

CODE OF ETHICS FAQs

General Questions

Question: Suppose my manager asks me to do something that I think is wrong. What should I do?

Answer: West Marine relies on you to use your best ethical judgment. Therefore, do not do anything that you believe may be wrong. A first course of action may be to express your concerns directly to your Manager. If you feel your Manager has not adequately addressed your concerns or if you are uncomfortable raising the issue with your Manager, you can take further steps to resolve this issue by speaking informally and confidentially with head of the Human Resources Department, the Legal Department, Internal Audit or the Asset Protection Department. The important thing is to not take any action that you know or believe to be against the Code of Ethics.

Question: The different laws are so complicated and cover so many different areas, how can I be sure that I won't violate some little technicality? Moreover, how am I supposed to understand it all? I'm not a lawyer.

Answer: Don't abandon your own judgment. If something seems intuitively wrong to you, ask before acting. You also have an obligation to understand the finer points of the rules governing your job. Do not hesitate to contact the Legal Department if you need clarification of a law; and don't hesitate to speak with a member of the Human Resources or Finance Department if you have a question about our standards and policies.

Question: What happens if I am faced with a situation where acting ethically conflicts with making a profit for the Company?

Answer: You must always engage in legal and ethical conduct no matter what the circumstances. West Marine's long-term profitability depends on our reputation. If you feel that there is a conflict between what is "right" and what is profitable, you should contact your Manager, or any of the other resources listed in our Code of Ethics for guidance.

Question: What exactly happens when I call the Network Hotline to report a concern?

Answer: If you aren't comfortable reporting a situation in person –you can call the Network Hotline at (800) 241-5689. Network calls are answered by a third-party provider whom West Marine pays for this purpose. The third-party provider takes down information about the complaint and then forwards it simultaneously to: Asset Protection, the Human Resources Department, the Legal Department and Internal Audit. The matter is then investigated by the appropriate department/parties.

Equal Opportunity

Question: I believe that I did not receive a promotion because my boss knows that I am pregnant. I heard my Manager say that when a woman becomes pregnant, it inevitably interferes with job performance. Is there anything I can do?

Answer: Yes. All employment-related decisions at West Marine (e.g., promotion, remuneration, training, etc.) must be based on job-related criteria, skills and performance. You should report the situation to the Human Resources department. A report could also be made using the Network Hotline.

Question: I think my Manager didn't promote me because of my age. What can I do?

Answer: If you believe that you or another Associate are discriminated against for age or any other reason that is protected by law, you should discuss it immediately with the Human Resources Department or the Network Hotline.

Question: Sometimes my Manager favors certain Associates with overtime and good job assignments. I

think I am being discriminated against. What should I do?

Answer: If you feel you are being unfairly treated, you should discuss the situation with your Manager. Tell your Manager that you feel you are not being treated fairly in terms of job assignments and overtime. Give him or her specific examples. If your Manager is unresponsive or if you have any fear of retaliation, contact the Human Resources Department or West Marine's Network Hotline.

Question: I believe I have no prejudices in this area, but I feel sure the job opening we have in our department my department requires a work schedule that is not suitable for a single parent. I only agreed as a courtesy to interview such candidates.

Answer: If you made such an assumption, you would be violating company policy and possibly breaking the law. At West Marine, equal opportunity means just that --a fair chance for everyone.

Harassment

Question: My Manager makes several of us uncomfortable with rude jokes and comments. What should I do?

Answer: Talk to your Manager about how you feel. If you are uncomfortable talking directly to your Manager, talk to another Manager, or to a representative of the Human Resources Department. We will not stand for harassment or a hostile work environment in which Associates feel threatened or intimidated.

Question: My boss talks frequently about her religious beliefs. This makes me uncomfortable because I think religion is a personal issue. What can I do to stop this without damaging my relationship with her?

Answer: Discussions of religion are highly personal. Talk to your Manager and tell her how you feel. If your Manager continues to discuss the subject with you against your wishes, report the behavior to your Department Head or to a representative of the Human Resources Department.

Question: I am a female Associate. My male co-worker makes repeated comments about my personal appearance that make me very uncomfortable. I've asked him to stop but he won't. What should I do?

Answer: You should report your co-worker's behavior to your Manager or to a representative of the Human Resources Department. If you are uncomfortable with these resources, contact the confidential Network Hotline.

Question: One of my co-workers has a screen saver on her computer that shows pictures of men in revealing clothing. I told her that it offends me and asked her to remove the screen saver. She says because it is in her office and not in a common area that it's okay? Is she right?

