

G-III APPAREL GROUP, LTD.
CODE OF ETHICS AND CONDUCT

This Code of Ethics and Conduct (“Code”) was adopted by the Board of Directors (the “Board”) of G-III Apparel Group, Ltd. (the “Company”) on March 13, 2013, and amended on June 9, 2015 and April 4, 2018.

Purpose

The purpose of this Code is to codify those standards that the Company believes are reasonably designed to deter wrong-doing and to promote, among other things, adherence to the following principles:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the “SEC”) and in other public communications made by the Company;
- Compliance with applicable governmental laws, rules and regulations;
- The prompt internal reporting of violations of this Code; and
- Accountability for adherence to this Code.

This Code shall be applicable to all of the Company’s employees, officers and directors. No provision of this Code, however, is intended to create any right in favor of any third party, including any stockholder, officer, director or employee of the Company or any subsidiary thereof, in the event of a violation of any provision of this Code.

I. Compliance with Applicable Governmental Laws, Rules and Regulations

The Company’s senior management should encourage and promote compliance by all employees, officers and directors of the Company, its subsidiaries and affiliated entities with the laws, rules and regulations applicable to their businesses and operations.

All employees must respect and obey the laws of the jurisdictions in which we operate. Although not all employees are expected to know all the details of these laws, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel.

II. Honest and Ethical Conduct and Ethical Handling of Conflicts of Interest

Employees, officers and directors should conduct themselves and their activities on behalf of the Company, its subsidiaries and affiliated entities in an honest and ethical manner which complies with this Code.

Employees should report to their immediate supervisors all material facts relating to relationships or financial interests which give rise, directly or indirectly, to an actual or potential conflict of interest. Conflicts of interest may not always be clear-cut, so if questions arise, employees should consult with their supervisors or follow the “Compliance Procedures” set forth in Section IX of this Code. Directors and members of senior management should make similar reports to the Audit Committee and the Chief Financial Officer.

In endeavoring to avoid any actual or potential conflicts of interest between their personal and professional relationships, employees, officers and directors should be aware of, and comply with, the following policies:

Holding a Significant Interest in Suppliers, Customers or Competitors

The Company prohibits you (and your immediate family members; namely, spouses and family living in the same household) from having any ownership interest in, or owning property with, any of the Company’s vendors, suppliers, contractors, agencies, customers or competitors (or their respective officers or employees) unless the Company determines that your interest will not conflict with your obligations to the Company. These restrictions do not apply to ownership of stock of a public company if such ownership is less than 5% of the outstanding stock of that company.

Outside Work

The Company prohibits its employees, officers and directors from working for, or conducting any outside business with, its competitors. To determine whether investments or activities create a conflict, employees are required to disclose to their supervisor/manager using the form attached as Exhibit A to this Code, all outside business and ownership interests which relate to the apparel, design and retail store fields. The list should include investments and activities involving apparel and retail store companies, and any of our material vendors, suppliers, contractors, agencies or customers of which you are aware, or become aware. If your activities change, you are required to deliver an update on the form attached as Exhibit A to this Code to your supervisor/manager, who will submit it to the department head for review. The Company will determine if such activities or investments are consistent with Company policies.

Unless the terms of an employee’s employment by the Company require exclusivity, employees may hold outside jobs as long as they (i) disclose any outside employment to their supervisor/manager using the form attached as Exhibit B to this Code, (ii) continue to meet the performance standards of their job with the Company, and (iii) are not working for a competitor of the company, including any company, business, entity or individual engaged in the apparel, design or retail industries or material vendors, suppliers, contractors, agencies or customers of which you are aware or become aware. All employees will be judged by the same performance standards and will be subject to the Company’s scheduling demands,

regardless of any existing outside work requirements. If the Company determines that an employee's outside work interferes with his or her performance or the ability to meet the requirements of the employee's position with the Company, as such requirements may change from time to time, the employee may be asked to terminate the outside employment if he or she wishes to remain employed by the Company in the position at issue.

