

Code of Ethics

It is the policy of Ballantyne Strong, Inc. that its employees, directors and agents are held to the highest standards of honest and ethical conduct when conducting the affairs of the company. Because the equity shares of Ballantyne Strong, Inc. are publicly traded, senior financial officers of Ballantyne Strong, Inc. are held to an especially high set of ethical standards which are further described below. Senior financial officers of Ballantyne Strong, Inc. will not commit acts contrary to these standards of ethical conduct nor shall they condone the commission of such acts by others within the Ballantyne Strong, Inc. organization.

1) General Standards of Ethical Behavior

Senior financial officers will:

- i. conduct their business and professional affairs in a way that avoids both real and apparent conflicts of interest between their interests and the interests of the Company;
- ii. refrain from engaging in any activity that would compromise their professional ethics or otherwise prejudice their ability to carry out their duties to the Company;
- iii. communicate to executive management of the Company and to the accountants engaged in financial audits of the Company, all relevant unfavorable as well as favorable information and professional judgments or opinions;
- iv. encourage open communication and full disclosure of financial information by providing a well understood process under which management is kept informed of financial information of importance, including any departure from sound policy, practice and accounting norms;
- v. ensure that all relevant staff members understand the Company's open communication and full disclosure standards and processes;
- vi. refrain from disclosing confidential information acquired in the course of their work except where authorized, unless legally obligated to do so;
- vii. inform subordinates, as appropriate, regarding the confidentiality of information acquired in the course of their work and monitor, as needed, to ensure that subordinates maintain that confidentiality;
- viii. refrain from using or appearing to use confidential information acquired in the course of their work for unethical or illegal advantage, either personally or indirectly through others;

2) Regarding Financial Records and Reporting

Senior financial officers will:

- i. Establish appropriate systems and procedures to ensure that business transactions are recorded on the Company's books in accordance with Generally Accepted Accounting Principles, established Company policy, and appropriate regulatory pronouncements and guidelines.
- ii. Establish appropriate policies and procedures for the protection and retention of accounting records and information as required by applicable law, regulation, or regulatory guidelines.
- iii. Establish and administer financial accounting controls that are appropriate to ensure the integrity of the financial reporting process and the availability of timely, relevant information for the safe, sound, and profitable operation of the company.

iv. Completely disclose all relevant information reasonably expected to be needed by the Company's auditors for the full, complete, and successful discharge of their duties and responsibilities.

3) Compliance with Applicable Law, Rules and Regulations

Senior financial officers will:

i. Educate members of the finance organization about any federal, state or local statute, regulation or administrative procedure that affects the operation of the finance organization and the enterprise generally.

ii. Monitor the compliance of the finance organization with any applicable federal, state or local statute, regulation or administrative rule.

iii. Identify, report and correct in a swift and certain manner any detected deviations from applicable federal, state or local statute or regulation.