

CODE OF BUSINESS ETHICS AND CONDUCT

MAY 2017



CHALLENGE ACCEPTED





MESSAGE FROM THE **PRESIDENT & CEO**

Dear Colleagues,

Since the founding of our company in 1989, we have always delivered superior products and services to our customers and conducted business in accordance with the highest ethical standards. Our continued growth and success reflect the satisfaction and trust of our employees, clients and business partners. We are committed to maintaining a culture of excellence and uncompromising integrity at all times.

SOSi's Ethics Compliance Program consists of various company policies as well as on-line and in-person training and seminars that are updated annually. We strive to provide our employees with the tools necessary to comply with the letter and spirit of applicable laws and meet our company's standards for behavior.

SOSi's Code of Business Ethics and Conduct is the cornerstone of our Ethics Compliance Program. It summarizes key laws and regulations with which we must comply and provides an overview of SOSi's expectations regarding ethical business conduct. The Code expresses our fundamental values and reinforces the responsibilities we share in protecting SOSi's reputation in the marketplace.

Please read the Code and uphold its principles. If you have questions regarding compliance with laws or ethical decision-making, you may obtain assistance through the various channels described in the Code. Your unwavering commitment to excellence and legal and moral business conduct will ensure that we retain our reputation as a company that both provides premier products and services and maintains the highest standards of integrity in all its business dealings.

Sincerely,

Julian M. Setian
President & Chief Executive Officer
SOS International LLC



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OPERATING PRINCIPLES

MISSION

Our mission is to deliver innovative and high-impact solutions that strengthen and protect our national security.

VISION

Our vision is to be the leading provider of mission and intelligence support to the U.S. Defense, Intelligence and Law Enforcement communities.

VALUES

EXCELLENCE

We strive to be the best.

INTEGRITY

We always do what's right.

DETERMINATION

We believe we can do anything.

Our operating principles are the foundation of our business and are keys to our success.

WE ARE COMMITTED TO EXCELLENCE

We approach our work with enthusiasm and aim to deliver "best in class" products and services.

WE OPERATE WITH INTEGRITY

We obey the law and maintain the highest standards of ethical behavior in all our dealings.

WE ARE BOLD AND DETERMINED

We embrace challenges and never allow obstacles to get in the way of accomplishing our goals.

WE ARE DEDICATED TO EARNING THE LOYALTY OF OUR CUSTOMERS

We aim to exceed our customers' expectations and quickly remediate problems when they arise.

WE TREAT OUR BUSINESS PARTNERS AS ESSENTIAL TEAM MEMBERS

We seek to build mutually beneficial relationships with our subcontractors, suppliers and other business partners.

WE RECRUIT THE RIGHT PEOPLE AND HELP THEM GROW

We hire the most qualified individuals and provide them with the education and training opportunities they need to succeed.

WE FOSTER TEAMWORK

We encourage our employees to collaborate with one another in order to promote creativity, learning and a wider sense of ownership.

WE ENGAGE IN CONTINUOUS IMPROVEMENT

We continually examine our processes and shortcomings to determine what we can do better and improve how we do business.

OVERVIEW

SOS International LLC, including each of its wholly-owned or controlled subsidiaries (collectively, SOSi or the company), is committed to conducting business ethically and in compliance with applicable laws, rules and regulations of the United States (U.S.) and other jurisdictions in which it operates.

This Code of Business Ethics and Conduct (Code) sets forth our expectations regarding ethical conduct of business by all our employees worldwide. It applies to all our dealings, including those with customers, business partners, competitors and colleagues. Unethical or illegal activities could damage SOSi's reputation and result in serious adverse consequences for the company and the individuals involved. Therefore, it is essential that you understand and comply with the Code. We also expect our agents, subcontractors, suppliers and other business partners to develop and enforce ethics policies that are materially similar to the Code.

While the Code is not intended to cover every ethical issue or situation that may arise, it provides general guidance regarding SOSi's standards of business conduct. If you have questions about ethical behavior or how to interpret or comply with the Code, SOSi policies, U.S. law, or the laws of the countries in which we operate, contact SOSi's Legal Department.