Answer: No, if the screen saver is offensive and you have asked her to remove it, you should report her refusal to the Human Resources Department or the Network Hotline.

Question: During a department presentation I asked a question. I felt the response I received was abusive and I felt humiliated. Several other people in the room started to laugh.

Answer: West Marine encourages open communication, differing opinions on issues and healthy debate when decisions are being made. However, when we disagree it should be done professionally and respectfully. Talk to the individual who made you uncomfortable, or contact your Manager or the Human Resources Department.

Question: My co-workers make jokes about my sexual orientation. Should I just ignore it?

Answer: No. West Marine will not tolerate this behavior. Notify the offending individuals that the conduct is not welcome and that it will be reported. You should promptly report this to your Manager, or to a representative of the Human Resources Department. You can also report this using the Network Hotline.

Substance Abuse

Question: I suspect that a fellow Associate occasionally comes to work drunk and may be drinking on the job. I am concerned for this co-worker's health and safety. What can I do?

Answer: You should discuss your concerns with the Human Resources Department, so they can take the appropriate steps to involve the right professionals to address the situation. You can also report your concern through the Network Hotline

Question: I think my boss has a drinking problem that is interfering with work in my area. What can I do? I really want to help.

Answer: You have an obligation to report your suspicions to the Human Resources Department. It is crucial to the Associate and public safety that West Marine's workplace is free of alcohol and prohibited drugs. By reporting your suspicions now, you not only fulfill your duty to West Marine, but you may also help your boss come to terms with a serious problem that could ultimately prove personally devastating to him or her.

Question: I suspect that my co-worker is abusing prescription drugs. Since this is not an illegal substance, should I tell someone?

Answer: Abuse of legally prescribed drugs can be as dangerous as abuse of illegal substances. Talk to your co-worker about our MHN Assistance Program if you are comfortable doing so. Otherwise, share your concerns with a representative of the Human Resources Department or the Network Hotline.

Associate Privacy

Question: I received a call from an individual outside the company asking for my Associates' start dates, titles and base salaries. She told me that she is working with Human Resources on a benchmarking project and that it was urgent. I'm not sure what to do.

Answer: Information about our Associates is confidential and should only be given to those who are authorized to have this information. Never provide this type of information unless you are certain that it is appropriate. In this situation, the request should be forwarded to the Human Resources Department to ensure that this is a legitimate request.

Question: The head of my department asked me to collect salary information for all Associates in the department in order to prepare the departmental budget. May I do this?

Answer: Yes. There is a legitimate business need for obtaining the salary information - preparing the departmental budget. You must, however, maintain the confidentiality of the information. This means sharing it only with those who have a business reason to know it and ensuring that you properly secure the data when not working on it (e.g., locking it in a drawer, password-protecting any electronic documents with the sensitive information).

Conflicts of Interest

Question: May I hire my brother to do some contract work for West Marine if his rates are the best rates available?

Answer: No. Regardless of your brother's rates, West Marine will not hire him to perform services under a contract if he will be working under your supervision or if you have any influence over the decision to employ him.

Question: My daughter is seeking employment and has expressed an interest in working for West Marine. What is West Marine's policy on this?

Answer: If the hiring policy at the relevant West Marine location allows it, your daughter can apply for

employment with West Marine, as long as the position for which she applies does not report to you (and you would not be reporting to her). Her application will be evaluated according to the same criteria as all other applications. You cannot use your influence or position to affect the hiring process.

Question: My brother owns a business and wants to be a West Marine supplier. May I direct him to a West Marine Manager?

Answer: Yes. You may direct your brother to the person who may be interested in his product or service. However, your Manager and the person making the purchasing decision should be told about the relationship. Normal West Marine procedures for selecting a vendor must be followed to make sure there is no appearance of special treatment for your brother.

Question: My wife works for one of West Marine's competitors. Does this constitute a conflict of interest?

Answer: No, not necessarily. However, you should discuss the situation with your Manager to make sure you are not given assignments that would create a conflict of interest. In no event should you disclose West Marine's confidential information to your spouse or solicit from your spouse confidential information about her employer.

Question: A friend asked me to invest in a company that will produce a product that might eventually be sold to West Marine. If my only involvement in the new company is financial, is it a conflict of interest?

