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FEDITC CODE OF BUSINESS  
ETHICS AND CONDUCT



Asset Number	Version	Effective Date	Pages
HR- MNL-1002	2.0	4/1/2018	19

**LETTER FROM THE CHIEF EXECUTIVE OFFICER**

FEDITC was built upon the principles of fairness and integrity in all that we do. Since 1999, we have remained passionate about providing our customers outstanding service at a fair price and providing you - our most important resource – an environment in which to thrive.

As FEDITC approaches its 20<sup>th</sup> anniversary, we are, more than ever, dedicated to preserving our customers trust. As a service company, you are our face and you reflect FEDITC’s culture and values on the front line.

In general, the use of good judgment, based on ethical, “common sense” principles will guide us to appropriate behavior. But, sometimes the most well intended course of action is not the correct course of action. Our reputation for integrity and excellence requires an understanding and vigilant observance of applicable laws and regulations, and a scrupulous regard for the highest standards of conduct and personal integrity.

This “Code of Business Ethics and Conduct” is meant to clearly articulate FEDITC’s commitment to an organizational culture that encourages ethical conduct and compliance with the law, and offer you a resource that translates that commitment into action.



I urge you to review this Code thoroughly and let it serve as a framework for ethical decision making.

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## CHAPTER 1 – ETHICS FUNDAMENTALS

### **APPLICABILITY**

This Code applies to all employees, officers, directors, agents, consultants and all others who conduct business on behalf of FEDITC. Since no one document can cover all situations, you are encouraged to freely direct any questions you may have to your FEDITC supervisor, the Human Resource Department or anyone in the FEDITC management chain.

### **ACCOUNTABILITY**

Each of us is responsible for adhering to the values and standards set forth in this Code and for raising any questions you may have as to its content or applicability. Violations of this Code may result in a variety of corrective or disciplinary actions, up to and including termination of employment.

### **RESPECT FOR THE INDIVIDUAL**

We all deserve to work in an environment where we are treated with dignity and respect. FEDITC is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

FEDITC, LLC is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to Human Resources.

### **CONFRONTING ETHICAL SITUATIONS**

All of us will most likely confront ethical challenges at some point in our career and each of us must determine how to respond. This isn't always easy for a variety of reasons. Perhaps we don't have all the facts but just "feel" it isn't right. Perhaps we fear that our reporting could negatively affect someone else's career and we don't want that on our back, or maybe we know that this is a common practice among our competitors - so why not us?

We recognize that reporting a potential, suspected or real ethical concern may be difficult, but FEDITC's policy is one of mandatory reporting of violations of the law or regulation, this Code or any FEDITC policy and non-retaliation on the part of FEDITC for such reporting.



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## CHAPTER 2 – ETHICS HOTLINE AND REPORTING POLICY

### **POLICY**

FEDITC is committed to the highest possible standards of ethical, moral and legal business conduct. In conjunction with this commitment and FEDITC’s commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith.

Regular business matters or employment-related concerns should continue to be reported through your normal channels and are not addressed by this policy.

### **UPHOLDING THE LAW**

FEDITC’s commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or FEDITC policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Because of the nature of our business, some legal requirements warrant specific mention here:

- [Federal Acquisition Regulation 52.203-13](#)
- [Anti-Kickback Act of 1986](#)
- [No FEAR Act](#)
- [DOD Fraud Hotline Posters](#)
- [Title 5 USC § 7353. Gifts to Federal employees](#)
- [FAR 3.104 – Procurement Integrity](#)
- [False Claims Act - Title 31](#)

### **REPORTING VIOLATIONS**

If you observe or have good reason to suspect a violation of law or regulation, this Code, or any FEDITC policy, you must report the matter.

#### **Timing**

The earlier a concern is expressed, the easier it is for us to take action.

#### **Evidence**

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In raising any question or concern or reporting misconduct, you must act in good faith. This does not mean that you need to be right, nor does it mean that you must have irrefutable facts to support your question or concern. It requires only that the information you are providing is not fabricated or presented in an intentionally misleading manner. Malicious allegations may result in disciplinary action.

