CARTHAGE INDUSTRIAL DEVELOPMENT CORPORATION POLITICAL CONTRIBUTION POLICY DATED 11-4-09

As a tax-exempt 501(c)(3) organization, Carthage Industrial Development Corporation (the "Corporation") is prohibited from directly or indirectly contributing to any political candidate, political party or political action committee, whether such contribution is financial or in-kind. To ensure that the Corporation complies with the legal requirements concerning political contributions, the Board of Directors has adopted the following policy and procedures:

A. Prohibited Contributions

1. The Corporation shall not contribute any funds, property, employees or services, directly or indirectly, to any political candidate, political party or political action committee.

Examples of political contributions include:

- a. Making cash contributions
- b. Purchasing tickets to fundraising events or dinners
- c. Purchasing advertisements in journals or yearbooks
- d. Providing employees to work on campaigns
- e. Contributing non-cash items for political events
- Permitting cars, premises or equipment to be used for political purposes.
- 2. The Corporation shall not reimburse any officer, director, employee, agent, volunteer or other individual or entity for any political contribution.

B. Internal Procedures

- 1. No contribution of the Corporation's funds, property, employees or services shall be made without the prior approval of the Board President or his or her designee and the Board Treasurer. Such approval is necessary to ensure that the contribution complies with applicable Laws and regulations.
- The Board President is designated as the compliance officer (the "Compliance Officer") to monitor the Corporation's compliance with this Policy and to answer any questions about this Policy that an employee, officer or director may have.
- 3. The Compliance Officer shall report to the Board of Directors about the Corporation's compliance with this Policy annually or more frequently as the Board of Directors may request.

- 4. The Corporation shall ensure that each employee, officer and director receives training concerning this Policy. At a minimum, this Policy shall be included in the Board Policy Binder and shall be distributed to all officers, directors and employees of the Corporation.
- 5. If the Corporation becomes a dues-paying member of any business or trade association, the Corporation shall take steps to ensure that no part of its dues is used for political purposes.
- 6. In the event that, notwithstanding this Policy, the Corporation has inadvertently made a political contribution, it shall take immediate steps to seek a refund of the contribution and implement such procedures as may be necessary to prevent future political contributions.
- 7. The Board of Directors shall periodically assess the adequacy and effectiveness of this Policy.

CIDC Secretary