

Code of Business Ethics and Conduct (external use)

Prepared by

Business Operations

Date

June 3, 2020



People • Technology • Information • Knowledge

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RECORD OF CHANGES

Issue Date: March 2018	Revision No.: 3	Revision Date: May 18, 2021	Policy No. BO-01 (ext)
Created By: Business Operations		Approved By: Executive Team	
Subject: Code of Business Ethics and Conduct (External)			

DISCLAIMER:
The Client Solution Architects Policies and Procedure Documents are intended to provide an organized reference source for statements of corporate policies and procedures. These policies define corporate objectives and establish guidelines for Client Solution Architects employees. Business conditions, federal and state law and organizational needs are constantly in flux and may require that portions of this policy will be rewritten.

I. SCOPE OF CODE

This Code of Business Ethics and Conduct (“Code”) is applicable to all employees, agents, suppliers, and contractors who are working for or on behalf of Client Solution Architects LLC (“CSA” or “the Company”). This may be in association with procuring and performing contracts for and with government entities, including the United States Government and for private, commercial clients. The ethical standards and guidelines that follow are modeled on federal requirements (will be updated/supplemented with state and local government ethical standards, when applicable). Therefore, the guidance in this Code is generally applicable to all and should be followed in employee dealings with all governmental entities. These standards also apply to quasi-government entities (for example, a regional transportation authority or the United States Postal Service), as well as Indian tribes and tribal organizations (as those terms are defined in 25 U.S.C. sec. 450b). These entities are collectively hereinafter referred to as “the Government.” CSA complies with all applicable laws and regulations.

II. INTRODUCTION

A. GOVERNMENT CONTRACTING

Doing business in the Government sector as a contractor is very different from doing business in the commercial marketplace. The laws related to contracting with the Government are far-reaching and complex, placing responsibilities on CSA that are beyond those faced in the commercial sector.

Statutes and regulations define the way in which Government contracts are conceived, structured, awarded, performed, and completed. Contract terms and the way contracts are administered are defined by these statutes and regulations. Meaning that many behaviors that are acceptable and often expected in a commercial setting are not allowed in the Government context. Even the intent to “please the customer” can result in unexpected consequences with the Government. For example, certain types of gifts, meals, and entertainment that might be considered a normal part of doing business with commercial customers are forbidden under Government contract rules.

B. STANDARDS

Obedying the law, both in letter and in spirit, is the foundation of this Code. Our success depends upon ALL operating within legal guidelines and cooperating with local and national authorities. Additionally, unyielding personal integrity is the foundation of corporate integrity. CSA’s policy is to promote the highest standards of integrity by always conducting our affairs in an honest and ethical manner. The integrity and reputation of the Company depends on the honesty, fairness, and integrity brought to the job by each person associated with us. Every individual

must apply common sense, together with his or her own highest personal ethical standards, in making business decisions where this Code contains no stated guidelines.

Finally, this Code, and government contract standards in general, depend on individuals asking questions and raising issues. Therefore, if you see something unusual or become aware of a potential or actual instance of non-compliance, say something. CSA is committed to the principle that there will be no retaliation who in good faith asks a question or raises an issue with their superior, or with any reporting channel in this Code, even if the matter turns out to be perfectly proper and appropriate.

C. VIOLATIONS OF THIS CODE AND GOVERNMENTAL LAWS AND REGULATIONS

Violations of the Code will not be tolerated.

For violations of the standards set forth in this Code, the Government can impose civil fines or penalties and even criminal prosecution. Improper conduct can result in price reductions, cancellation of a contract, and CSA's suspension or debarment from doing business with the Government.

All should be aware that conduct and records, including e-mails, are subject to internal and external audits and to discovery by third parties in the event of a Government investigation or civil litigation.

Any supplier who violates the standards in the Code may be subject to termination of their contractual agreement with CSA and/or forfeiture of payment.