### **Reporting**

The following channels are available to all who become aware of a violation, have a question or concern, or are seeking advice and counsel:

- Your manager, supervisor or someone in your management chain
- [ethics@feditc.com](mailto:ethics@feditc.com)

Or **ANONYMOUSLY** via Lighthouse Services, Inc. who specialize in providing independent third-party ethics hotline services, available 24 hours a day, seven days a week.

- Website: [www.lighthouse-services.com/feditc](http://www.lighthouse-services.com/feditc)
- FEDITC Ethics Hotline (phones to the Hotline do not have Caller ID)
  - Toll-Free Telephone:
    - Direct Dial
    - English speaking USA and Canada: 833-480-0010
    - Spanish speaking USA and Canada: 800-216-1288
    - French speaking Canada: 855-725-0002
    - Spanish speaking Mexico: 01-800-681-5340
  - AT&T USADirect
    - All other countries: 800-603-2869 (must dial country access code first)
- E-mail: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)
- Fax: (215) 689-3885 (must include company name with report)

### **CONFIDENTIALITY**

Using the Lighthouse Services reporting methods described above allow you to remain anonymous if you choose, but please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting and your anonymity will be protected to the extent possible by law. However, your identity may become known during the course of the investigation because of the information you have provided. Reports are submitted by Lighthouse to FEDITC or its designee, and may or may not be investigated at the sole discretion of our company.

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Other than reporting the suspected violation, you should treat the matter as confidential and avoid discussing it with others.

## **SAFEGUARDS**

### **Harassment or Victimization**

Harassment or victimization of individuals submitting reports will not be tolerated.

### **Non-Retaliation**

FEDITC will not tolerate any form of retaliation against anyone who raises good faith questions, concerns or complaints about conduct they believe violates this Code or other FEDITC policies.

If you serve in a supervisory or management position with FEDITC you must ensure that when an employee raises an issue about a fellow employee, a client, or even you, he or she is treated fairly. It is your responsibility to honor the trust placed in you and ensure that the employee is put into contact with the appropriate resources to appropriately address the matter. Under no circumstances should you dissuade an employee from reporting an issue or accessing higher management to resolve it. As a manager or supervisor, you are required to immediately contact [Ethics@FEDITC.com](mailto:Ethics@FEDITC.com) even if only to relate that an employee has reported a matter to you.

Anyone who violates this policy is subject to disciplinary consequences, up to or including termination of employment.

## **HOW THE REPORT WILL BE HANDLED**

FEDITC will investigate all reported instances of questionable or unethical behavior. The action taken will depend on the nature of the concern. In every instance where improper behavior is found to have occurred, the company will take appropriate action. The FEDITC Ethics Committee receives a copy of all reports and follow-up reports on actions taken by the company.

### **Initial Inquiries**

Initial inquiries will be made to determine the most effective method of investigation and resolution. Some concerns may be resolved as agreed without the need for further review.

### **Feedback to Reporter**

Whether reported directly to FEDITC personnel or through the hotline, the individual submitting a report will be given the opportunity to receive follow-up on their concern to include:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;

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- Giving an estimate of the time that it will take for a final response;
- Telling them whether initial inquiries have been made;
- Telling them whether further investigations will follow, and if not, why not.

**Further Information**

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from the reporter.

**Outcome of an Investigation**

At the discretion of the company and subject to legal and other constraints, the reporter may be entitled to receive information about the outcome of an investigation.



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## CHAPTER 3 – PROCUREMENT INTEGRITY

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Procurement Integrity encompasses a range of legislation, regulations, directives, actions, and attitudes for preserving the integrity of the Federal procurement and assuring the fair treatment of bidders, offerors and contractors. The term “integrity” itself is defined as firm adherence to a code or standard of values.

