



Técnico Corporation

An Employee-Owned Company

MARINE & INDUSTRIAL CONTRACTORS

Virginia • Alabama • California • Florida

Pennsylvania • Washington

CODE OF ETHICS & STANDARDS OF CONDUCT

December 31, 2019 – Update

For use in 2020 forward

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CODE OF ETHICS & STANDARDS OF CONDUCT:

Foreword:

This document is intended to be used by Técnico Corporation and any related or affiliated entity (hereinafter collectively called “Técnico” or the “Company”). This document is intended to set forth and convey the strong sense of ethics and morality in business conduct that has been a hallmark of the Company since it was established in 1986.*

The pursuit of technical excellence and the highest standards of professionalism are the hallmarks of the Company. The *Code of Ethics and Standards of Conduct* confirms each of the Company's commitment to ethical behavior in the conduct of all Company activities. We take pride in our dedication to integrity, fairness, and community responsibility.

Every level of management has the responsibility to monitor and vigorously enforce the *Code of Ethics and Standards of Conduct*. No one at the Company can ever justify an unethical or illegal action on the basis of following orders, because no one is authorized by the company to give such direction. We must also be aware of the damage that can result from the appearance of questionable conduct, even if innocent by intent. We are held accountable for our actions as individuals and as representatives of the Company. **Our goal is not just to provide guidance or rules and punishments, but to encourage a CULTURE OF ETHICS for all of our employees.**

The principles set forth in our *Code of Ethics and Standards of Conduct* reflect the type of behavior that has helped us earn the respect and success that we enjoy today and throughout our 80 plus years of operations. It applies and guides us in both our commercial and Government relationships and business. As we target even higher levels of achievement for the Company, it is imperative that we remember that our foundation is based on strict adherence to ethical conduct in our business relationships.

Anything less is unacceptable and will not be condoned

Adopted, effective this date: December 31, 2019

By: *Ray Wittersheim*
Raymond G. Wittersheim, President & CEO



Code of Ethics:

Stated in their simplest form, the **Company's fundamental ethical principles are:**

- Each Company employee is responsible for the appropriateness and consequences of his or her actions.
- Each employee must conduct all aspects of company business in an ethical and strictly legal manner and must obey the laws of the United States and of all localities, states, and nations where the Company does business or seeks to do business.
- Employee conduct on behalf of the Company with customers, suppliers, the public and one another must reflect the highest standards of honesty, integrity, and. fairness.
- Strict adherence by each Company employee to this Code and to the Standards of Conduct set forth on the following pages is essential to the continued vitality of our company. Therefore, compliance with and effective enforcement of the Code or Standards is a key responsibility of management and will be addressed as an element of each employee's regular evaluation.
- Failure to comply with the Code or Standards will result in appropriate disciplinary action, which may include termination of employment, reimbursement to the relevant Company for any resulting cost, losses or damages, and referral for civil or criminal prosecution. Principles of fairness will apply. An employee will be provided an opportunity to explain his or her actions.

Standards of Conduct:

Each Company employee must be careful to avoid situations that might involve a conflict of interest or appear questionable to others. In general, there are two major areas of concern:

- Participating in activities that conflict or appear to conflict with Company responsibilities, and
- Giving or receiving anything that might influence the recipient or cause another person to believe that the recipient may be influenced to provide more favorable treatment. This includes offering or accepting personal gifts and/or favors, bribes, kickbacks, illegal payments, or gratuities.

Company employees must avoid any actions that may appear to involve a conflict of interest with Company activities. These include any business, financial or other relationships with suppliers, customers or competitors by Company employees, their close family, or their close associates outside the Company. While an employee of the Company, questionable activities include serving on the board of directors of a competing or supplier company, significant ownership in a competing or supplier company, consulting with or working for a competing or supplier company and participating in any outside business during Company business hours. One must take care to give his primary duty of loyalty to the specific Company for which he works and to raise any potential conflicts of interest or other competing Company interests to his supervisors or to the proper authorities.