III. ETHICS AND CONDUCT COMPLIANCE

A. INTEGRITY OF COMPANY BOOKS, RECORDS, DOCUMENTS, AND ACCOUNTS

CSA's books, records, and other documents serve as a basis for managing our business and are important in meeting our obligations. The integrity of CSA's books, records, documents, and accounts (including submissions to the Government) depends upon the validity, accuracy and completeness of the underlying information, including cost entries, time reports, and other data. Therefore, all corporate and business records and time keeping, and reporting should be completed accurately and honestly. Making any false or misleading entries on any Company business record, including but not limited to financial reports or time reports, is strictly prohibited. In this regard:

- Transactions must be supported by appropriate documentation;

- No entry may be made in our books and records that intentionally hides or disguises the nature of any transaction or liability, or that misclassifies any transaction as to accounts or accounting periods;
- The terms of sales and other transactions with the Government must be reflected accurately in the documentation for those transactions, and all such documentation must be reflected accurately in our books and records;
- If required by a particular contract that is subject to cost reimbursement (sometimes called "cost plus") accounting requirements, costs must be properly allocated and charged to a Government contract or project and only so charged or allocated if they have been incurred in the performance of, or are otherwise properly allocable to, that contract or project, time must be properly charged, and all indirect cost rates must comply with Government accounting regulations
- No cash or other assets may be maintained for any purpose in any unrecorded or "off-the-books" fund.

CSA relies upon its business records to produce reports for the Government and commercial clients. Employees who collect, provide, or analyze such information for, or otherwise contribute in any way to, preparing or verifying business records and reports should strive to ensure that CSA's disclosures are accurate and transparent and that our reports contain all appropriate information.

To this end, our vendors must:

- Not take or authorize any action that would intentionally cause our financial records or financial disclosures to fail to comply with generally accepted accounting principles, Government cost accounting principles, or other applicable laws or regulations;
- Cooperate fully with CSA's Accounting/Finance and Contracts departments (as well as our outside accountants and counsel, and Government representatives), respond to their questions with candor, and provide them with complete and accurate information to help ensure that our books, records and reports are accurate and complete; and
- Not knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of CSA's reports to the Government, or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosures in any of our reports accurate in all material respects.

B. PROTECTION OF CONFIDENTIAL INFORMATION AND PUBLIC DISCLOSURE OF GOVERNMENTAL RELATIONSHIPS

For purposes of non-solicitation and/or nondisclosure agreement and/or any other agreements between CSA and an agent or contractor, the definition of confidential information includes, but is not limited to, all non-public information of the Government, Subcontractors, and CSA. Confidential information also includes all non-public information that might be of use to competitors, or harmful to the Government, CSA or third parties if disclosed. In some states, our response to a bid is confidential and cannot be disclosed. All have a duty to keep and refrain from disclosing confidential information.

Public disclosure of information concerning CSA and its work with the Government should be run through the Contracts department and made only through specific limited channels to avoid inappropriate or inaccurate publicity. You may not provide the media with any information about CSA and its work with the Government, whether off-the-record, for background only, confidentially, or secretly. All inquiries or calls from the press should be referred to CSA's Marketing Department.

C. APPEARANCE OF IMPROPRIETY

You should not engage in any conduct that creates the appearance of impropriety. Your conduct creates the appearance of impropriety whenever it would lead a reasonable observer to objectively conclude that you are acting in a manner that is dishonest, unethical, illegal or otherwise in violation of these guidelines.

It is not possible to identify every instance that results in the appearance of impropriety, but the following guidelines are designed to prevent common instances in which it may occur. Please also refer to the Human Resources Department for additional guidance on this topic.

1. Gratuities; Gifts and Entertainment Policy.

Federal and state statutes and regulations preclude Government employees and their immediate families from accepting gifts, gratuities or things of value from contractors. CSA's and its vendors' interaction with its Government customers should be free from the perception that favorable treatment was sought, received, or given in exchange for business courtesies such as entertainment, gifts, or gratuities. You must not give anything of value (including, but not limited to, money, services, loans, discounts to recreational activities, travel, entertainment, a promise of future reward or compensation, alcoholic beverages, or meals) to Government employees or officials for any reason. Providing gifts of even a nominal value to Government employees or officials can create, at minimum, an appearance of impropriety that we must avoid.

