



Personal Conduct/Conflicts of Interest

We must maintain high ethical standards in everything we do and avoid conflicts of interest and the appearance of conflicts of interest. For purposes of our relationships with our customers, a conflict of interest potentially exists in any situation in which you or your immediate family might personally benefit or appear to benefit (either directly or indirectly) from a transaction or decision in which you were involved or about which you had information gained through the job. It is your responsibility to notify your managers if any such situation exists or has existed, and refrain from being involved in any activity that conflicts or appears to conflict with Company duties and responsibilities to our customers.

Any employee who makes or receives any payment in exchange for business favors or preferential treatment violates Company policy. Such actions expose the Company to potential liability and damages the Company's reputation and the individual's personal honor.

Children's Cancer Recovery Foundation employees are expressly prohibited from: (1) soliciting for themselves or a third party (other than the Company itself) anything of value from anyone in return for any business, service or confidential information of the Company; and (2) subject to the exceptions set forth below, accepting anything of value (other than bona fide salary, wages, fees or other compensation paid in the usual course of business) from anyone in connection with the business of the Company, either before or after a transaction is discussed or consummated.

Acceptance of the following gifts, favors and entertainment is permissible:

1. meals, refreshments, travel arrangements, accommodations or entertainment, all of reasonable value (not exceeding \$100 per person) and in the course of a meeting or other occasion, the purpose of which is to hold bona fide business discussions, provided that the expense would be paid for by the Company as a reasonable business expense, if not paid for by another party;
2. advertising or promotional material of reasonable value, such as pens, pencils, note pads, key chains, calendars and similar items;
3. discounts or rebates on merchandise or services that do not exceed those available to other customers.
4. gifts of reasonable value (not exceeding \$50) that are related to commonly recognized events or occasions, such as promotion, new job, wedding, retirement, Christmas or Bar Mitzvah; or
5. civic, charitable, educational or religious awards for recognition of service and accomplishment (not exceeding \$100).