



# CODE OF CONDUCT

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INTEGRITY ALWAYS





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We thrive when we act with integrity at all times, when we treat each other with respect, and when we act ethically.

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George B. Mendiola, Jr.

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Dear Colleagues,

The work we do at FSA is important to our nation. We support critical missions, and we are a recognized leader in our industry for the dedicated support we provide.

Our reputation is built not only on deep customer knowledge, but also on integrity, which is the foundation of our culture and vital to our success. Our customers trust us to support their mission—and to always do the right thing.

Our industry is governed by very specific rules, and every employee of FSA has an obligation to understand and abide by those rules. Even a minor misstep or lapse in judgment can undo all the goodwill we have developed as trusted partners who deliver on our promises.

No matter our position in the company, we are all accountable for our conduct—to FSA’s customers, our business partners, ourselves, and each and every one of our colleagues. We thrive when we behave with integrity at all times, when we treat each other with respect, and when we act ethically.

At FSA, you have an impact on important missions, whether it’s directly with our customers or supporting our business. With that comes a responsibility to deliver on our commitments, and never to compromise our values and principles. We strive to exceed the legal and regulatory requirements of our business.

Don’t ever let a problem or challenge cause you to cut corners. We accomplish our missions together as a team, not as individuals. Speak up if you see something that doesn’t seem right, ask for assistance when you need it, offer help when your teammate needs it, and always do the right thing.



George B. Mendiola, Jr.  
FSA President

# WE ARE GUIDED BY OUR CODE OF CONDUCT

All of us, from board members and senior executives to front-line employees, are stewards of FSA's ethical culture. Maintaining a culture of integrity depends on applying our Code and values. When the Code does not provide sufficient guidance for a particular issue, ask questions and choose actions that best embody our **core values**.



INTEGRITY



RESPECT



MISSION  
UNDERSTANDING



TRUST



ACCOUNTABILITY

# CORE VALUES

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## INTEGRITY

Our culture of service is rooted in our passion for doing what is right and delivering on our commitments. We always act with honor and truthfulness even when no one is watching. Integrity has been an integral part of our company since day one and is fundamental to our decisions and behaviors.



## RESPECT

Acting with respect is fundamental to our strength as an organization. We treat customers, outside parties, and one another with dignity, fairness, and courtesy. We respect and value the contributions of all members of our community, regardless of status or role in the organization. We collaborate across organizational boundaries, focusing on adding value and earning the trust of our teammates. We foster an environment where people are happy and proud to work.



## MISSION UNDERSTANDING

We are honored to serve, support, and work side-by-side with our customers, with our teammates, and with each other. We use our deep customer knowledge to define what's needed to ensure mission success. Our company insists on excellence. Our customers deserve superior performance in our services and in the way we conduct business every day. Maintaining a level of excellence that is appropriate to our position as an industry leader depends on an individual commitment to quality from each of us.



## TRUST

Trust is not a given; it is something each of us must earn by never compromising our ethical standards. We build trust among fellow employees every day when we rely on each other to meet shared objectives. Leaders who foster trust create a culture of mission success, as well as motivate and inspire their teams. Our customers deserve a working partner that operates at the highest ethical level, and we must earn and retain their trust. Since our founding in 2004, we have appreciated the trust our customers place in us by consistently delivering performance of the highest quality.



## ACCOUNTABILITY

Accountability is at the heart of our pledge to make and keep commitments. Each of us is accountable for our actions, and we collectively strive to achieve our customers' missions by treating them as our own. Our reputation depends on reliably and consistently delivering on our promises to earn and keep the trust of our customers, Board of Directors, fellow employees, and the communities we serve.

# WE SUPPORT A SPEAK UP CULTURE

## **WE HOLD OURSELVES AND ONE ANOTHER ACCOUNTABLE**

It is our collective responsibility to maintain an environment in which all issues of importance can be freely discussed without a fear of criticism or retaliation. Protecting our culture means we must speak up when we believe something is not right. This may involve addressing your concern with the individuals who conduct themselves in a manner that worries you or reporting your concern through one of our disclosure channels.