Answer: This has the potential to be a conflict, depending on your position with West Marine, the ability you have to influence West Marine's purchasing decisions, the amount of your investment and the importance of West Marine as a future customer to the new company. Before investing you should contact the Legal Department and your Manager and obtain prior, written approval.

Question: My spouse works for a competitor and we sometimes talk about our companies' plans. Is this okay?

Answer: Probably not. Discussing publicly available information is permissible, but you should not discuss or exchange West Marine's plans, your spouse's company's plans, or any other information about either company that may be confidential. By sharing information with your spouse, you might violate your obligation to safeguard West Marine's confidential and proprietary information -even unknowingly- and you may also be violating antitrust or competition laws that prohibit certain types of discussions. If you find yourself in this type of situation, you should end the discussion immediately and inform your Manager, the Human Resources Department or the Legal Department.

Question: Do the conflict of interest policies apply to distant relatives, such as cousins or in-laws, or to friends?

Answer: The conflict of interest policies always apply to members of your immediate family (defined as your spouse, child, sibling, parent, stepchild, stepparent, as well as mother-, father-, son-, daughter-, brother-, or sister-in-law) and to any other individuals who live in your household, except for tenants and household Associates. If a relationship with a distant relative or friend could influence your objectivity, then you should apply the policies and avoid the situation.

Question: My co-worker's son has just been hired for a job in our department. Does this represent a conflict of interest?

Answer: We do have cases where relatives work in the same department. When this occurs, we ensure that raises and job performance evaluations are handled by someone independent and the situations are monitored on an ongoing basis to ensure objectivity and fairness.

Question: I am thinking about accepting an offer for a second job with a firm that provides technical support to some of West Marine's customers similar to that provided by West Marine. I don't think the

other firm competes directly though.

Answer: The proposed second job could present two potential conflicts. First, the firm offering you employment may in fact compete with our Company. Therefore, working for that firm could be a conflict for you. Second, the time you spend working for the second firm could conflict with your duties at this *Company*. In matters such as these, you should either decline the offer or, before you accept it, consult with your Manager or the Legal Department, who will review the situation.

Question: I am thinking about accepting an offer as a sales person at another retailer which sells product that is similar to West Marine's, is that permitted?

Answer: Because you have access to information about West Marine's products and pricing that aren't publicly known, your employment with a competitor is very likely to create the appearance of a potential conflict of interest. Speak with a member of the Human Resources department, Internal Audit or the Legal Department before you proceed.

Gifts and Entertainment

Question: A vendor has offered me free tickets to a sporting event that I really want to attend. May I accept?

Answer: Maybe. The most important consideration when deciding whether to accept a gift or paid-for entertainment, such as tickets to a sporting event, is whether receiving it could (i) compromise or appear to compromise your ability to make objective and fair business decisions, or (ii) influence or appear to influence a business relationship. For this reason, business entertainment must be moderately scaled (valued at less than \$100) and intended only to facilitate business goals. Relevant factors include, among other things, the fair value of the gift or entertainment, whether the vendor will be present at the event, the frequency of gifts and entertainment received from the vendor, whether the vendor is paying for travel, lodging and meals associated with the event, and the status of West Marine's business relationship with the vendor.

Consequently, if you are offered a gift or paid-for entertainment (including business entertainment) of more than the \$100 nominal value from a vendor, prospective vendor or any person with whom West Marine does or may do business, you must inform your Manager and, if appropriate, seek advice from the Legal Department.

Question: I received a "more than modest" gift from a vendor in a country that traditionally provides frequent and expensive gifts. How do I handle this?

Answer: In some cultures, gifts and entertainment play an important role in business relationships, and it is important to understand and adapt to local customs when working in countries outside the U.S. Bear in mind, however, that West Marine policies do not allow receiving gifts that could compromise - or appear to compromise - our ability to make objective and fair business decisions. You should review this matter with your Manager and the Legal Department to address the legality, timing, business purpose, and intent of the gift.

Question: I received a gift from a customer, but I am unsure of its value. How do I know if I need to disclose it to my Manager?

Answer: You do not need to seek approval of very modest items, unless other people could reasonably construe them as influencing your business decisions. You should use your best judgment to estimate the value of the gift you received and the need to seek appropriate approval. If in any doubt, always err on the side of asking for approval. If you have any doubt about an item's value or its implications in relation to an actual or perceived conflict of interest, you should discuss the situation with your Manager and the Legal Department.

Question: I've been asked to participate in a local customer-sponsored golf event. May I attend the event?

