



CODE OF ETHICS AND BUSINESS CONDUCT

1. INTRODUCTION

No code of ethics can cover every possible question of business conduct. When in doubt – ask before you act.

Each employee and Board Member of Visit High Point is responsible to uphold this Code. The chairman of the personnel committee of the Board shall be the Compliance Officer charged with administering the board's overall compliance program. Any failure to adhere to the standards outlined in this Code may be initially reported to the head of your department or business unit, or the human resources manager for resolution. Ultimately the matter may be reported to and reviewed by the Compliance Officer.

Inevitably, this Code addresses questions that escape easy definition. There will be times when you may be unsure how this Code applies. In such cases, contact the Compliance Officer.

2. DISCIPLINE

Violations of this Code may lead to serious sanctions, including termination of employment for employees and removal from the Board for Board Members.

Employees or Board Members who withhold information concerning an employee or Board Member's violation of law or this Code may also be subject to discipline. The conduct of each employee and Board Member is a vital matter to Visit High Point. Persons who violate the law expose themselves and Visit High Point to substantial penalties. Protecting Visit High Point's reputation is every employee and Board Member's responsibility.

3. NON-DISCRIMINATION

Visit High Point is committed to allowing employees to progress based on their talents, attitude, and performance. Each employee is subject to this standard. If you believe this policy has been violated, contact Visit High Point's human resources officer.

4. ANTI-HARASSMENT

Harassment of employees will not be tolerated. Visit High Point expects all personnel, including Board Members, to follow a simple standard: All employees must be treated with respect. Harassment covers a wide spectrum of conduct. This code sets a simple standard and everyone associated with Visit High Point must abide by it. Any employee or Board Member who believes the standard is not being maintained should contact the human resources officer.

5. HEALTH, SAFETY AND ENVIRONMENTAL POLICY

Visit High Point will conduct business at all times in compliance with appropriate health, safety and environmental laws and regulations. Any employee or Board Member who believes these standards are not being maintained should contact the human resources officer.

6. LABOR LAW COMPLIANCE

It is Visit High Point's policy not to do business or endorse businesses that do not comply with labor laws, including the Fair Labor Standards Act. Visit High Point will not endorse, support, or use goods or services that have been manufactured or provided in violation of applicable labor laws. Any employee or Board Member who believes a Visit High Point vendor is not complying with applicable labor laws should contact the human resources officer immediately.

7. BUSINESS COURTESIES AND GRATUITIES

Employees and Board Members should give or accept gifts of nominal value only. Exceptions need approval.

Business courtesies and gratuities including but are not limited to gifts, meals, cocktails, discounts, hospitality, entertainment, recreation, promotional items, travel, any tangible or intangible "item of value" for which the recipient does not pay fair market value. Visit High Point employee and Board Members may give or receive courtesies or gratuities in company related business dealings with customers or suppliers provided the following guidelines are met:

- They do not violate the law, regulations, and reasonable customs of the marketplace or the known policy of either party's employer.
- They are reasonable in cost, amount, quantity, and frequency.
- They are appropriate as to time and place.
- They do not influence or give the appearance of influencing the business judgment of the recipient.
- They can stand public scrutiny without damaging Visit High Point's reputation.

Under no circumstances should Visit High Point employee or Board Members give or receive money as a business courtesy or gratuity. Gifts worth US \$100.00 or more must be approved by the President of Visit High Point.

8. IMPROPER PAYMENTS

Bribery, kickbacks, or other improper payments have no place in Visit High Point's business. All employees and Board Members who come in contact with government officials – domestic and foreign – must maintain the highest professional standards. Never offer anything of value to such officials to obtain a particular result for Visit High Point. Bribery of government officials can lead to criminal penalties. Similarly obtaining special favors or benefits by means of bribery or cash payments is strictly forbidden.

9. PROPER ACCOUNTING PRACTICES

Visit High Point operations must comply with all laws relating to accurate and complete financial books and records. Each employee and Board Member must help maintain the integrity of Visit High Point's financial records.