## **OUR COMMITMENT TO YOU**

Each and every concern is taken seriously.

FSA does not tolerate any acts of retaliation against those who make reports of misconduct in good faith, assist another in reporting misconduct, or participate in an internal investigation. If you experience what you believe to be any form of retaliation, you should report this concern as soon as possible.

## **SPEAK UP ABOUT CONCERNS**

The disclosure channels on page 7 are available to our business partners and teammates if there is a belief that FSA or any of its employees has acted improperly or unethically.

## **WHY IT MATTERS**

Reporting issues in a timely manner allows FSA to investigate issues fairly and solve problems before they escalate or reoccur.

## **OTHER DISCLOSURE CHANNELS**

Employees also have the right to report suspected wrongdoing on federal contracts to various government officials, including but not limited to a member of Congress, the applicable agency inspectors general, the Government Accountability Office, contracting officers, any authorized law enforcement agency, or the U.S. Department of Justice.

# DISCLOSURE CHANNELS

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- Reporting Helpline: **(855) 216-4828**
- Online Submission: <https://fsafederal.com/integrity-always/>
- Your manager, another individual in the management chain, or any other FSA manager/leader
- Your Human Resources Business Partner
- Any member of the Ethics Team
- The Security Office
- The President
- A member of the Board of Directors

Anonymous reporting is available via the **Reporting Helpline** and/or the **Online Submission** channels.

# WE CONDUCT BUSINESS WITH INTEGRITY

Since our primary customer is the U.S. Federal Government, we have both a moral duty and a practical need to deliver our services in the most ethical way possible. Our customer is ultimately the citizenry of the United States, and we endeavor to fulfill the trust placed in us in all that we do. We must always act with the utmost ethical standards in the way we acquire, execute, and deliver our services.





## LEADERS AND MANAGERS

Our Code demands that we operate at the highest ethical level. It is essential that our leaders and managers:

- Foster a positive work environment where all employees feel free to voice opinions, ideas, and concerns
- Create a culture of collective mission success
- Model appropriate behaviors
- Regularly communicate the importance of ethically sound business practices
- Protect and preserve our reputation through ethical decision making
- Identify and report ethics and compliance risks
- Build trust internally and externally by responding appropriately and in a timely manner to concerns

## EMPLOYEES

Our Code requires each of us to take responsibility for our own actions. It is essential that all employees:

- Uphold our Code of Conduct
- Obey the law
- Act responsibly and in good faith
- Show respect toward one another and work collaboratively
- Speak up when misconduct is suspected
- Earn and retain the trust of those we work with, directly and indirectly
- Adhere to the expectations and standards of the customers we support

## BUSINESS PARTNERS AND TEAMMATES

In addition to our own commitments, FSA expects all our business partners and teammates to:

- Adhere to the principles of our Code of Conduct
- Follow the ethical best practices within their respective industries
- Establish management systems commensurate with the size and nature of their business to support compliance with laws, regulations, and the expectations related to or addressed expressly within this document

# WE TREAT

# ONE ANOTHER WITH RESPECT

Our collective success depends on the ability of each of us to perform at our best. If we engage in behavior that threatens our respectful work environment, it creates barriers that prevent us from reaching our full potential.

We are all entitled to work in an environment that is free from harassment, discrimination, and retaliation.



We're committed to treating one another with respect and maintaining a workplace that is free from harassment and discrimination. We strive to provide a work environment free from intimidating, hostile, degrading, humiliating, or offensive conduct. FSA strictly prohibits these types of unlawful conduct. Our goal is to provide a work environment accessible for employees with disabilities and in full compliance with applicable laws. This means that we:

- Are committed to equal employment opportunity
- Respect human rights and refrain from violating the rights of others
- Foster a safe and healthy work environment that is free from all forms of harassment, including sexual harassment or retaliation

