



CONFIDENTIALITY POLICY

It is the policy of the Company that the internal business affairs of the organization, particularly confidential information and trade secrets, represent Company assets that each employee has a continuing obligation to protect.

Information designated as confidential may not be discussed with anyone outside the organization and may be discussed within the organization only on a “need to know” basis. In addition, employees have a responsibility to avoid unnecessary disclosure of non-confidential internal information about the Company, its customers and suppliers. Accordingly, the Company may prohibit the use of cameras, including camera phones, in restrooms and other designated areas in order to secure employee privacy, trade secrets and other confidential business information. However, this employee responsibility to safeguard internal Company affairs is not intended to impede normal business communications and relationships.

Employees authorized to have access to confidential information may be required to sign special nondisclosure agreements and must treat the information as proprietary Company property for which they are personally responsible. Employees are prohibited from attempting to obtain confidential information for which they have not received authorization. Employees violating this policy will be subject to disciplinary action, up to and including termination and may be subject to legal action.

The Chief Executive Officer is responsible for coordinating the security and control of Company information and for approving any exceptions to this policy. Managers and supervisors are responsible for identifying information that should be classified as confidential and should work closely with the Chief Executive Officer to develop procedures to secure and control that information.

All media inquiries and other inquiries of a general nature should be referred to the Chief Executive Officer. In addition, all press releases, publications, speeches or other official declarations must be approved in advance. Further, questions about employee references should be referred to the Human Resources Department.

Employees should not discuss with the officers, directors or employees of competing organizations any topic that might give the impression of an illegal agreement in restraint of trade. These prohibited topics include pricing agreements, customer allocation and division of sales territories.

Employees are prohibited from disclosing material "inside information" that could affect the market value of the Company's financial securities to anyone outside the organization until that information has been made available to the public by management. Employees also are prohibited from using that information for their own personal profit.