Employees must observe Company ethical standards, as well as U.S. laws and regulations, when providing or accepting meals, entertainment or gifts to or from people in business situations.

It is recognized however that circumstances may differ depending on the facts and circumstances as well as upon the rules and regulations applicable to the other party with whom you may be dealing. Guidelines for dealing with various types of entities are set forth below.

Commercial Business:

Although most of our business is directly with the U.S. Government or for subcontracts for the Government, we do conduct business with strictly commercial companies. It is permissible for the Company or its employees to pay for meals, refreshments, and other ordinary or necessary expenses relating to Company business with commercial entities. However, employees should use good judgment, observe all civil and criminal laws, and follow guidelines that apply to recipients. This means that even if it is perfectly ethical and legal to provide minor gifts or favors under United States laws and regulations and under this Code of Conduct, such gifts or favors cannot be given if they violate the known rules, policy, procedures or regulations of the recipient's company / employer.

U.S. Government Business:

Rules of conduct with respect to U.S. government officials, for both Military and Civilian agencies, are extremely strict and well defined in law, government regulations, and Company policy. In general, the Company and its employees will not provide meals, entertainment, gifts or anything else of value to U.S. government employees; nor may any Company employee or representative discuss employment opportunities with government employees without the prior approval of the appropriate Company Ethic's Officer and/or the Company's Legal Counsel. The only permitted gifts or entertainment to Government officials or representatives are small, unsolicited items in the nature of general marketing or company logo materials, modest snacks (coffee or donuts), transportation, refreshments, or anything else of value where the value does not exceed those values permitted by current U.S. Government regulations. Limits on gifts to Government / Military employees or representatives are currently:

- **\$20 per gift per person for any single gift**, and
- **\$50 in total gifts per person per year**
- The value of the gift is determined not by what the giver paid for it, but what such gift is worth in the open market. For example, a "no-cost" airline ticket that is received for frequent flier mileage has a value of several hundred dollars and cannot be given away as being "free." A "free" ticket to a football game is worth the face value on that ticket.

Even such minor gifts or entertainment should be avoided if such has the appearance of impropriety. Please also be aware that gifts to or from family members count the same as if given by the Company employee himself. Further, Company employees shall not make any attempt to influence any government employee or member of Congress with regard to the award of a federal contract for which a specific solicitation has been issued, other than through the standard preparation, submission, and discussion of the Company's cost and technical proposals in conformance with procurement laws. Government employees should not be given nor accept free meals.

Other Business and Marketing Activity:

Many state, county, and local governments have very specific rules regarding the conduct of their employees. It is the responsibility of Company employees to seek out these rules of conduct, understand their application in the specific business setting and to unequivocally comply legally and in spirit. As noted above, the same requirements extend to foreign governments as well.

Similarly, Company employees may not accept any meals, transportation, refreshments, entertainment, gifts, or anything else of value from suppliers or their personnel or representatives except where such items are of the type normally given as marketing favors and are of very modest proportions. Examples of allowed gifts may include pens, calendars, baseball caps, T-shirts, etc. **As a guideline**, the same limits on giving items to U.S. Government personnel shall be utilized for determining whether such an item is "modest."

Attendance at local sporting events, golf tournaments, etc. may be accepted if reasonable, not lavish or extraordinary, and if not given or accepted in an effort to influence behavior or contract awards. Participation in unusually expensive, elaborate, or extraordinary events should be cleared with your supervisor or the relevant Company Ethics Officer in advance.

Notwithstanding such limits on gifts or marketing favors, Company employees with direct procurement-related responsibilities should be very hesitant about accepting any level of gifts in order to avoid even the appearance of impropriety. Company employees should NEVER accept or give gifts of cash or loans. Company employees should NEVER accept or give gifts with intent to influence behavior or encourage illegal, improper, or unethical acts. Company employees should NEVER solicit or request gifts from customers, suppliers, or other business relations. If offered gifts or promotional materials are not appropriate under the above standards, Técnico's employees should politely refuse the courtesy at the time it is offered.