## WHAT IS HARASSMENT?

- Sexual advances, requests for sexual favors, sexually explicit language, off-color jokes, remarks about a person's body or sexual activities
- Displaying sexually suggestive pictures or objects
- Suggestive looks, leering, or suggestive communication in any form
- Inappropriate touching
- Using slurs or negative stereotyping, including through teasing and joking
- Intimidating acts, such as bullying or threatening behavior
- Any unwelcome conduct based on status in a protected class that creates an intimidating, hostile, or abusive work environment

## WE ARE COMMITTED TO EQUAL OPPORTUNITY

Consistent with our goal of empowering people, FSA Federal is committed to providing all employees and employment candidates the right to equal employment opportunities and a harassment-free work environment free from retaliation. FSA's employment practices are based on an individual's capabilities and qualifications without regard to race, color, religion, sex (including transgender status, sexual orientation, and pregnancy), national origin, age (40 or older), disability, genetic information, veteran status, or any other category protected by federal, state, or local law. Equal employment opportunity applies to all policies and procedures, including recruitment and hiring, promotions, transfers, and terminations, as well as compensation, benefits, and other terms and conditions of employment. Our long-term success depends upon our ability to attract, retain, and develop a workforce with the knowledge and skills needed to support the vital missions of our customers.

We do not tolerate discrimination or any act that treats a person differently or less favorably on the basis of any protected characteristic.

## WE MAINTAIN A DRUG-FREE WORKPLACE

As part of creating a safe environment and workplace, you must not be under the influence of drugs (including inappropriate use of lawful medications), controlled substances, or alcohol while at work. Drugs and alcohol can impair your ability to do your job and may put other employees or your security clearance at risk.

## WE MAINTAIN A SAFE AND HEALTHY WORK ENVIRONMENT

Safety is a personal responsibility. Each employee must know and comply with all applicable health and safety rules and procedures and work safely at all times. The values and behaviors of putting safety first must be modeled by FSA management and followed by all employees.

Employees should:

- Look out for their own safety and the safety of others, especially visitors and new employees
- Follow all laws and company standards regarding safety
- Promptly report all incidents, illnesses, safety violations, and unsafe conditions as well as any safety concerns to your FSA supervisor and FSA Security
- Immediately report all accidents, particularly those involving injury, to the FSA Human Capital Management Department

At FSA, we do not do or say anything that could:

- Threaten the safety or security of any coworker or anyone else
- Cause damage to company real estate or personal property
- Create fear

We are all entitled to feel safe at work, and we must take responsibility for each other by promptly reporting anything that might threaten or harm another person. Weapons are not permitted in the workplace. If the handling of a weapon is required for specific contract duties, FSA employees may do so only after obtaining the required approvals. FSA takes threats of any kind very seriously. If you witness or become aware of any possible violent threats, contact your local Security Officer immediately. Follow up with your FSA supervisor, FSA Security, and the Human Capital Management Department.



Lately, a coworker has consistently been reporting to work late and leaving early. She frequently leaves her desk for extended periods of time and often smells of alcohol. I'm concerned for her safety. What should I do?



Bring your concerns to your FSA supervisor or to Human Capital Management. If an issue is confirmed, they are best equipped to help remedy the situation. You may also use any of the disclosure channels outlined on page 7.

# WE ENSURE THE

# QUALITY OF OUR PRODUCTS AND SERVICES

FSA and its employees have an uncompromising commitment to provide our customers the highest level of performance, while delivering quality services and solutions that meet their requirements at the agreed upon price and within schedule. FSA senior management and staff strongly support the continual improvement of the **Quality Management System**, including our quality objectives and the processes by which we provide our services, so that our work meets requirements and is done right the first time. Customer satisfaction requires us to ensure that the overall quality of services continually improve, and each employee is personally responsible for the work, job, or service provided, increasing efficiency and reducing rework/waste.

# WE ENGAGE IN FAIR MARKET PRACTICES

We are committed to winning work through the superior mission understanding and service delivery that comes from an empowered, ethical workforce. We are fair and honest in our dealings with customers, teammates, business partners, and employees.



