable regulations and policies. You must investigate all safety issues that come to your attention, and refer the matter to management.

The company is required to record and report work-related accidents. If you are involved in a work-related accident, you must immediately report it to a supervisor and follow the company's policies for reporting accidents and injuries.

Federal and state agencies may conduct periodic inspections. You must comply with these inspections and report any contact from a governmental agency or official immediately so that appropriate personnel may assist in any inspection.

Perform your job in a safe and environmentally responsible manner.

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Q. I am attending a work-related conference. A glass of wine is part of the dinner table setting. Can I drink the wine?

A. Yes, but consumption must be in moderation to avoid intoxication as you are representing LMG C and must behave professionally. However, employees driving company vehicles are prohibited from consuming any alcohol. You should never drink and drive.

## 1.5 Substance Abuse — Illegal Drugs and Controlled Substances

LMGC is committed to maintaining a safe and drug-free environment for all its associates. While on company time, company premises, or while operating company equipment or vehicles, you may never use, transfer, sell, manufacture or possess illegal drugs (which include any controlled substances that have not been prescribed for you by your doctor) or drug paraphernalia. You may not report to work under the influence of any illegal drug (e.g. show any sign of having taken the drug or drug testing demonstrates that you have used or consumed an illegal drug).

If you are taking any medication that creates a safety risk, you must report this to your supervisor, and you must not operate any LMG C machinery or vehicle if the medication affects your perception or responsiveness.

If you are arrested for a drug-related offense relating to conduct while on company property or business — or that otherwise relates to your work responsibilities — you must immediately report this arrest to your supervisor.

### 1.5.1 Alcohol

You may not be under the influence of, or drink alcohol while at work, while operat-

ing any vehicle, machinery, tools or equipment while conducting company business or while engaging in company activities for which any alcohol consumption might endanger the safety of yourself or impair your ability to perform your job.

Except where you have obtained prior approval from a department vice president or higher level senior manager, you may not serve, drink or possess alcohol on company premises, including in company or personal vehicles, while on company business. Although alcohol may be served at certain LMGC functions, events or business meetings if authorized by a department vice president or higher level senior manager, consumption at any such event is completely voluntary, should always be in moderation, and never in a manner that would embarrass or harm the company.

#### 1.6 Solicitation

Solicitation and distribution of literature during work time, or the use of company resources to solicit or distribute (fax machines, computers, telephones, etc.), and the distribution of literature in work areas at any time is prohibited. Non-employees may not engage in solicitation or distribution of literature on company premises.

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All fundraising and philanthropic initiatives that refer to or use the LMGC name, or that are organized by or directed at LMGC employees, must be conducted by the LMGC Media Department, and must conform to all company standards, including this Code.

#### 1.7 Employee Privacy

LMGC acquires and retains personal information about its employees in the normal course of operations, such as for employee identification purposes and provision of employee benefits. You should take appropriate steps to protect all personal employee information, including social security numbers, identification numbers and residential telephone numbers and addresses. You should never access, obtain or disclose another employee's personal information to persons inside or outside of LMGC unless you have proper approval and are acting for legitimate business purposes and in accordance with applicable laws and company policies.

##### 1.7.1 Monitoring On the Job

In order to protect company assets and ensure a safe workplace, it is necessary to monitor associates and company systems. As permitted by law, LMGC reserves the right to inspect, monitor and record the use of all company property, vehicles, systems and facilities — with or without notice — and to search any and all company property at any time and any personal property (including vehicles) on company premises.

Unless you are participating in an approved observation program or you have obtained prior approval from management, you may not record or videotape another employee, or access another employee's systems, records or equipment without that employee's knowledge and approval. In addition, unless you receive prior approval from the Management, you may never record or videotape any customer, business provider or competitor without that person's knowledge and approval.

#### 1.8 Misconduct Off the Job

Employees must avoid conduct off the job that could impair work performance or affect the company's reputation or business interests. You must advise your Human Resources representative of all felony convictions, and any criminal arrest or conviction that may affect your ability to perform your job.

LMGC reserves the right to inspect, monitor and record the use of all company property and systems..

