



The Akal Group of Companies, LLC



Akal Security, Inc.



Coastal International Security, Inc.



Protective Services Training Academy (PSTA)



Saber IMT, LLC

Code of Business Ethics and Conduct

September 2016 – Version 9

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CEO's MESSAGE

We, the members of the Akal Group of Companies (AGC), are committed to conducting ourselves with the highest ethical standards.

While this is not a unique or unusual statement – almost every corporation uses the same or similar language -- ***We Are Different.***

Why are we different?

- *The Akal Group of Companies...* Represents every employee in every one of our companies – Akal Security, Coastal International Security, Protective Services Training Academy and Saber IMT. If you work for the Akal Group in any capacity - full time, part time or contract - you must maintain the highest ethical standards. We also expect our partners, vendors and suppliers to adhere to the same highest standards.
- *are committed...* This is a promise from each of us – unequivocal dedication to doing what is right, especially when no one is looking.
- *to conducting ourselves...* Ours is a noble endeavor. We protect our country. We do this incredibly important work by placing ourselves between our nation and those who may wish to do it harm. Our clients range from senior U.S. Government executives to families traveling to a dream vacation, so we proudly protect the most precious resource there is – people. We do this while providing a good financial return to our owners, the American owned KIIT Company representing a worldwide community dedicated to serving humanity.
- *with the highest ethical standards.* We don't do things half way, we don't cut corners, and we don't take our eyes off the ball. We do it right, every time. The very core of our efforts is compliance with rules, regulations and laws; our dedication to fair play and equal opportunity; and our unwavering promise to accept no less than the highest levels of integrity.

The Akal Group is committed to conducting business with the highest ethical standards. We are dedicated to doing what is right, every time, especially when no one is looking.

This Code is the framework for how we conduct ourselves in our companies and as a personal metric of excellence. Please read through it and familiarize yourself with it. Be accountable to its requirements, and hold each other accountable as well. Working together, we shall continue to enhance our reputations as leaders in our industry, known for maintaining high standards, professionalism and service.

Sincerely,



Supreet S. Manchanda
Chief Executive Officer



SECTION 1. INTRODUCTION

Understanding and Compliance

Akal Group employees are expected to understand and comply with the Akal Group’s Code of Business Ethics and Conduct.

Think before you act

Before you act, always ask the following questions:

- Is it legal?
- Is it fair and honest?
- Will it stand up over time?
- How will it look to other people, especially to an outside party?
- Would I want to tell my spouse and children?
- Would I want to see it reported in the news media?

To Report a Concern

Employee Protection Line
(800) 461-9330
Report by Internet
www.convercent.com/report

Your calls and reports of a concern will be handled with seriousness and with discretion.

Scope: This Code of Business Ethics and Conduct (hereinafter the “Code”) applies to the companies in the Akal Group of Companies, including Akal Security, Inc., Coastal International Security, Inc., the Protective Services Training Academy (“PSTA”) and Saber IMT, LLC. (collectively referred to as the “Akal Group” and/or the “Company”) and their employees, including all Company officers, managers, and employees deployed throughout the Company’s client facilities world-wide. In addition, the Code applies to the Akal Group’s Contractors, vendors, and suppliers (“Business Partners”) on active project pursuits or Contracts to the extent of the Company’s interaction with such Business Partners.

Brief Overview: Akal Group employees are expected to understand and comply with the Akal Group’s Code. Accordingly, Company employees should read this Code, be sure to understand its expectations and defined requirements, to ask questions as necessary, and to report any concerns that they may have about violations or potential violations of the Code. All reports will be taken seriously and investigated in accordance with the provisions of this Code. As stated within the anti-retaliation provisions of the Code, employees who report a Code related concern in good faith are protected, in accordance with applicable laws, from any form of retaliation.

If you are not sure whether a given matter is in conflict with the Code, consider the following questions:

- Does the activity comply with the law, the Akal Group Code, and/or The Akal Group’s Policies and practices?
- How would the Akal Group’s customers, law enforcement, and/or the general public view the activity?
- How would your family members respond to knowing about these activities?

Reporting A Concern: Ultimately, the Akal Group’s ability to enforce the Code is based in large part on the willingness of the Company’s employees to follow the Code’s requirements and on the willingness of the Company’s employees to report violations of the Code. Reporting Code violations is a duty, and a failure to make a report can lead to disciplinary action. The Code provides guidance as to how to go about reporting a violation. For deliberate reasons, the Code provides employees with multiple options for reporting a violation including your immediate supervisor, human resources, the Chief Compliance Officer (see section 10.2 below), and/or other members of the senior management team. For those situations where the reporting individual wishes to remain anonymous, the Akal Group has established an external telephone hotline with a third party provider. Be assured that all calls will be handled with seriousness and with discretion.

Compliance with the Code: The Akal Group is committed to maintaining the highest level of business ethics, and therefore, this Code establishes standards of conduct which, in some instances, go beyond the strict



Commitment to Business Ethics

In some instances, the standards of conduct established by this Code go beyond the requirements of applicable laws and regulations, reflective of the Akal Group's commitment to maintain the highest level of business ethics.

requirements of applicable laws and regulations. Employees who violate the Code or Company policies will be subject to discipline up to and including termination of employment. Additionally, and as the Company's Chief Compliance Officer deems appropriate, Code violations will be reported to appropriate law enforcement and/or regulatory officials to the extent such Code violations involve actual or potential criminal activity.

This Code is not an employment Contract and all Company employees are employed "at will" which means that either the Company or its employees can terminate the employment relationship at any time, with or without cause, and with or without notice.

In the case of the existence of a Collective Bargaining Agreement ("CBA") and/or government directive, it is important to emphasize the preeminent status of an existing, in force CBA and/or government directive. Where there is a perceived conflict between a Company policy and a current CBA or government directive, employees should seek clarification or guidance from their immediate supervisor, human resources, or the Company's Chief Compliance Officer.

The Company's Chief Compliance Officer, Senior Management Team, and Board of Directors have the right to amend, modify, or revise this Code at any time with or without notice to Company employees or business partners.

Our Core Purpose

We provide critical protection in a threatening world.

SECTION 2. CORE PURPOSE AND CORE VALUES

2.1 Core Purpose

We provide critical protection in a threatening world.

