



## **Millennium Software Developers, Inc.**

3601 Cardinal Point Drive Jacksonville, Florida 32257-9242  
904 256-0053 800 393-4460 [ClosersChoice.com](http://ClosersChoice.com)

### **Code of Ethics:**

1. Requires the highest standards for honesty, integrity and ethical conduct at all times, including proper and ethical procedures for dealing with actual or apparent conflicts of interest between personal and professional relationships.
2. Requires all directors, officers, and personnel of the Company to act in good faith, with due care, competence and diligence, responsibly, without misrepresenting any material fact, and without allowing his or her independent judgment to be compromised or subordinated.
3. Prohibits engagement in conduct or activity, whether or not specifically prohibited in other Company policies, which may raise questions as to the Company's honesty, impartiality or reputation.
4. Requires compliance with the provisions of policies and guidelines set forth in this and/or any other code of business conduct or ethics code adopted by the Company.
5. Requires full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the Company with governmental and regulatory agencies.
6. Requires full, fair, accurate, timely and understandable disclosure of all material information known to them regarding the current or future financial condition, financial performance, or the business of the Company as appropriate.



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7. Requires compliance with all applicable laws, rules and regulations as well as any other business policy adopted by the Company.
8. Requires reporting of any potential or apparent violations of the Company's business policies or illegal behavior to their supervisor, the Human Resources Department, the Board of Directors or a designated Committee thereof.
9. Requires the highest level of confidentiality and fair dealing both inside and outside the Company's business environment and forbids the use of such confidential information for personal advantage.

On an annual basis, all individuals subject to this Code of Ethics will be presented with this policy and will be asked to read and abide by these guidelines and acknowledge receipt of the most recent "**Code of Ethics.**"