Various criminal statutes, the Federal Acquisition Regulation (FAR), and implementing Department of Defense (DoD) regulations govern the actions of personnel, who in the course of their employment as a Government contractor participate in the procurement process or have access to competition sensitive and nonpublic information in the course of their daily jobs.

The procurement process must be conducted in a manner that is above reproach. It requires that unauthorized contacts, conflicts of interest, disclosure of competition sensitive information or information that has not been made available to the general public be strictly avoided. Even the appearance of impropriety must be avoided.

### **NON-PUBLIC INFORMATION**

In your current job or as a result of prior employment, you may have access to many forms of non-public information. This information could be sensitive government acquisition information or it could be proprietary information of other companies that you had access to as part of your job or your employment at that firm. This policy applies whether or not you signed a non-disclosure agreement (NDA) with your former employer. It is FEDITC’s strict policy that all proprietary, business sensitive, competition sensitive, government non-public information and contractor bid or proposal information, either written or verbal, coming into your possession through your duties be appropriately used and protected and never used for personal gain.

Additionally, upon termination of your duties, you must surrender any materials in any form that contain such information to the government office which initially furnished them to you.

Any violation of this policy may result in disciplinary action against you and incur criminal or civil liability to the United States Government for the improper disclosure of information.

### **COMPETITION**

The way we conduct ourselves in our personal lives and in our business transactions defines who we are and how others perceive us. FEDITC values vigorous competition and the many advantages it brings to the market place and we stand fast that our success in the market will be based solely on the principles of procurement integrity and fair competition. We will compete fairly and we will win on our merits.

If you are involved in proposals or bid preparations, you must not knowingly make any untruthful statements, communications, or representations.

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### **CONFLICTS OF INTEREST**

Conflicts of interest (COI) are situations in which competing interests may impair our ability to make objective and unbiased business decisions. Please understand that a COI can exist even if there has been no unethical or improper activity so please don't be afraid to speak up. Prompt action may permit certain types of conflicts to be mitigated. We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs.

COIs basically come in two forms:

- Organizational Conflicts of Interest and
- Personal Conflicts of Interest.

#### **Disclosure**

The circumstances related to conflicts of interest can be complicated and difficult to assess. If you identify a real or potential Conflict of Interest (Organizational or Personal) regarding either current or contemplated work, you are required to report it to your FEDITC supervisor or another member of the FEDITC's management as you become aware of it. There is absolutely NO penalty for disclosure. Prompt action may permit certain types of conflicts to be mitigated through client-approved measures (e.g., using NDAs or firewalls).

#### **"Organizational" Conflicts of Interest**

Objectivity in judgement is paramount in all that we do. FEDITC does not accept work that creates an organizational conflict of interest (OCI), or even the appearance of a conflict without a client approved OCI mitigation plan.

As a FEDITC employee, you must be diligent in identifying any potential OCI and not engaging in any activities that violate Government procurement rules or contractual OCI restrictions and obligations. OCI generally falls into one of three categories:

- ***Biased Ground Rules*** involves a contractor setting the "ground rules" by helping the government define the terms of a competitive procurement for which the same contractor may have an interest in competing. **EXAMPLE:** Writing a statement of work, developing specifications, or performing systems engineering for a procurement which could skew the competition in favor of the contractor.
- ***Impaired Objectivity*** involves a contractor providing services that call into question the contractor's ability to render impartial advice to the Government. **EXAMPLE:** Evaluating proposals or past performance of itself or a competitor.

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- **Unfair Competitive Advantage** is where a contractor has access to nonpublic information as part of its performance of a federal contract, which may provide the contractor (or an affiliate) with an unfair competitive advantage in current or future procurements. EXAMPLE: Having access to sensitive government program acquisition information, source selection data or proprietary information of other companies that could benefit the contractor in seeking future work.

