



Code of Conduct



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Letter from Our CEO

Dear SourceAmerica Team Members,

Our mission is our driving force. It's who we are and what we do. We're making progress every day and are a leading job creator for people with disabilities. That's something we can all be proud of. Building on that progress means focusing on our values and culture just as much as on our work product. How successful we are as an organization depends on both.

We have a duty to uphold the highest standards of ethics and integrity – for ourselves and for the people we serve. ***Who we are and how we are perceived*** have a direct impact on how far we can propel our mission forward. Culture matters. Integrity matters. Our values matter. This is particularly true given our role in the AbilityOne® Program.

Our Code of Conduct is the cornerstone of our culture and explains the principles, policies, and legal obligations that define our organization. Each of us must do our part to safeguard our reputation. By living our values and adhering to the highest standards of ethical behavior, including our Code of Conduct, we send a message to customers, policymakers, nonprofit agencies, and others that we are a mission-driven and trustworthy business partner.

Upholding this type of culture takes work. It requires thoughtful actions and constant vigilance from each of us. As you read through our Code, I encourage you to think carefully about what it means to you as an employee and for our organization. I also want you to recognize that reading and acknowledging the Code is only the first step. We have to live it each and every day.

Speak up when you have concerns or questions. Uphold our values. Avoid even the appearance of impropriety. Together, we will be an even greater force for our mission and for the people with disabilities we serve.

Go. Be a Force.

Sincerely,



Richard Belden
President and CEO



Mission, Vision, and Values

Mission

The mission of SourceAmerica® is to increase the employment of people with disabilities by building strong partnerships with the federal government and engaging a national network of nonprofit agencies (NPAs) and experts.

Vision

Every American with a disability has career path and employment choices.



Values



Integrity

Adhere to the highest ethical standards.



Accountability

Honor commitments to each other, our customers, and the people we serve.



Passion

Demonstrate intense and unwavering dedication to our mission.



Inclusion

Value people for their differing abilities, backgrounds, cultures, experiences, and perspectives.



Collaboration

Work together and with others to innovate, adapt, and achieve our collective goals.

Code of Conduct

DID YOU KNOW?

As a federal contractor and a Central Nonprofit Agency, SourceAmerica is required to have a business ethics program. It's essential that all Team Members are trained on the Code of Conduct and the importance of ethics and compliance in the workplace.

SourceAmerica's standards of business conduct serve as an important resource for us in supporting day-to-day decision making and operations. Our standards represent the core of how we create a solid foundation of trust and success that is reflected in our relationships with customers, suppliers, and the community we serve. Our Code of Conduct (the "Code") is designed to deter wrongdoing and to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely, and understandable disclosure in reports and documents we file with regulatory agencies and in our other public communications;
- Compliance with all applicable laws, rules, regulations;
- Compliance with the Cooperative Agreement, and SourceAmerica Policies, procedures, work instructions, templates, forms, and job aids ("Controlled Documents");
- The prompt internal reporting of actual or perceived violations of this Code; and
- Accountability for adherence to this Code.

This Code applies to everyone at SourceAmerica (the "Company"), including the Board of Directors and all officers, employees, and those contractors/ temporary agency employees who have access to SourceAmerica systems ("Team Members"). The same high ethical standards apply to all, regardless of job or level in the Company.

Compliance with Laws and SourceAmerica Controlled Documents

We all have a personal responsibility to uphold and ensure the letter and spirit of our Code in our individual roles, every single day. It is important that you are aware of, and never intentionally violate, relevant laws and regulations. Violating relevant laws, regulations, this Code, the Cooperative Agreement or other SourceAmerica Controlled Documents, or encouraging others to do so, exposes our Company to risk, including risk to its reputation, and may result in disciplinary action up to and including termination of employment. Violations of laws or regulations may also result in legal proceedings and penalties, including, in some circumstances, civil and criminal penalties that could affect you personally and have adverse consequences for SourceAmerica.

There is a risk that downloaded or printed documents may not be the most current. Always review the correct version which can be found in the Controlled Document System.



How to Report a Concern

Stop. Think It Through.

There may be times when you are uncertain of the most appropriate action to take. A good first step in those situations is to check and see if SourceAmerica has a policy that covers your topic. You also have multiple resources available to you, including your direct manager (or, if unavailable, your department head), Human Resources representatives, the Legal Department, and the Business Integrity and Ethics Office (“Ethics Office”) staff. Below is an overview of general roles and responsibilities.



