

TESTEQUITY

TESTEQUITY, LLC

Code of Conduct and Ethics for All Employees

Table of Contents

1 INTRODUCTION	2	16 RECORD-KEEPING, FINANCIAL CONTROLS AND DISCLOSURES	9
2 COMPLIANCE WITH LAWS, RULES, AND REGULATIONS.....	3	17 PROTECTION AND PROPER USE OF COMPANY FUNDS, ASSETS AND INTELLECTUAL PROPERTY.....	10
3 CONFLICTS OF INTEREST	3	18 BOYCOTTS AND TRADING SANCTIONS	10
4 CONFIDENTIALITY	4	19 GOVERNMENT CONTRACTS	11
5 COMPANY OPPORTUNITIES.....	4	20 WAIVERS OF THE CODE OF BUSINESS CONDUCT AND ETHICS.....	11
6 COMPETITION AND FAIR DEALING	5	21 REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOR.....	11
7 BRIBERY AND CORRUPTION	5	22 IMPROPER INFLUENCE ON CONDUCT OF AUDITORS.....	12
8 GIFTS AND ENTERTAINMENT.....	5	23 SOLICITATION, DISTRIBUTION AND POSTING	12
9 POLITICAL CONTRIBUTIONS	6	24 COMPLIANCE PROCEDURES.....	13
10 PAYMENTS TO GOVERNMENT PERSONNEL.....	6	ACKNOWLEDGEMENT OF BUSINESS CODE OF CONDUCT AND ETHICS.....	14
11 TRADE COMPLIANCE.....	7		
12 DISCRIMINATION, RETALIATION, & HARASSMENT	7		
13 HEALTH, SAFETY AND ENVIRONMENT	8		
14 WORKPLACE VIOLENCE.....	8		
15 ENVIRONMENTAL.....	8		