

# *Predictive Analytics Group*

## *Code of Ethics*

### *“Partnering for the Future”*

Being a partner means living your day-to-day values in pursuit of success and excellence for the benefit of each other. At Predictive Analytics Group, we expect our employees to think of themselves as members, shareholders or owners of the companies we support. In every action they take, we expect our employees to exhibit honor and pride in their duties. Our commitment is to our partners, but also to ourselves. Making things better everyday is our goal.

### **Statement of Our Core Values**

#### *Company Vision*

Understanding your business is essential for success. Whether you are a retailer looking to get the most out of your co-branded relationship or a financial institution looking to enhance your risk management capabilities. Here at Predictive Analytics Group we will help you accomplish your goals every step of the way.

#### *Principles*

Predictive Analytics Group LLC, is an entity that embraces and exemplifies Integrity, Commitment to Excellence, Leadership and Caring. It is our goal to make sure that every project we deliver has been created with the upmost integrity, was made through a commitment to excellence in our duties to our customers and allows us to display true leadership through caring for our customers like we were part of their company.

## ***Values***

Predictive Analytics Group has a commitment to individual and organizational efforts to build a diverse team to support a diverse set of clients. To build respect, fairness, excellence, integrity and leadership through a solid set of values. Our team is driven from a mindset that we think of ourselves as our clients. Making sure our actions are what our clients are ultimately striving to achieve.

## ***Mission***

Our mission is to create be the leader in financial services consulting. Assisting our clients in achieving all of their goals and aspirations. Working with clients and partnering with other consulting companies to ensure that our clients get the optimal outcome for their business.

## **Build Trust and Credibility**

The success of our business is dependent on the trust and confidence we earn from our customers. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to *say* what we must do, but the proof is in our *actions*. Ultimately, we will be judged on what we do.

## **Respect for the Individual**

We all deserve to work in an environment where we are treated with dignity and respect. Predictive Analytics Group 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.

## **Create a Culture of Open and Honest Communication**

At Predictive Analytics Group 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.

Predictive Analytics Group 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.

### **Set Tone at the Top**

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 [Company Name], we want the ethics dialogue to become a natural part of daily work.

### ***Competition***

We are dedicated to ethical, fair and vigorous competition. We will sell Predictive Analytics Group services based on their merit, superior quality, experience and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Predictive Analytics Group or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

### ***Proprietary Information***

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

### ***Selective Disclosure***

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Predictive Analytics Group, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

### **Avoid Conflicts of Interest**

#### ***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 Predictive Analytics Group may conflict with our own personal or family interests because of the course of action that is best for us personally may not also be the best course of action for Predictive Analytics Group. We owe a duty to Predictive Analytics Group to advance its legitimate interests when the opportunity to do so arises. We must never use Predictive Analytics Group property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Predictive Analytics Group.

**Here are some other ways in which conflicts of interest could arise:**

1. Being employed (you or a close family member) by a competitor or potential competitor, supplier or contractor, regardless of the nature of the

employment, while you are employed with Predictive Analytics Group. Unless otherwise sub-contracted through an agreement between Predictive Analytics Group and the competitor, supplier or contractor.

2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier or contractor.
6. Placing company business with a firm owned or controlled by a Predictive Analytics Group employee or his or her family.
7. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all Predictive Analytics Group employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

### ***Gifts, Gratuities and Business Courtesies***

Predictive Analytics Group is committed to competing solely on a merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Predictive Analytics Group 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 Predictive Analytics Group 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 [Company Name] or customers, or would cause embarrassment or reflect negatively on Predictive Analytics

Group's reputation.

### ***Accepting Business Courtesies***

Most business courtesies offered to us in the course of our employment are offered because of our positions at Predictive Analytics Group. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at Predictive Analytics Group to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that Predictive Analytics Group maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Predictive Analytics Group is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain Predictive Analytics Group business.

### ***Meals, Refreshments and Entertainment***

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel

uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

### *Gifts*

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Predictive Analytics Group does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approval is obtained from management.

Employees with questions about accepting business courtesies should talk to their managers or the HR department.

### *Offering Business Courtesies*

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Predictive Analytics Group. An employee may never use personal funds or resources to do something that cannot be done with Predictive Analytics Group resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of [Company Name].

## **Set Metrics and Report Results Accurately**

### ***Accurate Public Disclosures***

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform Executive Management and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

### ***Corporate Recordkeeping***

We create, retain and dispose of our company records as part of our normal course of business in compliance with all Predictive Analytics Group policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Predictive Analytics Group's and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an

internal independent audit of Predictive Analytics Group books, records, processes or internal controls.

### ***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.

Predictive Analytics Group takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

### **Be Loyal**

#### ***Confidential and Proprietary Information***

Integral to Predictive Analytics Group's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

#### ***Use of Company Resources***

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Predictive Analytics Group are trusted to behave responsibly and use good judgment to conserve company

resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the Predictive Analytics Group network and our fellow employees, Predictive Analytics Group reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or Predictive Analytics Group's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

### **Do the Right Thing**

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing comply with the Predictive Analytics Group guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?

- What would I tell my child to do?
- Is this the right thing to do?

## Information and Resources

### Chief Executive Officer:

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