Your Resources

Your Direct Manager

Your direct manager (or, if unavailable, your department head) can help you navigate your day-to-day duties and address your concerns.

Human Resources

Generally, Human Resources addresses concerns related to SourceAmerica employee and employment matters.

Legal

The Legal Department addresses litigation and allegations of violation of law. Legal staff can cross over and work with both Human Resources and the Ethics Office to address various potential violations of the law.

Ethics Office

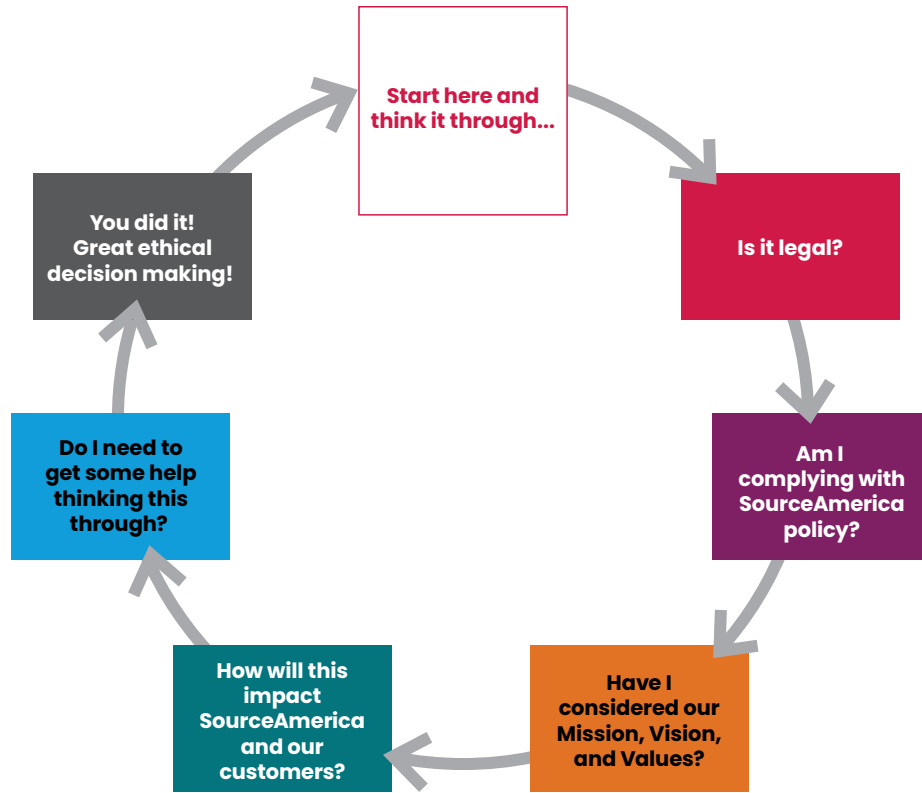
The Ethics Office generally addresses concerns surrounding fraud, waste, and abuse; our Code of Conduct; and conflicts of interest.

Question: I think that one of my colleagues has violated a SourceAmerica policy, but I am not sure. I don't want my colleague to get in trouble or be angry with me. What should I do?

Answer: If you sincerely believe that someone has not been compliant with laws, regulations, our Code of Conduct, or SourceAmerica Controlled Document, you have a responsibility to bring your concern to the attention of Human Resources, the Legal Department, or the Ethics Office. We will review the facts and determine what steps we need to take if there is a noncompliance. The earlier we address a concern, the better able we are to prevent an actual problem.

Ethical Decision Making: Thinking it Through

When faced with an ethical dilemma, stop, think it through, and get some help from your direct manager, your department head, Human Resources, the Legal Department, or the Ethics Office. You must report all actual or possible violations. When in doubt, follow the decision-making path below.



Speak Up! Listen Up! Step Up!

Speak Up!

SourceAmerica is committed to conducting business with the highest standards of ethics, honesty, and integrity and recognizes that we all have an important role to play in maintaining these standards. You are obligated to report violations of the Code, the law, or any other Company Controlled Document. This applies to possible violations where you have firsthand knowledge or possible violations brought to your attention by a Team Member. If you have questions or concerns, or you need to report a known or suspected violation, you should discuss it with your manager, the Ethics Office, or a Human Resources representative. You can also use [IntegritySource](#), [SourceAmerica's Ethics Helpline](#), to report your concern confidentially or anonymously.



