

## Millennium Sourcing's Ethics Policy

1. Always maintain the highest standards of ethical behavior. Avoid the intent and appearance of unethical or compromising practice in relationships, actions, and communications.
2. Refrain from any private business or professional activity that would create a conflict between personal interests and the interests of Millennium, including Millennium-sponsored programs of personal purchases that are not business related.
3. Refrain from soliciting or accepting money, loans, credits, or prejudicial discounts, **and the acceptance of gifts**, travel & entertainment favors, or services from present or potential suppliers that might influence, or appear to influence, purchasing decisions.
4. Demonstrate loyalty to Millennium by diligently following all guidelines and lawful instructions of Millennium, using reasonable care and only within delegated business authority granted. Only those employees who have been delegated this authority may issue a purchase order, sign a purchase contract or otherwise obligate Millennium, in writing, to purchase goods or services.
5. Promote positive supplier relationships through courtesy and impartiality in all phases of the purchasing cycle. Refrain from reciprocal agreements that restrain competition.
6. Encourage all segments of society to participate in the Millennium business process by demonstrating support for small, disadvantage, and minority-owned businesses.
7. Handle confidential or proprietary information belonging to Millennium or suppliers with due care and proper consideration of ethical & legal ramifications and all governmental regulations.
8. Conduct international purchasing in accordance with the laws, customs, and practice of foreign countries, consistent with United States laws, Millennium's policies, and these Ethical Standards and Guidelines.