



CODE OF BUSINESS CONDUCT AND ETHICS

INTRODUCTION

The purpose of this code of ethics is to ensure that all employees of Globalpundits know that this company expects and will accept no less than the highest standards of ethical and professional conduct from all employees. This code sets out basic principles to guide all employees' business behavior with the overriding principle being that all Globalpundits employees are expected to avoid even the appearance of impropriety in all business dealings.

Any employee who violates the standards in this code of ethics will be subject to disciplinary action. Any employee who believes himself or herself to be in a situation that may violate this code should follow the guidelines for reporting such violation outlined in this document.

CONFLICT OF INTEREST

Should an employee discover that his or her own private interest interferes with the interest of Globalpundits, then a conflict of interest has arisen. No Globalpundits employee should become involved in any business or situation that might benefit or profit him or her at the expense of Globalpundits business interests.

Employees should avoid any direct or indirect business connection with Globalpundits customers, suppliers or competitors (except on behalf of Globalpundits) as such relationships will almost always set up a conflict of interest for the employee. Employees should also take care to avoid any appearance of impropriety and must disclose to their supervisor any material transactions or relationships that reasonably could be expected to give rise to a conflict of interest.

Other examples that would be considered a conflict of interest and in violation of this policy are:

- Taking Globalpundits property for personal use.

- Writing a personal letter of complaint on Globalpundits stationery.

- Accepting a reward from a supplier or provider of services in exchange for business with Globalpundits.

- Using employee status with Globalpundits in inappropriate ways, such as to gain special consideration from authorities such as the police, and to obtain (for personal purposes) information not available to the general public.

This is in no way a comprehensive list but rather is intended to serve as examples for conflicts of interest. If any employee has a question about whether an activity establishes a conflict of interest or not, that employee should discuss the matter with a manager.

PROHIBITION OF PROVIDING GIFTS OR PAYMENTS

Employees may not offer gifts within the confines of a business relationship outside the following guidelines:

The gift is not cash.

The gift is consistent with customary business practices.

The gift is not excessive in value.

The gift cannot be interpreted as a bribe.

The gift does not violate any law or regulation.

“Kickbacks” or “bribes” intended to induce or reward favorable decisions and/or government actions are prohibited. Employees should not offer or make payment, either indirectly or directly, of anything of value, whether in the form of a gift, compensation, contribution, or otherwise, to:

- (1) Any person or firm employed or acting on behalf of a customer in order to induce or reward favorable action by the customer;
- (2) Any government entity in order to induce, reward action (or withholding of action) by a government entity; or
- (3) Any governmental official, political party, or its representative, or any candidate for political office in order to induce or reward favorable action (or withholding of action) or exercise of influence by a governmental official, political party or its representative, or any candidate for political office.

PROHIBITION OF ACCEPTANCE OF GIFTS OR PAYMENTS

Before any employee accepts any gift from any business entity, he or she should discuss the matter with management or the Corporate Ethics Officer, Joe Doyle at 803-404-0088. If offered a gift, please contact the Corporate Ethics Officer to determine if the gift may be accepted. Graciously explain to the giver the reason for doing so. Examples that would be a violation of our policy are as follows:

Accepting a reward from a supplier or provider of service in exchange for business with Globalpundits.

Using employee status with Globalpundits in inappropriate ways, such as to gain special consideration from authorities such as the police, and to obtain (for personal purposes) information not available to the general public.

This is in no way a comprehensive list but rather is intended to serve as examples of prohibition of acceptance of gifts or payments. If any employee has a question about whether an activity violates this policy, that employee should discuss the matter with a manager.

Acceptance of gifts may result in a conflict of interest. Before any employee accepts any gift from any business entity, he or she should discuss the matter with management or the Corporate Ethics Officer, Joe Doyle at 803-354-9400.

COMPETITION AND FAIR DEALING

Globalpundits is committed to honest and ethical competition. We require full compliance with antitrust and unfair competition laws. Because these laws can be complex, consult with your supervisor, the Corporate Ethics Officer, or the company's legal department if you are in doubt about the proper course of action in a particular situation.

COMPLIANCE WITH LAWS, RULES, AND REGULATIONS

Globalpundits expects all employees to respect and obey the laws of the cities, states and countries in which we operate. While it is impossible for any one person to know all the details of all laws, we expect our employees to have a working knowledge of the appropriate laws and just as importantly to know when to ask for advice from a manager regarding legal matters.

Globalpundits will report to the office of the Inspector General (OIG) any violation by a principal, employee, agent, or subcontractor of Federal criminal law that involves fraud, conflict of interest, bribery, or gratuity violations. Globalpundits will also report violations of the False Claims Act.

