

Code of Ethical Business Conduct

Revision History

January 1, 2004	Original issuance.
October 1, 2004	Replaced the AlertLine name and telephone number with the ConcernsLine name and telephone number.
July 25, 2006	Revised the “Political Contributions” section to allow for corporate political contributions as permitted by law and Company policies and procedures.
October 30, 2007	<p>Title of document changed.</p> <p>“Introduction” section revised to include expectations for parties who work on behalf of the Company.</p> <p>“No Retaliation” section enhanced to include reasonable good faith basis for reporting and to specify a supervisor’s responsibility to ensure non-retaliation for reports of good faith Code violations.</p> <p>“Consequences” section added to provide examples of Code violations. “The GPE IDEAL” section replaced the former “Our Values” section. Title of</p> <p>“Gifts” section changed to “Gifts and Gratuities.”</p> <p>“Regulation FD Compliance” section added.</p> <p>“Fraud” section added.</p> <p>“Approval of Business Transactions” section added.</p> <p>“Endorsements” section title changed to “Endorsements by Individuals” and language clarified.</p> <p>“Independent Accountants and Audit Services” section revised to include cooperation clause.</p> <p>“Records Management” section revised to include requests by Company counsel to preserve documents.</p> <p>“Cooperation with Investigations” section added.</p> <p>“Equal Opportunity, Diversity and Nondiscrimination” section added and combined with former “No Discrimination” section.</p> <p>“Substance Abuse” section revised to include ban against the misuse of prescription drugs during working hours and on Company or customer property and to provide for exception to possession or use of alcohol in connection with authorized events.</p>

“Violence” section added.

“Appropriate Use of Computer Resources” section revised to include discussion regarding employee use of company resources and employee privacy.

“Protection of Information” section revised to clarify anti-disclosure and protection provisions.

“Safety” section revised to clarify requirement to perform duties in manner that ensures personal safety of employees, customers and the public and to further explain the types of required reporting.

“Environmental Practices” section revised to clarify environmental awareness and reporting requirements.

Other non-substantive minor edits throughout the Code to improve consistency and clarity.

December 8, 2009

“Gifts and Gratuities” section revised to prohibit gifts or benefits during a request for proposals, qualifications or information process or during contract negotiations.

Revised to provide that director and officer disclosures are made to the Governance Committee.

December 14, 2010

Introductory letter revised to reflect Guiding Principles.

“No Retaliation” section revised to align with Dodd-Frank Act whistleblower provisions.

“GPE IDEAL” section deleted.

“Conflicts of Interest” section revised to: clarify, among other things, that a conflict may exist regardless of intent; define the term ‘financial interest’; specifically prohibit an independent contractor relationship with a Company competitor; and specify that employee disclosures are to be made to the Chief Compliance Officer in addition to the employee’s supervisor.

“Outside Business Contacts” section revised to align with internal policies regarding news media contacts.

“Political Activity” section revised to include a statement that employees serving on public bodies should disqualify themselves from any actions that may represent a conflict of interest.

“Insider Trading” section expanded to align with internal policies and to state that trading clearances may be given by the Assistant Corporate Secretary.

“Fraud, Theft, Payments, Kickbacks or Similar Conduct” section renamed from “Fraud” and expanded to include thefts, false statements, kickbacks and similar matters.

“Equal Opportunity, Diversity and Nondiscrimination” section expanded to include

suppliers and any other legally protected status.

“Appropriate Use of Computer Resources/Employee Privacy” section expanded to include any use in violation of Company policy.

“Reporting Concerns” section revised to reflect changes in address and organizational structure.

“Waivers” section revised to provide that non-officer and director waivers are made jointly by the President and the Chief Compliance Officer.

Other non-substantive minor edits to improve consistency and clarity.