According to contract requirements, I will be accompanying my customer to an out-of-state meeting. The contract allows me to charge the costs of the travel—including a rental car—to the contract. My customer has asked to ride with me in the rental car that I've reserved. What do I do?



Unless FSA is contractually required to provide transportation, you must politely say no. Should there be any further questions, direct your customer to your manager and/or the FSA Contracts Department.

This means that we:

- Carefully adhere to FSA's Quality Management System to increase efficiency and effectiveness to help us deliver on our commitments to our customers and promote mission success
- Uphold FSA's integrity, reputation, quality credentials, and deliverables by complying with contract terms, laws, and FSA policies
- Avoid conflicts of interest with government employees by avoiding even casual discussions of employment or contract work with current or former government employees
- Disclose situations in which we have supervisory responsibilities over a Closely Related Individual
- Do not participate or engage in kickback schemes, fraud, or corruption
- Know the policy surrounding giving and receiving gifts and gratuities and steer clear of those that can be perceived as favorable treatment being sought, received, or offered
- Comply with all aspects of the Procurement Integrity Act
- Participate in ethical competitive information gathering
- Thrive in a competitive and fair marketplace
- Comply with laws and FSA policies governing political activities
- Comply with the U.S. Foreign Corrupt Practices Act and similar laws enacted by other countries
- Comply with the applicable laws and regulations in the countries we travel to on business
- Avoid participating and engaging in outside activities that can conflict with FSA's legitimate interests

## **WE ACCEPT AND PROVIDE ONLY APPROPRIATE GIFTS AND ENTERTAINMENT**

We must only give or accept business courtesies that are for business purposes, are modest and infrequent, and are not prohibited by law or the policies that apply to all parties involved. You must never provide gifts, entertainment, or transportation to U.S. Government officials or customers. Exchanging gifts and sharing entertainment in connection with a legitimate business purpose can foster constructive relationships with third parties. However, gifts and entertainment should never affect, or appear to affect, impartial decision-making by FSA employees or anyone else. They should never be offered or received in exchange for preferential treatment.

# WE SAFEGUARD THE

# INFORMATION AND RESOURCES ENTRUSTED TO US



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Proprietary and confidential information has value and gives us a competitive advantage in our market. It deserves staunch protection against unauthorized use or disclosure. Similarly, improper use of assets could negatively affect our existing contracts or customer and have an adverse impact on future contract opportunities.

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George B. Mendiola, Jr.  
FSA President



Exercising integrity and mission understanding means that we communicate truthfully and use information and assets entrusted to us appropriately.

Our employees, teammates, customers, and business partners trust us to safeguard their information and resources, and our country's national security depends on our diligence.

This means that we:

- Use care and discretion to prevent the inadvertent disclosure of private, proprietary, and/or confidential information entrusted to us
- Take appropriate steps to secure sensitive information entrusted to us
- Use our access to company, customer, and employee information appropriately
- Employ appropriate IT security safeguards and do not share customer or FSA proprietary information to personally-owned devices, email addresses, or web storage services

## **WE ALWAYS OPERATE WITH INTEGRITY**

- We only use assets belonging to FSA, its customers, or suppliers for legitimate business purposes; we avoid making incidental personal use of our customers' assets unless we have advance written permission from a manager
- We protect personally identifiable information and personal health information
- We safeguard intellectual property belonging to FSA, customers, and business partners
- We will bring pre-existing intellectual property into FSA only with prior written approval from the Chief Ethics Officer

- We secure FSA, employee, teammate, customer, and business partner data by keeping our computer security systems updated and secure
- We keep assets safe from misuse, loss, damage, or theft. We immediately report any loss or breach, and we follow all required guidelines for the proper disposal of protected information

## **WE COMMUNICATE RESPONSIBLY**

FSA's reputation depends on all employees communicating responsibly within the company and externally. This means that we:

- Refrain from speaking on behalf of FSA unless authorized to do so
- Are mindful of how we use social media, being careful not to damage FSA's reputation
- When we use social media, we comply with this Code of Conduct
- Do not disclose confidential, proprietary, non-public, controlled, or classified information on social media

## **WE PROTECT SENSITIVE AND CLASSIFIED INFORMATION**

Our customers execute our country's most important missions. We are unwavering in our responsibility to protect classified data. We are vigilant in our responsibility to guard the sensitive and classified information we are entrusted with while serving our customers. We are alert to any potential disclosure of sensitive or classified information, whether intentional or not.

