

The Pasha Group Code of Conduct

**BUILT ON THE VALUES OF
“THE PASHA WAY”**



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Introduction

The *Code* takes the five values of The Pasha Group—Excellence, Honesty, Integrity, Innovation and Teamwork—and applies them to specific functions, tasks, relationships, and challenges in dealing with our six primary stakeholders—Customers, Employees, Suppliers, Owners, Communities, and Partners. There is also a section on our relationship with the Government. Each segment explains our commitments and responsibilities more fully.

Our *Code* is a summary of how we do business. The *Code* applies to all—officers, managers, supervisors, part-time employees and consultants. It gets specific but is not an all-encompassing rulebook. We must rely on the values and behaviors discussed in *The Pasha Way* to guide us. However, the content of our *Code* is totally consistent with our values.

The Pasha Group will conduct its business in compliance with all applicable laws, rules and regulations and with honesty and integrity. We are committed to delivering the highest quality services to our customers, in both the Government and private sectors, at fair and reasonable prices. Every job in our company is important and plays a vital part in our continued success. Only excellence and integrity on the part of all employees will enable us to exceed the expectations of our customers.

We will compete fairly, ethically and legally for all business opportunities. Our services must meet not only all our contractual obligations, but also the demanding requirements of our ISO 9001 procedures.

Our *Code* sets forth the cornerstones of our business practices. The Pasha Group is prepared to discipline or terminate any employee or officer immediately whose conduct violates applicable laws, regulations, *The Pasha Group Code of Conduct*, or basic standards of business honesty and integrity.

Our Ethics Program Director, in conjunction with our General Counsel and our owners, is responsible for the *Code*. Employees who have any questions about how the *Code* relates or conflicts with their understanding of the proper performance of their jobs, or any matter covered by the *Code*, must raise their questions with their supervisors or contact the Ethics Program Director directly.

When you have a question or concern about ethics or compliance, you can refer to our *Code* and *The Pasha Way*. If after reviewing them, you still have questions or doubts about the right thing to do, seek guidance from your supervisor, the General Counsel, or our Ethics Program Director.

Note: Our *Code* is not an employment agreement, and does not supersede detailed standards and procedures in *The Pasha Group Employee Handbook* or any collective bargaining agreement to which The Pasha Group or any of its affiliated companies is a party.

Customers

Our customers' satisfaction is fundamental to our business

Advertising

We present clear, accurate, and complete information about our services. We don't exaggerate, distort the truth, omit, or lie. We don't use deceptive or misleading advertising to gain an advantage. We can make accurate comparisons between The Pasha Group and its competitors when discussing our services. However, we do not disparage or misrepresent the services or capabilities of our competitors.

Bribes and Kickbacks

A bribe or kickback is the giving or accepting of money, fees, commissions, credits, gifts, or favors for the purpose of obtaining favorable treatment in return. We never offer, give, ask for, or take any form of bribe or kickback. We want our customers to use our services because of their value, not because they have received something extra under the table. Transparency and full disclosure of all aspects of our dealings will usually prevent a potential problem in this area.

Commercial Customers--Contracting, Gifts, and Entertainment

We negotiate in good faith with our customers, adhere to the terms and conditions of our contracts, and resolve disputes in a timely fashion. We expect and encourage all of our employees to compete vigorously for our customers' business. We also expect that we compete for, negotiate, and fulfill all of our contracts in a fair and ethical manner, and in strict compliance with applicable laws, regulations, and contractual terms.

We compete on the value of our services. We do not try to influence customers to contract for our services by offering them gifts, meals, or entertainment. The Pasha Group's policy permits gifts of reasonable value, normal business meals and entertainment, and the exchange of customary reciprocal courtesies between employees and our customers.

We may provide promotional non-cash items made available by The Pasha Group or gifts of nominal value if the gift:

1. does not conflict with the standards of the recipient's organization,
2. the frequency is in accord with industry standards,
3. does not exceed the value customarily and openly provided in the business area involved, and
4. is not requested by the recipient.