RESPONSIBILITIES

All SOSi employees are expected to:

- » know and follow the Code and SOSi policies;
- » comply with applicable law, whether or not specifically covered in the Code;
- » conduct business with integrity;
- » promote honest and ethical conduct in others;
- » complete all mandatory compliance education programs and other SOSi compliance initiatives in a timely manner;
- » report instances of observed or suspected misconduct; and
- » cooperate fully with SOSi compliance investigations.

New employees are required to read the Code during the corporate on-boarding process and sign the attached "Acknowledgement of Receipt."

SOSi's leaders at all levels are responsible for cultivating and enforcing an ethical work environment. SOSi managers are expected to:

- » serve as ethical role models for others through both their words and actions;
- » promote a culture of compliance with this Code, SOSi policies, and applicable law;
- » communicate and demonstrate intolerance of unethical behavior;
- » identify compliance training needs and ensure that their teams complete all required training in a timely manner;
- » foster an open work environment where employees can raise questions or concerns without fear of retaliation; and
- » understand when to escalate concerns and seek support from additional resources.

The success of SOSi's ethics and compliance program depends upon shared enforcement of our collective legal and moral responsibilities. Therefore, we must all participate in upholding both the letter and the spirit of SOSi policies and applicable laws. Adherence to the Code and SOSi policies is a significant indicator of judgment and competence and will be taken into consideration when evaluating an employee's performance and potential for future assignments and/or promotions.

REPORTING CONCERNS

We expect you to report promptly any conduct you believe in good faith may be a violation of the Code, as well as any other activities indicating a lack of compliance with legal or ethical obligations. You may report your concerns by contacting:

- » your manager;
- » SOSi's Human Resources Department;
- » SOSi's Compliance team (*compliance@sosi.com*);
- » any attorney in SOSi's Legal Department, including the General Counsel; or
- » SOSi's Ethics Helpline at *sosi.ethicspoint.com*.

SOSi's Ethics Helpline is operated by an industry-leading third-party provider and allows a report to be made online or by telephone 24 hours per day, seven days per week. The Helpline permits anonymous reporting and provides interpreters for callers who want to communicate in a language other than English. The U.S. toll-free number is 1-844-231-3572. As further detailed in the Helpline homepage, additional country-specific phone numbers are available as follows:

- » Afghanistan: 503-352-6143
- » Germany: 0-800-225-5288
- » Iraq: 503-352-6144
- » Italy: 800-172-444
- » Saudi Arabia: 1-800-10

- » United Kingdom and Northern Ireland (Cable and Wireless): 0-500-89-0011
- » United Kingdom and Northern Ireland (British Telecom): 0-800-89-0011

In some countries, you may be prompted to add the following additional number: 844-231-3572.

The list of country-specific toll-free numbers may be updated from time to time depending on locations where SOSi does business.

When you make a report, you will be assigned a unique identifier which you can use later to add details or to check the status of your report. When raising a concern, you should provide as much detail as possible, including the parties involved, the names of others who might have witnessed or have information related to the concern, relevant dates, and the specific conduct at issue. Due to confidentiality and other reasons, SOSi generally does not disclose the specifics of any internal investigation, but you may be able to contact the Helpline to learn whether an investigation has been closed.

We are committed to maintaining confidentiality to the greatest extent possible, subject to our legal obligations and responsibility to address issues effectively. We will investigate allegations and take appropriate action, if warranted.

AUDITS AND INVESTIGATIONS

As a U.S. government contractor, we routinely interact with U.S. government auditors and investigators, such as the Defense Contract Audit Agency and the Defense Contract Management Agency, and seek to provide timely and accurate responses to data requests. If you are contacted by an auditor, investigator, regulator or law enforcement official in connection with a SOSi business matter, you must immediately notify the head of the department to which the matter relates. Department heads will consult with SOSi's Legal Department as applicable. An audit or investigation

pertaining to a suspected violation of law should be referred to SOSi's Legal Department. No SOSi documents should be provided in response to a subpoena or lawsuit without the prior approval of SOSi's Legal Department.