III. Disclosure in SEC Filings and Other Public Communications

It is the Company's policy to make full, fair, accurate, timely and understandable disclosure in compliance with all applicable laws, rules and regulations in all reports and documents that the Company files with, or submits to, the SEC and in all other public communications made by the Company. If the Chief Executive Officer, the Chief Financial Officer, the Controller, any other person acting as the Company's principal accounting officer or any persons performing similar functions (each a "Senior Financial Officer") becomes aware of material information that affects the disclosures made or to be made by the Company in its SEC filings or submissions or other public communications, he or she promptly should bring such information to the attention of the Company personnel responsible for preparing such disclosures.

The Senior Financial Officers should oversee the establishment and management of the Company's internal controls and disclosure controls and procedures to enable:

- The Company's consolidated financial statements and the notes thereto to present fairly, in all material respects, the financial position, results of operations and cash flows of the Company as of and for the period(s) indicated in conformity with accounting principles generally accepted in the United States; and
- The Senior Financial Officers to bring to the attention of the Audit Committee any information, of which they are aware, concerning (i) significant deficiencies in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data or (ii) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.

IV. Competition and Fair Dealing

We are committed to business success through maintenance of high standards of responsibility and ethics and seek to outperform our competition fairly and honestly. Each employee, officer and director should endeavor to respect the rights of and deal fairly with the Company's customers, vendors, suppliers, contractors, competitors, agencies and employees.

To ensure objectivity and compliance with applicable laws, when dealing with vendors, customers, suppliers, competitors and agencies, employees, officers and directors

must ensure they offer and/or give gifts, meals, entertainment or travel only if it is of reasonable value, complies with the Company's expense reimbursement policies, complies with the recipients' local laws and corporate regulations, is not given with any corrupt intent to improperly influence the person's actions or decisions, and is infrequent. See the Company's "Anti-Corruption Policy" for further guidance.

Furthermore, employees, officers and directors must not accept gifts from the Company's customers, vendors, suppliers, contractors and/or competitors if the value of such gift exceeds \$250, unless approved by the Chief Executive Officer or Chief Financial Officer. For purposes of this Code, a "gift" means any gift, gratuity, favor, benefit, discount, forbearance, promotional item, lodging, gift card, door prize or other tangible or intangible item having monetary value for which the recipient does not pay fair market value. A "gift" also includes meals, drinks, entertainment and recreation (tickets, passes, etc.), services, training or transportation provided by a customer, vendor, supplier contractor and/or competitor where the donor is not in attendance. In the event the donor is in attendance, meals, drinks, entertainment and recreation (tickets, passes, etc.), services, training and transportation will not be considered "gifts" as long as they are limited to a reasonable value.

V. Corporate Opportunities; Use of Corporate Assets

Employees, officers and directors are prohibited from taking for themselves personally opportunities that are discovered through the use of corporate information or position without the consent of the Company. No employee, officer or director may use corporate property, information or position for improper personal gain, and no employee, officer or director may compete with the Company directly or indirectly. Employees, officers and directors owe duties to the Company to advance its legitimate business interests.

Employees, officers and directors may not use corporate assets or funds for any unlawful or improper purpose. The Company does not authorize and will not condone any payment by an employee, officer or director which is in the nature of a bribe, kickback, or undisclosed commission (or a commission in excess of those required in the ordinary course of business) to a third party for obtaining any business or otherwise bestowing a special favor on the Company or one of its employees. While certain nominal payments, gifts or favors to administrative personnel, who do not exercise discretionary authority, may be customary, any such payments, gifts or favors must be disclosed to senior management in advance to ensure that it is appropriate. Records of any such payment, gift or favor must also be maintained.

VI. Confidentiality

Employees, officers and directors will learn, work with, and be entrusted with, trade secrets and confidential information relating to the Company's operations. This information is not known outside of the Company or even known to all our employees. Examples of information that is confidential includes financial information, costs, business projections, marketing plans, customers, suppliers, designs (before available at retail), line

list, composites and sketches, as well as any information that is marked confidential. Keeping this information confidential is necessary to ensure our success. Because this information has substantial value to the Company, all employees, officers and directors must exercise care not to disclose any confidential information even inadvertently (for example, through conversation in elevators or restaurants or any other public places), to any unauthorized person in or outside the Company. Employees must ask their supervisors if they are not sure what is considered confidential information and comply with the following policies:

- Employees (except within the scope of employment) cannot remove, make or cause to be made any copies of drawings or photographs of products or product designs, reports, correspondence or other writings or samples relating to the Company.
- Employees cannot use for their own gain or disclose (except within the scope of employment) any trade secrets or other confidential information, data or knowledge relating to the Company.
- Employees must surrender all documents, drawings and information to the Company upon the termination of employment or at any time upon request of their supervisor.
- Employees' obligations under this Policy shall continue after termination of employment.