2. Prohibitions Against Kickbacks and Bribes.

CSA strictly forbids conduct that presents even the appearance of offering or accepting a kickback or bribe in connection with a Government contract. A kickback or bribe resulting in the award of a contract, as well as the Government giving any other form of favorable treatment to

a contractor, such as unwarranted waivers of deadlines or accepting non-conforming services, is prohibited. You are not permitted to make or authorize any offer, payment, promise or gift that is intended or appears to influence any person or entity to award business opportunities to CSA or to make a business decision in CSA's favor. For example, you should never make any promises to a Government customer regarding eligibility or receipt of government funding, or receipt of free services from CSA.

Anything of value can serve as the basis of a bribe. Examples of common forms of payments or benefits that may constitute a bribe if coupled with an intent to improperly influence or reward the beneficiary include, but are not limited to:

- Unreasonable gifts, meals, entertainment, travel expenses or other hospitality; · Unwarranted rebates or excessive commissions;
- Unwarranted allowances or expense reimbursements;
- Charitable contributions to organizations owned or recommended by a foreign official or owned by his or her family members;
- Contributions to a foreign political party or candidate for political office at the request of a third party;
- Uncompensated use of CSA services or facilities; and
- A payment or benefit may be deemed unreasonable, unwarranted or inappropriate under the if (i) it violates other applicable CSA policies (ii) violates CSA's contracts and/or (iii) a third party could reasonably perceive that the purpose of the arrangement is to influence a foreign official's decision or reward the improper performance of his or her duties.

CSA vendors are prohibited from engaging in Bribery of a Foreign Official in connection with our business. The FCPA is a federal law, enforced by the U.S. Department of Justice, which prohibits payments, gifts, or even offers of "anything of value" to a "foreign official" for the purpose of influencing the official or otherwise "securing any improper advantage" in obtaining, retaining or directing business.

CSA vendors must also be aware of, and comply with, applicable anti-bribery laws of the foreign countries with which they carry out international activities. Such foreign laws may include, but are not limited to, the United Kingdom (UK) Bribery Act, The Prevention of Bribery Ordinance of Hong Kong, and India's Prevention of Corruption Act. Since some of these foreign laws are in certain instances stricter than their FCPA counterpart, CSA employees should consult with Human Resources and Contracts regarding the specific requirements of these foreign anti-bribery laws as needed. "Facilitating" payments to Foreign Officials (i.e., payments that increase the speed at which Foreign Officials perform their functions) are permitted under the FCPA but may nonetheless violate local anti-bribery laws of the foreign jurisdiction (e.g., the UK Bribery Act). Therefore, facilitating payments are not permitted under this Policy unless (i) the payment is necessary to prevent risk of injury or harm to oneself or another person and (ii) Human

Resources and Contracts have determined the specific payment is permissible under the FCPA and the applicable laws of the local jurisdiction.

CSA must assess the risk of bribery in the international activities under their purview and take appropriate care to prevent and detect bribery and ensure compliance with corporate policies and the law. Certain countries have a high incidence of corruption, and particular care should be taken when undertaking activities in or involving those countries. For information regarding high-risk countries, see the Transparency International Corruption Perceptions Index available at <http://www.transparency.org/research/cpi/>.

Depending on the individual circumstances, appropriate steps may involve (i) additional training of employees and other third parties concerning this Policy, (ii) conducting appropriate due diligence before engaging third party vendors, agents or teaming partners, (iii) ensuring that contracts contain antibribery and compliance with law provisions, and (iv) requesting guidance from the Human Resources and Contracts before expanding operations into a new geographic location.

Failure to take appropriate steps to prevent and detect bribery creates legal risk for CSA and potential personal liability for the individuals involved. CSA must comply with the CSA's Procurement Manual and record keeping requirements as well as its financial controls for cash and non-cash transactions.