Business meals and entertainment can be an appropriate means of communicating with our customers. We expect The Pasha Group employee to act as the host, and clearly document the business purpose of the event. Moderation and appearance are important to our company's reputation, so we expect that when entertaining a customer you will not spend more than you would on yourself or friends in a purely social gathering.

Government Customer: Contracting, Gifts, and Entertainment

When we bid on or perform government contracts, we strictly comply with the government's requirements, including their rules on gifts, meals, entertainment, accuracy in reports and claims, and conflicts of interest.

The reporting of potential violations involving Government contracts is particularly important. The Pasha Group will promptly investigate any report of misconduct that is discovered. We will voluntarily disclose illegal activities involving or affecting any Government contract to an appropriate public official, assess any possible impact, and take corrective action, including prompt restitution of any damage(s) to the Government.

Most government employees cannot accept any gifts, gratuities, or entertainment, regardless of value. The Pasha Group employees must not offer or give, either directly or indirectly, gratuities of any kind, including entertainment, transportation, meals at business meetings, tickets to sporting or other events, and the like. The Pasha Group will not reimburse expenses for any gift or entertainment provided to any Government official or employee.

The payment back of a portion of the contract price to a Government official to encourage the purchase of services or to improperly influence future purchases is a kickback. No employee may offer, pay, solicit or receive, directly or indirectly, any fee, commission, compensation, gift or gratuity to or from any employee of a Governmental agency.

Employees

Creating an entrepreneurial community that emphasizes our individual ideas and dignity is the key to success.

Equal Opportunity and Diversity

The Pasha Group is committed to equal employment opportunities for all persons, without regard to race, color, religion, gender, national origin, sexual orientation, marital status, age or disability. We provide a positive working environment in which every employee may grow, contribute, and participate free from discrimination. We are committed to lawful policies in recruiting, hiring, evaluation, training, work assignments, compensation, promotion, and termination. We will not tolerate unlawful discrimination of any kind.

Each of us is responsible for fostering a positive work environment. It is our responsibility to treat each other fairly all of the time in every circumstance. Bias or intolerance would undermine the effectiveness of our organization.

Preventing Harassment

Each employee has the right to be free from improper or offensive conduct at work. Verbal, written, or physical conduct that disrupts another employee is harassment. All employees, customers, suppliers, and visitors should be treated with respect, courtesy, and dignity. To achieve this goal, each of us needs to exercise good judgment in our interactions and communications with others. The Company Rules and Standards of Conduct section of *The Pasha Group Employee Handbook* provides in-depth discussion of this and related issues.

Safety, Health, and the Environment

We are committed to providing a safe and healthy work environment. The Pasha Group follows all laws regarding workplace safety and health. Each of us has a responsibility to be on the lookout for unsafe conditions or practices and to report them to his or her supervisor.

We do not tolerate violent behavior at our workplaces, including threatening remarks, damage to someone else's property, or causing another to fear they could be injured.

Substance Abuse

We maintain a workplace that is free from the effects of drug and alcohol abuse. Alcohol abuse and illegal drug use threatens our ability to serve our customers effectively and achieve a high degree of teamwork among employees. The Pasha Group Substance Abuse Control Policy & Procedure section of *The Pasha Group Employee Handbook* provides more detailed information on this issue.

Privacy

Employee information and data, e.g., Social Security number, home address and telephone number, and medical information are confidential and may be used only for valid business purposes. While The Pasha Group respects your privacy, employees should not expect privacy when using services and equipment supplied by our company. We reserve the right to inspect our facilities and business telephone records, lockers, e-mails, Internet usage, and business documents.

Confidential Information

Information that an employee develops or receives as part of his or her job is proprietary to The Pasha Group. Pricing and cost data, business processes and procedures, financial data, know-how, wage and salary data, customer/supplier/subcontractor information, and other information which has not been released to the general public is company property and a valuable business asset. Employees must protect this information because unauthorized disclosure could destroy its value to our company and give unfair advantage to others.

Federal law defines “proprietary information” as information contained in a bid or proposal, cost or pricing data or any other information properly designated as proprietary by another contractor, agency or contracting officer. Federal law restricts the disclosure of such information during procurement. Proprietary information does not include information that is otherwise available without restriction to the Government, another competing contractor, or the public.

