



Red Castle Consulting Code of Conduct

Red Castle Consulting LLC's (Red Castle Consulting Group) success is dependent on the trust and confidence we earn from our employees, customers and partners. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct.

Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. Red Castle Consulting is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

Red Castle Consulting is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior.

Create a Culture of Open and Honest Communication

At Red Castle Consulting everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Red Castle Consulting will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Lead by Example

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Red Castle Consulting, we want the ethics dialogue to become a natural part of daily work.

Uphold the Law

Red Castle Consulting's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Avoid Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of the company may conflict with our own personal or family interests. We owe a duty to Red Castle Consulting to advance its legitimate interests when the opportunity to do so arises. We must never use company property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Red Castle Consulting.

Gifts, Gratuities and Business Courtesies

Red Castle Consulting is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Red Castle Consulting was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Red Castle Consulting does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Red Castle Consulting or customers, or would cause embarrassment or reflect negatively on Red Castle Consulting's reputation.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department.

Red Castle Consulting takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Signed: _____

Bryan M. Wright
President

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