

CODE OF CONDUCT

I. PRINCIPLES

A. *Compliance with Applicable Laws*

Operum shall comply with applicable laws. Operum shall stay abreast of changes in the law and provide updates and training on those laws for directors, officers and employees.

B. *Conflict of Interest Policy*

1. Operum Employees

- a. *Gifts to Operum employees:* No Operum employee shall accept gifts, entertainment, favors, honoraria or personal service payments other than of nominal value from any participating vendor.
- b. *Equity ownership by Operum employees:* No Operum employee shall, without appropriate disclosure, own an individual equity interest in any participating vendor where they would be in a position to influence a contracting decision.
- c. *Insider Trading:* Insider trading by an employee of Operum based on any knowledge of vendors or their prospects gained through their employment is prohibited.

2. Operum Non-Employee Officers, Directors or Advisors

- a. *No gifts to directors and officers who can influence contracting:* Any director or officer of Operum who is in a position to influence Operum contracting decisions and accepts any gifts, entertainment, favors, honoraria or personal service payments, other than those of nominal value, from any participating vendor will disclose such transactions to the President of Operum and recuse themselves from any negotiations or decisions relating to such participating vendor.
- b. Any non-employee, officer or director will disclose any individual equity interests in any participating vendors to the Operum President and will recuse themselves from any negotiations or decisions related to such participating vendor.

Questions about this statement or about Operum contact us at 978-747-1531 or email info@operumllc.com.