Customers or Vendors in Other Countries:

Técnico does little or no business with foreign customers, vendors, or governments. However, it is important to know that when dealing with people or entities in other countries, or from other countries (for example, foreign ships being worked in the United States), then three sets of rules may apply. Your conduct must:

- First, comply with Company policy and procedures including these Standards of Conduct, and
- Second, your conduct must comply with United States law, including, without limitation, the Foreign Corrupt Practices Act which precludes bribery, kick-backs and other prohibited acts even if they are legal in the other country in which you are doing business, and
- Third, your conduct must comply with the laws of the foreign country in which you are doing business or with whom you are doing business.

All of these requirements make it even more important that your behavior be ethical and that if you have any questions about your behavior or your dealings with foreign countries, companies, or individual representatives, you raise such questions up the line or chain of command as set forth herein.

Protection of Company or Customer's Funds, Data or Property:

Company employees have an obligation to protect all Company and customer data, property and funds under their control against loss, theft and misuse. This includes the proprietary information belonging to the Company or its customers, suppliers, prime or subcontractors, and end users. No Company employee may make any of this information available to unauthorized personnel.

Security procedures have been established to protect U.S. government classified information and many types of unclassified technical information. By law, Company employees who handle such data are required to know these procedures and strictly adhere to them at all times.

Company employees must use Company and customer assets, funds, property and data only for their proper and intended purposes and shall not engage in fraud, waste or abuse of such funds and property. Waste and abuse is defined as extravagant, careless, or needless expenditure of funds or the improper consumption or misuse of property. No use of such property or data may be made after termination of employment with the Company. It is imperative to make every effort to prevent the misuse of these assets by any other person. Improper use includes selling, loaning or giving away Company or customer property and modifying, destroying or disclosing customer, prime, subcontractor, end user or other Company data. Use of customer or Company property for personal or non-business purposes is considered to be improper and is in violation of this Code.

When in doubt, do not release Company or customer or supplier data or property until checking with the appropriate Company official or consulting any contract or government regulation that may apply.

Solicitation, Receipt and Use of Proprietary or Confidential Data or Source Selection Information:

No Company employee or representative may solicit, obtain or utilize Source Selection information relating to any active government procurements. In addition to materials so marked by the government, Source Selection information includes bid prices and proposed costs or prices submitted in response to a solicitation, source selection plans, technical evaluation plans, technical evaluations of competing proposals, cost or price evaluations of competing proposals, competitive range determinations, ranking of competitors, reports and evaluations of source selection boards, and government agency planning, programming, and budgeting system information. Violation of such government regulations or requirements, including without limitation the Procurement Integrity Act, may result in both Company and personal penalties including, without limitation, suspension, and debarment of the Company or the individual responsible for such improper inquiry or receipt.

Access to Government confidential or secure information is limited by Contract and Law. Use of Government data is limited to the Government project for which it is obtained. All Government security requirements must be strictly complied with. Use of Government issued Identification, Access cards, credentials, or computer access is limited to the terms provided and is to be limited only to those to whom access is legally provided. Credentials and access permissions should never be shared with those who are not expressly granted such access or permitted uses.

Similarly, no Company employee or representative may solicit, receive, or utilize any other company's proprietary material other than as authorized by that company. In the event that any Company employee receives such restricted or prohibited information either by mistake or in an improper manner, he shall immediately disclose such to the Company's Ethics / Compliance Officer who shall provide guidance on how to deal with the situation.

Each Company shall comply with all Federal, State or Local laws regarding the use of intellectual property that is owned by another party. Such information can include patents, copyrights, trademarks, trade secrets, or other confidential and proprietary data. Questions about the use or disclosure of data should be directed to Company officials or to Corporate Legal Counsel.