You must never improperly alter any documents or electronic records, lie to or mislead an internal or external investigator, or obstruct the collection of information relating to an investigation or to any legal action brought by or against the company. E-mail messages and other records maintained on SOSi systems or otherwise are subject to internal and external review and to discovery by third parties. We reserve the right, subject to applicable laws and regulations, to inspect e-mail messages, electronic files, and other resources and assets.

CONSEQUENCES OF VIOLATIONS

We take the Code very seriously. Insensitivity to, disregard for, or violations of the principles set forth in the Code will be grounds for appropriate disciplinary action. Depending on the nature of the violation and the history of the individual involved, disciplinary action may range from a warning to termination. Disciplinary action may be taken not only against an individual who authorized or participated directly in a violation, but also against anyone who deliberately failed to report a violation or who made a false claim or statement in connection with reporting a claim or participating in an investigation. In appropriate cases, we may also pursue civil legal action and/or refer a case for criminal prosecution.

NO RETALIATION

We will not tolerate retaliation against anyone who reports a concern in good faith or cooperates with a compliance investigation, even when an allegation is not substantiated. Anyone found to have retaliated

against a reporting individual will face disciplinary action up to and including termination of employment.

COMMITMENTS TO OUR CUSTOMERS

Satisfying our customers is a top priority. We strive to understand and anticipate their needs, and to deliver the highest quality products and services possible.

EXCELLENCE

We are committed to delivering "best in class" products and services to our customers. Consistent with this commitment, we adhere to a robust set of quality standards. Each of us is responsible for performing at the highest level possible and for ensuring that items delivered to our customers meet or exceed their expectations.

CONTINUOUS IMPROVEMENT

We strive to continually improve the products and services we offer. We do this by measuring our accomplishments and applying lessons learned to future work. Each of us must understand how our performance is being measured and to use feedback received to drive improvement.

COMMITMENTS TO OUR BUSINESS PARTNERS

We regard our subcontractors, suppliers and other business partners as essential to our continued growth and success. We aim to build long-term relationships with them by treating them fairly and honestly.

SELECTION OF BUSINESS PARTNERS

We promote competitive procurement to the maximum extent practicable. When procuring goods and services, it is our general policy to solicit multiple bids and to fairly evaluate all proposals received based on objective criteria such as price, product or service quality, past performance,

reputation and ability to meet delivery requirements. Under certain conditions, however, procurement from a single source may be justified. Questions regarding procurement and sole source justification should be directed to SOSi's Procurement Department.

TREATMENT OF BUSINESS PARTNERS

We honor the terms and conditions of our agreements with our subcontractors, suppliers and other business partners. We do not take unfair advantage of them through manipulation, concealment, abuse of privileged information, or any other unfair business practice.

COMMITMENTS TO OUR EMPLOYEES

We recognize that our employees are critical to achievement of our business goals. Accordingly, we strive to hire the most qualified people possible, treat them fairly and with respect, and to maintain a safe environment for performance of their work.

DIVERSE AND INCLUSIVE WORK ENVIRONMENT

As a global provider of goods and services to a wide variety of governmental and commercial customers, we employ a diverse workforce that includes people with a broad range of personal and work backgrounds. We are committed to maintaining an inclusive work environment where individual talents and perspectives are valued and leveraged. We invite you to respectfully express your views and to offer suggestions for innovation or improvement.

FAIR EMPLOYMENT PRACTICES

We are an equal opportunity employer. Our personnel actions are based strictly on individual ability, performance, experience, and company need. We make decisions related to hiring, work assignment, career development, promotion, transfer, termination, and wage and salary administration without regard to race, color, religion, national origin, genetic information, sex, age, disability, veteran status or any other category protected by law.