Answer: This kind of business entertainment is probably acceptable, because it builds your relationship, it can generate goodwill, and it is not lavish. Always consider whether the event would influence -or appear to

influence- a decision about the customer. Also consider whether it has a business purpose, how it appears to Associates and others, and whether attendance benefits the company. If it requires travel, you need to talk to your Manager.

Question: A supplier just offered me a 15 % personal discount. Is this appropriate?

Answer: You cannot accept a personal discount unless the supplier offers the discount to all West Marine Associates.

Question: I attended an industry meeting and won a weekend trip. The value definitely will exceed US\$100. Can I accept the prize?

Answer: You may accept a prize with a value greater than US\$100 won in connection with a random drawing or competition as long as the drawing or competition is open to all participants and the prize is not excessive in terms of value.

Customer Relationships

Question: I just received a call from a government agency requesting information on one of our customers. Should I provide the requested information?

Answer: You should contact the Legal Department before providing any information about a customer to a third party. The Company always seeks to cooperate fully with law enforcement investigations, but it must also take into account certain additional considerations, such as the Customer privacy and the potential liability to a Customer for providing information beyond that which is appropriate under the law.

Government Relationships

Question: What happens if I receive a subpoena for documents or testimony?

Answer: Do not attempt to respond to the issuer of the subpoena directly. A subpoena usually requires a quick response, so forward it immediately to the Legal Department.

Question: The mayor of our town is coming to visit our location. May I provide samples of our products and a gift bag including West Marine logo items?

Answer: Many local officials are prohibited from even accepting a cup of coffee. Always check with the Legal department.

Question: I have just received an invitation to attend a hearing of a government/local authority committee as an expert industry witness. How should I respond?

Answer: You must seek advice from your Manager and from the Legal Department as to whether you (or another) should attend; they will give you any necessary guidance for the hearing itself.

FCPA, Improper Payments, and Bribes

Question: A vendor has asked me to send his payment through a wire transfer to the Bahamas to the attention of a partnership that has no apparent relationship with the vendor. We have a long standing relationship with this vendor and have always sent our payments to his company in the United States. Should I be suspicious?

Answer: Yes, you should be suspicious because the vendor is asking you to transfer funds to a country that is unrelated to the vendor and to an entity unrelated to the transaction. This transaction may be used to disguise financing for criminal activity such as terrorism, illegal narcotics trade, bribery or fraud. Moreover, requests to transfer money to third parties also raise red flags that need to be investigated to ensure the legitimacy of the transaction. Consult with the Chief Financial Officer, who will review the situation.

Question: What is the difference between a "gift" and a "bribe?"

Answer: A "gift" is made with "no strings attached" in the interest of, for example, building a business relationship or expressing thanks. A "bribe" occurs if you accept or give something of value to someone in return for something else, such as the award of business or the exercise of the other's discretion or influence.

Question: What is a "kickback?"

Answer: A "kickback" is something of value provided for the purpose of improperly obtaining or rewarding favorable treatment in connection with the award of a contract.

Question: Can a foreign company pay an Associate's travel to visit their facilities in the foreign country?

Answer: Yes that is absolutely fine. Travel must be directly related to promoting, demonstrating, or explaining West Marine's products or services or executing or performing a contract. The amount should also be reasonable in light of the business purpose. The other company should not pay for a side trip to Vegas or an Associate's shopping trip in Paris. Entertainment must be proportional to the business purpose of a trip. Gifts must be not as a quid pro quo for any official action, of model value, not in the form of cash or monetary equivalents, permitted under local laws of the host country, customary, in type or value, in that country, given openly and not secretly, and accurately reflected in West Marine's books, records, and accounts.

Gathering Competitive Information

Question: What are some "acceptable" methods to obtain information about competitors, including competitor pricing?

Answer: The key point is to use publicly available information. Examples include annual reports, regulatory filings, stockbroker or transportation expert analyses, press releases, the Internet, trade journals, patents, etc.

Question: I've been asked to match a competitor price. What are some "acceptable" methods to obtain information about competitor pricing?

Answer: You should only use publicly advertised prices (such as newspapers, magazines, public websites, printed catalogs, customer mailing lists that are widely distributed to end users for which you use your own name [i.e., no fake name or surreptitious efforts]), or information that is provided voluntarily by a customer (orally, in person or by email) or a document provided by a customer, e.g., to encourage West Marine to match or lower its prices. You should document the source of the information and send it to the Legal Department.

Question: I received confidential information about a competitor from another competitor without asking for it. What should I do with it?