Data, Records and Reports:

All Company employees are responsible for preparing all Company business documents as completely, honestly and accurately as possible. These records include timekeeping records, expense reports, accounting records, test and progress reports, cost estimates, contract proposals, and presentations to clients, the public or Company management, and any representation, either written or verbal, made by any Company employee or representative in the conduct of Company business shall be factual, fully substantiated, and verifiable to the best of the employee's knowledge and belief.

It is essential to maintain accurate timekeeping and expense records, making sure to:

- Record and allocate charges for time, materials and other business-related expenses to the proper charge number.
- Check all invoices and payments to customers, consultants and suppliers to confirm the accuracy of information relating to products, services, prices and terms of sale.
- Submit complete, accurate and current cost or pricing data in U.S. government contract proposals, as required by the Contract or the Truth in Negotiations Act. Please be aware that the Truth in Negotiations Act ("TINA") only applies to non-competitive procurements or contract actions of a value of over **\$2,000,000** (this was \$750,000 for Contracts issued prior to July 1, 2018 unless amended). No cost and pricing submission or certification should be submitted without prior approval of the relevant Company Officer or designated TINA Certification Official or approval by the Company's General Counsel.
- Any suspected or known instances of submitting false or improper data, statements, charges, timecards, invoices or claims to the customer, especially to any Government customers, should be promptly reported to the Company's Ethics Officer for investigation and action, if appropriate.

Production and Performance Ethics and Safety:

Ethics and integrity begin with production. We strive for and insist upon strict compliance with all specifications or other Customer requirements with zero defects. Products we deliver must be:

- From the materials and of the quality of materials as ordered and specified
- Properly tested
- Meet all contract requirements
- Meet all referenced or appropriate industry standards
- Safe for the potential users and installers
- Purchased only from contractually permitted sources

Product substitution will not be tolerated!

Products and services will be provided in the safest possible work environment which shall confirm to or exceed all applicable safety standards.

Providing a Proper and Professional Work Environment:

All Company employees shall use fairness, honesty, and regard for the law in all business relationships with customers, suppliers, fellow employees, and applicants, as well as with local, national, and international communities and governments.

Employees shall engage in human resources management practices including, but not limited to, recruitment, selection, job assignment, transfer, promotion/demotion, layoff, return from layoff, discipline including termination, training, education, tuition, social and recreational programs, compensation and benefits without regard to race, color, religious creed, national origin, citizenship, marital status, gender, age, disability, and U.S. veteran status.

Supervisors and managers must understand and abide by the laws and regulations that limit the work that can be done by former U.S. government civilian employees and military personnel now working at the Company. Former U.S. government employees or members of the armed forces must also be aware of and adhere to these laws and regulations. Due care and consideration should be taken when considering hiring or other employment related contact or discussions with any current or former government employees or military personnel. Questions concerning such should be directed to either the Company's Ethics Officer or its Human Resources Director.

Company employees shall neither engage in or permit harassment of any Company employees for any reason by other employees, vendors, clients or anyone else with whom our employees come into contact in the course of their Company related business activities.

All Company employees are prohibited from possessing, using, distributing, manufacturing, purchasing, dispensing or selling controlled substances. Because these actions are both illegal and counterproductive to our business interests, they will not be tolerated on Company premises or any place where the Company conducts business either during scheduled work periods or at any time while conducting Company business. Alcohol abuse is an equally serious problem and will not be tolerated by the Company, either on Company premises during scheduled work periods or at any time while conducting Company business (including, without limitation, on lunch or other breaks). The Company encourages any employee with such substance or substance abuse problems to contact the respective Human Resources Director who will consider the employee for referral to any existing Employee Assistance Programs on a strictly confidential basis.

Environmental Awareness and Protection:

The Company is committed to preserving and protecting the environment. The Company and its employees shall not knowingly violate any environmental laws or regulations and shall attempt to be a good steward for the environment. All employees shall disclose any known or suspected environmental problems to Company management for action, reporting, or remediation. Disclosure to any of the reporting sources set forth below is encouraged.