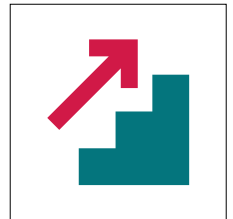
Listen Up!

Be an ethical role model by showing a strong commitment to our values through actions that foster a culture of integrity. We must all collaborate to promote an environment where compliance is expected and ethical behavior is the norm. By being alert to any situation or action that may be unethical, you help preserve our organization's reputation.



Step Up!

SourceAmerica takes all reports of possible misconduct seriously. Once a report is received, we will review, and when warranted, investigate the matter confidentially. Upon determination of whether the Code, the law, or Company Controlled Documents have been violated, we will promptly take appropriate corrective action. SourceAmerica expects all employees to cooperate in investigations fully and candidly.



We work hard to encourage each other to do the right thing. We also take necessary action when violations occur. This may include reporting relevant violations to the authorities and invoking employment consequences against those who engage in unacceptable conduct. Where such violations occur, improvements shall be openly discussed and implemented.

What types of concerns should be reported? Some typical concerns include, but are not limited to:

- Financial fraud or accounting irregularities
- Abuse or waste of resources
- Privacy and security issues
- Falsification or destruction of records
- Violence or threatening behavior
- On-the-job drug or alcohol abuse
- Discrimination and harassment
- Conflicts of interest
- Violations of regulations or policies
- Retaliation

Allegations Regarding NPAs

Providing a positive work environment where employees with significant disabilities can grow their skills, contribute, and make a positive impact is a fundamental value and expectation that both SourceAmerica and the U.S. AbilityOne Commission® share. This includes our network of NPAs. Therefore, when we are made aware of allegations regarding unethical or illegal behavior by NPAs, we promptly inform the highest level of authority at the NPA of the allegation, discuss next steps, and request that they communicate any corrective actions with us. When required or appropriate, we report the allegation or concern to the U.S. AbilityOne Commission in accordance with the Cooperative Agreement.

Anti-Retaliation

SourceAmerica encourages and enables individuals to raise serious concerns without fear of retaliation. Any Team Member who reports a violation will be treated with dignity and respect and will not be subjected to any form of discipline or retaliation for reporting in good faith. **Acting in good faith means that you provide all the information you have and believe you are giving a sincere and complete report.**

Retaliation against anyone who provides information or otherwise assists in an investigation regarding any conduct that the Team Member believes in good faith constitutes a violation of applicable laws or regulations, the Code, or SourceAmerica Controlled Documents is prohibited and will, in itself, be treated as a violation of our Code.

Team Members can find more information in our Reporting Suspected Violations and Anti-Retaliation Policy.



Fostering a Positive Work Environment

DID YOU KNOW?

When you take an active role in supporting SourceAmerica's Business Integrity and Ethics Program, you help create a positive work environment for your fellow Team Members.

We Respect Each Other

Each of us is responsible for creating a culture of trust and respect that promotes a positive work environment. We are connected by our mission, vision, and values, and together, we drive our successes. We should treat one another with fairness and courtesy in all of our interactions in the workplace and in work-related settings.

We Value Diversity and Inclusion



We believe diversity and inclusivity make SourceAmerica better, enriching our culture through the diverse skills, experiences, and backgrounds that each of us brings to the Company. Therefore, SourceAmerica maintains a safe and inclusive work environment where all dimensions of difference are valued and respected. Always appreciate what our Team Members have to offer; listen and be inclusive.

We prohibit discrimination in employment, employment-related decisions, and business dealings on the basis of a Team Member's race, national origin, age, color, sex, sexual orientation, gender identity, disability, or any other characteristic protected by federal, state, or local laws, rules, or regulations ("protected categories").

We should provide an environment free of discrimination for our associates, customers, NPAs, and suppliers. All employment-related decisions must be based on Company needs, job requirements, and individual qualifications.

We will provide reasonable accommodations to enable qualified employees with known disabilities to gain access to the work site and perform the essential functions of a job, so long as that accommodation does not impose undue hardship on SourceAmerica.