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## Chapter

Q. I need to make extra money and I want to get a second job. Is this a problem?

A. We often allow qualified sub-contractors to work for us during their own slow seasons. While representing LMG, all workers and vehicles must clearly display our logos and/or magnets. Labeled hard hats and shirts must be worn at all times during an LMG job. In order to prevent a conflict of interest, no soliciting of other jobs will be permitted within a 1 mile radius of an existing LMG job for a period of 3 weeks from the completion of said job.

### Maintaining Integrity and Fairness in the Workplace

LMG's reputation depends heavily on the actions and integrity of its associates. It is imperative that you avoid any relationships or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job. You owe a duty to LMG to advance its legitimate interests when the opportunity to do so arises. You must never use LMG property or information for personal gain, or take personal advantage of any opportunity that arises in the course of your work for LMG.

#### 2.1 Avoiding Conflicts of Interest

You must make sound, impartial and objective decisions on behalf of the company. To ensure that your actions are in the best interests of the company, you should disclose any potential or actual conflict to the LMG Ethics Line. This chapter addresses some of the most common conflicts.

##### 2.1.1 Personal Conflicts of Interest

You may not supervise someone with whom you share a close personal relationship, such as anyone in your family or household, someone with whom you have or had a romantic relationship, or a similarly close personal relationship. Nor may you participate in the selection process for, or supervise LMG's relationship with, a company that does business with LMG if it employs someone with whom you have such a close personal relationship.

##### 2.1.2 Employment Outside LMG

You may — with or without compensation — be self-employed or employed by, consult with, own, perform services for, or aid a company or organization (including a charitable organization), that is a vendor, supplier, contractor, subcontractor or competitor of LMG's, or in the same lines of business as LMG, as long as your actions do not interfere or take business away from LMG.

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##### 2.1.3 Activities Outside of LMG

Many employees participate in outside organizations (such as their local school board or homeowners' association). Membership in these associations can increase the name recognition and reputation of LMG and is therefore encouraged.

#### 2.2 Political Conflicts of Interest

LMG encourages its employees to participate in the political process. It is the respon-

sibility of every LMGC employee to comply fully with all laws and regulations relating to political contributions and interaction with government officials, including lobbying.

#### 2.2.1 Personal Political Interests

Your personal political contributions and activities must be kept separate from the company. If you make political contributions, you may not refer in any way to your employment or use the company's assets, including its name, in connection with your contributions, unless required to do so by law.

If you are appearing before a government body or engaging in contact with a public official outside of your ordinary work duties regarding a business in which LMGC is engaged or a business issue in which LMGC has an interest, you should make it clear that you are not representing LMGC, and you should advise your supervisor in advance.

#### 2.2.2 Contributions of Corporate Assets

You may not make payments of corporate contributions, whether monetary or non-monetary assets, to any domestic or foreign political party, candidate, campaign or public official unless that contribution is permitted under applicable laws inside and outside the U.S., and approved in advance by the Legal Department.

You should never trade or help others trade on information that may be viewed as material inside information.

### 2.3 Insider Trading and Financial Interests

As an associate, you may become aware of material "inside information" — that is, information that is not publicly available and that could reasonably lead a person to buy or sell LMGC's or another company's securities. You must never use material inside information (even if you acquired it as a "tip" from others) to trade — or advise or assist another person in trading — in LMGC's or any other company's stock or securities. This also prohibits you from trading in derivatives of these securities, such as call or put options. Insider trading is a serious violation of the law and can result in severe civil or criminal penalties, including imprisonment

#### 2.3.2 Significant Financial Interests in Companies

You may not take a significant financial interest in a company that is a business provider or that competes with or is in one of the same lines of business as LMGC. A significant financial interest is any financial interest that: (a) is more than 1/10 of one percent of a company's publicly traded securities or other financial instruments, and (b) exceeds 25 percent of an employee's LMGC annual base salary and last annual bonus.

#### 2.3.3 Transactions in Securities

You must not engage in any financial transaction that permits you to benefit from the devaluation of LMGC's stocks, bonds or other securities, including, but not limited to, short selling or buying "put" options on LMGC stock.

In addition, you may not participate in financial transactions in the stock or other securities of business providers or prospective business providers, including "friends and family" deals or initial public offerings (IPOs), if these opportunities may influence or appear to influence your business judgment on behalf of LMGC.