Answer: You should immediately contact the Legal Department and forward the information to them. Do not discuss or read the material or make any copies of it.

Proprietary and Confidential Information

Question: I will soon be leaving West Marine. What restrictions do I have about talking about the company and my job after I leave?

Answer: Your responsibility is the same as when you were still working at West Marine. You may not talk about or share any information that is confidential, sensitive, proprietary or is material and has not been made public. Contact someone in West Marine Legal Department if you need guidance or have specific questions.

Question: How do I know if something is a West Marine trade secret or is confidential?

Answer: You should treat everything you learn about the Company and its business as a trade secret or confidential, unless it is obviously a matter of general public knowledge. A particular document or other

material containing information does not need to be marked "trade secret" or "confidential" to be treated as such. If you have any questions, you should contact the Legal Department.

Question: I'm working with outside suppliers to develop new marketing campaigns, and speed to market is very important. Can we exchange materials through e-mail or the Internet?

Answer: Yes, but only if the information is exchanged in a secure manner and is subject to a Company-approved confidentiality agreement. In such cases, you must consult West Marine's Information Security Policy and obtain a Confidentiality Agreement from the Legal Department.

Question: We hired a person who formerly worked for a competitor. She is aware of proprietary and confidential information about her former employer. Is it okay for her to share this information at West Marine?

Answer: No. West Marine policy prohibits disclosing proprietary, technical information and confidential business information about her former company. Even if it were accidentally disclosed, you cannot use the information. Simply stated, West Marine will treat proprietary and confidential information about other companies in the same way that we expect former West Marine Associates to treat our confidential information after leaving.

Question: A former West Marine Associate who worked on my team recently contacted me to request that I provide copies of some materials we worked on during his employment. In the course of this conversation, I learned that this former Associate has copies of several binders and CDs with West Marine materials and data we used in a project. I told this Associate that I would get back to him. What should I do now?

Answer: You should not under any circumstances provide copies of the requested materials because they are likely to be West Marine confidential information. The former Associate may also have breached his obligations under the Code by taking West Marine confidential information, and there might be other issues for West Marine if this former Associate has used or revealed this information to others. The obligation to maintain the security of confidential West Marine information applies not just during your employment but also following your employment. Contact your Manager immediately, and your Manager in turn should alert the Chief Finance Officer or the Legal Department so that it can be determined what action West Marine should consider to protect its confidential information and property.

Question: I have seen another Associate stealing supplies from our Company. The person is a friend of mine, but I don't like the fact that he is stealing from the Company. What can I do?

Answer: It is a difficult situation for you, but you owe it to yourself and to the Company to let management or the Human Resources Department know what is happening. And remember, you may always call the Network Hotline.

Business Records

Question: We have been cleaning our work area and think we can dispose of product test records from several years ago. Is there someone we should check with before we do this?

Answer: Yes. West Marine has retention requirements for most types of information. In particular, there may be ongoing tax review, government contract requirements or legal proceedings that require retention beyond the normal timeframes. Ask your Manager, who will check to see if the records can be destroyed pursuant to our Records Retention Policy.

Question: My Manager has asked me to shred documents or delete e-mails related to a project handled by my department. Is this a proper request?

Answer: The destruction of documents and e-mails in the ordinary course of business is permissible if done in accordance with West Marine's Records Retention Policy and if there is no knowledge of any ongoing or imminent lawsuit, investigation, audit or examination to which the documents may relate.

Question: I have a strong suspicion a co-worker has stolen merchandise. How should I handle this?

Answer: Do not accuse the co-worker directly. Report your concerns at once to your Manager, Asset Protection or call the Network Hotline.

Question: I routinely delete my e-mail messages. I just found out that West Marine may be sued, and I remember that I recently deleted several e-mails that may be relevant. What should I do?

Answer: Alert the Legal Department and contact the information technology personnel that service your area. It is frequently possible to restore recently deleted computer files (including e-mail).

E-mail and the Internet

Question: May I use West Marine's e-mail software to send personal messages to friends and family?

Answer: Use of our computer networks, including e-mail, is primarily for business purposes. However, if your Manager allows limited personal use and your usage conforms to West Marine's standards of behavior and does not interfere with the job performance of you or others, you may use our e-mail software for personal messages. Remember, however, that company e-mail is not private. We reserve the right to review email sent over our networks without notice to you. If your message is highly personal or confidential, you should not send it using West Marine's computer systems.