We Respect Human Rights

We are committed to upholding fundamental human rights and believe that all human beings should be treated with dignity, fairness, and respect. We ask that our suppliers, affiliated NPAs, and anyone doing business with our Company demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws (for example, laws addressing human trafficking and child labor).



We are also committed to following the Fair Labor Standards Act and all other applicable wage and hour laws and regulations.

Team Members can find more information in our Trafficking in Persons Policy.

We Don't Tolerate Harassment

Each of us is responsible for creating a culture free of any form of harassment, retaliation, intimidation, threats, coercion or discrimination. This means treating one another with fairness and courtesy in all of our interactions in the workplace and in any work-related setting outside of the workplace, such as business trips, business meetings, and business-related social events.

Harassment is unwelcome verbal or physical behavior that is based on a Team Member's membership in a protected category. Sexual harassment is unwelcome sexual advances, requests for sexual favors, and all other verbal, physical, or visual conduct of a sexual nature, and it is not acceptable in the workplace. We prohibit all forms of harassment based on a Team Member's membership in a protected category.

Harassing conduct in the workplace is prohibited regardless of whether individuals involved are of the same or different sex, sexual orientation, race, or other protected category.

SourceAmerica's policies against discrimination and harassment apply in full force to all social media, both internal and external. Team Members are prohibited from engaging in conduct that violates SourceAmerica's non-discrimination, anti-harassment, or equal employment opportunity policies; that is threatening or obscene; and that is impermissible under the law if expressed in any other form or forum.

Team Members can find more information in our Non-Discrimination and Anti-Harassment and Equal Employment Opportunity Policies.

We are Mindful of Personal Relationships

Consensual romantic relationships between co-workers can, depending on the work roles and respective ranks of the co-workers involved, create an actual or apparent conflict of interest. Consensual relationships are prohibited when two Team Members involved are in a direct reporting relationship, and/or when one Team Member can exercise significant influence over any aspect of the other individual's performance, compensation, and promotion potential.

Team Members can find more information in our Non-Discrimination and Anti-Harassment Policy.



We Promote a Safe Workplace



SourceAmerica strives to provide a safe and healthy workplace for employees, customers, and visitors to its premises. All Team Members have a responsibility to assist SourceAmerica in maintaining safe working conditions. This means each of us comes to work every day looking out for ourselves and those who share our workspace. We speak up about conditions or actions that could lead to accidents. As part of promoting a safe workplace, we are committed to maintaining industry standards in all areas of employee safety and health, including industrial hygiene, ergonomics, and safety. If you are aware

of an accident, injury, occupational illness, or an unsafe practice or condition, you are responsible for reporting it immediately.

Threats, acts of violence, and physical intimidation are strictly prohibited. Possession of weapons on the job or on SourceAmerica premises is prohibited. No talk of violence or jokes about violence will be tolerated. As is the case with any violation of the Code, Team Members have a responsibility to report any unsafe behavior or condition regardless of whether they are directly involved or a witness.

Team Members can find more information in our Workplace Safety Policy and Workplace Violence Policy.

We Maintain a Drug-Free Workplace

In order to achieve a safe, productive, and drug-free work environment, and to comply with the Drug-Free Workplace Act, we strictly prohibit the unlawful manufacture, distribution, dispensation, possession, sale, or use of any controlled substances. This includes the abuse of alcoholic beverages and misuse of prescription/over-the-counter drugs during work hours or on Company property at any time or at any time while representing SourceAmerica's interests. Customer meetings or Company social events may include alcohol, and all Team Members are required to limit consumption under state guidelines.

SourceAmerica reserves the right to set standards for employment and may request that employees, as a condition of continued employment, submit to drug testing when there is a reasonable suspicion that an employee is under the influence of a restricted substance. All perceived violations of a drug-free workplace should be reported immediately.

Team Members can find more information in our Drug-Free Workplace Policy.



Being Good Stewards of Our Company Resources

We are all accountable for caring for SourceAmerica's physical property, business information, intellectual property, and all other SourceAmerica assets vital to the interests and success of the Company.

The controls and guidelines in our policies ensure the security of information and safeguard information systems, including the confidentiality, integrity, and availability of SourceAmerica data. This ultimately protects both the users and SourceAmerica.