For clarity, the following definitions are provided:

- "Bribery" means the direct or indirect (i.e., through a third party) (a) offering, giving, directing or promising to another person (including a Foreign Official's family member) anything of value with the intention to induce or reward a Foreign Official to (i) undertake an official act or decision, (ii) violate his or her official duties, (iii) use his or her influence to affect an act or decision of the government or (iv) give an improper advantage; or (b) engaging in (a) without the aforementioned intention to induce or reward, but which nonetheless could reasonably be interpreted as such an inducement or reward. See the FAQs that follow this Policy for examples of common forms of bribery.
- "Foreign Official" means any (a) employee, officer or agent of a foreign government, (b) political candidate of a foreign party, or (c) employee of a (i) foreign government owned or controlled commercial enterprise, university, research institution, health care facility, or instrumentality, (ii) public international organization (e.g., United Nations, World Bank, World Health Organization), or (iii) foreign political party.

There is zero tolerance for violating this policy. Any vendor who violates the policy will be subject to disciplinary action up to, and including, termination of contract. Note that violations of this policy may also be violations of state and/or federal laws and regulations; thus, civil legal action or referral for regulatory or criminal prosecution may be appropriate in certain cases.

3. Combatting Trafficking in Persons and Anti-Trafficking in Persons Compliance

CSA has a zero-tolerance policy and is opposed to all forms of trafficking in persons and is committed to mitigating the risk of trafficking in persons in connection with its operations and programs.

CSA is committed to full compliance with the U.S. Government's laws, regulations, and policies that prohibit trafficking in persons, including [Executive Order 13627](#), "Strengthening Protections Against Trafficking in Persons in Federal Contracts"; [FAR Subpart 22.17](#); [FAR 52.222-50](#); [FAR 52.222-56](#); and any other regulations from other agencies and governments, as applicable. CSA leadership understands the importance of anti-trafficking and has devoted resources to promote compliance.

CSA prohibits:

- Engaging in any form of human trafficking
- Engaging in commercial sex acts that may be directly associated with CSA, which includes during work hours, while attending off-site functions, and any time in work travel status
- Using forced labor of any kind for any reason
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses – regardless of issuing authority
- Using misleading or fraudulent recruiting practices during the recruitment of employees or offering of employment; such as failing to disclose, in a format and language understood by the employee or potential employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charge to the employee or potential employee, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place
- Charging employee candidates recruitment fees for employment
- Failing to pay contractually agreed return transportation costs for certain employees who have finished employment outside that employee's nation of residence
- Providing or arranging housing that fails to meet the host country's housing and safety standards

- Failing to provide proof of employment or similar work document in writing prior to the employee departing from his or her country of origin

CSA's Combating Trafficking in Persons Policy reflects all the requirements stemming from our contractual and ethical obligations to the people we serve. The policy includes all actions CSA may take against employees or others who violate the policy, and procedures for reporting and investigating violations.

All U.S. Government-funded awards and CSA-issued subcontracts with an estimated value of \$500,000 are required to complete an anti-trafficking compliance plan. The compliance plans may be adjusted based on risk factors for trafficking due to the location, beneficiary population, complexity, size of the program, or other variable deemed appropriate and relevant. In addition, subcontractors must certify that their staff and contractors at any tier have not engaged in trafficking-related activities.

Failure to comply with the requirements of the Combating Trafficking in Persons Policy or the anti-trafficking in persons compliance plan is grounds for CSA to take any and all appropriate actions, up to and including immediate termination of that subcontractor's award with CSA. For the purposes of each required award-specific compliance plan, "staff" means an individual engaged in the performance of the award as a direct employee, consultant, or volunteer of the awardee or any sub-awardee.

Consistent with award requirements, CSA country offices will develop and implement country plans that address award-specific challenges and reflect any unique country context in combating trafficking in persons, as needed.

All vendors are required to use their best judgement to report any suspected trafficking activity to their Supervisor, Human Resources, or other appropriate authority.

- CSA's ethics hotline at 855-662-SAFE (1-855-662-7233) or our third-party website can be used to make a report by clicking on submit report at www.safehotline.com. Use Company ID to report the issue: **0557708418**.
 - Your voicemail will be transcribed into text so that you can remain anonymous.
 - If you want to remain anonymous when making your report, please do not leave any self-identifying information. If you would like to be contacted by the company, include your name and contact information. We will not modify your report. The report will be submitted to your company "as is" with no changes.
 - Safe Hotline does not investigate your report. Your report will be forwarded to your company for investigation. The Safe Hotline service is a third-party service that allows you to report anonymously without fear of retribution.