Avoid Personal Conflicts of Interest

As a Company employee you are responsible to act in a fair and impartial manner in all business dealings, and to place the interests of the Company over personal interests in matters relating to Company business.

You must avoid financial, business, or other transactions or situations in which your personal interests might conflict with, or appear to conflict with, the interests of the company. Such situations may arise from relationships with customers, competitors, vendors and suppliers, present or prospective employees, or from the acquisition or use of company assets for personal gain. An actual conflict of interest does not need to be present to constitute a violation of this Code; you must also avoid activities that create the appearance of a conflict of interest.

A conflict of interest may exist when you use your contacts or position in the company to advance interests other than those of the company's, such as your own private business or financial affairs, or those of a close friend or relative (whether or not at the expense of the company). You should never use company property or information for personal gain or take for yourself personally any opportunity that is discovered through your position at the Company.

Examples of How a Personal Conflict of Interest Could Occur:

- Employment by a competitor or potential competitor, regardless of the nature of employment, while employed by the Company.
- Acceptance of gifts, payment, or services from those seeking to do business with the Company.
- Placement of business with a firm owned or controlled by a Company employee or family.
- Ownership of, or substantial interest in, a company that is a customer, competitor or a supplier.
- Acting independently as a consultant to Company customers or suppliers, while employed by the Company.
- Having a personal interest or potential for gain in any Company transaction.
- Using company assets, intellectual property, or proprietary information for personal gain.

- Employing or discussing employment with former government employees, or using them as consultants or subcontractors in violation of applicable laws or regulations.
- Having a close, personal relationship with a subordinate employee.
- Directly supervising a family member.

You must disclose in writing to your supervisor any situation, transaction, or relationship that might give rise to an actual or potential conflict of interest for possible review with Company legal counsel.

In order to avoid such conflict, Técnico's policy is to separate certain procurement functions including (a) approval of purchases, (b) receipt of goods or services, and (c) payment of related invoices.

Maintain Accurate Business Records

The Company's reputation and credibility depends on all of us maintaining accurate business records. We are committed to operating in an environment of open communication, while not compromising proprietary and confidential information.

You must ensure the accuracy of any business or financial records for which you are responsible. These include not only financial accounts, but other records such as quality reports, time records, expense reports, resumes, and submissions to the company.

If you are responsible for the preparation of any business or financial records on behalf of the company, you must ensure that all information contained in such records or communications is full, fair, timely, accurate, and understandable.

Accurately Charge Labor and Other Costs

The Company customers place special trust and confidence in us when they award us work. We must honor this special trust by ensuring the integrity of our accounting and company records.

You and your supervisor (or manager) are responsible for understanding and complying with the labor recording policies and procedures at your location. You are also responsible for properly accounting for labor, travel, material and other costs, and ensuring that they are accurately recorded and charged to the company's records. These costs include, but are not limited to, normal contract work, and bid and proposal work.

Knowingly mischarging the time that you work or falsifying your timekeeping violates company policy and the law. No employee shall knowingly approve such mischarging. Shifting costs to improper accounts is also prohibited as is doing personal work for Company officials on Company time.

Transactions between the Company and outside individuals and organizations must be promptly and accurately entered in our books in accordance with applicable generally accepted accounting practices and principles. Under no circumstances may you misrepresent facts or falsify records.

Compete Fairly for All Business Opportunities

The Company's continued long-term success depends on our upholding the integrity of the procurement process in bidding, negotiating and performing contracts for all of our customers. We compete fairly and ethically for all business opportunities.

You are responsible for dealing fairly with the company's customers, suppliers, competitors and employees. If you are involved in proposals, bid preparations, or contract negotiations, you must be certain that all statements, communications, and representations to prospective customers and suppliers are accurate and truthful. Once awarded, all contracts must be performed in compliance with specifications, requirements, and clauses.