Conflicts of Interest

We all are members of Team Pasha, and as such, each of us needs to base our business decisions on the needs and interest of The Pasha Group rather than our own personal interests. We should not participate in any activity that could conflict with—or appear to conflict with—our responsibilities to the company. Not only are the actual consequences of the actions of employees important, but also the appearance of propriety is also important to the company’s sense of integrity and reputation. Therefore, all employees must ensure that the perceptions that may be created by their actions reflect favorably on The Pasha Group. Employees will not undertake any activity while engaged in company business that is, or gives the appearance of being, improper, illegal, immoral, harmful or embarrassing to The Pasha Group or its customers. The use of the Ethics Help Line services or contacting the Ethics Program Director to request information or to report a suspected violation of the *Code* or any illegal act does not constitute a conflict of interest between an employee and The Pasha Group.

We all must be sensitive to any situation that might cause others to doubt our fairness or to question the good faith of our acts or decisions. All employees need to avoid any professional involvement with other persons or organizations that would create or give the appearance of any conflict of interest. These could include any of the following situations:

Interest in another Organization

A financial interest in any customer, supplier or competitor might cause divided loyalty or may give the appearance of divided loyalty. Whether an employee has a conflict of interest depends upon many factors, including: (a) whether he or she can influence company decisions that might affect personal financial interests; (b) the size of the investments and financial needs; and (c) the nature and extent of the competition or the relationship between The Pasha Group and the other business.

If you serve as a director, officer, or consultant with any company that does business with our company, you must disclose these relationships to the Ethics Program Director, even if you receive no compensation for your services. Any financial interest in any customer, supplier, competitor or other potential conflict of interest must be disclosed to the Ethics Program Director. The exception to this rule would be if the ownership is less than 2% of the stock of a publicly traded company, and the value of that ownership does not exceed \$100,000.

Political and Community Involvement

While The Pasha Group supports and encourages employees to become involved with their local communities and public institutions, potential conflicts may arise from such involvement. Employees also need to be certain that their involvement is clearly represented to be that of the individual and not of the company or fellow employees.

Outside Employment or Consulting

Before you accept any employment outside The Pasha Group, consider whether this job could create a conflict of interest or the appearance of a conflict of interest with your work here. Do not accept employment with a competitor, supplier, partner, or customer while an employee of The Pasha Group.

Advancing of Employee's Personal Interests

Employees may not act in any manner that would place their personal interests, financial or otherwise, above that of the company. Close personal relationships which are not familial but which could lead to questions about the objectivity of your judgment should also be disclosed to our Ethics Program Director and your supervisor.

It is common for employees of The Pasha Group to have friends, acquaintances, and even relatives working for competitors. A competitor may employ close friends or business associates. We would expect close friendships to be maintained but great care and common sense need to prevail. Never discuss pricing, market share, or company proprietary matters with them or anyone else outside of The Pasha Group.

Use of The Pasha Group Assets, including Electronic & Computer Technology

The assets of The Pasha Group are intended to be used in a manner that benefits our company. We must preserve these assets and use them wisely. The use of company time equipment, supplies, and facilities for personal use, or taking company owned equipment off company premises for personal use is permitted only when approved in advance by your supervisor. The unauthorized removal of company or government property could be considered theft.

Accepting Gifts and Entertainment

Employees should never accept gifts that might appear to undermine or influence good business judgment. Employees should never solicit gifts or favors from those with whom we do business.

From time to time, you may accept novelties, promotional items of nominal value, or modest gifts if:

1. the gift complies with the giver's company's standards,
2. the gift was not solicited, and
3. full disclosure of the gift would not injure the reputation of our company.

Whenever possible, a gift should be shared with the other members of your group, team, or department.

You may occasionally accept an invitation to a sporting event, entertainment, or meal by a supplier or customer if the activity is infrequent and of reasonable value, your host is present at the event, and disclosure of your attendance at the event would not embarrass our company.

Information – Accuracy of Documents and Recordkeeping

Applicable laws and regulations require that The Pasha Group's books and records accurately reflect all transactions of the company. All revenues and expenses must be properly recorded and promptly accrued. No undisclosed or unrecorded fund may be established for any purpose.