VII. Insider Trading, Hedging and Pledging and Other Policies

Employees, officers and directors who have access to non-public information regarding the Company or any other entity are not permitted to use or share that information for purposes of trading securities of the Company or such other entity or for any other purpose except the conduct of our business. To use non-public information for personal financial benefit or to “tip” others who might make an investment decision on the basis of this information is unethical and illegal. In addition, the Company prohibits employees, officers and directors from entering into hedging transactions related to Company securities and restricts pledges of Company securities as collateral for a loan or holding Company securities in a margin account. See the Company’s “Insider Trading, Hedging and Pledging Policy.”

In the event of that the Company is required to restate its annual financial statements, incentive compensation paid to executive officers based on the Company’s financial performance in specified fiscal years for which restated financial statements are required will be subject to recoupment. See the Company’s “Executive Incentive Compensation Recoupment Policy.”

In order to ensure that the interests of our executive officers and directors are aligned with those of our stockholders and to promote our commitment to sound corporate governance, we also require executive officers and directors to reach and maintain specified

levels of ownership of the Company's common stock. See the Company's "Stock Ownership Guidelines."

VIII. Disclosure and Trading Relating to a Cybersecurity Incident

The U.S. Computer Emergency Readiness Team defines cybersecurity as "[t]he activity or process, ability or capability, or state whereby information and communications systems and the information contained therein are protected from and/or defended against damage, unauthorized use or modification, or exploitation." The Company relies on its information and communications systems to conduct its business operations and engage with customers, business partners and other constituencies, and must comply with evolving privacy and data protection laws.

Accordingly, the Company is committed to protecting its information and communication systems from cybersecurity risks and responding appropriately to potential cybersecurity risks or incidents, maintaining appropriate and effective controls and procedures to enable accurate and timely disclosure of material cybersecurity risks and incidents and preventing securities trading on the basis of material nonpublic information related to cybersecurity risks and incidents. The U.S. Computer Emergency Readiness Team defines a cybersecurity incident as "[a]n occurrence that actually or potentially results in adverse consequences to ... an information system or the information that the system processes, stores, or transmits and that may require a response action to mitigate the consequences."

Any employee, officer or director who learns of a cybersecurity risk or a cybersecurity incident must immediately inform the Chief Information Officer ("CIO") or an individual sitting in an equivalent capacity, directly or through his or her supervisor.

After an initial evaluation of a cybersecurity risk or incident, if the CIO believes that non-public information regarding the cybersecurity risk or incident could potentially be considered material in any respect, he or she shall inform the Chief Financial Officer ("CFO"), or, in the absence of the CFO, the Chief Operating Officer ("COO"), of the risk or incident. (Any reference to the CFO shall include the COO in the absence of the CFO.) As set forth in the Company's Insider Trading, Hedging, and Pledging Policy, "information is generally regarded as 'material' if it has market significance, that is, if its public dissemination is likely to affect the market price of securities, or if it otherwise is information that a reasonable investor would want to know before making an investment decision." In the context of cybersecurity risks or incidents, materiality depends upon their nature, extent and potential magnitude, particularly as they relate to any compromised information or the business and scope of the Company's operations. In addition, the materiality of cybersecurity risks and incidents depends on the range of harm that such incidents could cause; for example, to the Company's reputation, financial performance, and customer and vendor relationships, as well as the possibility of litigation or regulatory investigations or actions. If the CIO has any doubt regarding the materiality of non-public information regarding the cybersecurity risk or incident, he or she must report it to the CFO.