2.2 Core Values

The Akal Group stands by a set of Core Values—the vital principles that guide our company's actions. Our Core Values serve as the strategic and cultural cornerstone in all of our business decisions and are resolute—they can never be compromised for convenience, trends, or short-term economic gain. We are committed to acting with truth and integrity while creating value for our clients, team members, employees, shareholders, and communities.

Transparency

Transparency is about being open, honest, and accountable in our performance and practices. We work hard to ensure our actions and methods are readily identifiable. Our transparency doesn't just make good ethical sense; it makes good business sense, too. We believe it breeds trust and clarity, both of which form the foundation of great teamwork and partnerships.

We are committed

We are committed to acting with truth and integrity while creating value for our clients, team members, employees, shareholders, and communities.

Our Core Values

- Transparency
- Humility
- Getting it Right
- Customer-Focus



Living our Core Values

Transparency breeds trust and clarity, both of which form the foundation of great teamwork and partnerships.

Humility means listening before responding and respecting the needs of each other, our clients, and employees.

Getting it Right means we get it right the first time or we will work until our obligations are fully met.

Customer-Focus means we listen to and focus on the customer. Our vision is to build long-lasting, professional and trusted relationships.

A Safe Environment

A Safe Environment characterized by respectful treatment brings out the full potential in each of us, which contributes directly to our business success.

Harassment or discrimination of any kind are not tolerated.

If you believe you are being harassed or have seen harassment, you are encouraged to promptly notify the Human Resource Department or the Employee Protection Line.

Humility

Humility engenders real confidence. It is based on a quiet skill and expertise, deep knowledge and experience, and the acknowledgment that we are not afraid to ask questions and improve where required. Our commitment to humility means listening before responding and respecting the needs of each other, our clients, and employees.

Getting It Right

Our company-wide dedication to “getting it right” means we operate under the belief there is *no* substitution for diligent and vigorous preparation, meticulous quality control, and strict Contract and regulatory compliance. We *will* get it right the first time or we will work until our obligations are fully met. No excuses, no backtracking, no exceptions. Just solid accountability—and a focus on getting the job done right.

Customer-Focus

Our goal for each Contract is to listen to and focus on the customer. Every client. Every time. Communication is key. Delivery of our promises is critical to our business survival. We don’t want our customers to be complacent about our services—we want them to be impressed. Our vision is to build long-lasting, professional and trusted relationships.

SECTION 3. SAFETY IN THE WORKPLACE

The Akal Group strives to create a safe workplace characterized by respectful treatment among employees. We believe that such an environment brings out the full potential in each of us which, in turn, contributes directly to our business success.

3.1 Equal Employment Opportunity

Except where required or permitted by law, employment practices shall not be influenced or affected by virtue of an applicant’s or employee’s race, color, religion, sex, sexual orientation, national origin, age, disability, marital status, veteran status, genetic information, or any other factors protected by law. Employees who believe they are the victim of discrimination in the workplace should report their concern to their manager or to Human Resources. For further information, please see *the Company’s Equal Employment Opportunity Policy included in the General Policies Manual.*

3.2 Harassment-Free Workplace

The Akal Group has zero-tolerance for conduct that constitutes unlawful harassment in the workplace. The Company prohibits any member of management and any employee from making unwelcome and/or unsolicited sexual advances. This includes verbal or physical conduct of a sexual nature. This also includes situations where an individual’s submission to verbal or physical conduct is made explicitly or implicitly a term or condition of that individual’s employment.



The Akal Group also prohibits any conduct that creates an intimidating, hostile, or offensive working environment that unreasonably interferes with the individual's work performance. If you believe you are being harassed or have seen harassment, you are encouraged to promptly notify the Human Resource Department. *For further information, please see the Company's policy against Harassment, Discrimination and Retaliation included in the General Policies Manual.*

We strive to maintain a safe work environment

We strive to maintain a safe work environment that is free from violence in any form including threatening behaviors, assaults, harassment, intimidation, bullying, taunting, teasing, or any other conduct that leads to violence in the workplace. Report any violent workplace behavior whether directed against them or others to your supervisor, Human Resources, or the Employee Protection Line.

Always report information

Always report information accurately and promptly resolve discrepancies in Company records. Maintain accurate, timely, and complete Company records and reports.

3.3 Violence-Free Workplace

The Akal Group strives to maintain a safe work environment that is free from violence. The Company prohibits violence of any kind directed towards any person outside the scope of an official duty reaction or response to an immediate threat made toward an employee, client, general public, or facility we are responsible for protecting. Workplace violence against the Akal Group's employees whether such violence arises by way of co-workers or by way of employees of Business Partners who interact with the Company's employees is not acceptable. The Akal Group will not tolerate workplace violence in any form including threatening behaviors, assaults, harassment, intimidation, bullying, taunting, teasing, or any other conduct that leads to violence in the workplace. Employees are encouraged to report any violent workplace behavior whether directed against them or others to your supervisor, Human Resources, or the Employee Protection Line. *For further information, please see the Akal Group's policy on Preventing Workplace Violence included in the General Policies Manual.*

3.4 Drug/Alcohol Free Workplace

The Akal Group is committed to maintaining a safe and productive working environment. The use or abuse of alcoholic beverages, controlled substances, inhalants, prescription drugs and over-the-counter medications, and the illegal use of drugs can impair performance, jeopardize safety, and expose the Company to the risk of injury, property loss, and damage. Company employees are prohibited from reporting for work or working while impaired by controlled substances, drugs or inhalants, or while under the influence of alcohol. *For more information please see the Company's Drug and Alcohol Free Workplace policy included in the General Policies Manual.*

3.5 Management of Firearms

Employees who are to carry firearms will be granted authorization to do so upon completion or verification of appropriate training with regard to the type and model of firearm to be carried. Employees may only carry company authorized and issued firearms and weapons while on duty. Employees must follow all applicable weapons handling procedures to avoid negligent handling and accidental discharge of weapons.



SECTION 4. MAINTAINING ACCURATE AND COMPLETE RECORDS

No business goal of any kind

No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Report and store information

Report and store information accurately and promptly. Ensure records are properly filed, labeled, and secured, and that access is appropriately limited to those with a business need to access the records.

