



THE CREATIVE COMMUNITY

STANDARDS OF BUSINESS CONDUCT

These Standards of Business Conduct are applicable to all board members, officers and employees (each a “Representative”) of Lake City Arts (“LCA”), and to LCA’s business activities.

LCA is committed to the adherence to ethical, moral and legal standards in the conduct of its business. However, LCA can not achieve this goal without the support of each individual Representative. The integrity, reputation and viability of LCA depend on the individual actions of each Representative. To realize this commitment, Representatives must act in accordance with these principles.

Our Standards of Business Conduct (“Standards”) serve to assist the individual in making decisions in the course of his or her everyday activities. Our Standards do not -- and cannot -- cover all situations. Our Standards should be interpreted in connection with more specific LCA policies and the Representative’s good common sense. Reasons such as “Everyone does it” or “It’s not illegal” are unacceptable excuses for violating our Standards. Additionally, we must seek to avoid situations and actions that *appear* to be improper.

You are responsible for becoming thoroughly familiar with these Standards. If you have any questions concerning a particular situation, you are encouraged to discuss the matter with an officer or board member. Any suspected violations should be reported to the President or a Vice President. Every effort will be made to protect your confidentiality, to insure that your questions are answered and your concerns are investigated promptly. You may call anonymously, if you prefer.

Employees

We are committed to maintaining employment practices based on equal opportunity for all employees. We will respect each other’s privacy and treat each other with dignity and respect. We are committed to maintaining an atmosphere of open communication for all Representatives.

Conflicts of Interest

Representatives should avoid any situation where their objectivity may reasonably be questioned whether due to individual interests or personal or family relationships. However, we recognize that a Representative may inadvertently find himself/herself in such a situation. The Representative should notify the President or Vice President of the existence of such a situation, immediately.

Non-Public LCA Information

Representatives shall not, without proper authorization, give or release confidential data or information concerning LCA to anyone who is not a Representative.

Ownership Interests

A Representative owning, directly or indirectly, any interest in a company doing or seeking to do business with LCA, must promptly disclose such information to the President, a Vice President or the Secretary/Treasurer. Ownership of stock in public companies is not required to be disclosed.

Related Employment

If a member of a Representative's immediate family is employed with an entity doing or seeking to do business with LCA, you are required to report this information to President, a Vice President or the Secretary/Treasurer if you are in a position to recommend or determine if LCA will do business with your family member's business or employer. The disclosure of such information will not preclude LCA from doing business with such an outside entity but may require that work assignments be shifted or additional approvals be obtained prior to doing business with the outside entity so as to avoid any the appearance of impropriety.

Dealing with Suppliers

People who want to do business, or continue to do business, with LCA must understand that all purchases by LCA will be made exclusively on the basis of price, quality, service and suitability to LCA's needs.

Representatives or their families must not seek or accept any type of payment (direct, indirect, under-the-table, or otherwise), kickback or rebate related to or based upon LCA's purchase or sale of goods or services. Any offer of this type should be immediately reported to the President or Vice President.

Gifts and Entertainment

We recognize that common business practice permits the offer and acceptance of certain courtesies, usually meals and entertainment. Do not accept or offer gifts or entertainment if someone would believe that the gift or entertainment obligates you or LCA to do business with that person or company.

Political Activities and Dealings with Public Officials

Representatives are encouraged to become active in political and/or governmental affairs on their own behalf. However, remember that only an officer or other designated Representative may act or speak on behalf of LCA. If you have any questions, please consult with the President or a Vice President.

No LCA funds or other assets may be used for payments, gifts, loans or any other transfer, either directly or indirectly, to propose, support or oppose a) the adoption of legislation or the election of any candidate for public office or b) any political party. No LCA funds or other assets may be used for payments, gifts, loans or other transfer, either directly or indirectly to any government official, agent or employee or any other person or entity, where such transfer could reasonably be construed to be a bribe, kickback or other illegal or unethical payment.

Compliance

By signing the attached Compliance Statement, you agree that you understand and agree to comply with our Standards. The Compliance Statement and any written disclosures under these Standards will be maintained in LCA's records. Periodically, you will be asked to reaffirm your commitment and understanding of these Standards.

Violations

Representatives should immediately report any violation of these Standards to the President, a Vice President or the Secretary/Treasurer. Violation of these Standards may result in disciplinary action ranging from an oral reprimand to termination of status as a Representative. All proposed disciplinary action is subject to review by the board of directors. In addition to any disciplinary action taken by LCA, some violations may require restitution and may lead to civil or criminal action against the persons or entities involved.

Updating

We will periodically review our Standards of Business Conduct and make appropriate additions or changes. You will be fully informed of all updating of the Standards.

The policies and procedures set forth provide guidelines for Representatives but do not create contractual rights regarding termination, continued employment or otherwise. Any employment relationship is employment-at-will.

COMPLIANCE STATEMENT

I, _____, have read and understand Lake City Arts' Standards of Business Conduct. I agree to comply with and help insure compliance with these Standards. I understand that violation of these Standards may result in disciplinary action ranging from an oral reprimand to termination of my status as a Representative.

Date: _____