You must refuse any offers to provide the Company with any unauthorized contractor bid and proposal information or source selection and immediately report the offer to the Ethics Office. You may not use, obtain, accept or receive any information to which the Company is not clearly and legitimately entitled. If you ever have reason to believe that the release or receipt of any information is unauthorized, or you are uncertain as to the Company's legal right to use the information, to not copy, distribute or use it until you have obtained guidance from the Ethics Office, which will consult with legal counsel.

Anti-Trust Policy

The Company is fully committed to compliance with the anti-trust laws, which are designed to promote free and open competition in the marketplace. Not only does the customer benefit by getting the best product or service at the lowest price, but the Company also benefits by being able to compete on a fair level playing field with competitors. The anti-trust laws are complex and must be complied with strictly.

Hiring Policy

The Company is fully committed to fair employment practices and hiring and does not discriminate or permit discrimination or harrasment on the basis of age, sex, color, religion, race, or veterans status. The Company encourages fair employment opportunity and diversity in hiring.

The hiring or discussion of hiring Government employees with current or former government relationships is something that must be carefully considered and there are many complex regulations that apply to such discussions and to the potential for eventual hiring decisions and work restrictions. Do not discuss employment with any current Government employees and refer all such inquiries to our Human Resources department.

Prior to hiring we are required to verify certain information about potential employees including their status as American citizens, as properly registered or work permitted non-citizens, and to verify their prior employment, and check for background information such a convictions or potential suspensions that could impact their ability to perform on Government contracts. Such research will be performed by appropriate management or HR personnel in all appropriate cases.

Subcontractor Dealings and Policy:

The Company is fully committed to fair treatment of its subcontractors and suppliers. We should encourage all subcontractors and suppliers to act ethically and professionally as we act ethically and professionally towards them. Subcontractor agreements should be reached based on providing the best, most efficient and cost-effective services for our clients and customers giving due consideration to price, technical capacity, delivery schedules, past performance, and the customer's needs and preferences. Prior to engaging in any subcontractor agreements, research should be conducted to ensure that the subcontractor or supplier complies with any Government or customer requirements including, but not limited to, citizenship requirements, security requirements, eligibility to do business with the customer (i.e., checking for suspension or debarment on the Excluded Parties List System, the "EPLS", or other applicable listings), etc.

Knowledge of the Company's Ethics Program and Training:

Each employee will be given a copy of, or access to, the Company's Code of Ethics and Standards of Conduct. Each employee will be given periodic training and educational sessions designed to highlight all or specific parts of the Company's Ethics Program and Standards of Conduct. New employees will receive written, live, or videotape instructions on the same subject. Each employee is responsible for obtaining the information necessary to follow directives in this document and for reporting to management any observed or suspected deviations from policies.

Many of the standards discussed in this document reference U.S. government legislation and regulations, as well as Company policies. These referenced materials are available through Company management, the Company Human Resources representative, or the **Company Ethics and Compliance Officer, Mr. Keith Adkins at 1-757-545-4013, extension 1049**. Referenced Government publications, regulations, or hotlines can be obtained utilizing standard internet search engines.

Sanctions for violating Company Ethics or Standards of Conduct:

Failure to maintain the Company's highest ethical standards may result in the following sanctions at the individual, supervisory, and corporate level:

- Written or oral warnings or Reprimands
- Refresher training
- Time Off without pay
- Suspension
- Termination
- Administrative or civil action for return of improper payments or conversion or theft
- Civil Penalties under applicable State or Federal Law
- Criminal Penalties under applicable State or Federal Law
- Personal or Corporate Suspension or Debarment from Government contracting
- Civil or criminal penalties or sanctions for improper release of confidential materials

Such sanctions may be applied at the discretion of the Company involved or by actions of the Government or of customers or other entities that deal with the Company. Sanctions may be enforced at the appropriate level up to and including immediate termination. The sanctions applied will depend upon the severity of the violation of law or Company policy or Standards of Conduct.

Communicating Ethics and Other Business-Related Issues:

Self-monitoring and reporting of ethical violations is a critical part of the Company's Ethics Program and Standards of Conduct. The Company relies upon its own employees to assist in such self-monitoring and policing of its ethical obligations and behaviors. Additionally, the Company will have internal controls, internal audits and reviews, and management review by the Ethics Officer and other officers in order to maintain the highest ethical standards.

