

GATOR BOOSTERS, INC.
CODE OF ETHICS
For Directors

The Audit Committee of Gator Boosters, Inc. has established the following Ethics Policy for directors of Gator Boosters, Inc.:

All directors of Gator Boosters, Inc. will adhere to the highest ethical and business practices. All actions of the directors, officers, and employees of Gator Boosters, Inc. shall be in compliance with the applicable law, and any applicable University of Florida Guidelines, Policies, and Procedures on Outside Activities.

The Ethics Advisor for the University of Florida is the Vice President and General Counsel, 123 Tigert Hall, Post office Box 113125, Gainesville, Florida 32611, 352-392-1358 (office) or 352-392-4387 (facsimile).

In addition to the foregoing policy that was established by the University of Florida Trustees for the University, the Directors of Gator Boosters, Inc. and the Audit Committee also shall be bound by the following Code of Ethics. By signing, I acknowledge that I have read, understand and agree to adhere to the Code of Ethics and Ethics policy. I will:

1. Formally and promptly communicate any breach in this Code of Ethics to the President of Gator Boosters, Inc. or the Chair of the Audit Committee of the Board of Directors of Gator Boosters.
2. Act at all times with honesty, integrity and independence, avoiding actual or apparent conflicts of interest in personal and professional relationships, and expect and encourage such conduct by others.
3. Act in good faith, responsibly, with due care, competence, and diligence, and without knowingly misrepresenting material facts or allowing independent judgment to be subordinated.
4. Protect and respect the confidentiality of any information designated to me to be confidential information of Gator Boosters or the University of Florida, except when authorized or otherwise legally obligated to disclose. Any confidential information acquired as a Director will not be used for personal advantage.
5. Promote ethical behavior among my peers.
6. Embody and enforce this Code of Ethics.

The directors of Gator Boosters, Inc. shall affirm in writing on an annual basis their commitment to this Code of Ethics.

Adopted by the Audit Committee of Gator Boosters, Inc. on June 22, 2006.

**POLICIES FOR THE BOARD OF DIRECTORS AND
THE AUDIT COMMITTEE OF THE BOARD OF DIRECTORS
CONCERNING CONFLICTS OF INTEREST**

Policy No. 1

If any Gator Boosters director believes that he or she has or might have a potential conflict of interest or the appearance of such a conflict, that member shall contact the chairman of the Audit Committee or any other member of the Audit Committee, or the Audit Committee's financial expert, for advice and guidance of the Audit Committee.

Policy No. 2

If any director believes that he or she might have a conflict of interest or an appearance of a conflict of interest on any item that comes before the Board of Directors of Gator Boosters, Inc., that member shall recuse himself or herself by stating that he or she may have a conflict of interest on that item, and that member shall leave the room before the item is discussed or voted on, and shall rejoin the meeting after discussion and voting has been completed on the item. Such recusal shall be duly noted in the minutes of the meeting of the Board of Directors.

Unanimously adopted by the Audit Committee and the Board of Directors of Gator Boosters, Inc. on September 9, 2006.

Executive Director