The CFO shall evaluate all available information regarding the cybersecurity risk or incident, in consultation with the CIO. If he or she believes that any of the non-public information could reasonably be material, he must present it to the other Senior Financial Officers for the purpose of reaching a materiality determination and, if any such information is determined to be material, making appropriately and timely disclosure of the material non-public information in compliance the Company's obligations under applicable laws and guidance, including but not limited to the Securities Act of 1933, as amended, the Securities Exchange Act of 1934, and the SEC's Statement and Guidance on Public Company Cybersecurity Disclosures and SEC rules and regulations, and the data security regulations of the Federal Trade Commission.

Until the cybersecurity risk or incident has been resolved and remediated, the Senior Financial Officers should regularly re-evaluate the available non-public information in compliance with the above procedures and shall keep the Audit Committee and/or Board of Directors informed as appropriate.

As further described in the Company's "Insider Trading, Hedging and Pledging Policy," no director or officer of the Company or employee of the Company or its subsidiaries may purchase or sell any Company security, whether or not issued by the Company, while in possession of material non-public information about the Company, or communicate that information to any person, including family and friends. Every officer and director of the Company and employee of the Company or its subsidiaries is subject in all respects to the provisions of the Insider Trading, Hedging and Pledging Policy, as well as applicable insider trading laws, in connection with any material non-public information that he or she may possess regarding a cybersecurity incident or the cybersecurity risks faced by the Company. Accordingly, no such director, officer or employee in possession of material non-public information related to Company cybersecurity risks and incidents shall trade the Company's securities until the close of business on the second trading day after the Company's public disclosure of such material non-public information or the expiration of any quarterly or special blackout period instituted by the Company. Any questions should be directed to the Compliance Officer identified in the Insider Trading, Hedging and Pledging Policy.

IX. Record Keeping

The Company requires honest and accurate recording and reporting of information in order to make responsible business decisions. For example, only the true and actual number of hours worked can be reported.

Business expenses incurred by employees must be authorized and must be documented and recorded accurately. An employee's supervisor should be consulted if the employee is not sure whether a certain expense is legitimate.

All of the Company's books, records, accounts and financial statements will be maintained in reasonable detail, will appropriately reflect the Company's transactions and

will conform both to applicable legal requirements and to the Company's system of internal controls. Unrecorded funds or assets shall not be maintained.

Business records and communications often become public. Consequently, employees should avoid exaggeration, derogatory remarks, guesswork and inappropriate characterizations of people and companies that could be misunderstood. This applies as well to email. Records should always be retained or destroyed according to the Company's record retention policies.

The Company maintains information such as job applications, initial employment information, performance reviews, promotions, salary history and disciplinary actions in its personnel files. Personnel files are retained by the Company in accordance with retention requirements of applicable laws. To protect employee privacy, access to personnel files is restricted to only those with a legitimate business reason. The Company will release information contained in its personnel files to third parties only to the extent it is required to do so by judicial order, discovery request, subpoena or where it is otherwise required to do so by law. In the event the Company is so compelled to release information contained in its personnel files to a third party, it may do so without notice to the employee.

It is essential to maintain up-to-date personnel records for insurance and other purposes. Please notify Human Resources promptly of any changes in your personal status including: marital/dependent status, insurance beneficiary, address and telephone number and emergency contacts.

X. Prohibition Against Discrimination, Harassment and/or Retaliation

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at the Company will be based on merit, qualifications, and abilities. The Company does not and will not discriminate in employment opportunities or practices on the basis of race, color, creed, religion, sex, sexual orientation, national origin, ancestry, citizenship status, age, disability, marital status, familial status, veteran status, genetic information, or any other characteristic protected by applicable federal, state or local laws. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

The Company is committed to providing a work environment that is free of intentional and unintentional harassment or discrimination. Actions, words, jokes, or comments based on an individual's race, color, creed, religion, sex, sexual orientation, national origin, ancestry, citizenship status, age, disability, marital status, familial status, veteran status, genetic information, or any other characteristic protected by applicable federal, state or local laws will not be tolerated.

