

# Code of Ethics Policy

## Overview

This policy describes the conduct expected of all employees and Directors. It is general and not intended to be all-inclusive.

## Discussion

### Applicable Laws

The conduct of the Company and its employees are to be in compliance with the laws and regulations relating to the company's business.

Any employee, officer or director involved in court or other similar proceedings arising out of his or her employment with, or service to, the Company is expected to abide by the rules, cooperate with the orders of, and not in any way commit perjury or obstruction of justice. All Company employees must, at a minimum, comply with all applicable laws that relate to the conduct of our business in the relevant jurisdiction.

### Generally Accepted Accounting Principles (GAAP)

Generally Accepted Accounting Principles are accounting principles that are considered to have substantial authoritative support. Pronouncements made by the Financial Accounting Standards Board (FASB) are considered GAAP. You can learn more about GAAP and FASB at <http://www.fasb.org>. All company records are to be in compliance with Generally Accepted Accounting Principles.

Employees are expected to maintain accurate and reliable corporate records that comply with GAAP and Company policies and procedures.

The Company CEO, Financial Officer, and others identified by the CEO have specific legal obligations to ensure the Company provides full, fair, accurate, timely, and understandable financial reports and internal controls.

### Moral and Ethical Standards

All employees are expected to adhere to sound moral and ethical standards.

### Loyalty

All employees and Directors have a duty of loyalty to the Company and may not take personal advantage of any opportunity that properly belongs to the Company.

## **Kickbacks and Gratuities**

The Company considers it to be unethical and illegal for any employee to accept or offer payment, gift, gratuity, or employment to or from vendors, contractors, or government officials as an inducement for preferential treatment. All offers for kickback and gratuity shall be reported to the CFO.

The Company does not consider the giving or acceptance of a ball cap, tee shirt, jacket, an occasional lunch, game of golf, or the like with non government officials to be a kickback, gift or gratuity for the purpose of this policy.

## **Conflicts of Interest**

The best interests of the Company are expected to be foremost in the minds of our employees, officers, and directors as they perform their duties. No employee shall be, potentially be, or appear to be, subject to influences, interests, or relationships, which conflict with the best interests of the Company.

Employees, without prior approval of the CEO, may not serve as an Officer, Director, manager, employee, or agent of any company that is a competitor, supplier, or customer of the Company.

Employees should not engage in outside interests that divert time and attention from properly attending to Company affairs.

The Company does not make loans to or guarantee obligations of Company Officers and Directors.

## **Improper Influence on Conduct of Audits**

No officer, director, or any other person acting under the direction thereof, shall take any action to fraudulently influence, coerce, manipulate, or mislead any independent public or certified accountant engaged in the performance of an audit of the financial statements of the Company for the purpose of rendering such financial statements materially misleading. Examples of such behavior include, but are not limited to:

- Offering or paying bribes or other financial incentives, including offering future employment or contracts for non-audit services.

- Providing an auditor with an inaccurate or misleading legal analysis.

- Threatening to cancel or canceling existing non-audit or audit engagements if the auditor objects to the Company's accounting.

Seeking to have a partner removed from the audit engagement because the partner objects to the Company's accounting.

Blackmailing, and Making physical threats.

Confidential Information

Employees and Directors may not divulge confidential or proprietary information except as authorized by the CEO.

## **Employee Privacy**

The Company is committed to protecting the privacy of its employees. This includes employee data maintained by the company. Employee data will primarily be used to support Company operations, provide employee benefits, and comply with laws and regulations. The Company and all employees are expected to comply with all data protection laws, regulations, and Company policies.

## **Computing Resources, Email, and the Internet**

All Internet related services are intended to be used for company business. All information on company computer systems, including electronic mail, is the property of the Company. To ensure that computing resources are used in accordance with expectations, management may inspect and disclose the contents of electronic messages if such inspection and disclosure is made for legitimate business purposes or as necessary to protect the rights and property of the Company.

Use of computing resources to offend or harass others is not acceptable and prohibited. Employees, who use the Internet to access sites that contain offensive materials related to sex, race, or other protected categories, or who otherwise violate these prohibitions, will be subject to termination.

## **Political Activities**

The Company considers itself an apolitical organization. As such, no Company funds or assets will be contributed or used for the purpose of influencing any election without the approval of the Company Board of Directors. This policy does not prohibit Company participation in trade or special interest organizations.

## **Safety and the Environment**

The Company is committed to full compliance with all safety and environmental laws and regulations. All employees are expected to comply with these laws, regulations and Company policies.

## **Anti Trust**

Any planning or acting together with competitors about the nature, extent, or means of competition is a violation of Company policy and anti trust laws. This includes, but is not limited to, price fixing, sales or production quotas, geographic competition, and boycotts.

## **Compliance Procedures**

Any employee who knows, or has reason to believe, of violations to this or other company policies and procedures is expected to promptly report the violation to:

Name: Christopher Shepard  
Telephone: 810-233-7331 x 330

Reporting may be anonymous. No employee will be subject to retaliation, discrimination, or other adverse treatment for reporting known or suspected violations of this and other Company policies and procedures.

Each year, Company Officers are required to state in writing that they have no knowledge of material violations to this and other Company policies other than those that may have been previously reported, if any.

As part of its regular auditing procedures, the Company audit committee will periodically review internal policies and procedures and report their finding to executive management.

The Company's external auditors are also expected to report in writing any known or suspected violations of this and other Company policies.

The company discloses this Code of Ethics on its web site in addition to all other filing requirements.

## **Document Control**

Interpretation: Company CEO  
Authorization: Company CEO  
Date Accepted: 10-25-2005

## **Revision Information:**

## **Related Documents:**

All Company policies, procedures, and internal controls are related to this document.

**Receipt of Acceptance**  
**EL Hollingsworth & Company, Inc.**  
**Code of Ethics Policy**

I, \_\_\_\_\_, as an officer, director and/or employee of EL Hollingsworth & Company, Inc., by affixing my signature herein agree to abide by the Code of Ethics Policy contained in this document. I further certify that I have been provided a complete copy of the Accounting and Internal Control Policies of E.L. Hollingsworth & Company, and agree to abide by the policies set forth herein. I also understand that this policy may be updated from time-to-time. The company commits to make every effort to notify me of significant changes or updates to this policy but it is ultimately my responsibility to review all updates and/or changes.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_