Q. The other day, when we were signing out from our shift, one of my co-workers did not sign out properly. When I brought it to his attention, he said, ‘this is the way it’s always been done. No one has said anything about it so I don’t really worry about the Policy.’ Is it okay to continue a practice that is against Policy but seems to be accepted by everyone at the work site, even the local client representative?

A. No. Standing practices that may seem acceptable but are contrary to Company policy, Contract, or legal requirements are never a good idea. Every employee must adhere to current requirements. The Contracting Officer is the only person who is authorized to modify any Contract requirements.

The Akal Group is fully committed to maintaining accurate business records and to protecting Company funds and assets. The Company maintains a system of internal controls consistent with FAR 52.203-13 that ensures compliance with applicable laws and regulations, and that promote the full, accurate, and timely disclosure of information in the Company’s reporting to internal management, external auditors, and external parties including regulatory and governmental authorities.

All Company financial reports, accounting records, commercial reports, risk reports, expense accounts, and other documents must accurately and clearly represent the relevant facts or the true nature of the transaction. Improper or fraudulent accounting, documentation, timekeeping of hours worked, or financial reporting are contrary to Company policy and may also be in violation of applicable laws.

4.1 Company Records

In the normal course of performing their jobs, employees frequently receive, create, and transact with Company records. Company business records must always be accurate and reliable. They are required to reflect correct operational requirements and the financial transactions of the Company in order to properly manage our business and report the financial results of Company operations. No entry will be made on Company books and records that intentionally hides or disguises the true nature of any transaction or outcome of a specific operational or business requirement. There is no excuse for a deliberately false or misleading report or record. Employees are required to properly maintain any and all records, to ensure that they are properly filed, labeled, and secured, and that access is appropriately limited to those with a business need to access the records. It is the responsibility of all Akal Group employees to ensure that the Akal Group’s records including documents, electronic information, voicemails, and any other form of media are properly managed, handled, stored, and only destroyed in accordance with the Company’s *File Retention and Maintenance Policy* and applicable management directives.

4.2 Financial Records and Reporting

The Akal Group must maintain accurate financial records of its business transactions and must ensure proper reporting to auditors of its financial results. Financial records could include Company-wide financial records, specific business unit transactions, as well as individual travel and expense reimbursement invoices. These and many other forms of financial information must be managed properly and must be appropriately presented when requested. To the extent that employees create, handle, or are otherwise involved in the handling of financial records they must ensure that the records are accurate, properly maintained, and appropriately represented in internal and/or external financial disclosures. Employees are forbidden to use,



E-mail is discoverable and is considered Company property.

E-mail is a legal, Company document and is discoverable by law in lawsuits and other claims, as are other files and documents stored on your computer. The Company reserves the right to inspect, monitor, and record the use of all Company property and systems.

Document management is critically important to the Akal Group's business operations.

All business records including documents, electronic records, emails, voicemails, and any other form of media should be maintained as required by your management and in accordance with any applicable retention guidelines.

authorize, or condone the use of “off-the-books” bookkeeping, secret accounts, non-Company email accounts, un-recordable bank accounts, “slush” funds, falsified books, or any other devices that would remove Company funds in an unauthorized manner and/or be utilized to distort records or reports of the Company’s true operating results and financial condition.

4.3 Business Travel Reimbursement

The Akal Group’s policy is to reimburse staff members for reasonable and necessary expenses incurred in connection with approved travel on behalf of the Company. In connection with reimbursement for business travel and expenses, Company staff should not incur financial losses or gains. Employees are expected to spend the Company’s money as carefully as they would their own. Travel and related expenses should be consistent with the needs of business. Travel and expense reimbursement requests that are inaccurate, inflated, or based on fictitious expenses will be considered fraudulent. The Akal Group has zero-tolerance for employees that submit inappropriate or fraudulent reimbursement requests and such conduct will be the basis for discipline up to and including termination. Employees who approve travel and related expenses are responsible for the propriety and reasonableness of expenditures, for ensuring that expenses are submitted promptly and that receipts and explanations properly support reported expenses. *See AGC’s Domestic and International Travel Policies for more detail.*

4.4 Document Retention & Litigation Hold Procedures

Document management is critically important to the Akal Group’s business operations. All business records including documents, electronic records, emails, voicemails, and any other form of media should be maintained as required by your management and in accordance with any applicable retention guidelines outlined in Section 3.3 of the HR Manual. In addition, from time to time, similar to many companies, the Company may be involved in a lawsuit. In the event of litigation, the Akal Group may need to issue a Litigation Hold Notice advising certain individuals of the Company’s need to retain, for legal purposes, specific types of records including documents, electronic records, email, voicemails, and other forms of Company information. If you receive a Litigation Hold Notice memorandum from the Company management, you are required to immediately follow the requirements of the notice. Litigation Hold Notices supersede any other retention guidelines that would otherwise apply to the records at issue. It is important that records subject to a Litigation Hold Notice not be destroyed or in any way altered. Company employees must follow the Litigation Hold Notice guidelines.



Employee Records

Employee records must be kept secure and confidential at all times. Employee records shall not be placed on unauthorized storage devices that may be lost or stolen.

Beware of conflicts of interest.

Conflicts of interest can arise in various circumstances. For example, if an employee, or a member of his/her immediate family, has a financial interest in a customer, supplier, partner, or competitor of Akal. Conflicts can also arise if an employee has outside employment with a company or organization with whom Akal does business.

Q. One of my relatives works for the Company. I have been asked to participate in his performance evaluation. Should I do so?

A. While it may be lawful for you to make personnel decisions affecting the relative, doing so creates the appearance of impropriety. Recuse yourself from making the decision.

The same considerations apply when dealing with suppliers and subcontractors. There could be an appearance of impropriety if you participate in awarding a Contract or purchase order to a Company, if your relative or close friend has a financial interest in the Contract or purchase order. It may also be improper to advocate for a teaming relationship with a relative or close friend.

4.5 Employee Records

The Akal Group's business operations, including its Human Resources and Accounting functions, require an effective system for keeping records on job applicants, current employees, and former employees. The Company respects the privacy rights of its employees and will therefore properly maintain such information in accordance with applicable Federal and State laws. Employee data is only to be shared or distributed to those with a clear business need. Employee data should not be placed on unauthorized storage devices including laptops, thumb-drives, or other media that may be easily lost or stolen. All employee records must be kept secure and confidential at all times.