#### 2.3.4 Loans

Personal loans from the company to any executive officer (as defined by securities law) are unlawful and strictly prohibited. Personal loans from the company to any other employee must be approved in writing in advance by the Legal Department or in accordance with an approved LMGC program. Loans between employees who are in a direct or indirect reporting relationship are prohibited.

Q. My supervisor is experiencing a personal emergency and I offered a loan until the next pay period. Is this a concern?

A. Yes, loans between employees who are in a direct or indirect reporting relationship are prohibited.

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## Chapter 3

Q. Can I place materials taken from one job and place them on another pile or different job?

A. No, this is a form of stealing from the company.

No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

### Protecting LMGC's Assets and Reputation

#### Promote Substance Over Form

##### 3.1 Preparing, Disclosing and Maintaining Accurate Records

LMGC is committed to maintaining and providing truthful information that fully satisfies applicable legal disclosure requirements.

###### 3.1.1 Create Accurate Records

If you have concerns about a record's accuracy and you have brought them to your supervisor's attention and your supervisor has failed to address them, you must report those concerns to the LMGC Ethics Line.

To ensure accurate reporting, LMGC employs both internal and outside auditors. You must cooperate with and provide any auditor or investigator accurate, timely and truthful information. You must not improperly influence, manipulate or mislead any auditor or investigator. Failure to cooperate with any audit or related investigation will result in discipline, up to and including termination.

###### 3.1.3 Retaining Company Records

Company records must be retained according to applicable laws. You may never destroy, alter, mutilate or conceal any record if you have been directed to retain it or if you know — or contemplate or reasonably believe there is a possibility — of any litigation, or any internal or external investigation concerning that record. If any person directs you to violate this policy, you must immediately contact the Legal Department or Security and use all reasonable measures to protect the record.

##### 3.2 Safeguarding Company Information

You must protect company information, both nonpublic information, which includes "inside information" (information that could reasonably lead a person to buy, sell or hold LMGC's or another company's securities) and nonpublic information entrusted to LMGC (such as an unlisted telephone number, marketing presentations, correspondence), as well as publicly available information in which LMGC or others have intellectual property rights (such as copyrighted materials).

###### 3.2.1 Protecting Nonpublic Company Information

You must safeguard nonpublic company information by following company policies and procedures and contractual agreements for identifying, using, retaining, protecting and disclosing this information.

You may not release nonpublic company financial information to the public or third parties unless specifically authorized by LMGC's Controller. You may not release other nonpublic company information to the public or third parties unless you are specifi-

cally authorized by a vice president or higher-level supervisor to do so.

You may only disclose nonpublic company information to employees who have demonstrated a legitimate, business-related need for the information. If you receive a subpoena or court order that requires the disclosure of nonpublic information, you must coordinate your response with Security and the Legal Department.

You may never disclose nonpublic company information to Internet forums (including “blogs”), chat rooms or electronic bulletin boards, selected shareholders or financial analysts.

Do not acquire or disclose nonpublic information.

When outside parties request nonpublic company information, you must inform your supervisor and refer the requesting party to the Legal Department.

Even after the company releases information, you should be mindful that related information may still be nonpublic and must be protected.

Your obligation to safeguard nonpublic information continues after your employment with the company terminates. Without LMGC’s specific written prior authorization, you may never disclose or use nonpublic company information.

If you suspect or are aware of any improper disclosure of nonpublic company information, you must report it to Security immediately.

### 3.2.2 Acquiring Nonpublic Company Information of Others

You cannot accept nonpublic information belonging to a third party (including information from a former employer) unless the person disclosing the information is authorized to do so, LMGC has the owner’s written permission to receive it, and the information is provided according to a written agreement that has been approved in advance by your supervisor and the Legal Department.

### 3.3 Proper Use of LMGC’s Property and Property Owned by Others

You must always protect LMGC’s tangible and intangible property and any property entrusted to your care by customers or business providers. Company property and the property of co-workers, customers, and business providers may not be taken, sold, loaned, given away or otherwise disposed of, regardless of its condition or value, without specific authorization. Property includes, but is not limited to, tangible property, data, records, chain saws, equipment, and all communications.

It is never appropriate to use LMGC machinery, equipment or vehicles for personal purposes (unless specifically authorized by LMGC management).