### **“Personal” Conflicts of Interest**

The Federal Government defines, (see United States Code: [41 U.S.C. 2303](#)), “Personal conflict of interest” to mean a situation in which a covered employee has a financial interest, personal activity, or relationship that could impair the employee’s ability to act impartially and in the best interest of the Government when performing under the contract. (A *de minimis* interest that would not “impair the employee’s ability to act impartially and in the best interest of the Government” is not covered under this definition.)

(1) Among the sources of personal conflicts of interest are—

- (i) Financial interests of the covered employee, of close family members, or of other members of the covered employee’s household;
- (ii) Other employment or financial relationships (including seeking or negotiating for prospective employment or business); and
- (iii) Gifts, including travel.

(2) For example, financial interests referred to in paragraph (1) of this definition may arise from—

- (i) Compensation, including wages, salaries, commissions, professional fees, or fees for business referrals;
- (ii) Consulting relationships (including commercial and professional consulting and service arrangements, scientific and technical advisory board memberships, or serving as an expert witness in litigation);
- (iii) Services provided in exchange for honorariums or travel expense reimbursements;
- (iv) Research funding or other forms of research support;
- (v) Investment in the form of stock or bond ownership or partnership interest (excluding diversified mutual fund investments);
- (vi) Real estate investments;
- (vii) Patents, copyrights, and other intellectual property interests; or
- (viii) Business ownership and investment interests.

At times, we may be faced with situations where business actions taken on behalf of FEDITC may conflict with our own personal or family interests. This is a personal conflict of interest. More specifically, it means a situation where financial interests, personal activities, or relationships could impair your ability to act impartially and in the best interest of FEDITC or the Government when performing under a contract. FEDITC’s ability to provide unbiased advice and assistance to our clients cannot be influenced by such a conflict.

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A conflict may be present at the beginning of your employment with FEDITC or arise later due to a change in your personal circumstances, or a change in FEDITC’s business operations. As you can imagine, it is impossible to list every type of conflict that could possibly arise but we must all be diligent in identifying and addressing them.

Three of the most common types involve personal financial holdings, interests of immediate family members, and employment or financial relationships. But the Federal Acquisition Regulation (FAR) also specifically addresses the prevention of personal conflicts of interest for contractor employees who perform “acquisition functions closely associated with inherently governmental functions”. Because these positions require more stringent procedures, they are addressed in a separate section below.

But remember, the fact that this Code does not specifically address a type of conflict does not negate your obligation to disclose it as described above.

- **Personal Financial Holdings** - An example of this type of conflict is if you are advising a client about a procurement where you have a financial interest in a company that provides the product or service being procured, or you are advising a client on policies that directly affect a company in which you have invested.
- **Interests of Close Family Members** - This type of conflict could present itself, for example, if you are assisting in a source selection and one of the potential awardees is your family member’s employer.
- **Employment or Financial Relationships** - Any employment discussions with your current client, whether the discussions were initiated by you or the client, may constitute a conflict of interest. You must inform your FEDITC supervisor of any such discussions or if your client solicits you or a family member for employment

### **AFFILIATION**

Affiliation is another very important matter that we must all understand and consider in the course of our everyday work, particularly, when making business decisions such as the selection of teaming members or subcontractors. While not specifically defined as a Conflict of Interest, a determination of affiliation has serious consequences relative to a company’s small business size status.

Affiliation is all about **control**. The Small Business Administration (SBA) affiliation rules look to whether a business controls, or has the power to control another, or when a third party (or parties) controls or has the power to control both businesses. Please bear in mind that it does not matter if the control is exercised, so long as the power to control exists.

Control may arise through a variety of avenues, including ownership, management, economic dependence or other relationships or interactions between individuals or businesses, including

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family members, a prime and its subcontractors, or even between parties to a Joint Venture. And while there are exceptions, opportunities for affiliation are numerous and we should be extremely mindful of them when establishing relationships and business arrangements.

While the rules that govern affiliation can be somewhat convoluted, please be clear, a finding of affiliation can lead to a loss of small business size status – and the ability to compete for these set-asides.