- The status of your report can be checked by selecting the 'Report Status' option via any reporting method – text, voicemail or website. To check the status and respond to any comments and/or questions made by the company, you will need the Company ID number and the Report Key number. After entering a new report, you will receive a Report Key number that identifies your report. The Report Key number cannot be retrieved, so you must take care to safeguard this number if you wish to know the status or to add new information to your report.
- DOD Inspector General Hotline 1-800-424-9098 or <http://www.dodig.mil/hotline>, or
- National Human Trafficking Hotline 1-888-373-7888.

Any violations of this policy will result in disciplinary action that may include but is not limited to termination of employment for CSA employees and termination of the relationship with CSA for non-employees.

Any supplier or supplier personnel engages in any prohibited activities, fails to report suspicious activities, or engages in retaliatory actions will be subject to action including termination of the business relationship and reporting as appropriate.

Questions regarding CSA's Combating Trafficking in Persons Policy and this compliance plan may be directed to CSA's ethics hotline at csacompliance@csaassociates.com.

References:

- [U.S. Presidential Executive Order 13627](#)
- FAR Subpart 22.17: Combatting Trafficking in Persons
- [FAR 52.222-50: Combatting Trafficking in Persons](#)
- [FAR 52.222-56: Certification Regarding Trafficking in Persons Compliance Plan](#)

Key Definitions:

- Bonded labor or debt bondage: The use of a debt or other threats of financial harm as a form of coercion. Some workers inherit debt, others fall victim to traffickers or recruiters who unlawfully exploit an initial debt assumed as a term of employment.
- Commercial sex act: Any sex act on account of which anything of value is given to or received by any person.
- Forced labor: Situations in which persons are coerced to work using violence or intimidation or by more subtle means, such as accumulated debt, retention of identity papers, or threats of denunciation to immigration authorities.

- Human trafficking: Human trafficking means recruiting, harboring, transporting, providing, or obtaining a person for labor or services through the use of force, fraud, coercion, abduction, deception, the abuse of power or of a position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation. Exploitation includes involuntary servitude, peonage, debt bondage or slavery, the removal of organs, and sex trafficking or other forms of exploitation.

D. HIRING AND EMPLOYMENT DISCUSSIONS WITH GOVERNMENT EMPLOYEES

In many instances it is improper to even communicate with a Government employee and his or her immediate family, including legislators and legislative employees, regarding employment if CSA is involved in a procurement process with the Government entity. Additionally, former Government employees typically are subject to “revolving door” rules that limit their efforts to influence Government decision-making (including rewarding contracts and participating in the administration of same) and are permanently barred from appearing before a Government agency on matters in which they personally participated or had a direct and substantial interest while employed by the Government. There also are time restrictions on former Government employees and their immediate families holding certain positions within CSA or representing CSA in connection with certain matters or activities.

Due to these rules, CSA employees should not contact a current or former Government employee or his or her immediately family, regardless of seniority, about employment with CSA (as either an employee or consultant) without the approval of Talent Acquisition, Human Resources, and Contracts. In addition, CSA may require current or former Government employees to seek advice from their agency’s compliance officer or legal department before taking on: (i) any assignment related to their former agency; or (ii) any tasks that relate to matters that they know or should have known were pending under their official responsibility during their last year of employment.

E. NON-DISCLOSURE OF PROCUREMENT INFORMATION (PROCUREMENT INTEGRITY ACT)

Various laws prohibit or limit the disclosure of “sensitive procurement information” provided to or created by the Government or a CSA Teaming Partner. “Sensitive procurement information” is: “contractor bid or proposal information”: or “source selection information” disclosed prior to the award of the federal procurement contract to which the information relates. CSA and its vendors must take care to ensure that sensitive procurement information is neither solicited nor obtained. If you are aware that such information has been obtained,

inadvertently or otherwise, it is your responsibility to stop reading the information, quarantine the information immediately, and promptly notify Legal.