### 3.3.2 Company Funds

Company funds — which include anything that has or represents financial value — must be handled responsibly, honestly and in accordance with applicable company policies. Personal or unauthorized use of company funds is strictly prohibited. Corporate credit cards must be used solely for authorized business purposes and may not be used for personal charges.

Corporate credit cards are to be used only for approved business purposes.

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### 3.4 Protecting Communications and Computer Systems

Communication and information systems are provided to associates to conduct the company’s business and are valuable assets that must be protected by all associates. You must protect company information and data from accidental or unauthorized disclosure, misuse, improper alteration or destruction.

#### 3.4.1 Prohibited Activities

You may never use company systems (such as e-mail, instant messaging, the Intranet or Internet) to engage in activities that are unlawful, violate company policies, or result in LMGC's liability or embarrassment. Some examples of inappropriate uses of the Internet and e-mail include:

- Pornographic, obscene, offensive, harassing or discriminatory content;
- Chain letters, pyramid schemes or commercial ventures;
- Religious materials or unauthorized mass distributions;
- Gambling, auction-related materials or games;
- Large personal files containing graphic or audio material;
- Violation of others' intellectual property rights;
- Malicious software or instructions for compromising the company's security.

In addition, you may not use company communication networks or equipment to access personal e-mail service, such as "Hotmail," "America Online," "Earthlink" or any other external e-mail service without authorization from your supervisor.

### 3.4.2 Protecting Company Systems

You must protect the security of any identification access number or password that you use for any computer, network or communication device. All electronic media — such as software, diskettes, CD-ROMs, and files, when acquired through public networks (e.g. the Internet) or from outside parties, must be checked for viruses prior to installation or use. Only approved and properly licensed software is to be used on company systems, and its use is subject to the applicable software owner's license agreements. You must obtain proper authorization prior to acquiring, accessing, using, commenting over public networks (e.g., the Internet), altering, disposing of, or destroying data.

### 3.5 Sabotage and Espionage

LMGC's operations must be appropriately secured from sabotage and espionage to protect our customers and each other. This includes customer and employee personal information, network operations and facilities, computer systems and passwords, security procedures, company facilities and their locations, technical and marketing research data, product development information and business plans and strategies.

External electronic mail sources may in some instances circumvent company virus protections.

Q. A friend sent me a chain letter e-mail requesting that I forward to ten others to support a charitable cause. Is this O.K.?

A. No. Circulating chain letters through company systems or mail is prohibited.

Q. Can I check the weather on the internet with a company computer?

A. Absolutely, Our business revolves around the weather and should be available at all times.

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Always wear/display your identification badge at work.

Always protect LMGC's property

Never compromise integrity for a quick solution.

Intellectual Property can be many things such as marketing strategies, business plans, and other items. If not certain, contact the Legal Department.

You must take all appropriate precautions to protect LMGC's systems and premises. Do not leave visitors unescorted or sensitive areas unattended or unlocked. When on company property (or, if appropriate, while on company business) wear your identi-



fication badge and request identification from others whom you do not recognize. Most important, you must report all suspicious activity to Security immediately.

### 3.6 Intellectual Property

Intellectual property includes information protected by LMGC's trademarks or copyrights, the use of which is restricted by applicable intellectual property laws. To safeguard LMGC's intellectual property from illegal copying or other misuse, employees must ensure it is affixed with or identified by trademark, service mark or copyright symbols.

If you're unsure whether or what protection is necessary or appropriate, or if you believe disclosure or use by a third party is improper, contact the Legal Department.

#### 3.6.2 Information of Former Employers

Former employers may require you to sign non-disclosure or other agreements that may affect your work at LMGC. If you have not done so already, you must disclose these agreements to your supervisor immediately after you join LMGC.

### 3.7 Protecting LMGC's Reputation

LMGC's reputation as a company and corporate citizen is a key asset. You are responsible for protecting this valuable asset.

Requests and inquiries must be referred to the authorized groups described below:

- Media Relations is responsible for contacts with the news media and inquiries about community relations.
- The Legal Department handles contacts from outside attorneys and federal and state legislative bodies and regulatory agencies.
- Human Resources handles all inquiries about current and former employees, including employment verification.

Unless you receive prior approval, you may never suggest that you are speaking on behalf of LMGC when presenting your personal views at community, professional or cultural functions, or on the Internet. Even if you claim to be speaking on your own behalf, you must not mention LMGC without first coordinating your comments with Media Relations and, where appropriate, the Legal Department.