SECTION 5. CONFLICTS OF INTEREST

The Akal Group strives to encourage and promote objectivity in business decision-making. Avoiding conflicts of interest is critical to maintaining integrity and honesty in the way the Company conducts its business. The Company employees have a duty of loyalty to the Akal Group and must also avoid any situation that may involve a conflict or the appearance of a conflict between their personal interests and the interests of the Company. In dealings with current or potential Business Partners including customers, suppliers, Contractors, or competitors, as well as with co-workers, employees must act in the best interests of the Akal Group to the exclusion of personal advantage. To this end, Company employees are expected to make business decisions with the Akal Group's best interests in mind and to exercise business judgment independent of external influences such as personal financial interests, external business relationships, outside employment, and familial relationships.

Employees must promptly disclose to their supervisor and/or the Contacts referenced in this Code any situation that may involve a conflict of interest, including the types of conflicts more fully described below. These relationships are not necessarily prohibited. However, because they may create either an actual or perceived incentive to act other than in the best interest of the Akal Group, such relationships must be disclosed and carefully managed and controlled through an employee's withdrawal from the situation and other measures. After disclosure, the Chief Compliance Officer will evaluate each situation and, if deemed necessary, a control plan will developed with the employee and their immediate supervisor.

5.1 Financial Interest in a Business Partner

A conflict may arise when an employee, or a family member, owns a financial interest in any outside enterprise which does business with or seeks to do business with the Company. For purposes of this paragraph, "financial interest" is an ownership interest of greater than 1% in the entity at issue.



Q. I am dating a co-worker who is being promoted to supervisor of my shift. Do we have to bring this to the attention of our manager?

A. Yes. This situation would create a conflict of interest. Even if you and your colleague are currently equals at the same worksite, you should advise your manager of the relationship to prevent an inappropriate reporting relationship.

Q. I hear that one of our competitors has offered gifts and gratuities to government employees. This seems to give them a competitive advantage. Why can't we do this?

A. This sounds like an ethics violation. Offering, giving, soliciting, or receiving any form or bribe, kickback, or under-the-table payment is prohibited. Don't go along with ethics violations. The excuse that 'everyone is doing it' is not a valid defense in such situations.

5.2 Outside Directorship or Key Roles

A conflict may arise by serving as a director, officer, partner, consultant, employee, or in any other key role in any outside enterprise that does business with or seeks to do business with the Akal Group. Outside employment with organizations that have no business dealings with the Company is generally not deemed a conflict of interest nor is serving on boards of not-for-profit organizations and related community organizations so long as the time commitment of such service does not interfere with the employee's work duties.

5.3 Corporate Opportunities

Acting as a broker, finder, or other intermediary for the benefit of a third party in transactions involving the Akal Group or its interests is a conflict. The Akal Group prohibits employees from using Company property, information, or resources for personal gain, for the benefit of third-party, or to compete against any business dealings of the Company or any of its associated business entities.

5.4 Association with a Competitor

A conflict may arise by having any connection with or acting in any capacity similar to those capacities described above for any business or other entity that would be considered a "competitor" of the Company.

5.5 Non-Fraternization, Nepotism and Family Members

A conflict may arise by other arrangement or circumstances, including family or other personal relationships, which might dissuade the employee from acting in the best interest of the Akal Group. Although the Company permits the employment of relatives, such family members cannot be supervised or managed by another family member. It is expressly prohibited for a supervisor to initiate or engage in any kind of close personal relationship beyond normal workplace relations with a subordinate.

5.6 Organizational Conflict of Interest

Distinct from individual and personal conflicts of interest, another important obligation for a U.S. Government Contractor is the duty to avoid *organizational* conflicts of interest ("OCIs"). OCIs can take a variety of forms. *Impaired Objectivity* involves a Contractor providing services that may inappropriately influence the Government's decisions related to its other contractual interests, such as by overseeing, managing, directing, evaluating, or testing its own products, services, or deliverables. *Biased Ground Rules* may exist when, under Contract, a Contractor helps its clients define the terms of a competitive procurement for which the same Contractor may have an interest in competing. *Unfair Competitive Advantage* involves a Contractor's



unequal access to non-public information in a competitive U.S. Government procurement.

Identifying and Managing Potential Organizational Conflicts of Interest Effective OCI identification requires diligence during all phases of business and work activity including strategic planning, business development, proposal development, and Contract execution. If you identify a potential OCI regarding either current or contemplated work, contact your supervisor, Contract Administrator, and/or the Chief Compliance Officer.

Q. We have hired a new employee who used to work for a competitor. He has some bids and pricing models from his old Company that would be very useful for us. They are internal documents and not marked as confidential or "source selection information", so can we use them?

A. No, these are considered "trade secrets" and are protected by law. Trade secrets of a Company should not be used outside of the intended business relationship. Do not take possession of this information. Insist that the employee return it to his former Company.

Recording time spent on Contracts and projects.

It is important to always keep accurate, contemporaneous records of time spent working on Contracts and projects. Always allocate time to the correct Contract or project on which the work was done. Never shift time worked on a given project or Contract, for example, to another time period, project or Contract.

SECTION 6. INTEGRITY IN THE MARKETPLACE

The Akal Group strives to conduct business with clients and competitors with complete honesty and integrity. The Company expects employees to properly service clients and contend with competitors in a professional and ethical manner.

6.1 Relations with Suppliers/Business Partners

Employees who make purchasing decisions or enter into Contractual relationships on behalf of the Akal Group with Business Partners must perform these duties in a manner that is in the best interests of the Company. Buying decisions should be based on competitive negotiations, quality, value, delivery, and any Contractual or legal requirements that may apply.

6.2 Contracting and Bidding

Employees must comply with all Federal, State, and Local laws regarding bidding for and entering into Contracts. There are three fundamental principles that always apply when dealing with Contracts:

- First, Employees must not knowingly make or cause to be made any false or fraudulent statement or false claim for payment, whether orally or in writing. This includes bids, proposals, requests for payment, or any other documents of any kind that contain false, fictitious, or fraudulent information.
- Second, Employees must not offer, give, solicit, or receive any form of bribe, rebate, gratuity, or kickback in connection with a Contract.
- Third, Employees must not seek or knowingly receive information that the Company is not authorized to possess in bidding, including, but not limited to confidential or proprietary data or pricing information of other competitors bidding for Contracts, including non-public documents relating to bidding or source selection. Employees who become aware of such information must immediately report the information to the Chief Compliance Officer.