F. LOBBYING RESTRICTIONS

All lobbying activities and related expenditures must be conducted under the supervision and approval of our Contracts Department due to the requirements of the 1989 Byrd Amendment, [31 U.S.C. § 1352](#). CSA complies with the following: (i) "Limitation on Payments to Influence Certain Federal Transactions ([FAR 52.203-12](#))"; and, (ii) "Certification and Disclosure Regarding Payments to Influence Certain Federal Transactions ([FAR 52.203-11](#))". These two Byrd Amendment clauses preclude recipients of federal contracts from influencing a member or an officer or employee of Congress regarding the award of a contract. In effect, tax money intended to purchase goods or services must not be used to influence the award of *future* contracts. Additionally, state laws prohibit former or present government employees for acting in a representative capacity for CSA before the legislature or state agencies, including participating in procuring and administering contracts.

I. USE OF CONSULTANTS, AGENTS, AND CONTRACTORS AND CONTINGENT FEES, AND TEAMING AGREEMENTS/JOINT VENTURES

1. Consultants, Agents, Contingent Fees.

Honesty and integrity are key standards for the selection and retention of those who represent CSA. Paying bribes or kickbacks, engaging in industrial espionage, obtaining the proprietary data of a third party without authority, or gaining inside information or influence are just a few examples of what could give us an unfair competitive advantage in a Government procurement and could result in serious violations of law.

All agents, representatives, or consultants must be willing to certify to their compliance with CSA policies and procedures and must never be retained to circumvent our ethical and business standards. In addition, Contracts must review and approve all consulting agreements related to Government contracting for CSA and pre-approve any effort to retain an employee or consultant to facilitate Government business. Similarly, if you are approached regarding entering into a contingent fee arrangement with a person or entity, contact Contracts.

2. Debarred Contractors.

Contractors who have committed certain specified offenses that indicate a lack of business integrity or responsibility may be suspended or debarred from doing business with the Government. The names of the contractors suspended or debarred from federal government contracting appear in the System for Award Management, which includes the GSA Excluded Parties List System, which is publicly available on-line at <https://www.sam.gov> and can be further verified via FAPIIS at <https://www.fapiis.gov/fapiis/index.action>.

CSA refrains from doing business with any contractor or subcontractor that has been suspended or debarred by the Government. Moreover, CSA must be careful that its certifications of compliance with this requirement when entering a contract are accurate. Any employee who has reason to believe that a contractor with whom CSA intends to contract is suspended or debarred must notify Contracts immediately.

J. FALSE CLAIMS ACT AND FALSE STATEMENTS ACT

Knowingly submitting a false or fraudulent claim, or supporting a claim with a false statement, is prohibited pursuant to the False Claims Act ("FCA"). The definition of a "claim" is so broad that overcharging the Government for products or services is the most typical FCA problem. "Product substitution" cases are also a common FCA action. In "product substitution" cases, the payment request for services rendered is deemed "false" since the contractor gave the Government noncompliant goods or services. Similarly, bid rigging and false proposal certifications can lead to FCA violations because the invoices requesting payment are based on pre-contract misconduct or misrepresentations. Another common FCA violation stems from invoices submitted on contracts that would not have been awarded "but for" a false statement, certification, or representation.

The False Statements Act is frequently used to prosecute companies and individuals for false statements that are made to the Government in the course of the competition for or performance of a contract. Accordingly, employees must not make false statements (oral or written).

In addition, contractors should never misrepresent their size or status to the government in order to qualify for contracts intended for small businesses or those owned by women, veterans or other disadvantaged groups. If CSA is a subcontractor to a small or disadvantaged business under a set-aside contract, CSA must strictly follow all regulations governing allowable levels of subcontracting and deal with the prime contractor in a strictly arms-length manner.

K. RECORD RETENTION AND AUDIT RESPONSIBILITY

Reliable records allow CSA to comply with all laws and regulations. In addition, they are required to allow CSA's leadership to make informed business decisions. Accurate records must be maintained in a reliable and designation location. It is against the Code and/or applicable laws and regulations to alter, delete, improperly store, misrepresent, or falsify records.