We Safeguard Physical Property and Assets

Our assets are the resources we use to conduct our business. They include:

- Physical assets, such as office furnishing, equipment, and supplies;
- Technological assets, such as computer hardware, software, and information systems;
- Financial assets, such as cash and credit cards;
- Our Company's name, its brand, customer relationships; and
- Information assets, such as intellectual property, including information about products, services, systems, and other data.

All physical and technological assets provided to you by the Company, whether used inside or outside the workplace, are Company property and are provided for your business use. Reasonable personal use of SourceAmerica assets is permitted but use good judgment and ensure it does not interfere with your ability to do your work and does not violate the Code.

Company assets are to be used for legitimate Company business and are to be appropriately safeguarded against cyber-related attack, theft, loss, waste, or abuse. Never sell, lend, or give away SourceAmerica assets, regardless of their condition or value, unless you are authorized to do so.



We Protect Information Systems

The electronic resources we use every day to conduct our business make up SourceAmerica's information systems. They include, but are not limited to, all computers, emails, voicemail, Intranet, Internet, network systems, and devices that store electronic data that is owned by or administered by SourceAmerica. We must use good judgment and integrity when creating and sending work product. All information created, sent, received, downloaded, printed, or stored on our information systems is Company property.



SourceAmerica reserves the right to monitor, access, and disclose communications and information as we deem appropriate, subject to applicable laws and regulations. You should not have any expectation of privacy when using Company resources. Keep in mind that all work that you do using our information systems may be disclosed internally or externally where a business need exists.

You must also remain vigilant of and report to the HelpDesk links, attachments, detected viruses, spam, or other sources of attacks that jeopardize our information systems.

Team Members can find more information in our Acceptable Use Policy, Mobile Device Policy, and Information Security Policy.

We are Thoughtful about Social Media

Social media has become an effective tool in how SourceAmerica conducts business, both inside and outside the Company. When you use social media as part of your job or on personal time, it is important that you make responsible decisions while following relevant SourceAmerica policies.

As a general rule, think about the effect or impact your statements might have. Keep in mind that your social media postings are public, permanent, and easily transferable and that they can affect SourceAmerica's reputation and your relationships in the workplace.

Team Members can find more information in our Social Media Policy.





We Abide by All Information Governance Policies

Our records are our corporate memory, providing evidence of actions and decisions and containing data and information critical to the continuity of our business. All records are the property of SourceAmerica and should be maintained and disposed of in accordance with our Records Retention Schedule. Do not destroy official Company documents or records before the retention time expires.

The Legal Department occasionally may issue Preservation Orders notifying you to preserve certain records if it receives formal notice of legal or regulatory proceedings, investigations, or audit requests or reasonably anticipates litigation. We must all abide by the directions contained in these Preservation Orders, as failure to do so could subject the Company and employees to serious legal risks.

Team Members can find more information in our Information Governance Policy, Records Disposition Procedure, and the Records Retention Schedule.

We Protect Company Confidential Information and Intellectual Property

SourceAmerica seeks to provide an environment that encourages creative works as well as the disbursement of knowledge and innovation. Confidential information and intellectual property emerging from these actions are recognized by SourceAmerica as valuable assets to the Company. As such, we have a special responsibility to safeguard the confidential information and intellectual property of our Company.

Confidential Information

When discussing Company confidential information internally, you must do so on a strict need-to-know basis. Confidential information is not intended for distribution outside of SourceAmerica. You are required to take proper precautions to secure it and ensure that you only access what is necessary to meet business needs or to comply with applicable federal and state laws and with SourceAmerica Controlled Documents. If you have questions regarding marking documents properly, please consult the SourceAmerica Template Decision Tree on the homepage of The Source.

If it is suspected that confidential information has been lost or disclosed to unauthorized parties, you must notify the information owner, your business unit's vice president, and the Ethics Office immediately.

Intellectual Property

Be mindful of your responsibilities to protect nonpublic confidential information and intellectual property. SourceAmerica owns and has exclusive rights to all intellectual property invented, created, authored, made, or designed by an employee in the course of their employment or by a contractor under a work-for-hire agreement.



Team Members may be directed to document their innovations, maintain records of attempted solutions, or collaborate with the Legal Department throughout the stages of intellectual property development to manage the safeguarding, registration, and potential public disclosure or use of the intellectual property. For example, if you are involved in the development of an invention, you should keep all related information confidential at all stages of development and follow the guidelines of the Intellectual Property Policy.

