

LEADER COMMUNICATIONS, INC.



**Calendar Year 2010
Ethics Program Performance Accountability Report**

March 14, 2011

INTRODUCTION

In January 2007 LCI established its **Ethics Program**. The purpose of the **Ethics Program** is the promotion of strong ethical conduct by all members of the LCI family. LCI is committed to providing an environment where employees exhibit honesty, integrity, respect for our laws, and respect for each other.

LCI VISION

The vision for LCI is that it will be among the most respected businesses in the nation. The promotion of strong ethical conduct by all members of the LCI family is the foundation we build on to achieve our vision. Not only are we committed to an environment where employees continuously exhibit honesty, integrity, and respect but, also to put in place the mechanisms that support the on-going achievement of that goal. To this end, we established and continue to maintain the **LCI Ethics Program**.

LCI ETHICS PROGRAM

1. **The Ethics Code** – a document that conveys our values and commitment to standards that promote honest and ethical conduct, including the ethical handling of conflicts of interest.
2. **Ethics Training** – training that focuses on educating employees and managers on the Ethics Code and compliance with the ethics program. The training helps employees and managers build essential skills to recognize and respond appropriately to ethical dilemmas.
3. **Ethics Reporting** – an Ethics Complaint telephone line that employees can call any time (24/7) from anywhere to anonymously report suspected unethical behavior such as compliance violations, fraud, financial irregularities, or other similar activities. The Ethics Complaint Line is not meant to replace employees speaking directly with their supervisors but, we recognize that in some instances employees may not feel comfortable using traditional reporting processes, so the Ethics Complaint Line provides an anonymous alternative reporting method.
4. **The Ethics Committee** - to administer the Ethics Program and make recommendations to resolve ethics concerns.

The theme for the Ethics Program is **“Pointing You in the Right Direction so You Can Continue Doing What’s Right”**.

GOALS OF LCI’S ETHICS PROGRAM

- Strengthen the ethical culture of LCI
- Providing ethics training and assistance to the LCI family of stakeholders
- Point the LCI stakeholders in the right direction so they can do what’s right
- Recommend corrective actions when ethical breeches occur

HIGHLIGHTS OF CY 2010 ETHICS PROGRAM

CY 2010 was the fourth year of LCI's formal Ethics Program. The committee met once during CY 2010 on January 25, 2010. The meeting was conducted to review Ethics Program related information and recommend changes for the Ethics Program, to review ethics training provided, review program documents, and review reported incidents or information requests to the Ethics Committee or its members.

Ethics Orientation was provided to new employees by Human Resources personnel. Follow-on ethics training was provided to all employees through the deployment of briefings and training materials via LCI's eSign Program. Supervisors were instructed to emphasize ethics compliance during work center meetings and additional ethics information was provided via the LCI electronic newsletter *The Communicator*. All ethics questions received by the Ethics Committee members were addressed and answers provided to the questioner. The Ethics Hotline was available 100% of the time for anonymous reporting. LCI was an active participant and supporter of the Oklahoma City Ethics Program. All employees were evaluated on ethics compliance during their annual performance evaluations.