The federal government generally requires contractors and subcontractors to maintain accurate books and records pertaining to a contract or subcontract for three (3) years after final payment, although the retention period for other types of books and records, such as those related to customers receiving E- Rate funding, may be longer. Accordingly, CSA is required to

keep for such retention periods all documents (regardless of media) related to any Government contract or subcontract performed by Company in a secure and accessible location. In addition, the Government frequently conducts audits and investigations to identify and address procurement fraud.

At CSA, we maintain accurate documents and records associated with our Government contracts and all business dealings in accordance with such requirements. If you are approached by an investigator or a Government auditor for any reason, you should contact the Finance Department immediately. Moreover, you must not alter, destroy, or conceal any documents relating to an investigation or take any action that could hinder an investigation, and must fully cooperate with any internal and/or external inquiries. Violations of these laws are punishable by fines and/or up to twenty (20) years imprisonment.

L. TIMEKEEPING AND EXPENSE REPORTING RESPONSIBILITY

CSA requires all employees, subcontractors, vendors, and suppliers to accurately record their time and only incur and expense for **allocable, allowable** contract or task order business expenses. Allowable business expenses will be identified in CSA-specific employee policies and/or contractual requirements. CSA employees must be fully compliant with CSA's Timekeeping Policy and CSA's Credit Card and Reimbursement Policy and Procedure and any contractual or task order requirements. CSA is not responsible for reimbursement of unallowable business expenses or inaccurately incurred hours on timesheets.

Falsifying time and expense reports can lead to termination of employment, termination of contractual agreements, or disciplinary action.

M. ASSET USE RESPONSIBILITY

CSA requires that all users of CSA's, clients', subcontractors', vendors', suppliers', and third-parties' assets are properly used and protected. Assets include but are not limited to information technology, materials, and facilities. Assets shall only be used for their intended purpose which is to conduct legitimate business operations in accordance with CSA's Code and any applicable contract. Unauthorized parties (to include friends, family, competitors, etc....) should never access these assets unless they have permission from CSA's executive team or, in the case of entrance of a facility, signed in via a visitor log and have clearly identifiable visitor badging. Use of CSA-furnished or Government-furnished assets assumes no expectation of privacy.

Assets shall be reasonably protected and never left in public or open spaces (such as a vehicle). All marked documentation such as PII, classified information, FOUO, CDI etc.... must be properly

cared for and stored in accordance with applicable laws, rules, and regulations. Irresponsible use of these assets can lead to termination of employment, termination of contractual agreements, or disciplinary action.

Asset violations shall be reported immediately as follows:

- For improper use of assets: ithelp@csaassociates.com and hr@csaassociates.com
- For cyber incidents: cybersecurity@csaassociates.com
- For security violations: security@csaassociates.com
- For contractual violations: contracts@csaassociates.com and security@csaassociates.com, ithelp@csaassociates.com, and/or hr@csaassociates.com (depending on the applicable issue)

IV. PERFORMING BUSINESS WITH ETHICAL SUPPLIERS, VENDORS, AND TEAMING PARTNERS

CSA only performs business with those clients, subcontractors, vendors, and suppliers that concur with CSA's corporate ethos. All individuals performing business with CSA are required to operate ethically and in compliance with the Code and all applicable laws.

CSA is wholly committed to transparency and cooperation. CSA has a zero-tolerance policy for criminal activity of any kind. CSA will fully cooperate with any oversight request or investigation including but not limited to audits, floor checks, subpoenas, interviews, and requests for information from investigators.

V. COMPLIANCE PROGRAM

CSA's ethics and compliance programs, including this Code, are overseen by Business Operations. They are responsible for ensuring that appropriate policies and procedures exist to help employees comply with CSA's expectations of ethical conduct. To facilitate compliance specific with this Code, CSA has implemented a program of business ethics and conduct awareness, training, and review. Additionally, CSA conducts periodic evaluation of the effectiveness of our ethics and compliance programs, as well as periodic monitoring and auditing to detect improper conduct. All are expected to cooperate fully during any reviews and audits.