Use of the company brand and logo must adhere to approved corporate identity specifications. To seek guidance or report misuse, contact Media Relations

Media Contacts:

publicrelations@lmgc.com

Always report information accurately and promptly resolve discrepancies in company records.

LMGC's reputation is a key asset that all employees must protect.

LMGC will generally deny requests for company-sponsored endorsements or testimonials. All requests, including the use of LMGC's name should be directed to Public Relations Department

## Chapter

### Maintaining Integrity and Fairness in the Marketplace

#### Our Keys to Success

LMGC's integrity in the marketplace is a key component of our reputation for trustworthiness and service.

## 4.1 Customer Relationships

LMGC's customers expect and deserve fair, honest and respectful service. You are accountable for your role in the delivery of that standard of service.

### 4.1.1 Customer Privacy and Communications

You must not — or permit others to — access any sensitive or personal customer information.

You must ensure that business providers, such as contractors and vendors, make appropriate arrangements to protect customer privacy and identifying information. If you are aware of or even suspect a breach of customer privacy — including a loss of customers' personal identifying information — you must notify Security immediately.

You should also know and follow the "Privacy Principles" below.

#### LMGC PRIVACY PRINCIPLES

1. LMGC obtains and uses individual customer information for business purposes only.
2. LMGC informs customers how information LMGC obtains about them is used, as well as their options regarding its use.
3. LMGC gives customers opportunities to control how and if LMGC uses individual information about them to sell them products and services.
4. LMGC enables customers to control how and if LMGC discloses individual information about them to other persons or entities — except as required by law or to protect the safety of customers, employees or property.
5. LMGC strives to ensure that the information LMGC obtains and uses about customers is accurate.
6. LMGC considers privacy implications as new services are planned and introduced and informs customers of the privacy implications of these services.

Treat customers fairly in all aspects of transactions, including pricing, advertising, marketing and service solutions.

Protect customer confidential information and respect customer privacy by following the LMGC Privacy Principles.

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7. All LMGC associates are responsible for safeguarding individual customer communications and information.

8. LMGC participates in and supports consumer, government and industry efforts to identify and resolve privacy issues.

### 4.1.2 Customer Marketing

Before using any customer information to market additional products or services, or disclosing customer information to other companies for marketing purposes, you must follow all company policies and applicable laws and regulations regarding the use and disclosure of this information.

## 4.2 The Government as a Customer

When dealing with federal, state and local government agencies that are customers, you should apply the same high standards of fairness and integrity that you employ with all customer contracts and you should consult with the Legal Department to identify additional laws, regulations and procedures that you must follow.

### 4.2.1 Cooperating With Government Investigations

You must cooperate with government investigations and inquiries relating to LMGC. To ensure that the company properly responds to an investigation, you must advise

the Legal Department and Security of any government inquiry. Any documents, information or testimony you provide in response to a request by a government agency must be full, fair, accurate and timely, and reviewed in advance by the Legal Department.

If you discover or suspect any misrepresentation, misstatement, misunderstanding, omission or other mistake by yourself or another employee, you must immediately disclose it to the Legal Department so that the company can take prompt steps to remedy the situation.

Provide accurate and clear information.

Learn and follow all additional requirements when dealing with the government as a customer.

Ethical behavior is promoted by full and open disclosure.

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You should never use gifts and entertainment to place undue influence on the company's business providers.

#### 4.2.2 Disclosure of a Court Order

#### 4.3.1 Gifts and Entertainment

LMGC competes on the merit of its products and services, and not through gifts, entertainment, or other business courtesies. Although the exchange of gifts and entertainment can promote successful working relationships and good will, you must follow all applicable laws and company rules and procedures. Failure to follow these provisions can harm LMGC's reputation or result in fines or criminal penalties.

#### 4.3.6 Special Rules for Government Officials

It is important to remember that special rules apply to domestic government officials. Laws, rules and regulations concerning appropriate gifts and entertainment for government employees are complex and can vary depending on government branch, state or other jurisdiction. All LMGC employees who, on LMGC's behalf, interact with government officials are responsible for complying with applicable laws and regulations.