No false or misleading statement or entry is to be made for any purpose in the books and records or in any correspondence, communication or certification of any type, including telephone and e-mail communications.

The Pasha Group may be required to submit accounting and other records to prime contractors or to a Government customer as the basis for payment on existing contracts and subcontracts, and may be required to submit estimates in support of future contracts or subcontracts. No employee should ever falsify supporting documentation to any customer's contract or proposal.

It is our policy to charge all labor and material costs accurately, to the appropriate account, regardless of the status of the budget for that account. Charging labor or material costs improperly or to the wrong account, charging direct contract effort to an overhead or indirect account or falsifying time cards, inspection reports or other records, is a violation of company policy and our values.

We have implemented the quality control standards and procedures of ISO 9001. These controls give all of our customers a high degree of confidence in our services, procedures, and processes. All employees must adhere to these quality requirements and procedures published in *The Pasha Group Quality Manual*.

In addition, we are often required to certify compliance with quality control specifications and testing requirements imposed by the Government or a prime contractor. The failure to conduct required inspections or testing, or the manipulation of inspectors, inspections, testing examiners or test data, are all violations of company policy and are to be reported to your supervisor or the company's Ethics Program Director.

Retention of Records

Detailed procedures and requirements are covered in *The Pasha Group Quality Manual*. If your responsibilities include the preparation, maintenance, security, or filing of company data and reports, you must review, understand, and act on these procedures and material.

Copyrights, Patents, and Trademarks

Our intellectual property is a valuable asset. Proprietary information may also qualify as a "trade secret." A trade secret may consist of a formula, pattern, device or compilation of information that gives a business an advantage over competitors who lack such information. So it is critical that we protect our data and information from competitors or those not required to maintain the confidentiality of such data.

We respect and protect our proprietary information, whether it belongs to us or to others. All inventions, discoveries, ideas, and trade secrets created by employees on the job or produced using our company's resources are considered the property of The Pasha Group.

We are prohibited from making unauthorized copies of copyrighted written materials, documents or computer software belonging to individuals or entities other than Pasha. When our employees commence work at The Pasha Group, we expect and require that they do not disseminate or otherwise share any unauthorized copies of written materials or documents that are the property of any former employer, even if our employee participated in the creation of those written materials or documents. It is our policy to treat all companies' written materials, documents and computer software with the same respect and protection that we expect be given to our company's proprietary information.

Competitive Information: To keep current with developments in our industry, we have to obtain information about other companies, including those with whom we compete. This information should be obtained through public, ethical, and legal means at industry conferences, in trade journals, and in other published materials. We never seek information by inducing a competitor's employee or third party to disclose confidential information, to spy, or to commit theft.

Pricing and market data may be obtained from commercial customers; however, we don't use our customers as a funnel to gather competitors' pricing. We need to respect the confidential information of others, including that of former employers and former employees. We need to inquire about confidentiality agreements, so we never solicit information that would knowingly violate such an agreement. We never disclose any customer or supplier proprietary information

including information of a former employer, unless the organization owning the information gives us prior written authorization to do so. Newly hired employees are not to be approached to divulge confidential material about their former companies nor should any of our employees seek to share such confidential information with our company.

Suppliers

Our suppliers are a critical link in our ability to serve our customers and exceed their expectations.

Selecting Suppliers

Building strong relationships with suppliers is part of our ability to deliver high quality services to our customers. We treat our suppliers fairly, as we expect to be treated. Our purchasing decisions need to be based on sound, objective business criteria, such as performance, quality, delivery, and cost. Whenever possible, we encourage competitive bids. We are able to clearly explain to a supplier why their company was not chosen for a specific procurement.

Contract Negotiations

It is our duty to negotiate for the best prices and terms available. We have set very high standards of quality and performance that our suppliers must meet or exceed. Our ability to compete for our customers' business requires our costs to be competitive. We follow all applicable laws and regulations and uphold ethical business practices. All of our supplier agreements are documented and clearly identify the services or products to be provided, and the prices, terms, and conditions of sale. We honor the contractual obligations and commitments we have with our suppliers.