HARASSMENT

We are committed to maintaining a workplace free of unlawful harassment. We prohibit any act that creates a hostile work environment or that constitutes, or is perceived to constitute, harassment, including any behavior perpetrated through the use of company equipment such as computers, fax machines and telephones. Examples of harassment include, but are not limited to, unwelcome conduct that is sexual in nature, discriminatory slurs, or any racist, sexist, ethnic or other inappropriate jokes, remarks or gestures that are offensive or threatening. We expect you to treat your colleagues with dignity and respect at all times and to refrain from abusive, hostile, or otherwise offensive behavior. In addition, you must be aware of local customs and behaviors when operating in unfamiliar environments. What may be acceptable behavior in one location may be offensive or illegal in another.

HUMAN RIGHTS

We comply with all applicable laws and regulations prohibiting human trafficking, including Federal Acquisition Regulation 52.222-50, Combating Trafficking in Persons. We do not permit the use of forced labor, bonded labor, indentured labor, involuntary prison labor, slavery or trafficking in persons.

Also, we do not permit child labor to be used in the performance of any work. The term "child" refers to any person under the minimum legal age for employment where work is performed, provided the legal age is consistent with the minimum working ages defined by the U.N. International Labour Organization.

SUBSTANCE ABUSE

As part of maintaining a safe workplace, you must not use illegal drugs, misuse prescription or over-the-counter medications, or consume alcohol while performing work for SOSi, as participation in such activities can impair your ability to do your job and put you and others at risk. In addition, you may not manufacture, distribute, purchase, or possess illegal drugs or controlled substances on any SOSi work premises. Known or suspected violations should be

reported promptly. If you are suspected of substance abuse, you may be subject to drug testing.

You may consume alcohol at company-sponsored events when authorized by management and when appropriate monitoring is in place. In some parts of the world, consumption of alcohol is entirely prohibited. You are required to know and adhere to the alcohol laws of the countries in which you perform services.

WEAPONS AND VIOLENCE

We prohibit weapons in the workplace except in cases where the carrying of weapons is necessary and authorized for performance of specific work awarded to the company.

We encourage you to bring disputes or differences with others to the attention of your supervisor, a member of company management, the Human Resources Department or the Security Department before a situation escalates into violence. You may not engage in threatening or violent behavior of any kind. You must immediately report any threats or acts of violence or other behavior that creates concerns about violence.

SAFE WORKING CONDITIONS

We strive to maintain safe working conditions and to conduct business in an environmentally responsible manner. You are responsible for complying with relevant environmental, safety and health laws, regulations, warnings, policies and procedures, and are required to report any accident, injury or other safety or health concern immediately to a supervisor.

PROTECTION OF INFORMATION AND INTELLECTUAL PROPERTY

In the course of our business dealings, we create and have access to a significant amount of sensitive information and intellectual property. We must use care and discretion to prevent inappropriate disclosure or use of such information and property.

SENSITIVE INFORMATION

You are required to safeguard all sensitive information entrusted to you, including, without limitation:

- » SOSi proprietary or confidential data;
- » competition-sensitive information;
- » third-party data shared under a confidentiality obligation;
- » information subject to access restrictions by government agencies; and
- » an individual's personal data.

All such information must be used for legitimate business purposes only and be accessed by, and communicated to, only those authorized individuals who have a need to know such information.

In addition, sensitive information should neither be discussed where it might be overheard nor left in plain view while unattended. Privileged information that is no longer needed should be shredded subject to applicable retention requirements.

You are not permitted to remove proprietary or confidential SOSi information from work premises without proper authorization, or to disclose proprietary or confidential company information to third parties without entering into non-disclosure agreements. In addition, all SOSi proprietary or confidential information disseminated internally or provided to outside third parties must be appropriately labeled with a restrictive legend at the bottom of each page. Upon separation from SOSi, you are required to return any proprietary or confidential information in your possession and to refrain from disclosing such information for a specified period of time after your departure from the company.