More information on this topic may be found at <https://www.sba.gov/document/support--affiliation-guide-size-standards>.



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**“ACQUISITION FUNCTIONS CLOSELY ASSOCIATED WITH INHERENTLY  
GOVERNMENTAL FUNCTIONS”**

These types of positions are specifically and separately addressed in FAR 52.203-16, and defined as “supporting or providing advice or recommendations with regard to the following activities of a Federal agency:

- Planning acquisitions
- Determining what supplies or services are to be acquired by the Government
- Developing statements of work
- Developing or approving contractual documents, to include documents defining requirements, incentive plans, and evaluation criteria
- Evaluating contract proposal.
- Awarding Government contracts.
- Administering contracts (including ordering changes or giving technical direction in contract performance or contract quantities, evaluating contractor performance, and accepting or rejecting contractor products or services)
- Terminating contracts.
- Determining whether contract costs are reasonable, allocable, and allowable.

The FAR requires that contractors whose personnel perform the above functions have procedures to screen for potential personal conflicts of interest, maintain effective oversight to verify compliance.

If you perform any of these functions, you may be required to complete and submit a Disclosure of Interests Statement.

**GIFTS AND BUSINESS COURTESIES**

FEDITC employees are prohibited from giving or offering gifts to, or receiving gifts from government personnel with the intent of receiving any favorable treatment.

While gifts may be commonplace in the commercial world with business deals sealed over dinner at fine restaurants or sporting events, when the customer is the U.S. federal government, the gift rules are very different.

Federal Regulations generally prohibit a U.S. Government employee from accepting any gift from an outside source. While the regulations do provide for some “minimal value” exceptions such as the \$20/\$50 rule, (which generally allows a government employee to accept an unsolicited gift valued at \$20 or less as long as the total value of individual gifts received from any one person does not exceed \$50 in a calendar year), the interpretation of these exceptions can be confusing and application can be complex. For these reasons and to avoid even the

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appearance of impropriety, it is FEDITC policy to avoid any manner of gift giving to government employees, even if allowed.

**What is a Gift?**

For our purposes, a “gift” is anything, tangible or intangible, where the full value of the item is not paid by the recipient. Gifts do NOT include items where the recipient provides reimbursement, such as through a “fair share” box, or modest items of food or refreshments (such as soft drinks, coffee and donuts offered other than as part of a meal), greeting cards, certificates or similar items with little intrinsic value.

**BRIBES AND KICKBACKS**

FEDITC strictly prohibits bribes, kickback or any other form of improper payment, direct or indirect, to any representative of the government in order to obtain a contract, benefit or government action. FEDITC also prohibits any employee from accepting such payments from anyone.



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## CHAPTER 4 - IN THE WORKPLACE

### **TIME AND EXPENSE REPORTING**

We have the opportunity every day to demonstrate our personal integrity in a very real way - by accurately and honestly recording our time and any reimbursable expenses. FEDITC employees and their supervisors are responsible for understanding and complying with the labor recording policies and procedures covering their contracts and take all steps necessary to ensure that time charging for labor, travel, material, and other costs, are accurately and completely recorded.

Knowingly falsifying your time records or instructing others to do so is strictly prohibited by FEDITC. Anyone who violates this policy is subject to disciplinary action, up to and including termination of employment, and may be subject to further criminal or civil legal action. In submitting your time report, you are certifying that all entries are complete and accurate and conform to the timekeeping and leave procedures in the FEDITC “Employment Guidelines” handbook available on the FEDITC ADP website. Managers and supervisors also have an obligation to review their employees’ timecards for accuracy and to examine questionable entries.

#### **Direction from the Client**

Although you may take reasonable direction from a client regarding work activities, the client cannot waive any of FEDITC’s policies such as time and expense reporting. A contractor has a legal right to establish rules of conduct and attendance for its employees.