Supplier Information

Just as we value our proprietary information, we respect and guard our supplier's proprietary information. We exercise the same care and sensitivity to supplier information that was outlined in the previous section under Competitive Information, and do not share with third parties confidential information given to us by our suppliers unless directed to do so by the supplier involved.

Owners

Our owners not only own our company, they provide its vision, lead its people and shape its processes. We must maintain their respect and trust.

Performance

The long-term success of The Pasha Group is directly related to the performance and accomplishments of each of us as individual contributors and as team members. We expect that each of us will endeavor to contribute our best efforts to achieve our individual, team, and business goals to make our company a success.

Communication

We provide accurate and timely information about our business. We always strive to manage our business activities to be both ethical and profitable. We strive to use good judgment and act prudently. We strive to communicate openly and effectively. We are careful when releasing information publicly. If you receive a request for information from an outside party, promptly notify your supervisor. If you become aware that incorrect or improper information has been communicated, you need to take the necessary steps to see that the miscommunication is acknowledged and corrected in a timely fashion.

Communities

We strive to enhance quality of life in the communities in which we do business.

Team Pasha Citizenship

The Pasha Group values encourage each employee to do his or her part to improve the well-being and goodwill of our local communities. We get involved in the life of our communities by being caring citizens, volunteering, and working to support local institutions as they grapple with the perplexing problems and challenges of our modern world.

Environmental Practices

The Pasha Group is committed to the protection of our natural environment and the conservation of all of its resources. We fully comply with all environmental laws and regulations. Employees play a critical role in ensuring that the method by which services are provided does not unreasonably harm the environment.

Partners

Our Partners are critical to our ability to provide world-class service to our customers.

Selecting Partners

The ability to work effectively to serve our customers and to maintain the highest ethical standards we have for ourselves is paramount to selecting a partner. We treat our partners fairly and expect them to maintain the highest levels of service to the customers we jointly serve.

Contract Negotiations with Partners

It is our responsibility to negotiate for the best prices and terms for our customers. We follow all applicable laws and uphold ethical business practices to achieve fair and competitive pricing when working with a partner.

State and Federal Government Relationships

The government is both a valued customer and the institution that creates the laws and procedures that regulate our operations and business.

Lobbying

It is important that we are consistent in our approach to public policy issues at all levels of government. Employees must obtain prior approval from the General Counsel to engage outside counsel or a public affairs/communications firm to contact government official about legislation, regulatory policy, or rule making.

Political Activities

The Pasha Group encourages employees to participate in political activities on their own time and at their own expense. However, such activities may lead to a conflict of interest. Employees can never pressure fellow employees to support or contribute their time or money to any candidate or political cause. When we participate in political activities, we do so as individual citizens, not as representatives of The Pasha Group.

Antitrust

The basic provisions of the Federal antitrust laws define as illegal, the following:

"Every contract, combination . . . or conspiracy" in restraint of interstate trade or trade between the United States and foreign nations;

For any person to "monopolize, or attempt to monopolize, or to combine or conspire with any other person or persons, to monopolize" such trade;

To sell goods at discriminatory prices, where the effect may be "to substantially lessen competition or tend to create a monopoly in any line of commerce"; To sell goods on the condition or understanding that the purchaser will not use the goods of a competitor where the effect may be "to substantially lessen competition or tend to create a monopoly in any line of commerce"; To engage in "unfair methods of competition" or in "unfair or deceptive acts or practices."

States, including California, also have antitrust laws that prohibit some of the same conduct as the federal laws as well as related but different conduct such as locality discrimination and secret rebates.

The applicability of the antitrust laws in some situations is clear and unmistakable. In other situations, the applicability of the laws is less certain. Our employees are obliged to observe the law in their day-to-day conduct of The Pasha Group's business. Accordingly, the advice of the General Counsel's office should be sought in every case where there is any doubt as to the appropriate action or course of conduct. If an employee suspects that fraud, abuse, contract violations, or illegal acts have occurred, he or she must contact their supervisor or the Ethics Program Director.