You must not inappropriately seek to obtain proprietary or confidential information about SOSi competitors and other third parties. For example, you are not permitted to ask a SOSi colleague to divulge any information that would violate a confidentiality agreement between

such individual and his or her previous employer. If you come into contact or are inadvertently provided with the proprietary or confidential information of a third party, you must contact SOSi's Legal Department. Unless SOSi's Legal Department instructs otherwise, you must promptly destroy all copies of such information in your possession.

If you are granted access to classified and national security information, you must take all necessary measures to protect such information in accordance with SOSi policies and U.S. government requirements. Security breaches or other violations must be reported immediately to SOSi's Security Department.

INSIDER TRADING

Securities laws in the U.S. and other countries prohibit "insider trading," which refers to purchase or sale of a security based on use of material nonpublic information. "Material nonpublic information" is any information not available to the general public that an investor would deem relevant in deciding to buy or sell a security. You must exercise care when handling material nonpublic information and may not use, or cause others (including family members, friends, suppliers, customers, and even co-workers) to use such information gained through the course of your employment by SOSi, or otherwise, to buy or sell securities. Even the appearance of improper transactions should be avoided.

INTELLECTUAL PROPERTY

As with the responsibility for protecting sensitive and nonpublic information, it is equally important to safeguard intellectual property. Intellectual property includes trade secrets and rights to patents, copyrights and trademarks.

You are required to protect SOSi's intellectual property, even after you leave the company. In addition, you must respect intellectual property rights that belong to others. For example, inappropriate downloading or use of a third party's copyrighted software is prohibited. Questions regarding use or downloading of software should be directed to SOSi's Information Technology Department.

DATA SECURITY

In order to maintain the security of SOSi data, you are required to have password protection for any mobile phones and computers used to access company e-mail or data and to keep such access information confidential. Loss or theft of telephonic devices or computer hardware used to retrieve company e-mail or data must be reported immediately to SOSi's Information Technology Department.

You must obtain approval from SOSi's Information Technology Department prior to installing hardware or software on the company's information systems. Apparent or real computer viruses should be reported immediately to the Information Technology Department.

CAREFUL COMMUNICATION

We must exercise proper care and good judgment when communicating with the media or using social media in order to prevent misconception of company views and inadvertent disclosure of proprietary or confidential company information.

COMMUNICATION WITH NEWS MEDIA

Unless you are an official SOSi spokesperson, you are not authorized to speak on behalf of the company. All media inquiries should be directed to SOSi's Corporate Communication Department.

USE OF SOCIAL MEDIA

This Code applies to your online conduct (blogging, tweeting, commenting and other forms of online activity) just as much as it applies to your offline behavior. You cannot, for example, use any social media platform to harass someone, disclose personal, proprietary or confidential information, or violate a third party's intellectual property rights. If you are using your personal social media account(s) to discuss SOSi-related matters, you are required to identify yourself as a SOSi employee and make it clear that the views expressed are your own and do not necessarily reflect the views of SOSi.

PROTECTION OF COMPANY ASSETS

Company assets are critical to performance of our work. We share a responsibility to protect these assets from abuse, misuse, damage or theft.

USE OF COMPANY ASSETS

As a general rule, company assets such as facilities, phones, computers, copy machines, fax machines, software, logos, e-mail accounts, office supplies, and vehicles should be used for business purposes only. Occasional use of SOSi equipment or resources for personal reasons is permitted as long as such use is reasonable, does not interfere with the accomplishment of work assignments, is not in support of a personal business, and does not constitute an immoral or illegal activity. Loss, damage or theft of company property must be reported promptly. All company-issued equipment must be returned upon separation from SOSi.

We reserve the right, subject to applicable laws, to access, review, monitor and disclose any information transmitted, received or stored using company equipment, with or without an individual's knowledge or consent.

THEFT

Misappropriation, larceny, embezzlement, inaccurate time keeping, and other forms of theft are strictly prohibited and constitute violations of law.

PERSONAL CONFLICTS OF INTEREST

Doing business with integrity means making decisions that align with the best interests of our company, without prioritizing any personal benefits you stand to gain.