DISCLOSURE POLICY

It is Globalpundits's policy that all disclosures in financial reports and in other public communications of a like nature made by Globalpundits should be full, fair, accurate, timely and understandable. Members of Globalpundits's senior management have the general responsibility for preparing communications and will at all times endeavor to remain fully informed with respect to these matters and to see that such filings and communications comply with this disclosure policy. In addition, employees of Globalpundits should inform senior management if they learn that information in any filing or communication was untrue or misleading at the time the filing or communication was made or if they have information that would affect any such filings or communications to be made in the future.

Globalpundits COMPETITION STANDARDS

Globalpundits is committed to open and fair competition in all our business dealings, both in our businesses and with the companies who do business with us. Under no circumstances will unethical or illegal business practices be tolerated by this company.

Individuals who work for Globalpundits are expected:

- To not disparage competitors, their products or their services;

- To maintain arms-length relationships in all business opportunities;

Report any overpayments made by the Government to management so that the overpayments can be returned; and

To keep management informed of all business matters and especially those that might be of a sensitive nature.

RECORD KEEPING

The recording and reporting of information must be honest and accurate at all levels of the Globalpundits organization.

The records, accounts, financial statements and all company books must be maintained in appropriate detail and must accurately reflect Globalpundits's transactions. Additionally, these records must conform to legal requirements and to our internal controls.

All business records should be retained or destroyed according to our policies. Under no circumstances should any business records be destroyed after knowledge of litigation or government investigation has been received.

CONFIDENTIAL INFORMATION

All employees who have access to confidential information must respect the responsibility Globalpundits has to keep certain information confidential. Such confidential information can be Globalpundits business-based or customer-based. Only when required by laws or regulations or when advised by Globalpundits legal representatives should any confidential information be disclosed to any third party.

Also included in such confidential information is the requirement Globalpundits has to keep certain employee information confidential. All employees who have access to confidential employee information must take all precautions to keep employee personal information confidential.

POLITICAL ACTIVITY

Individuals may choose to participate and or contribute to political parties, causes, and candidates. However, such activity or contributions may not be represented as being on behalf of Globalpundits or any individual business unit. Globalpundits funds cannot be used for political contributions.

PROHIBITION AGAINST DISCRIMINATION AND HARASSMENT

Globalpundits does not discriminate on the basis of race, color, religion, national origin, age, sex, sexual orientation, gender identity, marital status, veteran's status, disability, or any other factors not related to a person's ability to do a job. Globalpundits makes reasonable accommodations for the physical and mental disabilities of employees.

PROFESSIONAL CONDUCT

All employees of Globalpundits are expected to treat people with dignity, respect and compassion to foster a work environment free of harassment, intimidation, and unlawful discrimination. Employees should develop, administer and advocate policies and procedures that foster fair, consistent and equitable treatment for all.

Employees may not be physically or verbally abusive to others; this includes co-workers, supervisors, vendors, contractors, and customers. Employees may not engage in offensive behavior. All Globalpundits employees are expected to abide by all applicable policies regarding employee conduct.

REPORTING ILLEGAL OR UNETHICAL BEHAVIOR

Every employee of Globalpundits is expected to report what he or she believes in good faith are violations of the law or of Globalpundits policy, whether accidental or deliberate, by any other Globalpundits employee. Should you become aware of a violation, it is your responsibility and obligation to disclose the matter fully to your supervisors. The failure to report such violations is itself a violation of Globalpundits policy.

Employees will not be disciplined or retaliated against for reporting violations in good faith.

When appropriate, employees should report violations to local management. Under some circumstances, employees should report violations to someone on the corporate staff. Employees may write or call any corporate staffer with such information.

Should any employee feel it necessary to report any illegal or unethical behavior, the employee should call Corporate Ethics Officer, Joe Doyle at 803-404-0088.

Or, if you are uncomfortable reporting this information directly, you may call Hotline at 1-803-354-9400 #1, the phone number is available for this purpose, or email to HR@globalpundits.com to submit a report of any suspected unethical or illegal behavior. You need not identify yourself when calling or emailing if you prefer not to. Please be aware that emailing Globalpundits does not ensure the complete anonymity as provided when using the phone number.

You may report ethical violations in confidence and without fear of retaliation. Globalpundits does not permit retaliation of any kind against employees for good faith reports of ethical violations.

I have read and understand the Globalpundits Code of Business Conduct and Ethics. I believe I am in compliance with this Code (exceptions should be brought to the attention of Corporate Human Resources Department).

Signature

Printed Name

Date