



STATEMENT OF CORPORATE PRINCIPLES

THE ALS GROUP is committed to providing ongoing independent professional advice to our Clients without any financial stake in the outcome. We pledge to our Clients that we will manage all engagements in accordance with these principles. We serve our Clients with integrity, competence and objectivity using a professional approach at all times and placing the best interests of our Clients above all others.

We establish realistic Client expectations by subscribing to written Engagement Letters which outline our obligations along with the fees and any expenses which we may incur while performing such obligations.

We operate responsibly and with integrity, avoiding even the appearance of impropriety. We conduct our business honestly, conscientiously and free of deception or fraud. We observe all applicable laws and regulations.

It is every employee's duty to observe these principles. Any perceived deviation from these principles should be immediately reported to the President.

CONFLICTS OF INTEREST

ALS represents and performs services for its Clients as a fiduciary. We hold ourselves to the highest standard of care. We will not accept an engagement from any prospective Client whose interests are in conflict with any current ALS Client.

ALS will not accept engagements from any insurer or underwriter, nor will we enter into any agreements with any insurer, underwriter or broker since we deem such relationships to be antithetical to our fiduciary duty to our Clients.

ALS staff is to avoid any real or apparent conflict between personal interests and those of the Firm. ALS assets and resources are for use in ALS business only.

CONFIDENTIALITY

All information we receive from any source that pertains to the work for our Clients is strictly confidential and will be managed in accordance with the confidential expectations of our Client. All other information, whether internally generated or not, must be handled with discretion. It is not to be misused nor disclosed so as to place ALS at a potential or actual commercial advantage or for the benefit of another who is not entitled to receive it.

Some of our Clients are corporations whose shares are publicly traded in accordance with Federal and State securities laws. It is a violation of law for any person to trade directly in shares of securities when in possession of non-public information. Because of the breadth of this requirement, EMPLOYEES ARE PROHIBITED FROM TRADING IN SECURITIES INVOLVING ANY OF OUR CLIENTS WITHOUT PRIOR WRITTEN PERMISSION FROM ALS' PRESIDENT. Violation of this rule is grounds for immediate termination.

INTERNAL OPERATIONAL AND ACCOUNTING CONTROLS

ALS understands the importance of maintaining adequate operational and financial controls to conduct an effective and accountable business. We are continually perfecting our Operational Best Practices through revision and ongoing training. It is the Firm's policy that the records and accounts of the business must be reliable, truthful, accurate, complete, current and comply with prescribed standards and regulations.

BUSINESS GIFTS, FAVORS AND ENTERTAINMENT

ALS prohibits the practice of giving or receiving gifts to or from brokers, insurance companies or underwriters and discourages the practice of giving to or receiving gifts from others even if such gifts are of nominal value. This also applies to gifts made indirectly by another on ALS's behalf. We believe that the results we deliver, rather than the influence of gifts, best serve everyone's interests.

CONDUCT TOWARDS EMPLOYEES

ALS is committed to its employees. We support and encourage personal and professional growth within the organization. We believe in the inherent dignity of every employee and do not allow practices which infringe upon this. ALS is an equal opportunity employer. Staff is recruited for their relevant aptitudes, skills, experience and ability. Discrimination or harassment based on legally protected class or activity is not permitted. Treatment at all times shall be fair in terms of compensation, job security, work experiences, recognition of achievement and opportunities for advancement.

Very truly yours,

By:



Albert L. Sica