Additionally, employees must immediately report any known or suspected violations of these principles to the Chief Compliance Officer.



6.3 Gifts and Entertainment

The Akal Group should always be free from even the mere perception that favorable treatment was received in exchange for gifts or other business courtesies. Whether interacting with U.S. Government personnel, Foreign, State or Local governments or commercial parties, Akal Group employees must ensure that their gift and hospitality practices comply with both the law and the spirit of this Code. If you have any questions or doubts about the legality or wisdom of offering, giving or accepting a particular benefit, it is your duty to consult with the Chief Compliance Officer.

Gifts and Hospitality to U.S., State, and Local Government Employees

Employees of Federal, State and Local governments are restricted in their ability to lawfully accept entertainment, meals, gifts, gratuities, and other things of value. To ensure that we comply with those obligations, Akal Group employees are prohibited from giving anything of value to U.S. Federal, State or Local government employees, except as follows:

- Modest Akal Group advertising or promotional items of little intrinsic value (generally \$10.00 or less) such as a coffee mug, calendar or other item with an Akal Group or affiliated business unit logo;
- Modest refreshments such as soft drinks, coffee, and pastries provided only on an occasional basis and only in connection with business meetings; and
- Business related meals and local transportation having an aggregate value of \$20.00 or less per occasion. Also, the aggregate of all business courtesies provided to any single government employee recipient shall not exceed \$50.00 in any single calendar year.

Certain other exceptions regarding widely attended gatherings and other activities are permissible with specific approval of the Chief Compliance Officer.

Providing Gift and Hospitality to Foreign Government Recipients

The laws of foreign countries and the U.S. Foreign Corrupt Practices Act ("FCPA") may prohibit Akal Group employees from providing meals, gifts, gratuities, entertainment, or other things of value to personnel of foreign governments and foreign public officials. Employees should consult the Akal Group *Foreign Corrupt Practices Act Policy* and seek specific guidance from the Chief Compliance Officer.

Gifts and Hospitality to Non-Government Persons

Akal Group employees may provide gifts, meals, refreshments, entertainment, and other business courtesies of reasonable value to non-government persons in support of the Akal Group business activities, provided:

Q. I will be visiting with the Contracting Officer for one of our government Contracts next week. Is it okay if I offer to buy her lunch?

A. No. Although generally gifts and gratuities of a nominal amount not exceeding \$20 to a government employee are not illegal, they often create the appearance of favoritism and impropriety. In addition, there is often a question of whether a gift is, in fact, of only a nominal amount. For that reason, the best practice is not to give gifts or gratuities to customers or vendors and not to accept them, either. Be especially careful not to give gifts or gratuities to government employees.



Q. The Contracting Officer gave me a stack of papers and in it was a copy of a competitor's bid. I know he didn't mean to do this, but it is gold-mine of information! Can't we use this since we broke no laws in getting the information?

A. No, we can't use it and it is extremely risky for the Akal Group to have possession of this information. Source selection information that has been submitted to the U.S. Government is protected by law. Immediately consult with your supervisor who will obtain advice from legal counsel on how to best deal with the situation.

- It does not violate any law or regulation or the company policy of the recipient. The Akal Group employee providing the business courtesy must inquire with the recipient about any limitations before offering the business courtesy;
- The gift or business hospitality must be in good taste and not cause embarrassment for either the Akal Group or the recipient organization;
- The market value of any gift, entertainment or hospitality shall not exceed \$100.00 per person unless specifically approved in advance by his or her supervisor and the Company Chief Compliance Officer.

Waivers May Be Permitted: Employees should not hesitate to seek guidance from their management if they have any questions about these requirements. As necessary and appropriate, the Chief Compliance Officer will consider waivers to the expenditure limit referenced above in situations where such waivers are deemed in the best interests of the Akal Group and are properly approved by the Company's Chief Compliance Officer and not unlawful. In order to be considered for such waivers, employees should first discuss the gift or entertainment matter with their supervisor. If the supervisor supports the need for the waiver, the manager must then notify the Chief Compliance Officer of the request for a waiver. Only the Chief Compliance Officer may issue a waiver with regard to the expense limits noted above.

Please Note: Certain functions and employee levels within the Akal Group are subject to additional guidelines due to the specific duties of their role. Such functions and employee levels will receive a position specific Gift and Entertainment Memorandum with additional information about applicable expense levels and approval processes. Only those employees who receive such memorandum are subject to these additional rules. All other Company employees are subject to the rules stated above in this paragraph 6.3.

6.4 Truth of Statements in Advertising

All business communication will be factual, in good taste, and free from false claims or statements. This includes business correspondence, advertisements and sales promotion materials, newsletters and news releases, and any other communication prepared for internal or external use.

6.5 Employee Political Involvement

Employees are encouraged to be involved in the political process as private individuals and they are free to express their political views and to support candidates of their choice. Employees are prohibited, however, from communicating on political matters on the Akal Group's behalf without the express consent of the Company's President.



Regulations on Political Contributions

Employees should be aware that there are various laws that restrict *political contributions of personal funds* by employees of companies doing business with those government entities. Employees considering political contributions to candidates where the Akal Group does business should consult with the Chief Compliance Officer.

Q. The other officer posted at my site has not yet completed all his training hours. He is doing a great job, and I have no complaint, but I know he is not scheduled to complete his training until next month. Is this OK? My supervisor is the one who scheduled this officer, so what can I do?

A. No, this is not an acceptable situation. Under the False Claims Act, the Akal Group is prohibited from billing for the services of employees if, in fact, those employees have not been fully trained as required by Contract. You should report this situation immediately. If you are not confident that you can safely report this to your supervisor, call the Employee Protection Line where you can report the situation anonymously and confidentially.