You should avoid any activity that could result in, or give the appearance of, a personal conflict of interest. A personal conflict of interest describes any

circumstance that could cast doubt on your ability to act in SOSi's best interests and to exercise sound business judgment unclouded by personal interest or divided loyalties. Conflicts of interest may arise in many ways, including, for example, when you:

- » continue to supervise an employee with whom you have a romantic relationship;
- » direct SOSi business to a vendor in which you have, or a family member has, a direct or indirect personal financial interest;
- » perform outside work for, or serve on the board of, a customer, competitor or supplier of SOSi; or
- » take personal advantage of a SOSi corporate opportunity.

The presence of a conflict does not necessarily mean that an activity will be prohibited. As soon as you have identified a potential conflict of interest, contact SOSi's Legal Department.

FINANCIAL INTEGRITY

Accurate and reliable financial records serve as the basis for management of our business and are of critical importance in meeting our obligations to our customers, suppliers, other business partners, and employees. Inaccurate or incomplete records could result in violation of laws and regulations.

ACCURATE BOOKS AND RECORDS

Our books and records must be maintained in accordance with generally accepted accounting practices and applicable laws and regulations. No false entries are ever permitted for any reason. You must not improperly alter, conceal, or destroy any document or otherwise misrepresent any fact, circumstance or transaction related to SOSi business. In addition, you must follow all applicable record retention requirements. Achievement of a business objective should never be used as an excuse to misrepresent facts or falsify records.

Your timesheets and expense reimbursement forms must be completed honestly and expeditiously in accordance with SOSi policies and customer requirements. Improperly shifting costs from one contract or project to another, improperly charging labor or materials, and falsifying timekeeping or other records are strictly prohibited.

MONEY LAUNDERING

We are committed to complying with money laundering laws worldwide and do not condone, facilitate, or support money laundering. Money laundering is the process by which individuals or entities move criminal funds through the financial system in ways aimed to disguise or hide traces of their illegal origin. You should be alert for unusual financial transactions that may indicate money laundering, such as irregularities in the way payments are made, payments made by third parties for the benefit of another party, and payments from offshore banking locations. Any suspicious financial activities or transaction should be reported.

SPECIALIZED GOVERNMENT CONTRACTING REQUIREMENTS

As a U.S. government contractor, we must stay abreast of laws and regulations applicable to our dealings with the U.S. government and its employees. These rules are stricter than those that govern our work or relationships with commercial customers. Failure to comply with relevant laws and regulations may result in administrative, civil or criminal penalties for both SOSi and the individual(s) involved in wrongdoing, including suspension or debarment from doing U.S. government work.

PROCUREMENT INTEGRITY

U.S. law prohibits competitor companies from soliciting, obtaining or disclosing contractor bid or proposal information or source selection information from the U.S. government or anyone else during the course of competition for an award. If you receive any information that might be construed as violating that law, contact SOSi's Legal Department.

RECRUITING AND EMPLOYING U.S. GOVERNMENT EMPLOYEES

U.S. law restricts employment discussions between a contractor and a current or former U.S. government employee involved personally and substantially in a procurement on which the contractor is bidding. Some former U.S. government employees or military personnel, even if permitted to be hired, may be precluded from performing some types of work or from engaging in communications with certain U.S. government officials. Given the complexity of the requirements, you may not enter into employment discussions, even preliminary ones, with any individual employed by the U.S. government or the U.S. military without consulting SOSi's Legal Department. It is never sufficient to rely upon a candidate's representation as to what legal restrictions apply.

GIFTS, MEALS AND OTHER BUSINESS COURTESIES TO U.S. GOVERNMENT EMPLOYEES

U.S. government employees are subject to strict rules regarding acceptance of meals, travel, lodging, gifts, gratuities, and entertainment. As a general rule, you are not permitted to offer or give any item of value to any U.S. government employee without consulting SOSi's Legal Department.

