

PHOENIX GROUP

GOVERNMENT & CORPORATE SUPPORT SERVICES

Code of Conduct

PHOENIX GROUP of VIRGINIA, INC. Code of Conduct outlines expected behaviors for all Phoenix Group employees.

Phoenix Group will conduct its business fairly, impartially, in an ethical and proper manner, and in full compliance with all applicable company policies and procedures, and local, state and federal laws and regulations.

In conducting its business, integrity must underlie all company relationships, including those with the government, customers, suppliers, communities and among employees. Phoenix Group expects to meet or exceed all industry standards for compliant and ethical behavior.

Ethical business conduct is required of Phoenix Group employees in the performance of their company responsibilities.

Employees will not engage in conduct or activity that may raise questions as to the company's honesty, integrity, impartiality, reputation or otherwise cause embarrassment to the company.

Honesty and integrity are the basic principles of Phoenix Group's Code of Conduct.

Our personal standards and ethics must, at all times be above reproach, and we must conduct ourselves in a manner to reflect credit upon Phoenix Group, and the government.

We must be honest in all our relationships and must avoid even the appearance of illegal, noncompliant, or unethical conduct.

Phoenix Group management is required to notify, in writing, the DoD or GSA Office of the Inspector General, whenever there is credible evidence that a principal, employee, agent, or subcontractor of Phoenix Group has committed a violation of the civil False Claims Act or a violation of Federal criminal law involving fraud, conflict of interest, significant overpayments, bribery, or gratuity violations in connection with the award, performance, or closeout of a contract or any related subcontract.

It is the responsibility of each and every Phoenix Group employee to maintain the highest standards of business ethics and conduct, including taking positive action to prevent and report any improper acts that may come to your attention.

Employees will ensure that:

- ❖ Respect and fairness are the foundation for all of our transactions and interactions.
- ❖ They will protect all company, customer, government and supplier assets and use them only for appropriate company approved activities.
- ❖ They do not engage in any unfair or anti-competitive business practices or any activity that might create a conflict of interest for the company or for themselves individually.
- ❖ They will comply with all company policies and procedures and local, state and federal laws and regulations.

- ❖ They will follow all restrictions on the use and disclosure of information. This includes following all requirements for protecting the information of Phoenix Group and ensuring that customer, government and supplier proprietary information is used and disclosed only as authorized by the owner of the information or as otherwise permitted by law.
- ❖ They do not take advantage of their employment with Phoenix Group to seek personal gain through abuse of their position or through the inappropriate use of information from Phoenix Group, customers, the government, or suppliers.
- ❖ They will promptly report any illegal, unethical, or other improper conduct to the ethics advisor, the company president, human resources, the company hot line, the government hotlines, or to other appropriate authorities.

WHERE TO GO FOR ASSISTANCE

Every employee has the responsibility to ask questions, seek guidance and report suspected violations of this Code of Conduct.

Retaliation against employees who come forward to raise genuine concerns will not be tolerated.

If you have a question on these rules, please immediately contact the Phoenix Group Ethics Advisor, Human Resources, or the company President.

You can also call the Values Line 24 hour ethics hotline at 1-888-475-8376.

To report waste, fraud and abuse on government contracts call the DoD hotline at 1-800-484-9098.

The Department of Homeland Security OIG hotline number is 1-800-323-8603. The GSA FraudNet hotline number is 1-800-424-5210.

Updated 1/20/2010