Many foreign countries, especially in Europe, also have antitrust laws governing competition that are generally similar to those in the United States. Throughout the world, the purpose behind all antitrust laws is to prevent unfair practices or acts that would harm the consumer. If you have any questions about the company's activities in any foreign country, you should consult the General Counsel's office.

Employees with special responsibilities or involvement in those parts of our business that are highly sensitive to anti-trust policy must consult and understand the more detailed information in *The Pasha Group Antitrust Compliance Policy and Guidelines*.

Political Contributions

All Pasha Group political contributions are made in compliance with federal, state, and local laws, and will only be made with the approval of both the President and the General Counsel.

A political contribution is any payment, loan, or gift of any value in connection with an election or to an organization or group formed to support or defeat a referendum or ballot initiative.

Please be aware of the following:

1. In some states, business organizations are prohibited from making political contributions
2. The Pasha Group does not make contributions to candidates running for any U.S. Federal offices
3. The Pasha Group will not reimburse an employee or any other person for a political contribution.

False Claims, Statements, or Certifications

It is against the law to knowingly make a false claim or false statement to any Government official. Such violations can subject The Pasha Group to monetary penalties, damaging publicity, expensive and time-consuming audits and investigations, reduction in contract prices, and the loss of Government contracts and subcontracts. Also, both the company and individual employees may be subject to civil and criminal sanctions, including prison sentences, fines, and suspension or debarment from Government contracting.

Regulatory Compliance

The Pasha Group operates in a highly regulated environment. Some of the government agencies that regulate our business include the Department of Transportation, Department of Defense, Internal Revenue Service, Environmental Protection Agency, Occupational Safety and Health Administration, Department of Labor, plus other federal, state, and local agencies.

This environment is both complex and ever changing. As we all know, ignorance of the law is no excuse in our legal system. We must comply with the regulatory requirements of these agencies. This requires all employees to take an active role in being knowledgeable and up-to-date on all the laws and regulatory environments that apply to their business activity. Attendance at training sessions and updating ourselves on these matters are important responsibilities of all employees.

Regulatory Agency Investigations and Requests for Information

The Pasha Group cooperates courteously with all government inspection personnel. We provide information to which they are entitled during an investigation, and respond to any proper specific request for information. All employees must immediately notify their manager or the General Counsel whenever an inspection, investigation, or request for information occurs.

During all communications with the government, we never:

1. Conceal, destroy, or alter any company documents or records;
2. Lie or mislead anyone representing the government; or
3. Directly or indirectly obstruct the collection of information.

Hiring former Government Employees

The government's rules for hiring its employees are both complex and constantly changing. All employees must check with the Human Resources Department for guidance before any employment discussion can take place with a current or former government employee.

All employment, agent or consulting arrangements with any person leaving Government service, or any officer leaving military service within the last three years must be reviewed in advance with the General Counsel to ensure that we are complying with Federal conflict of interest laws.

Debarred or Suspended Organizations and Individuals

The Pasha Group will not knowingly employ on a Government contract or subcontract any individual or organization listed on the General Services Administration's Consolidated List of Parties Excluded from Federal Contracting unless it notifies the Government in accordance with applicable regulations, and otherwise complies with those regulations.

All employees must contact their supervisor or our Ethics Program Director if they become aware that an individual or organization may have been debarred or suspended.

Doing Business Overseas

We have business relationships around the world. In many locales, regulations, customs, manners, and cultural norms are unfamiliar or unwritten. Regardless of these challenges, The Pasha Group requires all of its employees to comply with local laws and adhere to the values, standards, and policies of *The Pasha Way* and *The Pasha Group Code of Conduct*. Honesty, Integrity, Excellence, Innovation, and Teamwork serve as the basis for all of our business dealings, everywhere.

There are several United States laws that govern our activities in international markets, including the United States Foreign Corrupt Practices Act. This law and company policy prohibit payment in any form either directly or indirectly through a third party to foreign officials for the purpose of gaining business or favorable government treatment.

In doing business abroad, as within our home market, focusing on complying with both the spirit and letter of the law, and conducting all of our relationships with honesty and integrity is the recipe for success.