ORGANIZATIONAL CONFLICTS OF INTEREST

We cannot participate in a U.S. government contract if an Organizational Conflict of Interest (OCI) exists that cannot be effectively neutralized or mitigated. Each individual contracting situation must be examined on the basis of its particular facts and the nature of the proposed contract. Generally, the OCI rules are designed to prevent:

- » the existence of conflicting roles that might bias a contractor's judgment; and
- » unfair competitive advantage, as might occur when a contractor competing for work possesses proprietary information that was obtained from a government official without proper authorization.

The OCI rules are complex and require the exercise of common sense, good judgment and sound discretion.

At any point that you become aware of an actual or potential OCI, contact SOSi's Legal Department.

COST AND PRICING DATA

Cost and pricing data submitted to the U.S. government in support of a bid, proposal, or contract modification must be accurate, complete and current. If you are involved in preparation of bids or proposals or contract negotiation, you must not knowingly make any untruthful or inaccurate statements, communications or representations, or fail to disclose required information.

CONTRACT PERFORMANCE

Once a U.S. government contract is awarded to us, it must be performed in accordance with all contract clauses and requirements. For example, contracts may include special accounting, invoicing, reporting, performance and legal obligations. If you work on U.S. government contracts, you must understand and comply with the specifications of the contracts that you help to perform.

Subcontractors used by SOSi in connection with performance of a U.S. government prime contract must adhere to many of the same rules that the company is held to as the prime contractor. Thus, subcontracts issued by us in connection with U.S. government work must include all clauses and requirements necessary to ensure subcontractor compliance with the terms of the prime contract.

SUBMISSION OF CLAIMS

All customer invoices are required by law to be accurate, complete and conform to the related contractual requirements and applicable Federal Acquisition Regulation provisions. Accordingly, you must properly charge labor, travel, material and other costs to appropriate accounts. Only costs that are properly chargeable to a contract may be billed to, or reimbursed by, the U.S. government. We cannot, for example, submit "unallowable costs," such as those for alcohol, excess travel, and goods and services for personal use. If you are uncertain whether an item may be invoiced, ask your manager or contact SOSi's Finance Department.

BRIBERY AND CORRUPTION LAWS

We must always act ethically in the way we acquire, execute, and deliver our services. We have no tolerance for corruption and bribery in connection with our business.

FOREIGN CORRUPT PRACTICES ACT AND ANTI-KICKBACK ACT

We comply with all applicable laws relating to anti-bribery and anti-corruption, such as the U.S. Foreign Corrupt Practices Act, the U.S. Anti-Kickback Act and comparable legal requirements. You must not seek or pay a bribe or kickback in any amount, from or to anyone, anywhere, for any reason whatsoever, whether on SOSi's behalf, or on behalf of others. Accordingly, you must never solicit, offer, promise, authorize or provide, directly or indirectly, anything of value with the intent or effect of inducing anyone to forego his or her duties and provide an unfair business advantage to SOSi, you or others. "Anything of value" means anything that may have value to the recipient, including cash, gifts, meals, entertainment, business opportunities, offers of employment, and facilitating payments, such as payments to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance. There is no monetary threshold for this term. Therefore, any amount could be construed as a bribe or a kickback. An exception to this policy may be made in an extreme circumstance where there is imminent threat to life, health or safety.

In addition, you must not accept anything of value offered to you, directly or indirectly, that is intended to extract improper advantage or to exert undue influence on your decision-making.

GIFTS, MEALS AND ENTERTAINMENT

Exchanging gifts and sharing meals and/or entertainment in connection with legitimate business purposes can foster constructive relationships with third parties. However, gifts, meals and entertainment should never be offered or received as a means to obtain preferential treatment.

You may not solicit business courtesies such as gifts, meals or entertainment from actual or potential customers, suppliers or other business partners. You may exchange business courtesies with nongovernment personnel provided that doing so does not violate any policies of the recipient's organization, any contractual agreement with a customer, SOSi policies or applicable law. Any offering you make or receive must be reasonable and modest in cost, not include cash, and be justified by a legitimate business purpose consistent with the scope of your work responsibilities. Most importantly, an offering cannot be made to improperly influence the recipient's business judgment.

