

## **SENIOR FINANCIAL MANAGERS' CODE OF ETHICS**

The U.S. Postal Service hereby adopts the following Senior Financial Managers' Code of Ethics:

- I. The Senior Financial Managers' Code of Ethics applies to all individuals acting in a permanent or temporary capacity as: the Postmaster General; the Deputy Postmaster General; the Chief Financial Officer; the Vice President, Controller; the Vice President, Finance and Planning; the Treasurer; the Manager, Corporate Accounting; the Manager, Corporate Financial Reporting; the Manager, Budget; the Manager, External Reporting; the Manager, SOX Compliance; and Senior officials performing successor functions ("Senior Financial Managers"). The Postmaster General, at his or her discretion, may modify and extend the application of this Senior Financial Managers' Code of Ethics at any time or in any manner that is consistent with applicable laws and regulations and which he or she determines to be in the best interests of the U.S. Postal Service.
  
- II. The U.S. Postal Service is committed to providing full, fair, accurate, timely and understandable disclosures in periodic reports and other financial disclosures it files with, or submits to, the Postal Regulatory Commission or otherwise makes available to the public. Senior Financial Managers are expected to use their best efforts to cause the U.S. Postal Service to, and to cause the persons under their supervision or control to cause the U.S. Postal Service to:
  - Maintain accurate books and records that reflect the U.S. Postal Service's financial information;
  - Maintain disclosure controls and procedures that cause material information to be made known to management;
  - Maintain internal controls and procedures for financial reporting to provide reasonable assurances that the U.S. Postal Service's financial statements are fairly presented in conformity with generally accepted accounting principles;
  - Prepare financial statements in accordance with generally accepted accounting principles and provide financial information that fairly presents in all material respects the financial condition, results of operations and cash flows of the U.S. Postal Service; and
  - Otherwise provide full, fair, accurate, timely and understandable disclosures in periodic reports and other financial disclosures the U.S. Postal Service files with, or submits to, the Postal Regulatory Commission or otherwise makes available to the public.

- III. The U.S. Postal Service is committed to comply with all laws, rules and regulations applicable to its business. Senior Financial Managers are expected to become familiar with the laws and regulations applicable to their duties and to use their best efforts to comply, and to cause the persons under their supervision or control to comply, with all laws, rules and regulations applicable to the U.S. Postal Service's business.

The U.S. Postal Service will, from time to time, provide training programs for this purpose, and Senior Financial Managers are encouraged to participate in the appropriate training programs.

If a Senior Financial Manager is uncertain about the propriety or legality of any proposed action, then the Senior Financial Manager should seek guidance from the General Counsel before proceeding.

- IV. The U.S. Postal Service expects Senior Financial Managers to act with the highest degree of honesty, integrity and ethical conduct in all of their official duties. Senior Financial Managers should set an example for all other employees by consistently seeking to act in the best interests of the U.S. Postal Service.
- V. A Senior Financial Manager must promptly disclose to an Ethics Official any situation where the Senior Financial Manager identifies a real or apparent conflict of interest between his or her personal interests and his or her duties to the U.S. Postal Service. The Senior Financial Manager must make such disclosure promptly after identifying the conflict and before the Senior Financial Manager takes any official action, or any additional official action, on the matter. An Ethics Official will provide the Senior Financial Manager with prompt and appropriate guidance to resolve the conflict. The Senior Financial Manager must comply with this guidance as soon as practicable.
- VI. If a Senior Financial Manager becomes aware of a material violation of this Code of Ethics, he or she must promptly bring the matter to the attention of the General Counsel. Where appropriate, the General Counsel will refer the matter to the Inspector General or the Chief Human Resources Officer and Executive Vice President to conduct any necessary investigation.
- VII. The U.S. Postal Service expects careful compliance with this Code of Ethics. Failure to follow the Code of Ethics would be regarded as a matter of extreme seriousness and may be the subject of disciplinary action pursuant to the standard procedures of the U.S. Postal Service.