Responsibility, Reporting Suspected Violations of our Code of Conduct, and Consequences

The Pasha Group and its employees are committed to operating according to the highest standards of business ethics and practices. Our *Code* and the values of *The Pasha Way* are the guidelines as to how we are to conduct ourselves. These two documents have been carefully crafted and reviewed by our owners and numerous employees within the company. They take these guidelines seriously, and we expect that all employees take them seriously, too.

Understanding and Compliance

Employees are personally responsible for understanding and complying with our *Code* and any other specific policies and procedures of The Pasha Group that relate to their positions or responsibilities. The employee's signature on the attached Employee Agreement to Comply with The Pasha Group Code of Conduct is an acknowledgment that he or she has read and understands the *Code*, and will make every effort to comply with it. All employees will be asked to sign an Agreement to Comply on the anniversary date of their first signing. If you do not understand something, ask your supervisor or contact our Ethics Program Director. Keep asking until you understand the answer!

In many ways, our *Code of Conduct* defines the type of company we want to be and the work environment we want for each other. We desire The Pasha Group to continue to be a first class company of first class people, and have a vested interest in maintaining that status.

Failure to comply with our *Code* will result in disciplinary action up to and including termination of employment. An employee who witnesses a violation and fails to report it may be subject to discipline. Also, a supervisor or manager may be subject to discipline if the violation reflects inadequate supervision or lack of diligence.

As with all matters within our company, the values of *The Pasha Way* ensure that fairness, privacy, and dignity will characterize any disciplinary process. Any employee charged with a violation of the *Code of Conduct* will be afforded an opportunity to explain his or her action as part of the investigation, and before any disciplinary action is taken.

Reporting Suspected Violations or Unethical Conduct

As a general guideline, employees should first discuss their concerns with their supervisor. However, you are not required to contact your supervisor before contacting the Ethics Program Director. Any issue involving Federal Government contracting policies and procedures must be referred to The Pasha Group's Ethics Program Director directly. All employees have a responsibility to communicate information fairly, honestly and objectively. We also have the obligation to continue voicing our concerns until we are sure that our position has been understood.

Ethics Help Line

Any employee needing information or wishing to discuss a matter of concern with our *Code* can contact our Ethics Program Director by calling (415) 927-6295 in San Rafael. Alternatively, any employee may contact our 3rd Party Help Line services provider at (833) 610-0060 or submit a report online at www.lighthouse-services.com/pashagroup to report a concern or incident. . Reporters will remain anonymous unless the caller chooses to identify himself or herself. You may also contact the Ethics Program Director by mail:

Eric Wong, Ethics Program Director
The Pasha Group
4040 Civic Center Drive, Suite 350
San Rafael, CA 94903

The outside of the envelope should read “**Confidential**” to ensure that only the Ethics Program Director will open the envelope. Alternatively, an employee may send the envelope via interoffice mail. The outside of the envelope should again be marked “**Confidential**.”

Finally, you may make contact via email: eric_wong@pashanet.com.

Rules of Reporting

The Ethics Program Director will adhere to the following rules when contacted by an employee:

1. Employees will be treated with empathy, dignity and respect.
2. Communications will be kept in confidence.
3. Employees need not identify themselves. All anonymous reports will be acted upon in the same manner as identifiable reports. However, identifying yourself will facilitate an investigation of the reported matter.
4. Concerns will be addressed and the employee will be informed of the outcome, to the extent possible, as soon as a suitable set of actions has been agreed upon.
5. Direct or indirect retaliation by anyone against an employee who makes a report, or uses the Ethics Help Line, , hard copy mail, or e-mail communication to make a report will not be tolerated.
6. Senior management will be informed periodically of the general nature of all contacts and the resolution of any issues. This will allow them to take corrective action when an issue is not isolated or unique.
7. We would like the opportunity to first resolve an issue or conflict within our company. However, if you are unable to gain appropriate attention within the company, our management system and Help Line will have failed to perform their roles. Any employee may go to external organizations to seek assistance.
8. Any issue involving improprieties, fraud, waste, and abuse, or violations of the terms of any Government contract, must be reported to the Ethics Program Director in a timely fashion.