No Code of Ethics can review the extensive accounting requirements which Visit High Point must fulfill. All Visit High Point books and records must be maintained in accordance with generally accepted accounting principles, Visit High Point fiscal procedures, and with all local and national laws governing such books and records. Corporate assets and funds must be properly acquired, safeguarded, and disposed with financial reporting accurately reflecting the business activity of Visit High Point. To meet these obligations, however, Visit High Point must rely on

employee truthfulness and accounting practices. Employee and Board Members may not participate in any misstatement of Visit High Point's accounts. At the same time, no circumstances justify the maintenance of "off the books" accounts to facilitate questionable or illegal payments. If you are unsure about an accounting practice, contact the human resources officer immediately.

10. POLITICAL CONTRIBUTIONS

Visit High Point's funds, property, or services may not be contributed to any political party, candidate, or committee.

In addition, employees and Board Members must not offer or promise contributions to any public official to influence the performance of the public official's duties on behalf of the Visit High Point.

11. CONFIDENTIAL INFORMATION

One of Visit High Point's most valuable assets is its confidential corporate information. Visit High Point's legal obligations and competitive position requires this information remain confidential.

Confidential corporate information generally falls in two categories. The first category encompasses information intended for internal use only. This information typically relates to Visit High Point's operations and its work to generate growth in High Point. Visit High Point endeavors to keep this information confidential indefinitely.

The second category involves confidential information which Visit High Point routinely discloses to the public at a time and a place on a need to know basis. Premature or improper disclosure of such information may expose the individual involved to serious discipline. Confidential information must not be disclosed by employees or Board Members to anyone outside Visit High Point, except for legitimate business purposes (such as contacts with Visit High Point's officers or its outside counsel). Even with Visit High Point, confidential information should be discussed only with those who have a need to know the information. An employee's obligation to safeguard confidential corporate information continues even after the employee or Board Member leaves Visit High Point.

12. CONFLICTS OF INTEREST

Avoid any situation in which your personal interest conflict with Visit High Point's interest. Each employee and Board Member owes Visit High Point a duty of loyalty. For that reason, all employees and Board Members must exercise great care any time their personal, corporate, professional, or employment interests conflict with Visit High Point's interest. The following sections review several potential problem areas. This list is not exclusive. The general principal, however, is simple: Exercise great care anytime there might be even the appearance that any employee or Board Member acted for reasons other than to benefit Visit High Point's overall goal and mission.

As an employee or Board Member when making decisions relating to Visit High Point, your first obligation rests with Visit High Point. Visit High Point requires the full attention of its employees and Board Members during their service on the board.

Do not divert for personal gain any business opportunity. Each employee and Board Member owes Visit High Point a duty of loyalty. That duty is violated if the employee or Board Member personally benefits from a business opportunity. This problem typically arises when an employee has an interest in an entity which offers a product or a service beneficial to the employee. This problem also arises when a Board Member has a vote or makes a decision which benefits the Board Member or the Board Member's industry directly. The Board Member

should initially, immediately and openly disclose his or her interests to the entire Board. Thereafter the Board Member may participate in the discussions. However, the Board Member should recuse himself or herself from that particular vote at the Board meeting.

13. REPORTING

Report all violations of this Code of Ethics. If you believe that a Visit High Point employee, Board Member, consultant, agent, or representative is violating the law or Visit High Point's policies or is engaged in activities that could damage Visit High Point's reputation, you should bring that information to the attention of your manager or to one of the following:

- The human resources officer;
- The President of Visit High Point;
- The Compliance Officer.

14. CONFIDENTIALITY AND NO RETALIATION

In bringing your concerns or questions to any of the above, as much as possible confidentiality will be maintained and only those who need to know about such matter will be advised of its existence. No employee or Board Member will be subject to any form of retaliation or discipline who in good faith: (a) reports what they believe to be a violation of this Code, or (b) participates as a witness, or (c) assists in an investigation.

15. CERTIFICATION OF COMPLIANCE

I certify that I have received, read, and understood Visit High Point's Code of Ethics and Business Conduct. I understand what types of conduct violate these policies or are considered outside the scope of my employment or service as a Board Member. I promise to comply with the terms of this Code in the future and understand that violation of these terms may lead to the termination of an employee's employment or of a Board Member's service on Visit High Point's Board.

Employee/Board Member

Date