Similarly, it is the Company's policy to prohibit sexual harassment of any employee by any supervisor, employee, customer or vendor. While it is not easy to define precisely what types of conduct could constitute sexual harassment, examples of prohibited behavior include unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars or posters, sending sexually explicit e-

mails or texts and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually-related comments. Depending upon the circumstances, improper conduct also can include sexual joking, vulgar or offensive conversation or jokes, commenting about an employee's physical appearance, conversation about your own or someone else's sex life and/or teasing or other conduct directed toward a person because of his or her gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

Every report of perceived discrimination or harassment will be fully investigated and corrective action will be taken where appropriate. Employees are required to cooperate in all investigations. The Company prohibits retaliation against any employee who makes a good faith complaint regarding a violation or possible violation of this Code or participates in the Company's investigation thereof.

Any employee who believes that he or she has been the subject of any prohibited discrimination, harassment and/or retaliation is strongly encouraged to report immediately the facts thereof, in accordance with the Complaint Procedures outlined below, to such employee's supervisor or manager, to Human Resources directly, or to Mr. Alan Feller, Chairman of the Audit Committee. As appropriate, the allegations of discrimination, harassment and/or retaliation will be investigated in as confidential manner as possible, subject to the need to conduct a full and impartial investigation, remedy any violations of the Company's policies or monitor compliance with the Company's policies.

In the event that an investigation establishes that an employee, officer or director has engaged in conduct or action constituting discrimination, harassment and/or retaliation in violation of this policy, the Company will take appropriate corrective action up to and including termination of employment.

XI. Complaint Procedures

All of us must work to ensure prompt and consistent action against violations of this Code. However, since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and on the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In many situations, there is shared information and responsibility. Are your colleagues informed? It may help to get others involved to discuss the problem.

- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and he or she will appreciate being brought into the process. Remember that it is your supervisor's responsibility to help solve problems.
- Utilize the Company's "open door" policy. In the rare case where it may not be appropriate to discuss an issue with your supervisor, or where you do not feel comfortable approaching your supervisor with your question, remember that the Company maintains an "open door" policy so that you may discuss the issue locally with your office manager or Human Resources manager. If that is not appropriate, or if you do not receive a satisfactory response within five business days, the Company's "open door" policy allows you to continue to raise the matter to higher levels of management, including ultimately the Chief Operating Officer, the Chief Executive Officer, the Chairman of the Audit Committee and/or the Board.

XII. Reporting Illegal or Unethical Behavior and Code Violations

It is the policy of the Company to comply with all applicable legal and regulatory requirements, including those relating to accounting, internal accounting controls and auditing matters, and to require its employees to do likewise. Every employee has the responsibility to assist the Company in meeting these legal and regulatory requirements.

Any employee of the Company who becomes aware of any information concerning any conduct which he or she reasonably believes to constitute an accounting, auditing or internal control irregularity or impropriety or to be in violation of United States federal securities laws, laws regarding mail, wire or bank fraud, the rules and regulations of the SEC, any provision of law relating to fraud against stockholders, the commission or possible commission of a federal offense, violations of the Company's accounting practices or internal controls, or other concerns regarding questionable accounting or auditing matters, is encouraged to promptly report such information to their supervisors, the Human Resources department and/or to Mr. Alan Feller, Chairman of the Audit Committee.

Employees are encouraged to talk to supervisors or other appropriate personnel about observed illegal or unethical behavior or violations of this Code or if they are in doubt about the best course of action in a particular situation. Employees additionally are expected to cooperate in internal investigations of misconduct.

The Company prohibits retaliation against any employee who submits a good faith report of suspected misconduct or a suspected violation of applicable laws, regulations or Company policies, including the policies contained in this Code. Any employee who retaliates against an individual who has reported suspected misconduct or violations in good faith will be subject to disciplinary action up to and including termination of employment.

Senior Financial Officers and directors should report to the Audit Committee (and any other appropriate committee) of the Board any known or suspected violation of this Code by any Senior Financial Officer.

Nothing in this Code prohibits employees from reporting possible violations of any federal law, rule or regulation to any governmental agency or entity including, but not limited to, the Department of Justice, the SEC, Congress, and any agency Inspector General, or making other disclosures that are protected under the whistleblower provisions of any federal law, rule or regulation.