Question: I have received an offensive e-mail message. What should I do?

Answer: Ask the sender to stop transmitting offensive e-mails to you. If the sender is a West Marine Associate or Contractor and he or she persists in sending offensive material, you should promptly report this to your Manager or to the Human Resources Department. You may also report the situation using the Network Hotline.

Commitment to Fair Competition

Question: A competitor is constantly making misleading and disparaging comparisons with our product. What can I do to counter this?

Answer: West Marine expects its Associates to compete vigorously and effectively but never unfairly. Therefore, you must make sure that any comparisons with the competition are fair and accurate. You should also contact the Legal Department, since certain legal remedies may be available to West Marine.

Anti-Trust

Question: During a dinner break at an industry conference, someone who works for one of our competitors mentioned that his company was considering increasing prices because of certain industry pressures. Everyone knows that our Company is also experiencing these same pressures. Is it okay for me to discuss our pricing plans?

Answer: No. You may never discuss pricing with a competitor. This prohibition applies equally to learning the competitor's pricing practices or plans (other than from publicly available information) and to revealing those of the Company. As soon as you realize that a competitor is starting to raise this subject, you should break off the discussion, even if it means walking out in the middle of a meal. You should then immediately report what happened to the Legal Department.

Accurate Reporting

Question: If my department has made its revenue target for the quarter, is it okay for us to defer recognition of additional revenue to the next quarter?

Answer: No. Under acceptable accounting principles, all revenue, and expenses must be recognized in the

period in which they are earned or have occurred.

Question: I believe I received a poor performance evaluation after I made a complaint about the accounting treatment of an item. Previously, I had always received excellent reviews. What can I do?

Answer: West Marine's policy prohibits any retaliation against Associates who raise legitimate concerns. Contact the legal department or the human resources department with your concerns. You can also call the West Marine Network Hotline.

Question: I'm concerned about reporting a suspected fraud. What if I am wrong and it gets me in trouble, or I hurt someone's reputation?

Answer: We do not hold Associates accountable for reports made in good faith, even if they turn out to be unfounded. We are careful when looking into alleged wrongdoing to ensure that Associates' reputations are protected. Investigations are conducted in an objective, fair and confidential way. We encourage you to talk to your Manager first to help decide the best course of action.

Insider Trading

Question: I overheard in the Galley that West Marine is planning to acquire another large company. Can I buy or sell West Marine shares or shares or options of the other company?

Answer: No. The fact that you were not specifically given the information to do your job doesn't matter. The prohibition against trading applies to any information you obtain - regardless of how you obtained it.

Question: Am I liable for tipping if I tell my uncle about something important going on at the Company and he buys or sells West Marine shares?

Answer: Yes, most likely. If you pass material nonpublic information to your uncle, a court might find that you were trying to help him profit or trying to gain something personally by telling him. You might also have breached a duty to the Company. Your uncle could also be liable.

Question: I know West Marine is negotiating confidentially with a certain company. Can I buy shares in that company?

Answer: No, you must wait until the deal is made public. You may be liable for insider trading if it is determined, even with hindsight, that the negotiation with the company is material information. Even if the information is not material, you should not buy shares in the company because any perception of wrongdoing could harm the reputation of both you and West Marine.

Question: How do I know whether I am aware of "material" nonpublic information about the company?

Answer: Information is material if it is important to an investor making a decision about buying or selling the Company's stock. This information includes financial results, business acquisitions or sales, senior management changes, government investigations, changes in significant customers, and product recalls. If you are unsure whether you have material information, refrain from trading and consult your Manager or the Legal department.

Question: If I was already planning to make a trade before I became aware of material information, may I still complete the transaction?

Answer: No. A person who trades in company stock while aware of material nonpublic information will be deemed to have traded on the basis of that information even though the inside information was not a significant factor in his or her trading decision.

Political Activities and Contributions

Question: A friend of mine is running for political office, and I would like to help her out with her campaign. Is there a problem with this?

Answer: No. Your personal support is your personal business. Just make sure that you do not use West Marine assets, including company time, or the West Marine name, to advance the campaign.

Question: May I make personal political contributions?

Answer: Yes. Personal political contributions are not prohibited. This is entirely a matter of personal choice.

Question: I strongly support a candidate for office in the upcoming election. May I hand out campaign literature on the job?

Answer: No. Distribution of such materials during work time or in work areas is an unacceptable use of company property and time and could create the mistaken impression that West Marine is endorsing a particular candidate.