The Company fosters a free interchange between employees and all levels of management through its Open-Door Policy. Company employees are encouraged to contact their immediate supervisor to report or resolve a problem but are free to contact higher levels of management if necessary. Subject to unusual circumstances, and except as specifically set forth to the contrary, Company employees are encouraged to follow the below-listed reporting chain to raise issues of known or suspected ethical violations or to obtain approvals for areas involving ethical questions (for example, gift levels, data disclosure issues, etc.). However, any ethical issues can be raised first with the Company Ethic's Officer at the option of the person so reporting.

If any Company employee has reason to believe that a violation of these Standards of Conduct or any other Company procedure(s) has occurred or is likely to occur, or has a serious question about whether such a violation has occurred, it is their obligation to contact at least one of the following persons or groups within their particular entity or Company:

- Their immediate supervisor, or if concerned about the actions or reaction of your immediate supervisor, go one level higher,
- Their department head or General Manager,
- The designated **Company Ethics Officer** can be reached at **1-757-545-4013, Extension 1049**. The Company has designed **Mr. Keith Adkins as the Corporate Ethics Officer, or**
- **Ms. Suzanne Jones, Director of Human Resources at 757-545-4013, ext. 1013, or**
- Any other Company corporate officer
- You may also call and leave an anonymous message, or leave your name and contact information at your choice, at the **Company Ethics Hotline which is: 877-668-4390.**
- You may also contact the Company company legal counsel (currently Daniel R. Weckstein @ VANDEVENTER BLACK LLP, at **(757) 446-8610** or email to **dweckstein@vanblk.com**).

PROTECTING AND ENCOURAGING EMPLOYEES TO REPORT ETHICAL QUESTIONS, ISSUES OR VIOLATIONS:

The Company will not disclose the identity of an employee who has made a report without their permission unless disclosure is unavoidable during an investigation. The Company will attempt to promptly investigate and provide you with some feedback concerning the investigation unless such a report is inappropriate (for example, if there are Privacy Act concerns or on-going formal or concurrent outside investigations).

In no event will adverse action be taken against a Company employee for filing a report; however, all employees are responsible for their own actions even if such actions eventually lead to the filing of a report. These reports will be treated in confidence to the maximum extent consistent with the fair and rigorous enforcement of the Code of Ethics and Standards of Conduct. You may be interviewed as part of any investigation resulting from your report in order to assist us in making a proper and reasonable investigation. While we prefer that your reports include your name to assist in further investigation, we will accept anonymous reports or questions about ethics related issues and will act upon such reports.

There are also other outside hot lines that you may use to report suspected ethical violation. Among them are the Department of Defense Hot Line. Numbers for such hotlines are posted on Company bulletin boards or available from our Corporate Ethics Officer. However, we would prefer that you utilize internal Company procedures and reporting sources before reporting any issues externally. Again, there is a **Company Ethics Hotline at 877-668-4390**. Such procedures allow us to locate, investigate and correct potential problems and to best protect our employees and their jobs. Any issues reported will be fully investigated and corrected as appropriate, and we will disclose the results of such investigations to government authorities as appropriate and as covered by Federal or State requirements.

Disclosure of ethical violations, suspected ethical violations, violations of law, suspected violations of law, or actual or suspected significant overpayments by the Government is mandatory under the law. This is true even if we only have **credible evidence** and not absolute proof of such events. We strongly encourage you to raise such issues and Company will then promptly investigate them and disclose and address them with the Government as required. You are our eyes and our ears and we seek your assistance in finding and aiding us in the reporting of such matters.

REMEMBER: ETHICS IS JOB NUMBER ONE AT THIS COMPANY. TÉCNICO CORPORATION IS COMMITTED TO STRONG ETHICAL BEHAVIOR AND WE NEED YOUR HELP!