Special rules apply to extending business courtesies to employees of government entities and state-owned enterprises. As a general rule, you are not permitted to offer or give any item of value to any such government employee without consulting SOSi's Legal Department.

In rare circumstances, local customs in some countries may call for the exchange of gifts having more than nominal value as part of a business relationship. In these situations, guidance must be sought from SOSi's Legal Department.

ANTITRUST LAWS

We are subject to various antitrust laws in the countries in which we conduct business. These laws are designed to promote and protect fair and open competition. SOSi is committed to upholding the free enterprise system.

FAIR COMPETITION

We believe that fair and open competition is beneficial to our customers. Accordingly, we compete in the marketplace based on our reputation, competitive pricing and superior quality of our products and services.

ANTITRUST LAWS

Antitrust laws prohibit competitors from engaging in collusive practices aimed at restricting trade. You must not engage in prohibited conduct such as fixing prices, rigging bids, allocating customers or markets, or limiting the production or sale of products for anti-competitive reasons. If you have questions as to whether conduct is appropriate, contact SOSi's Legal Department.

INTERNATIONAL TRADE LAWS

Given the global nature of our business, it is important that we understand and follow all applicable trade laws and regulations.

EXPORTING AND IMPORTING

The U.S. and many other countries have export/import control laws governing strategically necessary technology, equipment, software and services. These laws apply primarily to items that are designed for military purposes and to data, goods and services developed for civil applications but which can be used for military purposes without further modification. Violations of these laws can harm U.S. national security and undermine foreign policy. Given the complexity of these laws, and the fact that their applicability is not limited only to the items described above, you should consult SOSi's Legal Department prior to negotiating or engaging in transactions that require the import or export of data, goods or services.

SANCTIONS

Certain countries, entities, and individuals may be subject to economic and trade sanctions administered and enforced by the Office of Foreign Assets Control of the U.S. Department of the Treasury. SOSi and its employees are prohibited from engaging in or facilitating business transactions with such countries. If you have doubts about the propriety of doing business with certain countries, entities or individuals, you should consult with SOSi's Legal Department.

BOYCOTTS

U.S. law prohibits boycotts aimed at allies of the U.S. Thus, you are not permitted to take any action that would cause SOSi to be in violation of a boycott not sanctioned by the U.S. government. All requests to engage in any restrictive international trade practices must be made to SOSi's Legal Department.

GOOD CORPORATE CITIZENSHIP

We are committed to good citizenship through active involvement in our communities and responsible engagement in the political process.

CHARITABLE ACTIVITIES

We believe that helping others is important, as manifested by the active involvement of our company and many of our employees in charitable organizations and community activities. We invite you to give back to our global communities.

LOBBYING

We encourage you to participate in the political process and to support the political parties and candidates of your choice. In doing so, your participation must be on an individual basis, on your own time and at your own expense. Many countries restrict or prohibit corporations from donating corporate funds, goods or services (including employee work time), directly or indirectly, to political candidates. Consistent with the limitations, you may not contribute any SOSi funds or use any SOSi assets or facilities for the benefit of political parties or candidates anywhere in the world, unless approved in advance by SOSi's Legal Department.

RIGHT TO REVISE

This Code is provided for informational purposes only and its contents are subject to change without notice. In the event of any inconsistency between this document and any translation into another language, the English language meaning shall control. SOSi specifically disclaims any liability with respect to this document, and no contractual obligations are formed by it, either directly or indirectly.

ACKNOWLEDGEMENT OF RECEIPT SOSi CODE OF BUSINESS ETHICS AND CONDUCT

I do hereby acknowledge and confirm that I have received a copy of SOSi's Code of Business Ethics and Conduct ("Code"). I certify that I have read and understand the contents of the document and agree that while employed or engaged by SOSi I will conduct myself in accordance with the Code.

I understand that it is my duty and responsibility to report any known or suspected violations of the Code and other SOSi policies.

I understand that I will be held accountable for my actions, and that any violations of the Code may result in disciplinary action, up to and including termination.

PRINTED NAME

SIGNATURE

DATE