## WE PROTECT EMPLOYEE PRIVACY

As an employee, you have the right to expect reasonable privacy regarding your employment information, Personally Identifiable Information (PII) and Protected Health Information (PHI). We take care and exercise caution when collecting and working with PII and PHI. Company personnel and medical records, both electronic and hardcopy, may only be accessed by employees who are authorized and have work-related reasons for doing so.



I'm social media friends with a coworker, and the other day I noticed he posted a series of anti-law enforcement memes. In his profile picture, he's wearing a company t-shirt. Should I say something?



Yes. You may also use any of the disclosure channels outlined on page 7.

# WE AVOID CONFLICTS OF INTEREST

We're all involved in activities outside of work. As an FSA employee, you'll want to be sure yours align with our business interests and policies.

A personal conflict of interest arises when an employee's private interests conflict with their responsibilities to FSA or its customers. We may not realize when our loyalties are divided. Even the mere appearance of a conflict can damage our ethical credibility. That's why it's important to disclose even potential conflicts of interest so they can be objectively reviewed and approved.



## WE MANAGE PERSONAL CONFLICTS OF INTEREST

We cannot use our job at FSA and the information we learn while at work for our personal benefit or to gain outside employment. Submit an Outside Activities Request to the Ethics Office if you'd like to:

- Work for a potential customer, business partner, or competitor, including running a side business that may compete with FSA
- Run for political office
- Serve on a federal, state, or local advisory board or committee

Did you know?

- A small, one-person company can be considered an FSA competitor
- A business can be an FSA competitor even if it does not have any active contracts
- Performing any form of marketing, including maintaining a website, can create a conflict of interest if the business markets to potential FSA customers or provides services similar to those provided by FSA

If you wish to participate in an activity that may pose a potential conflict, you must complete an Outside Activities Request (OAR). The OAR process was developed to allow employees and FSA an opportunity to mitigate any personal conflicts of interest and protect FSA, you as an employee, and our customers. Even part-time employees must obtain advance permission from the Ethics Office before engaging in outside activities. If in doubt, ask questions. Visit the Ethics business function on FSAConnect for additional information, forms, and who to contact.

## WE PARTICIPATE APPROPRIATELY IN POLITICAL ACTIVITIES

We encourage employees to participate in the political process, but laws governing contributions and company participation are complex. Some state and local jurisdictions have enacted Pay-to-Play laws that may affect your personal contributions or even those of your immediate family. If you are unsure of these laws and their implications, please reach out to the Office of the President for guidance.



I'm currently working on a contract for which there are several contracting companies supporting the requirement. I have been approached by one of these companies to support one of their programs. The work would be done after my normal work hours and would not utilize any FSA assets (e.g., FSA phone or computer). Would it be okay for me to accept this offer?



Although you would not be doing work on FSA "time," there is the potential that this other company is an FSA competitor. When confronted with such a situation, you must secure the approval of the FSA Ethics Office before moving forward.

# WE PREPARE

# BUSINESS RECORDS ACCURATELY AND COMMUNICATE RESULTS HONESTLY

Being a government contractor involves a unique set of risks and responsibilities. We expect greater scrutiny regarding our recordkeeping, especially with regard to representations we make to the government. We adhere to the highest standards in our business practices—that includes preparing all business records completely and accurately and communicating that information openly and honestly. At no time do we misrepresent facts or falsify or alter our records and data.



## WE KEEP ACCURATE BUSINESS RECORDS

Business records include physical or electronic documents we create as part of our work. Proper creation and preservation of business records ensures we maintain financial integrity and meet our tax and regulatory requirements. We are all responsible for reporting true and complete information in the business records we prepare, every time.

