

## **Code of Conduct**

### **Integrated Management Information, Inc. (IMI Global)**

IMI Global's business philosophy is based on the principles of honesty and integrity in all of its dealings with employees, customers, shareholders, business associates, governmental agencies and the community. It is the responsibility of each IMI Global employee to fully understand and rigorously uphold these principles. This Code of Conduct contains guidelines and principles to help guide officers, directors and employees in a variety of specific situations that may arise during the course of an individual's employment at, or association with, IMI Global.

#### **Conflicts of Interest**

It is the responsibility of employees and directors to avoid activities that may present conflicts of interest or the appearance of a conflicts of interest. A conflict of interest may occur when an individual's private interests conflict with the interests of IMI Global. Specifically, conflicts may arise when an individual's private activities (business or personal) make it difficult to perform work objectively and diligently on behalf of IMI Global. In addition, conflicts may arise when an individual or an individual's family is offered or receives personal benefits as a result of the individual's position with IMI Global, or when an individual has a financial interest in IMI Global's competitors or suppliers. Employees and directors are encouraged to openly discuss potential conflicts of interest with their supervisors or the board of directors.

#### **Fair Dealing**

Employees and directors are obligated to deal fairly with IMI Global's employees, customers, suppliers and the community. Fair dealing means refraining from taking unfair advantage of any individual or entity through manipulation, misrepresentation, concealment, or any other form of dishonesty.

#### **Compliance With Laws**

IMI Global requires all employees and directors to comply with all laws, rules and regulations in relation to their dealings with the Company. As IMI Global is a public company, employees and directors are specifically encouraged to respect all SEC and NASD rules and regulations, including, but not limited to, Regulation FD and insider trading regulations. In addition, the Company's finance department is required to scrupulously adhere to high financial reporting standards and regulations and to strive for maximum transparency in all financial reporting processes.

#### **Proper Use of Company Assets**

Employees and directors are responsible for the good stewardship of all IMI Global assets, including physical assets, financial assets, and IMI Global's good name. Only authorized employees or directors may enter into agreements on behalf of the Company.

#### **Protection of Confidential Information**

Employees and directors are expected to protect confidential and/or proprietary information that, if inappropriately disclosed to a third party or competitor, could put IMI

Global at a competitive disadvantage or expose the Company to legal or regulatory issues. Employees and directors are encouraged to consult their supervisors or officers for clarification of what constitutes confidential and/or proprietary information. Some examples include technology and processes underlying the Company's products and services; material non-public information involving business activities, including customers, transactions, financial results, growth plans, and other information.

**Trademarks, Service Marks, Copyrights**

Employees and directors must avoid the unauthorized or improper use of all trademarks, service marks and copyrights that apply to the Company and/or its products and services. Authorization from a supervisor or legal counsel should be obtained prior to the use or reproduction of such devices.

**Reporting of Illegal or Unethical Activities**

IMI Global is committed to building a strong, successful company within strict legal and ethical guidelines. The Company strongly encourages its employees and directors to report illegal or unethical behavior, or even the appearance of such behavior, to a supervisor, officer, Company legal counsel, or director. The Company ensures that persons making such reports in good faith will not be subject to retaliation by management.