



TRADALLIANCE

We focus on service

CODE OF BUSINESS CONDUCT AND ETHICS

In performing their job duties, TRADALLIANCE employees should always act lawfully, ethically, and in the best interests of TRADALLIANCE.

This Code of Business Conduct and Ethics (the "Code of Conduct") sets out basic guiding principles. Employees who are unsure whether their conduct or the conduct of their coworkers complies with the Code of Conduct should contact their upper management. Employees may also report any suspected noncompliance.

I. Compliance with Laws, Rules and Regulations

Employees must follow applicable laws, rules and regulations at all times. Employees with questions about the applicability or interpretation of any law, rule or regulation, should contact their upper management.

II. Conflicts of Interest

In performing their job duties, employees are expected to use their judgment to act, at all times and in all ways, in the best interests of TRADALLIANCE.

A "conflict of interest" exists when an employee's personal interest interferes with the best interests of TRADALLIANCE. For example, a conflict of interest may occur when an employee or a family member receives a personal benefit as a result of the employee's position with TRADALLIANCE.

A conflict of interest may also arise from an employee's business or personal relationship with a customer, supplier, competitor, business partner, or other employee, if that relationship impairs the employee's objective business judgment.

Employees should attempt to avoid conflicts of interest and employees who believe a conflict of interest may exist should promptly notify their upper management.

III. Discrimination and Harassment

TRADALLIANCE provides equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind.



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IV. Health and Safety

TRADALLIANCE provides a clean, safe and healthy work environment. Each employee has responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices and reporting accidents, injuries and unsafe conditions, procedures, or behaviors.

Violence and threatening behavior are not permitted. Employees must report to work in a condition to perform their duties, free from the influence of illegal drugs or alcohol.

V. Price Fixing

Employees may not discuss prices or make any formal or informal agreement with any competitor regarding prices, discounts, business terms, or the market segments and channels in which the Company competes, where the purpose or result of such discussion or agreement would be inconsistent with applicable antitrust laws.

VI. Bribery; Payments to Government Personnel

TRADALLIANCE rejects all forms of bribery and corruption in all forms. Giving or receiving gifts or entertainment should remain within acceptable customary and legal limits.

Employees may not bribe anyone for any reason, whether in dealings with governments or the private sector. Employees may not make illegal payments to government officials themselves or through a third party.