#### 4.3.7 Special Rules for Foreign Officials

The Foreign Corrupt Practices Act and other countries' laws restrict the exchange of gifts and entertainment with foreign officials. Before offering meals, gifts, gratuities, entertainment or anything of value to any foreign government personnel, official, political party or party official or candidate, you must consult in advance with the Legal Department to make sure that you are in compliance with applicable U.S. and foreign laws and LMGC standards.

#### 4.3.8 Returning Gifts

If a gift exceeds the standards set forth in this Code, you should return the gift with an explanation that company standards do not permit you to accept such gifts.

#### 4.5 Relationships with Departing and Former Employees

Your obligation to abide by certain company standards exists even after your employment ends. For example, absent vice-president level or above approval, you may not accept a job with another company if your new duties would cause you to:

- Breach any employment condition or agreement you have with LMGC; or
- Use or disclose LMGC nonpublic information in the new position.

In addition, when leaving or retiring from the company you must ensure that you

return all LMGC property in your possession, including all records and equipment.

You may not provide any LMGC nonpublic company information to former employees. If a former employee solicits this information from you, you must notify Security or the Legal Department immediately.

You may not rehire a former employee or engage that employee as an independent contractor or agency employee unless that person has been separated from the company for a minimum time period established by Human Resources.

You may not purchase products or services on LMGC's behalf from former employees unless they have been separated from the company for more than a year. Even if this is the case, you must obtain appropriate authorization from your supervisor and follow LMGC's procurement policies.

Certain former employees may have information from which they can still unfairly benefit even after a year. If you suspect this is the case, you should consult with Corporate Procurement for appropriate action. Exceptions may be made only with approval from a department vice president.

#### 4.6 Interaction with Competitors

Q. I have established good relations with the account executives of some of our competitors. At trade shows and conferences we often catch up on industry trends, customer deals, etc. Is this appropriate?

A. Use caution in these situations and do not discuss the price or terms of any LMGC contracts or gain competitive information directly from a competitor. You should not even joke about work related topics since this could be misinterpreted. You should refuse to discuss any anti-competitive issues and leave such conversations immediately.

You must make independent pricing and marketing decisions and cannot coordinate your actions with LMGC's competitors.

##### 4.6.1 Avoiding Violations of the Antitrust Laws

The antitrust laws prohibit two kinds of activities. If you have any questions about whether any activity falls into the following categories, or if you have any information about someone in the company engaging in the following types of conduct, you must contact the Legal Department.

First, the antitrust laws prohibit agreements with competitors fixing prices, dividing markets, rigging bids, or otherwise limiting competition. Both explicit agreements and informal "gentlemen's agreements" are against the law. Violation of these prohibitions may result in serious consequences for you or the company, including criminal liability and imprisonment.

The following activities are prohibited:

- **Price Fixing.** You must not agree with a competitor on prices or set prices in concert with a competitor.
- **Market Allocation.** You must not agree with a competitor to divide markets or engage in any communications with competitors about the places or customers for which they or LMGC are competing.
- **Bid Rigging.** You must not agree with a competitor to set the terms or direct the outcome of a bidding process. You also must not engage in any communications with competitors about bids.
- **Group Boycotts.** You must not boycott a supplier or customer as a way to make the supplier or customer stop dealing with a rival. A group boycott – an agreement with others not to deal with another person or business – may violate the antitrust laws if it is used to force customers to pay higher prices or to hinder a rival from entering the

market.

In addition, you should be careful of the following:

- **Joint Ventures, Teaming Arrangements, and Non-Competition Agreements.** The antitrust laws do not prohibit all joint ventures or teaming arrangements. Sometimes, agreements not to compete are permissible as part of otherwise valid business arrangements. But those occasions are limited and must be approved by the Legal Department. You may not submit a joint bid, enter into a joint venture or teaming arrangement, or negotiate a non-compete agreement without the approval and involvement of the Legal Department.

Second, the antitrust laws prohibit certain types of unilateral conduct, that is, conduct undertaken by LMGC alone. Violation of this prohibition may result in large fines and judgments against the company.

You must not engage in the following conduct:

- **False Statements.** When making comparisons to a competitor, stick to the facts. Do not embellish, exaggerate, or mislead.

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- **Exclusive Dealing.** Exclusive dealing occurs when a company requires, as a condition of doing business, that a customer forego dealing with competitors.

