



Code of Ethics

Horizon Telcom, Inc. (the "Company") believes that one of its greatest assets is the public trust it has enjoyed for more than a century. Further, Horizon knows that how others judge, react and interact with the Company is significantly influenced by both individual standards of conduct and the corporate philosophy that determines how business is conducted.

- Employees and directors will represent the Company in all business activities with strict adherence to standards of honesty, integrity and honor. To this end, employees will avoid not only impropriety, but also the appearance of impropriety. Employees and directors will refrain from participating in activities or decisions that might involve a real or perceived conflict of interest with the Company.
- Employees and directors will report to the Company or appropriate authorities any known or suspected violations of law, regulations or corporate policy.
- The Company will maintain all records and information in accordance with applicable laws and regulations. Employees will ensure that all records are accurate, compliant, and supported by appropriate documentation.
- It is the objective of the Company to hold employees in management positions personally and strictly accountable for taking the measures necessary to achieve this objective within their areas of responsibility.
- All employees and directors will act in good faith, responsibly, and with due care, competence and diligence, without misrepresenting material facts or allowing your independent judgment to be subordinated by others.
- All employees and directors will respect the confidentiality of information acquired in the course of his or her work except when authorized or otherwise legally obligated to disclose. Employees and directors agree not to use confidential information acquired in the course of his or her work for personal advantage.
- Violations of the Code may result in disciplinary action up to and including termination.

- Except with the prior approval of the Chief Compliance Officer (defined below), no employee shall enter into any understanding or agreement - whether expressed or implied, formal or informal, written or oral - with a competitor limiting or restricting any of the following aspects of the competitive strategy of either party or of the business offering of either party to any third party or parties:
 - Prices
 - Costs
 - Profits
 - Product or service offerings
 - Terms or conditions of sale
 - Production or sales volume production facilities or capacity market share
 - Decisions to quote or not to quote
 - Customer or supplier classification or selection
 - Sales territories
 - Distribution methods

RELATIONSHIPS WITH VENDORS

- Based on core values of honesty and accountability, Horizon expects all its business transactions to be legal, open, honest, fair, fully auditable and conducted in a manner complimenting its long-established moral and ethical standards. Though Horizon hopes to maintain lasting relationships and partnerships with vendors who provide excellent products and services at competitive prices, periodic reevaluation of these relationships/partnerships/contracts should be expected to ensure the Company is receiving best-value returns on any and all of its investments. The competitive bid process should never be interpreted as disloyalty or dissatisfaction.
- Horizon employees may not accept gifts, gratuities, entertainment, meals, or purchasing discounts in any amount if ever there is an expectation of reciprocal obligation. The Company recognizes that non-monetary personal gifts having a small value given as gestures of goodwill, in the spirit of seasonal giving, or for public relations purposes are an accepted part of doing business. Employees are obligated to report instances, however, and to make full disclosure to Horizon's Department of Human Resources for any personal gift approximating \$75 or more in value.
- Employees and vendors or business partners are expected to report to the Company or appropriate authorities any known or suspected violations of law, regulations, corporate policy, conflict of interest or other infractions of this Code of Ethics, whether real or implied.

IMPLEMENTATION AND OVERSIGHT OF THIS CODE

The Company's Board of Directors (the "Board") is ultimately responsible for the implementation and enforcement of this Code. The Board has designated the Audit Committee to administer this Code. The Audit Committee shall be responsible for designating an officer with sufficient seniority and stature within the organization to be the compliance officer (the "Compliance Officer") to assist in the administration of the Code with respect to non-executive employees. The Audit Committee has designated the Chief Financial Officer, currently Peter M. Holland, as the Compliance Officer. He can be reached at (740) 772-8547 or pete.holland@horizontel.com. With respect to matters relating to directors and executive officers, the Audit Committee may investigate such matters and present reports and/or recommendations to the Board.

Questions regarding the application or interpretation of this Code are inevitable. You should feel free to direct questions to the Compliance Officer or the chairperson of the Audit Committee, as applicable.

If you learn of or suspect that a violation of the Code has occurred or is likely to occur, you must immediately report the violation to the Compliance Officer, another member of the Company's senior management, or the Audit Committee, as appropriate.

SUMMARY

Horizon's reputation depends on its employees. Although some legal and ethical risks appear small, they can be large enough to threaten the future of the Company. Each employee must commit to the highest standards of ethical behavior and abide by all laws. The future of our company could depend on this commitment. The Company will enforce these standards fairly on all levels.