6.6 Political Contributions

Employees may not make political contributions or gifts of any kind to any candidate or Government official on behalf of the Akal Group, unless otherwise authorized by the Company's CEO. Employees, however, are free to make individual contributions to political candidates in accordance with any and all applicable laws. However, employees should be aware that there are various laws restricting even *political contributions of personal funds* by employees of companies doing business with those government entities. Depending on the jurisdiction involved, these so called "pay-to-play" laws may: (1) flatly prohibit any personal contributions; (2) require a public disclosure of any employee contributions made or (3) prohibit the Akal Group from doing business with a government customer for a period of time where an employee has made a personal political donation. Consequently, employees considering political contributions to candidates where the Akal Group does business should consult with the Chief Compliance Officer.

SECTION 7. COMPLIANCE WITH LAWS

The Akal Group is committed to complying with all applicable Federal, State, and Local laws. The Company's commitment to integrity begins with complying with laws, rules, and regulations where we do business. Every employee must, to the extent practicable, have an understanding and working familiarity of the policies, laws, rules, and regulations that apply to his/her specific roles. Any employee who is unsure of whether a contemplated action is permitted by law or Company policy, should seek the advice of the resource expert. It is the responsibility of every employee to prevent violations of law and to speak up if he/she sees possible violations. Some of the laws that are more pertinent to the Company are discussed below.

7.1 Competitive Intelligence

The Akal Group requires all employees to comply with all applicable laws in acquiring competitive intelligence. In this context, competitive intelligence refers to information gathered about the Company's competitors and their internal operations. The Akal Group prohibits acquiring competitive intelligence by means of theft, blackmail, wiretapping, electronic eavesdropping, bribery, improper inducement, receiving stolen property, threats, or other improper methods. Employees must respect the confidentiality of competitors' information and must not misrepresent who they are or for whom they work in obtaining such information. Employees should immediately notify their manager whenever the employee believes he/she has received information that the employee believes may be confidential or proprietary to another organization and not otherwise publically available. Management personnel receiving such reports are hereby directed to immediately report the matter to the Company's Chief Compliance Officer.



Antitrust laws

Promote vigorous competition and open markets. The Akal Group is committed to upholding Antitrust laws and prohibits employees from making false statements about competitors and from illegally obtaining competitors' confidential information.

7.2 Antitrust

The Akal Group strives to conduct business with clients and competitors with complete honesty and integrity. The Company is committed to upholding Federal and State antitrust laws which exist to promote vigorous competition and open markets. The Akal Group prohibits employees from making false statements about competitors or their products or services; and prohibits employees from illegally obtaining the competitor's confidential information. Further, no employee shall discuss or agree with any competitor on prices, terms or conditions of sale, territories, customers, or any other subject of a competitive nature. With the limited exception of teaming arrangements in which the Company is working with competitors on joint projects and with written approval from management, no employee should ever exchange prices or any competitive information with a competitor. Prior to any such communication occurring, it must be reported to the Company's Chief Compliance Officer for review and monitoring.

7.3 False Claims Act

The civil False Claims Act is a Federal law that prohibits any person or organization from knowingly presenting false claims for payment to an agency of the United States Government. "Knowingly" includes having actual knowledge that a claim is false or acting with "reckless disregard" or "deliberate ignorance" as to whether a claim is false. For the most part, a "claim" is considered an invoice presented to the client for services the Company provided. Examples of potential false claims include knowingly billing for services that were not provided, submitting inaccurate or misleading claims for actual services provided, or making false statements to obtain payment for services. The presentment of false claims to the U.S. Government can lead to civil and/or criminal penalties.

The Akal Group makes every effort to comply with the Federal False Claims Act by having compliance protocols that include systems to ensure the integrity and quality oversight of its billing to the U.S. Government. Accordingly, the Company requires all employees to adhere to the requirements of the False Claims Act by ensuring that that all invoices and time sheets submitted to a customer are accurate, complete, and reflect actual work performed. This means that the services provided comply with Contract requirements, hours billed reflect actual hours worked, all employees are properly trained and qualified, all qualifications are current, and records demonstrating employee qualifications are complete and up to date.

Q. At times, some of the officers on the Contract where I work leave work 30 minutes early but record their time as if they had worked their whole shift. They are receiving pay for time that they did not actually work. This doesn't seem proper.

A. You are correct. This would also mean a client is being billed for hours not worked. This behavior is a violation of the Code of Business Ethics and Conduct and could also result in a violation of the False Claims Act should a government customer be billed for time that was not worked. Report the violation to your supervisor, other appropriate official within the Company, or the Employee Protection Line.

7.4 Foreign Corrupt Practices Act (FCPA)

The Akal Group has a well-established reputation for running its business in an ethical manner. It is important for us to continue to maintain this record of integrity and the Company's reputation both in the U.S. and abroad. Like any U.S. company that does business overseas, the Company, its employees, subsidiaries, affiliates,



Q. Everyone knows it is impossible to do business in some foreign countries without spreading around money. Isn't it alright to do this as long as it doesn't get linked back to the Akal Group?

A. No. Any action that you take in the course of doing business is the responsibility of the Akal Group. Violations of the Foreign Corrupt Practices Act ("FCPA") can result in severe consequences for the Company. Many successful companies accomplish business goals in foreign environment without violating the FCPA, and you can too. Please consult with your supervisor on methods to accomplish your tasks in an ethical manner.

Akal Group employees combat trafficking in persons

by immediately reporting all allegations of conduct that could be indications of trafficking in persons or any form of forced labor.

customers, Contractors, vendors, and suppliers may be subject to the U.S. Foreign Corrupt Practices Act ("FCPA"). The FCPA generally prohibits payments by companies and their representatives to foreign government and quasi-government officials in order to secure business. Violations of the FCPA can result in severe penalties to the Akal Group as well as to individuals involved in the violation. FCPA violations can also damage the Company's reputation and ability to conduct business.

