

Business Code of Ethics and Conflict of Interest Policy

Ademino & Associates is proud of its tradition as an ethical and socially responsible organization. Over the years, this has meant dealing fairly with our associates, our agents, our policyholders, government regulators, and the public. Everything we achieve depends upon the trust of these essential constituencies. Each associate of this organization, who acts on its behalf, is responsible for its good name and for following the tenets set forth in this statement.

The Agency will conduct its business honestly and ethically wherever we operate in the country. We will constantly improve the quality of our services and operations and will maintain a reputation for honesty, fairness, respect, responsibility, integrity, trust, and sound business judgement. No illegal or unethical conduct on the part of officers, managers, or associates is in the Agency's best interest. We will not compromise our principles for short-term advantage. The ethical performance of the Agency is the sum of the ethics of the people who work here. Thus, we are all expected to adhere to high standards of personal integrity.

- **Customers** – Place the customer's interest first in all decisions and actions.
- **Conflicts of Interest** – Avoid even the appearance of inappropriate behavior or conflict of interest by refusing to accept gifts, payments, fees, services, discounts, or other favors that would, or might appear to, improperly influence actions or decisions.
- **Contracts** – Honor the contractual rights of all parties to any transaction. Consider the spirit of the contractual relationship and not just the terms.
- **Keep with your Realm of Expertise** – Propose only services that are within your areas of expertise, within knowledge, and ability. Bring in other team members when their expertise will benefit the customer.
- **Confidential Data** – Guard all confidential data, whether it is regarding the agency, its customers, or another organization, such as an insurer, with whom we do business.
- **Intellectual Property** – Respect the copyrights of publishers and other organizations and do not risk an infringement suit by inappropriately copying and distributing their content.

- **Respect your Colleagues** – Act professionally and with respect for your associates, abiding by the Agency harassment, safety, and other policies.
- **Duty to Come Forward** – As part of its commitment to ethical and legal behavior, the Agency requires its associates to report any actual, apparent, or suspected violations of law or ethical standards so that they can be investigated and dealt with appropriately. Every inquiry and complaint made will be taken seriously. Each will be fully investigated on its merits and the associate will be informed of the resolution. Under no circumstances will an associate suffer retaliation by the Agency as a consequence of coming forward under this policy.

Remember that good ethics is good business!