## WE REPORT OUR TIME HONESTLY AND ACCURATELY

The hours recorded on timesheets are the primary basis for invoices to our customers. Any improper charging of time on customer contracts could be considered fraud and have legal consequences. Honest and accurate charging of your labor hours is of the highest importance. Because contracts differ in their terms and conditions, every FSA employee is responsible for understanding and ensuring the accuracy of all applicable labor reporting. You must charge your time accurately and completely to the contract/project/task order on which you are working. Improper time charging may lead to disciplinary action up to and including termination of employment.

Chart it all. Charge it right. Charge it daily.

If you have any questions regarding time charging processes or procedures, you must obtain clarification from your FSA supervisor, the Finance Department, or the Ethics Office.

## WE SUBMIT ACCURATE EXPENSE REPORTS

All expense reports must be completed accurately. This includes the following key points:

- Charge accurately to the correct charge number
- Charge all costs correctly
- Follow FSA's procedures for expense reporting

Make sure all expenses are permissible by the terms of the contract to which you are billing and have been authorized by your supervisor or are authorized unbillable expenses. If at any time you have a question regarding proper expense charging, contact your FSA supervisor for assistance.

## WE PRACTICE FINANCIAL INTEGRITY

FSA is committed to providing full, fair, accurate, and understandable disclosures in all financial and other reports we file or publish. All records and reports must be prepared with care, accuracy, and honesty and comply with accounting procedures and internal controls. If you believe our records are inaccurate or misleading, you must report it.



I'm often asked by the customer to complete a task at the end of the day, causing me to stay 15–30 minutes late. I never log this since I know the tasks are important for the mission. Even though I'm an hourly paid non-exempt employee, this is good teamwork, right?



Our timekeeping policy requires that you charge all hours worked to the correct charge code. Hourly paid non-exempt employees are entitled to pay for all hours worked. If overtime hours are not authorized, politely let the customer know that you cannot stay late for that reason and offer to complete the task the next workday. You may contact your FSA supervisor for further guidance, if necessary, or use any of the disclosure channels outlined on page 7.

# WE PARTICIPATE IN TRAINING

Our industry is governed by very specific rules, and each one of us has a responsibility to understand and abide by them. FSA's required training equips us with the skills, knowledge, and understanding to anticipate ethical challenges, recognize potential dilemmas, and make sound decisions.

Training is key to ensuring we are knowledgeable about FSA policies, regulations, and legal requirements that apply to our day-to-day jobs.

We complete all required training by the due date.



# WE COOPERATE WITH INVESTIGATIONS

FSA will respond promptly to questions, concerns, and reports of wrongdoing. Investigations are as confidential as possible under the circumstances. It is crucial that we cooperate fully with investigation activities by FSA, as well as outside investigators and regulators.



Effectively working with investigators or regulators as they establish regulations and conduct audits and inspections is critical to maintaining our reputation.

- Contact the Chief Ethics Officer immediately if you receive a request for information from a government official
- Treat regulators professionally, courteously, and respectfully
- Make sure the information you provide is accurate and not misleading
- Do not ignore requests for information, subpoenas, or any other request from a government official; contact the Chief Ethics Officer immediately if you receive such a request
- Consult with the Chief Ethics Officer before you provide information to regulators or law enforcement authorities



# WE REPORT CONCERNS

FSA strives to make our culture **open, honest, and collaborative**. We therefore provide multiple methods of asking ethics and compliance questions or raising concerns. While providing your name with your report helps us investigate and provide you feedback regarding your issue, anonymous reporting is also available to the extent it is allowed by law. You can use any of the following methods to raise a concern, ask a question, or make a report of unethical or illegal activity.



Ethics Hotline: **(855) 216-4828**

Ethics Website: **<https://fsafederal.com/integrity-always/>**

FSACONnect: **<https://fsa365.sharepoint.com/sites/ethics>**

MyADP: **<https://my.adp.com>**

Look for the 🚩 Need Assistance link at the bottom of the screen



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