

## Gift Policy

Effective Monday, September 27, 2010 the following Gift Policy shall apply to all staff employed at ADS Advanced Data Services, Inc ("ADS").

As stated within the ADS Conflict of Interest Policy, ADS is completely independent and does not have any relationships with service providers participating in the E-Rate program. ADS only offers E-Rate consulting services to E-Rate applicants and does not offer consulting services to service providers. It is ADS policy that employees and others acting on ADS's behalf must be free from conflicts of interest that could adversely influence their judgment, objectivity or loyalty to the company in conducting ADS business activities and assignments. ADS recognizes that employees may take part in legitimate financial, business, charitable and other activities outside their ADS jobs, but any potential conflict of interest raised by those activities must be disclosed promptly to management.

To further avoid even the appearance of a conflict of interest and to demonstrate our commitment to impartiality, equal treatment and the highest standards of conduct in relation to all organizations, the following gift policy shall apply:

**No gifts of any kind, of any value, shall be accepted, on or off the work site, by ADS employees. The word "gift" means any item having any cost or financial value, including food or beverages, and including vendor-sponsored meals or parties. Gifts received must be disclosed promptly to management.**

Exempted from this policy are gifts such as t-shirts, pens, trade show bags and all other items that employees may obtain, as members of the public, at events such as conferences, training events, seminars, and trade shows, that are offered equally to all members of the public attending the event. This includes attendance at , food, beverages, items provided at events, exhibitor trade show floor locations, press events, and parties funded by conference or event sponsors.

All organizations are respectfully asked not to deliver or deposit any gift either for individuals or for a particular department or office. This policy applies equally to all organizations. Any gift that is received shall be returned to the giver whenever feasible and, when not feasible, shall be donated to a non-profit institution not related to ADS.

Please appreciate that the policy applies equally to all organizations. Our purpose is not just the equal and fair treatment of all organizations, but also the appearance of equal and fair treatment to employees and to the public at large.