Your responsibility to protect nonpublic confidential information and intellectual property also applies to information from your prior employer before coming to SourceAmerica or when leaving SourceAmerica.

Team Members can find more information in our Intellectual Property Policy.

We Adhere to Privacy Laws

We collect and store personal data in the course of our work and must properly manage it. Personal data is any personally identifiable information (PII) that can uniquely identify an individual.

We only collect, access, use, or disclose personal data for appropriate and legitimate business purposes and will only use the minimum amount of personal data needed to accomplish a task. We will also protect and secure the information in accordance with written policy.

Team Members can find more information in our Privacy Policy.

Conducting Business with Integrity

DID YOU KNOW?

Your actions as a Team Member help maintain and strengthen our reputation as an organization that acts ethically and with integrity in everything we do.

We Interact with, and on Behalf of, Our NPA Network with Integrity

The NPA Recommendation Process

We are committed to making recommendations to the U.S. AbilityOne Commission that represent the best interests of the AbilityOne Program and federal customers. The NPA Recommendation Process is the process that SourceAmerica utilizes to make recommendations for the development of project opportunities to be added to the Procurement List (PL). The PL is published and maintained by the U.S. AbilityOne Commission. It is an integral component of the AbilityOne Program, and we must follow the related regulations and policies when making recommendations.

NPA and Customer Confidential Information

Just as we are careful in protecting our own confidential information and intellectual property, it is equally important for us to protect the confidential information of our NPA network and customers. We are responsible for using only the information needed to accomplish our business objective and for storing and safeguarding it in a manner that we would our own and that complies with applicable laws.

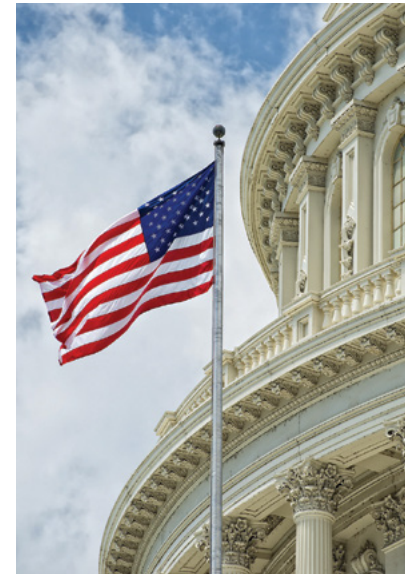
We Interact with Government Entities with Integrity

There are times when SourceAmerica works closely with government entities. You are responsible for knowing and following all Company Controlled Documents, laws, rules, and regulations that govern those interactions. These rules may be stricter and more complex than those governing interactions with nongovernmental entities.

Any conduct that could appear improper must be avoided when dealing with government officials and employees. Payments, gifts, meals, or other favors given to a government official or employee can result in substantial fines and penalties and are strictly prohibited by SourceAmerica policy.

We must follow all applicable rules and regulations that govern how we engage in discussions with current or former government employees about potential employment opportunities at SourceAmerica. You must not make any offer or promise of employment, future employment, or business opportunity to any government official. This includes engaging in any discussions with government officials related to these topics.

Team Members can find more information in our Hiring and Recruiting Current and Former Government Employees Policy and Gifts and Entertainment Policy.



We Act with Financial Integrity

Accurate and reliable records are crucial to our business. We are committed to maintaining accurate Company records and accounts to ensure legal and ethical business practices and to prevent fraudulent activities. The U.S. AbilityOne Commission counts on us to use and provide accurate information so they can make good decisions. We are responsible for helping ensure that the information we record, process, and analyze is accurate, timely, and in accordance with applicable legal and accounting principles.

Additionally, it is your responsibility as an employee to make open and full disclosure to, and cooperate fully with, outside accountants or auditors in connection with any audit or review of our Company's financial statements, internal controls, or Controlled Documents. If you have a reason to believe that any of our Company's books and records are being maintained in a materially inaccurate or incomplete manner, you are required to report this immediately to the Ethics Office or IntegritySource, SourceAmerica's Ethics Helpline.

We rely on you to come forward and report if you or another team member are being pressured to inappropriately prepare, alter, conceal, or destroy documents, or if someone has made a misleading, incomplete, or false statement regarding our records.