- **Refusals To Deal.** Refusals to deal occur when a company declines to offer to one customer a service that it makes available to other customers, or when a company offers a service to one customer on more burdensome terms than it makes available to other similarly situated customers.

- **Tying.** Tying occurs when a company forces a customer who wants one product to buy a second product also, as a condition of buying the desired product.

- **Reciprocal Dealing.** Reciprocal dealing occurs when a company forces a supplier to buy something from the company as a condition for the company continuing its business relationship with the supplier.

- **Setting Prices Below Cost.** The antitrust laws limit the circumstances in which a company may set prices below cost.

#### 4.6.2 Marketing Company Products and Services

You may not make inaccurate, misleading or unsubstantiated comments when discussing LMGC's products and services in business-related conversations, advertising and other public communications. You must obtain approval beforehand from the Marketing Department prior to releasing any new marketing campaign or communication to current or potential customers.

Prior to marketing or discussing the company's products or services with potential customers, you must familiarize yourself with applicable laws and regulations. If you are unsure which regulations or laws apply to you, you should consult the Legal Department.

#### 4.6.3 Statements About Competitors and Their Products

You should promote LMGC's products and services through fair and accurate comparisons with its competitors, and sell on the strength of LMGC's products, services and reputation.

You should not make unfair, misleading or inaccurate comparisons with competitors' products and services; comment on competitors' character, financial condition, or potential legal or regulatory problems; or make negative remarks about entire groups of competitors and their products and services.

Deal fairly and honestly in all activities, including pricing, licensing, and rights to sell.

Accurately identify yourself when you gather public information about competitors.

#### 4.6.4 Gathering Information About Competitors

While it is entirely proper for employees to gather information about competitors, you must avoid even the appearance of improperly acquiring this information. You must accurately represent yourself and never misrepresent your identity when gathering competitive information. You must also ensure that any agents or consultants employed to obtain competitive information on LMGC's behalf also represent themselves accurately and follow these principles.

Generally, it is appropriate to gather competitive information from public sources, industry gatherings and surveys, and benchmarking/competitive research. It is never appropriate to request or obtain nonpublic competitor information from government or agency reports that are not available to the public from other competitors or former employees of competitors, who must abide by any non-disclosure or confidentiality agreements with their former employers, unless you are well briefed beforehand by the Legal Department regarding what you can and cannot discuss. It is also never appropriate to commit theft, espionage or breach of a competitor's non-disclosure agreement.

If you have reason to believe that competitive information from customers or others may not be public, you should consult with the Legal Department before accepting or using this information.

#### 4.7 Relationships With Affiliates

In order to ensure that the company's organizational structure is not used unfairly, all transactions between and among the LMGC companies (also called "affiliates") must comply with company policy and all federal and state laws and regulations.

#### 4.8.5 Payments to Contractors

Payments to contractors (including agents, marketing representatives and consultants) must be made in accordance with the terms of their contracts, which must be in writing. Prior to entering any contract with a foreign party, you should review it with the Legal Department. Contracts that provide for payments to parties other than the contracting party are generally not acceptable.

In order to comply with the FCPA's record-keeping requirements, you must deny requests from foreign parties to vary the terms of contracts by:

- Increasing or decreasing agreed amounts on any invoice if such a request is contrary to LMGC's standards, procedures or applicable laws; or
- Submitting multiple invoices if you suspect such invoices may be used in a manner contrary to LMGC standards, procedures or applicable laws or are otherwise being used improperly.

Commissions and other fees paid must be reasonable and customary, and may not exceed legal limits in the locality where they are paid.

Pay promptly and in accordance with agreed upon terms.

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#### 4.8.6 Record Keeping Requirements

LMGC is required to accurately record information regarding payments, including the amount and recipient. These record-keeping requirements apply to any agents or consultants who represent LMGC. This means that you must ensure that LMGC — and any agent or consultant who acts on LMGC's behalf — properly documents all transactions and maintains accurate information with respect to the amount and ultimate recipient of contract payments, commissions and other payments.

## Sources of Help

LMGC provides many resources to help you make ethical decisions. In addition to your supervisor, you may consult with your Human Resources representative or the LMGCEthics Line.

[ethics@lmgc.com](mailto:ethics@lmgc.com)

ethics line: 800-936-2010