FCPA strictly prohibits the use of bribes or illegal payments to any non-United States official, political party, or political candidate to obtain or retain business or other improper advantage. Acts generally prohibited under the FCPA include the following: (1) illegal or questionable customer rebates; (2) commercial bribes and kickbacks; (3) financial transactions that involve manipulation of sales, earnings, or other financial data; (4) use of interstate commerce to pay or facilitate payment to any non-United States government official, political party, or political candidate; and (5) keeping inaccurate books and records that attempt to disguise or conceal illegal payments. In addition, the use of any third party agents or intermediaries to facilitate any of the illegal payments or actions described above is strictly prohibited. The Akal Group encourages employees to raise questions and to report any concerns they may have about transactions abroad that appear to violate this Anti-Bribery and FCPA policy. *Further information about this Anti-Bribery and FCPA policy can be found by contacting the Corporate Compliance office.*

7.5 Combating Trafficking in Persons

The Akal Group prides itself on good corporate citizenship and strives to maintain a safe and healthy workplace. In furtherance of these objectives, the Company has zero tolerance for and strictly forbids its employees, business partners and agents from engaging in, supporting, or failing to report indications of trafficking in persons, including sex trafficking, severe forms of trafficking in persons, commercial sex acts, other forms of forced labor, and the use of misleading or fraudulent practices in the recruitment of employees.

The Akal Group's policy to combat human trafficking is the right thing to do, and it also aligns and complies with U.S. Federal law and Federal government mandates for Government Contractors. As a Federal Government Contractor, the Company's compliance with these policies is essential in order for the Akal Group to continue to operate as a Government Contractor.

Trafficking in persons and trafficking-related activities violate the Akal Group's Code of Conduct and Federal law. Company employees, business partners, or agents who violate this policy will be subject to discipline including removal from the Federal Contract, a reduction in benefits or termination of employment.

Akal Group employees, business partners and agents are expected to *immediately report all allegations of conduct that could be human trafficking or forced labor.*



Retaliation for raising an ethics issue is prohibited.

The Company takes ethics seriously, and will not condone retaliation against an employee who makes a good faith report of a suspected violation of ethics. Retaliation makes a potentially bad situation worse.

For example, do not deliberately change an employee's working hours or duty station as a way of retaliating for making an ethics complaint. As an additional example, do not give an employee a poor performance rating because the employee has reported a suspected ethics violation.

Company employees, business partners and agents can report their concerns through the same reporting channels referenced in this Code, including the Human Resources Department, the Chief Compliance Officer, or the Employee Protection Line.

The Akal Group must inform the Contracting Officer and the Agency Inspector General of any credible information that an employee, business partner or agent may have engaged in human trafficking, and the corrective actions that the Company has taken in response. The Akal Group and its employees will cooperate fully with Federal Agencies conducting audits or investigations into allegations of conduct related to trafficking in persons.

SECTION 8. COMPANY ASSETS AND RESOURCES

Protection of Company property and services is vital to our business. Company property should not be used for personal benefit or any other improper purpose. Company property should not be sold, loaned, given away, or otherwise disposed of, regardless of condition or value, except with proper authorization.

8.1 Confidential and Proprietary Information

Integral to the Akal Group's business success is its protection of confidential Company information, as well as non-public information entrusted to it by employees, customers, and/or other business partners. Confidential and proprietary information includes any trade secrets or Company proprietary information, regardless of whether it qualifies as a trade secret, including but not limited to: processes, client lists or prospective clients, operating methods, cost, pricing, pricing formulas, strategic data, technical and cost proposals, bidding documentation, financial data, payroll or compensation information, organizational structure, ownership interest, business plans and proposals, Contracts, data and information the Company receives in confidence from any other party, any other secret or confidential matters of the Akal Group, or anything else that, if disclosed, could harm the Company. The Akal Group will not disclose confidential and non-public information without proper authorization from the Chief Compliance Officer.

8.2 Classified and National Security Information

In our jobs, we are sometimes entrusted with classified, sensitive, and proprietary information. Such information must be protected and may never be disclosed to unauthorized personnel unless approved by the U.S. Government. Employees must take all steps necessary to protect classified, sensitive, and proprietary information and must coordinate all activities related to this information with the Facility Security Officer ("FSO"). It is never appropriate to disclose this information to another person who does not have a need to know this information and without explicit approval from the U.S. Government.



8.3 Use of Company Resources

Company resources, including time, materials, equipment, and information, are provided for company business use. Protection of company property and services is vital to our business. Generally, company property should not be used for personal benefit or any other improper purpose. The Akal Group does acknowledge that, on occasion, employees will use certain company assets for personal use (for example the telephone and the computer). The Company permits occasional personal use as long as it does not affect job performance or cause a disruption to the workplace.

Q. Can I check basic things like the weather forecast, local news, and personal email on the Internet with my Company computer?

A. Yes. Limited personal use of Company systems—up to 15 minutes per day—is permissible if it conforms to the Code of Business Ethics and Conduct standards. Some external websites can create a weakness in the network security system and should not be accessed through the corporate or client networks. Check with your supervisor if you have any questions as to the security of the site you wish to visit.

It is prohibited for any employee to issue a statement on behalf of the Company via social networking sites, blogs, or other forms of media or disclose sensitive internal information obtained in providing services to a client.

Generally, we will not use Company equipment (such as computers, copiers, and fax machines) in the conduct of an outside business or in support of any religious, political, or other outside daily activity, except for Company-requested support to non-profit organizations. We will not solicit contributions, nor distribute non-work related materials during work hours.

In order to protect the interests of the Company Information Technology (“I.T.”) network and our fellow employees, the Akal Group reserves the right to monitor or review all data and information contained on an employee’s Company-issued computer or electronic device, the use of the Internet, or the Company’s intranet. We will not tolerate the use of Company resources to create, access, store, print, solicit, or send any materials that are harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate.

Questions about the proper use of Company resources should be directed to Human Resources or the Chief Compliance Officer.

Refer external inquiries to the appropriate office

to assure communications made on the Company’s behalf are complete and accurate.

SECTION 9. COMMUNICATIONS WITH EXTERNAL ENTITIES

The Akal Group strives to properly manage all communications with external entities that are made on the Company’s behalf, so as to ensure that such communications are complete and accurate. Accordingly, we encourage employees to refer inquiries from external entities to the appropriate company representative. The Akal Group has authorized certain individuals to speak on the Company’s behalf to members of the media and regulators.

Media and legal inquiries may be referred to: Carin Melet, Vice President, Corporate Counsel, 505-692-6753

Government inquiries may be referred to: Dev Suroop K. Khalsa, Chief Compliance Officer, 505-692-6625



Q. I was called today by the local press for some information about a recent incident concerning the Company. Doesn't the public have a right to know the real information directly from the source?