We Follow Proper Procedures Regarding Public Statements Given on Behalf of the Company

It is important that public statements given on behalf of the Company are accurate, consistent, and concise; that they adhere to the Company's branding and messaging strategy; and that they are given by authorized Team Members only. The Communications Team will facilitate that continuity and consistency using the proper communications channels.

Team Members can find more information in our Media Policy.

We are Mindful of Political Activities

We understand the many ways in which Team Members express their fundamental right of freedom of belief and are actively involved in personal political and charitable activities. However, when we participate in these activities in a personal capacity, we should do so on our own time and at our own expense, and we should ensure that our activities do not interfere with our work, do not involve Company property (including the SourceAmerica or AbilityOne names and logos), and do not conflict with the Code.

Lobbying activities are highly regulated, and we must not make any contact with government officials to influence legislation, regulation, policy, or other governmental actions on SourceAmerica's behalf without authorization from the Government Affairs Department.

It is imperative that we comply with all statutory and regulatory requirements relating to lobbying activities as well as the gift and travel rules of the House, Senate, Executive Branch, or IRS regulations.

Team Members can find more information in our Policy on Lobbying.



We Avoid Conflicts of Interest

SourceAmerica believes business decisions should be made with integrity and not influenced by a conflict of interest. We have a duty to advance and act in the best interest of SourceAmerica at all times. Conflicts of interest expose employees and the Company to increased scrutiny and criticism and can undermine our credibility and the trust that others place in us.

All Team Members must make prompt and full disclosure of and avoid any situation, relationship, or activity that may involve an actual, potential, or perceived conflict of interest. Team Members should contact the Ethics Office to make such disclosures or to report any questions, problems, or issues regarding conflicts of interest.

For example, we must (i) never use Company resources or nonpublic Company information for personal gain or allow a relationship or activity to impede our duty (including conflicts involving family members or close friends); (ii) avoid competing with SourceAmerica or exploiting a SourceAmerica business opportunity; (iii) avoid outside employment that creates a conflict; (iv) never accept an honorarium or speaking fees, nor receive compensation for consultations that draw upon ideas or data derived from their official duties at SourceAmerica; and (v) ensure that when considering hiring former or current NPA employees that we follow the appropriate conflict of interest reviews to prevent the perception of or an actual conflict of interest.



If you have an actual, potential, or perceived conflict of interest, you must disclose it by completing the Conflict of Interest Disclosure Form or by speaking with the Ethics Office.

Question: I would like to volunteer with an organization that provides services to individuals with disabilities but the services are different than what SourceAmerica provides. I am pretty sure that this would not be a conflict of interest. Do I have to report this opportunity?

Answer: Yes, you do need to bring this opportunity to the attention of Human Resources or the Ethics Office. There may be something you did not consider, and we will ask the questions that will help us provide the best guidance. It is always better to err on the side of disclosure.

Team Members can find more information in our Conflict of Interest Policy and Hiring and Recruiting Current and Former Non-Profit Agency (NPA) Employees Procedure.

We Comply Fully with All Fraud, Anti-Kickback, and Anti-Trust Prohibitions and Related Laws

Fraud and Anti-Kickback

SourceAmerica is required to comply with federal anti-kickback prohibitions and related laws. These laws were enacted to establish and maintain integrity in business dealings between the federal government and its contractors and explicitly prohibit fraud and kickbacks. All Team Members are responsible for knowing what constitutes fraud and kickbacks and should speak up if they notice any situations that appear to meet the definition of fraud or kickback.

It is never acceptable to take any part in any activity that involves theft, fraud, embezzlement, extortion, or misappropriation of funds. Your participation in fraud occurs any time that you help conceal, alter, falsify, or omit information in our records either for your benefit or at the direction of any others. You must refuse to engage in any questionable activities and must report any suspicious behavior.

Team Members can find more information in our Fraud and Anti-Kickback Policy.

Anti-Trust

To promote a free, vigorous, and open marketplace, we are committed to doing business in a lawful, competitive, fair, and ethical manner. We comply fully with all anti-trust and anti-competitive behavior laws.



United States anti-trust and anti-competitive laws are complicated, and failure to adhere to them could result in significant penalties imposed on both SourceAmerica and the employee who violated the law. There is virtually no circumstance allowed by law to enter agreements with competitors to fix prices, rig bids, manipulate terms of sale, control production output, or divide markets or customers.