A. CLARIFYING QUESTIONS

If you encounter a situation or is considering a course of action and its appropriateness is unclear, the employee should discuss the matter promptly with Human Resources. Human Resources is also available to those who wish to ask questions about CSA policies or seek

guidance on specific situations. Contact with Human Resources will be kept strictly confidential to the extent reasonably possible within the objectives of this Code.

B. REPORTING POSSIBLE VIOLATIONS

One of the most important responsibilities a vendor has is the obligation to report possible violations of law or our codes of business conduct.

CSA's helpline and website have been established to provide you with channels to report possible violations confidentially and anonymously. Both the Helpline and the website are staffed by an independent third party. When contacting either the Helpline or the website, employees may provide their name, but are not required to do so.

CSA's efforts to disclose possible legal violations and contract overpayments are not limited to current and future violations. CSA is committed to investigating all possible violations, regardless of the date on which the possible violation or overpayment occurred. In determining whether to report a possible violation, individual employees should err on the side of making a report.

C. INVESTIGATING AND RESOLVING COMPLAINTS

CSA reviews each report of a possible violation of law or CSA's codes of business conduct and takes all allegations seriously. As needed, Internal Audit or the assigned investigator(s) (if necessary) will interview witnesses, collect documents, and consult with others at CSA. CSA will employ a fair process in its investigation of violations of this Code.

CSA prohibits any employee from taking retaliatory action against anyone for making a good faith report of a possible violation or assisting in an investigation of a possible violation.

If any investigation indicates that a violation of the Code has occurred, CSA will act appropriate under the circumstances and if it determines that an employee is responsible for a Code violation, they will be subject to disciplinary action including possible termination of their contract and, in appropriate cases, civil action or referral for criminal prosecution. Appropriate action also may be taken to deter any future Code violations.

CSA's Executives (in consultation with senior managers and Directors) will be responsible for (i) determining when disclosure to the agency contracting officer, inspector general, and/or other Government officials is required or otherwise appropriate, and (ii) ensuring the appropriate disclosures are made.

D. HARASSMENT, DISCRIMINATION AND DRUG-FREE WORK ENVIRONMENT

CSA is committed to providing a work environment free from discrimination and unlawful harassment, disrespectful or unprofessional conduct based on:

Race	Color
Religion	Creed
National Origin	Ancestry
Gender Identity or Expression	Age
Sexual Orientation	Physical or Mental Disability
Genetic Information	Gender
Marital Status	Military Status
Covered Veteran Status	Pregnancy
Childbirth	Pregnancy-Related Conditions
Any characteristic protected under local, state, or federal law	

CSA also prohibits discrimination, harassment, disrespectful or unprofessional conduct based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics.

Such conduct is prohibited in any form at the workplace, at work-related functions, or outside of work if it affects the workplace. This policy applies to all CSA employees, clients, customers, guests, vendors, and persons doing business with CSA.

Any behavior or action which is coercive, discriminatory, intimidating, harassing, or sexual in nature is inappropriate and prohibited. Complaints shall be thoroughly investigated and, pending results from an investigation, may lead to disciplinary actions or termination

CSA is also committed to maintaining a business environment that is free from the effects of drug and alcohol abuse.

It is expected that all will assist in maintaining a work environment free from the effects of alcohol, drugs or other intoxicating substances. Compliance with this substance abuse policy is made a condition of employment and vendor contractual arrangement.

In working with CSA, you are prohibited from the following when reporting for work, while on the job, on company or customer premises or surrounding areas, or in any vehicle used for company business:

The unlawful use, possession, transportation, manufacture, sale or other distribution of an illegal or controlled substance or drug paraphernalia

The unauthorized use, possession, transportation, manufacture, sale or other distribution of alcohol

Being under the influence of alcohol or having a detectable amount of an illegal or controlled substance in the blood or urine ("controlled substance" means a drug or other substance as defined in applicable federal laws on drug abuse prevention)

Any vendor violating these prohibitions will be subject to termination of their business relationship with CSA.