XIII. Consequences for Non-Adherence to Code Provisions

Each employee, officer and director shall be personally responsible and accountable for his or her adherence to the provisions of this Code. The Company may impose such sanctions, including dismissal for cause, for violations of this Code as it shall determine, under the circumstances and in accordance with applicable law, to be in the best interests of the Company and its stockholders.

Note as to scope and waivers of this Code:

This Code applies to all employees, officers and directors of the Company. It also is intended to constitute the code of ethics for the Company's Senior Financial Officers pursuant to Item 406 of Regulation S-K of the SEC. Any waiver of this Code for the Company's executive officers or directors may be made only by the Board of Directors of G-III Apparel Group, Ltd., and, as required, will be promptly disclosed to stockholders and as further required by law or Nasdaq regulation.

EXHIBIT A

OUTSIDE BUSINESS OWNERSHIP REPORTING FORM

The Code of Ethics and Conduct (“Code”) adopted by the Board of Directors of G-III Apparel Group, Ltd. (the “Company”) requires employees to report (via the completion and submission of this form) outside business and ownership interests which relate to the apparel, design and retail industries, including:

- Owning, operating, or engaging in any business enterprise (including having an ownership interest in a business, managing the operation of a business or creating or running a website or social media site) relating to the apparel, design and retail industries; or
- Owning, operating, or engaging in any business enterprise (including having an ownership interest in a business, managing the operation of a business or creating or running a website or social media site) relating to any vendor, supplier, contractor or customer of the Company.

In order to ensure compliance with this policy, list below all business and ownership interests, including stock ownership, related to the apparel, design and retail industries and/or related to any material vendor, supplier, contractor or customer of the Company, of which you are aware.

BUSINESS AND OWNERSHIP INTERESTS:

Employee’s Name: _____ Today’s Date: _____

Current Position: _____

AFTER COMPLETING THIS FORM, SUBMIT IT TO YOUR SUPERVISOR/MANAGER. UPDATE THIS FORM AS NECESSARY IF ANY OF THE INFORMATION REPORTED CHANGES.

EXHIBIT B

OUTSIDE WORK RELATED ACTIVITY DISCLOSURE FORM

The Code of Ethics and Conduct (“Code”) adopted by the Board of Directors of G-III Apparel Group, Ltd. (the “Company”) prohibits employees from holding outside jobs working for a competitor of the Company, including any company, business, entity or individual engaged in the apparel, design or retail industries. In order to ensure compliance with this policy, employees are required to disclose all outside jobs (via the completion and submission of this form) that they hold while employed with the Company. Please list all outside employment in the spaces provided below.

OUTSIDE WORK OR EMPLOYMENT:

Name of Outside Employer or Enterprise: _____

Employee’s Relationship to Employer or Business Activity (e.g., employee, owner, director):

Describe the type of business or work activity:

Proposed Start Date: _____ Proposed End Date: _____

No. of Hours per Week: _____

EMPLOYMENT WITH THE COMPANY:

Current Department/Location: _____ Date of Hire: _____

AFTER COMPLETING THIS FORM, SUBMIT IT TO YOUR SUPERVISOR/MANAGER. UPDATE THIS FORM AS NECESSARY IF ANY OF THE INFORMATION REPORTED CHANGES.

G-III Apparel Group, Ltd.

**RECEIPT & ACKNOWLEDGEMENT OF
CODE OF ETHICS AND CONDUCT**

I have received the foregoing Code of Ethics and Conduct (the “Code”) and have read the Code in its entirety.

I understand that I am obligated to comply with all the policies and procedures contained in the Code and that any failure to abide by those policies and procedures may result in disciplinary action against me including, but not limited to, my employment being terminated.

I understand that the Code is a summary of some of the Company’s current policies and procedures regarding honest and ethical conduct, but that it is not all-inclusive.

I understand that this Code supersedes and replaces all previously issued policies and procedures on ethical conduct.

I understand that the Company may revise the policies and procedures contained in the Code, in whole or in part, at any time.

Print Full Name

Employee Signature

Date