We will engage in independent pricing based on information obtained legally and ethically.

Team Members can find more information in our Anti-Trust and Anti-Competitive Behavior Policy.

We Never Make False Claims and Always Act with the Highest Degree of Integrity and Honesty

As government contractors, we must always act with the highest degree of integrity and honesty when engaging in business with our customers. The False Claims Act was passed to keep contractors from defrauding the federal government by making false claims and false statements and to punish noncompliance. The following are a few examples of actions prohibited by the False Claims Act:

- Knowingly (or with reckless disregard) presenting a false claim for payment (for example, overbilling for a service or product);
- Creating false records or making false statements in the performance of a government contract (for example, certifying that a product meets a certain quality standard when it does not); and
- Knowingly buying government property from an unauthorized officer of the government.

SourceAmerica as a company, all Team Members, as well as our NPAs, must comply with the False Claims Act. You are strictly prohibited from making or submitting false or misleading entries on any bills or claim forms and from participating in any arrangement that results in these acts.

We are Trustworthy in Our Procurement Actions

Procurement in Government Contracting

When attempting to win government work, you must not take any action that would give SourceAmerica an unfair advantage, such as obtaining or using sensitive procurement information from federal government agencies.

You must not solicit or accept any proprietary or source selection information during any procurement action. Source selection information includes items such as listings of offerors and prices, bidders prior to bid opening, technical evaluations or proposals, source selection board reports and evaluations, and recommendations.

Proprietary information can include, but is not limited to, items such as cost or pricing data or any information within a competitor's bid or proposal they have designated as proprietary.

For more information, see [Procurement Integrity Act in 41 U.S.C. §§ 2101- 07](#).

Procurement Generally



Our suppliers (for example, vendors, consultants, and others who provide us with goods and services) are our trusted partners in support of our mission. The quality of their contributions is directly linked to our ability to provide excellent service. Therefore, we seek suppliers who have a commitment to integrity and high standards of excellence. We use objective business-related criteria when choosing suppliers.

We allow suppliers to compete fairly and equally on their quality and commitment to excellence. Therefore, we will not be influenced by gifts, favors, loans, gratuities, rewards, promises of future employment, or any item of monetary value from a supplier or potential supplier.

In addition, we will never take unfair advantage of our suppliers through abuse of confidential information, misrepresentation of material facts, or any other unfair dealing practice. We will not engage in any activity prohibited under anti-trust laws nor will we pay bribes or accept kickbacks.

Team Members can find more information in our Procurement Policy.

We are Responsible with Gifts and Entertainment

The exchange of gifts and entertainment can build goodwill in business relationships, but some gifts and entertainment can create improper influence or the appearance of impropriety. SourceAmerica's reputation is built on its core values. Accordingly, Team Members may not accept or offer any gifts, favors, or entertainment that can reasonably be perceived as an attempt to influence SourceAmerica's business decisions.



Our Gifts and Entertainment Policy outlines which gifts and entertainment are appropriate, which ones are prohibited, and what requires prior approvals and disclosures.

Question: My meeting at an NPA started later than planned and the NPA offered to reimburse my lunch. We were originally going to have lunch together, which I ended up having alone. Can I accept their reimbursement?

Answer: While it is generally okay to accept a modest lunch (such as pizza or sandwiches) that is being shared with employees of the NPA, you may not accept reimbursement of a lunch where the employees of the NPA were not present. Follow the SourceAmerica processes and submit an expense report as usual. Remember, it is never okay to accept or offer cash or a gift card.

Team Members can find more information in our Gifts and Entertainment Policy.

Upholding Our Internal Controls

Internal controls are the guardrails that keep SourceAmerica on track to advance our mission. Internal controls are practices that are systematically designed to prevent misconduct, misuse, and misappropriation of assets. When internal controls are properly followed, they promote efficiency, reduce our risks, and help ensure the reliability of financial information and compliance with applicable laws, rules, and regulations. Very often, internal controls take the shape of written Controlled Documents, but more often it is about people, operations, communications, and the work environment.

Every Team Member must familiarize themselves with all applicable internal control policies and adhere to them in the workplace and when representing SourceAmerica in any capacity. Doing so helps safeguard not only our own reputation as employees and individuals, but also SourceAmerica's reputation as an organization. We all have a role to play, and it is up to each of us to do our part.





SourceAmerica[®]

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