The question of whether contractor personnel can participate in activities such as Commander’s calls, sports days, down-days, physical fitness time, office picnics, and holiday parties has always caused a great deal of confusion and concern. We understandably all want to be part of “the team” but please understand, we, as government contractors, are subject to different laws and terms in performing our contract. A government client cannot grant contractor personnel the same duty time flexibility as government employees. Directing contractor personnel to participate in these activities during duty time is not permissible.

Additionally, you must notify your FEDITC supervisor if client personnel provide you direction that adds new services or deliverables, substantially modifies current services or deliverables, or changes our performance schedule.

### **WORKPLACE HARASSMENT**

FEDITC does not condone any activity that disrupts or interferes with an individual’s work performance or that creates an intimidating, offensive, or hostile work environment. This policy applies regardless of whether the individual engaging in the harassing conduct is an employee, a

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client, a subcontractor, or any other third party. Elaboration on this policy may be found in the FEDITC “Employment Guidelines” handbook available on the FEDITC ADP website.

Any FEDITC employee, supervisor, or manager found to have violated the harassment policy or is found to have intentionally provided false information in reporting a complaint of harassment will be subject to disciplinary action, up to and including termination.

### **FEDITC PROPRIETARY INFORMATION**

In the course of your employment with FEDITC, you may receive or contribute to the creation of confidential or proprietary information relative to the operations of FEDITC. This information includes any data or information relating to the business of FEDITC which is not generally known by and readily accessible to the public. For example: policies, plans, procedures, strategies and techniques; information concerning our Company's earnings and methods for doing business; names and addresses of the Company's employees, suppliers, contractors/subcontractors, and customers; pricing, credit and financial information. The unauthorized use of such information is not permitted. This obligation continues even after your employment ends with FEDITC.

### **BUSINESS OPPORTUNITIES**

As a FEDITC employee, if you become aware of business opportunities that FEDITC might pursue, you may not take personal advantage of these opportunities by pursuing them on your own or receiving personal benefit from referring them to others. Your responsibility is to inform FEDITC management of the opportunity for pursuit if so desired.

It is FEDITC policy that employees strictly refrain from entering into any subcontract, teaming agreement or business arrangement with a family member, acquaintance or any other entity that could be construed to present an opportunity for a personal conflict or a ruling of affiliation, as discussed in Chapter 3.

Similarly, you may not use FEDITC’s property or information for personal gain or to compete with the firm.

### **USE OF COMPANY RESOURCES**

Company resources, including time, material, equipment and information, are provided for company business use. Occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

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Employees and those who represent FEDITC are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, do not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, and do not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the FEDITC network and our fellow employees, FEDITC reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, and the use of the Internet or FEDITC intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

### **MEDIA INQUIRIES**

From time to time, FEDITC employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, you should direct all media inquiries to your FEDITC supervisor. No one may issue a press release without first consulting with the Senior Vice President.



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## CONCLUSION

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At FEDITC, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that FEDITC is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we *should* do so.

Although FEDITC, LLC's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If you are concerned whether the standards are being met or are aware of violations of the Code, you have been given the tools to make that known.

FEDITC takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Once again, we want to thank each of you for your efforts and we look forward to continuing our work together in building a company culture based on strong core values and the highest ethical principles.

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These policies may be revised, revoked, or superseded at any time, and new relevant policies may be issued. The absence of a policy in this Code does not in any manner limit the effectiveness of other FEDITC policies and procedures.

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### Asset Change History

Revision Date	Revision Number	Author	Revision Description
03/01/2017	.01	Patricia Tiner	Initial Asset Creation
05/05/2017	.02	Kelly Mitchell	Revisions to content
08/15/2017	.03	Marissa Cortez	Revisions to Content
01/08/2018	.04	Marissa Cortez	Added Lighthouse information
03/01/2018	.05	Marissa Cortez	Created a second version
3/23/2018	.06	Patricia Tiner	Revisions to content
3/28/2018	1.0	Marissa Cortez	Approved
09/05/2018	2.0	Patricia Tiner	Addition of new language in section titled Affiliation.

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