A. No. Communication with the press is governed by Akal Group policy, and is often restricted by client Contract. It is your duty as an employee of the Akal Group to not respond to requests for information from the press. Take the contact information from the caller, and let them know that an authorized representative will return their call. Give this information to your immediate supervisor who will refer the matter to the Director, Training and Communication for the Akal Group.

Disclosure Compliance

The Akal Group encourages employees to support compliance with disclosure obligations by reporting any suspected misconduct. A knowing failure to disclose suspected misconduct may lead to disciplinary action.

If you are not sure to whom you should refer the external entity, you may always direct the inquiry to your **supervisor**, **Human Resources** or to the **Chief Compliance Officer**.

SECTION 10. REPORTING VIOLATIONS OF THE CODE

The Akal Group seeks to foster a workplace that is conducive to open communication regarding the Company's business practices and ethical standards. In connection with those efforts, the Company is committed to protecting its employees from unlawful retaliation for properly disclosing or reporting conduct that they perceive to be illegal, unethical, or of an otherwise questionable nature.

Additionally, should it be determined that an employee has deliberately made false or misleading allegations, disciplinary action up to and including termination will be taken.

10.1 Mandatory Disclosure Rule Compliance

In accordance with its status as a Federal Contractor, the Akal Group will self-disclose to government officials whenever the Company becomes aware of illegal or fraudulent conduct. More specifically, the Akal Group will make disclosure to the applicable Office of Inspector General whenever the Company becomes aware of "credible evidence" of a violation of Federal law involving fraud, a conflict of interest, bribery, gratuity or a violation of the civil False Claims Act. This could include overpayments on a Contract, as well as any deficiencies in the services provided to a government client.

The Akal Group encourages employees to support compliance with these self-disclosure obligations by reporting any suspected misconduct. A knowing failure to disclose suspected misconduct may lead to disciplinary action.

Employees may submit reports of suspected misconduct to their manager, the Chief Compliance Officer, Human Resources or through the publicized Employee Protection Line including anonymously. Whether a report is made openly or anonymously, employees should understand and be assured that the Akal Group will not tolerate any retaliation in any form against any employee who has in good faith raised a suspected issue or cooperated in the investigation of a suspected issue. Employees and managers are reminded that suspected misconduct should be reported to the proper internal channels and that company policy prohibits employees and managers from undertaking their own investigations or factual inquiries. The Chief Compliance Officer will ensure that all reported issues are thoroughly investigated and also escalate issues, as appropriate, to the Akal Group Board of Directors.

Employees are encouraged to internally report any form of suspected misconduct. However, employees are particularly encouraged to report to the Company any suspected or observed misconduct of the following forms:



Watch out for the warning signs.

We all know the warning signs, but they are worth repeating. When you think or hear the following, you know that you are skating on thin ice:

"No one will ever find out."

"We can cover it up."

"We'll do it just this one time."

"Everyone does it."

"It doesn't really hurt anyone."

"This is nothing; the government wastes so much money, anyway."

"We must win this Contract at all cost."

"We never had this discussion."

"Destroy the document."

Report suspected ethics violations.

If you have reasonable grounds to believe that an ethics violation has occurred, or will occur, then report the matter to your **supervisor, management,** or the **Employee Protection Line.**

Employee retaliation is prohibited

The Company takes ethics seriously, and will not condone retaliation against an employee who makes a good faith report of a suspected violation of ethics. Retaliation makes a potentially bad situation worse.

For example, do not deliberately change an employee's working hours or duty station as a way of retaliating for making an ethics complaint. As an additional example, do not give an employee a poor performance rating because the employee has reported a suspected ethics violation.

- Bribery, kickbacks or improper gratuities.
- Employee and/or organizational conflicts of interest.
- Improper offers of employment to Government employees.
- Labor mischarging or time inflation.
- Possible false statements or certifications.
- Falsification of documents or reports.
- Delivery of nonconforming products or services.
- Theft or misuse of Government property.
- Failure to return overpayments by Government customers.
- Violation of criminal law involving fraud.
- Any violation of the laws address in Section 7 of this Code.

10.2 Employee Protection Line

Individuals who wish to report an ethics or business violation concern may call the following telephone number: (800) 461-9330. Outside of the U.S., call collect: (720) 514-4400. Individuals may also report by internet at www.convercent.com/report.

10.3 Correspondence to the Chief Compliance Officer

In addition to the hotline, the Company employees may elect to submit their concern via U.S. Mail at the following address:

Dev Suroop K. Khalsa
Chief Compliance Officer
Akal Group of Companies, LLC
PO Box 1197
Santa Cruz, NM 87567

10.4 Prohibition Against Retaliation

In accordance with applicable laws, the Akal Group prohibits retaliation against any individual for: (1) reporting a matter internally or externally that the employee, in good faith, believes to be a violation of this Code or any law, rule, or regulation; (2) cooperating with an internal investigation; or (3) cooperating with an external or government led investigation. Retaliation itself is considered by the Company to be a violation of this Code. If any individual believes he/she is subject to retaliation for having made a report to the Company management, he/she should report the matter immediately to Human Resources.



10.5 Reporting to Outside Agencies

Neither the reporting protocols or options discussed above, nor the other provisions of this Code, nor any other Akal Group Policy, should be construed or interpreted as restricting the right of any Akal Group employee to report a matter of concern to any Government Agency, regulator, or to any law enforcement official.

This includes, but is not limited to: the Equal Employment Opportunity Commission; the U.S. Department of Labor; any Office of Inspector General of any Government Agency; the Department of Justice; or to any other law enforcement agency. While the Akal Group welcomes and encourages its employees to report matters of concern by way of the Company's internal resources or its Employee Protection Hotline, the Akal Group's policies do not prohibit Company employees from contacting, cooperating with, or otherwise communicating with the agencies noted herein, nor are Akal Group employees limited or impeded by the Company as to their ability to participate in any State or Federal whistleblower programs.

SECTION 11. WAIVERS

If any Company employee believes a waiver of this Code is necessary or appropriate, a written explanation must be provided to the Chief Compliance Officer in advance of any action that otherwise is a breach of this Code. No waiver shall be deemed to have been granted unless the waiver is in writing and approved by the Chief Compliance Officer.