Code of Conduct

Speak Up!

Listen Up!

Step Up!
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Mission, Vision, Values

Mission
Deliver industry-leading products and services through a national community of organizations that share a common vision to provide employment options for professionals with disabilities.

Vision
All people with a disability have a choice of careers, are celebrated for their abilities and are recognized for creating a more vibrant work environment.

Values
Values are a set of standards that determine attitudes, choices and action. As we position ourselves as a national leader for people with disabilities, these values will help align our organization and culture for mission success.

TRUST
A firm reliance on the transparency, integrity and character of people and process

EMPOWERMENT
Inspire individuals to achieve superior outcomes

PASSION
Intense and unwavering commitment to our mission

INNOVATION
New and better ways to be relevant

STEWARDSHIP
Prudent use and management of our resources

HUMILITY
To serve and learn
When faced with an ethical dilemma or a compliance concern, you have a responsibility to take the action that complies with the law, SourceAmerica’s values and policies.

At times you might be uncertain of the most appropriate action. In those cases, as you are deciding what action to take, answer the questions in this guide to help you determine the most appropriate way to proceed.

If you are still unsure of what to do, you have resources available to you including your manager, your department head, Human Resources representatives, the Chief Legal Officer and Ethics Officer.

NOT SURE?
Contact the Chief Legal Officer for guidance.

NOT SURE?
Talk to your manager, a Human Resources representative, the Chief Legal Officer or Ethics Officer for guidance.

Ask yourself:

Is it legal? YES

Does it comply with Company policy? YES

Is it consistent with SourceAmerica’s values? YES

Could this hurt the Company’s reputation? YES

The action may have serious consequences. DO NOT DO IT.

The decision to move forward appears appropriate.
Introduction to Our Code of Conduct

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

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships
- Full, fair, accurate, timely and understandable disclosure in reports and documents we file with regulatory agencies and in our other public communications
- Compliance with applicable laws, rules and regulations
- The prompt internal reporting of violations of this Code
- Accountability for adherence to this Code

This Code should help guide your conduct in the course of our business. Many of the principles described in this Code are, however, general in nature, and the Code does not cover every situation that may arise. Use common sense and good judgment in applying this Code. If you have any questions about applying the Code, it is your responsibility to seek guidance. This Code is not the exclusive source of guidance and information regarding the conduct of our business.

This code applies to everyone at SourceAmerica (Company), including the Board of Directors and all officers and employees (Team Members). The same high ethical standards apply to all, regardless of job or level in the organization.
Compliance with Laws

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

Speak Up! Listen Up! Step Up!

Speak Up!
SourceAmerica aims to conduct business with the highest standards of ethics, honesty and integrity and recognizes that you have an important role to play in maintaining these standards. You are obligated to report violations of the Code, the law or any other Company policy or procedure. This applies to possible violations where you may have firsthand knowledge or those brought to your attention by a Team Member. If you have questions or concerns, or you need to report a known or suspected violation, you should discuss it with your manager, SourceAmerica’s Ethics Officer or a Human Resources representative. You can also use SourceAmerica’s Ethics Helpline to report your concern confidentially or anonymously.

You may be subject to discipline, up to and including termination, for your failure to do so.

Listen Up!
Leaders, by virtue of their positions of authority, must be ethical role models for all employees, show a commitment to our values through their actions and foster a culture of integrity. All Team Members must promote an environment where compliance is expected and ethical behavior is the norm. You must be alert to any situations or actions that may be unethical or potentially damaging to our reputation.

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

While we work hard to identify, incentivize and reward those who do the right thing, we may also take necessary action when violations occur. This may include reporting relevant violations to the authorities and invoking employment consequences against those who reject our values, allow violations of this Code or engage in other unacceptable conduct. Where such violations occur, improvements shall be openly discussed and implemented, rather than buried or hidden.
Investigations

All internal investigations are conducted promptly and thoroughly by qualified personnel who have been trained to conduct investigations lawfully, professionally, fairly and confidentially. Team Members and leaders should not interfere in internal investigations or engage in their own fact-finding. Rather, you should promptly raise ethics and compliance questions and immediately report suspicious behavior. Team Members and others involved in internal investigations will be treated with dignity and respect. All investigations and any resulting corrective action will be conducted in compliance with applicable law and Company policies.

All Team Members are expected to cooperate in internal investigations, audits, accounting reviews or directions from the Chief Legal Office in connection with lawsuits or government investigative proceedings. Searches of Company-provided physical and information technology resources may be required. Retaliation will not be tolerated against any Team Member who cooperates in these kinds of Company activities. After an investigation is completed, appropriate disciplinary and other corrective action will be taken when warranted by the facts. SourceAmerica may, in appropriate cases and subject to applicable law, notify government authorities and cooperate with any resulting prosecution or other government action. In addition, when legally required or otherwise appropriate, SourceAmerica will timely self-report compliance violations to applicable government authorities and cooperate with any resulting official proceedings.

For more information, see our Internal Investigations Policy.

Anti-Retaliation

Any Team Member who reports a violation will be treated with dignity and respect and will not be subjected to any form of discipline or retaliation for reporting in good faith. Acting in “good faith” means that you provide all the information you have and believe you are giving a sincere and complete report.

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

That a Team Member has raised a concern honestly, or participated in an investigation, cannot be the basis for any adverse employment action, including separation, demotion, suspension, loss of benefits, threats, harassment or discrimination.

If you work with someone who has raised a concern or provided information in an investigation, you should continue to treat the person with courtesy and respect.

However, employees who file false reports or provide evidence that they know to be false will not be protected by policy and may be subject to disciplinary action.

If you feel an act of retaliation has occurred, you should report your concerns via SourceAmerica’s Ethics Helpline or directly to SourceAmerica’s Ethics Officer.

For more information, see our Reporting Suspected Violations and Anti-Retaliation Policy.
Workplace Environment

Respectable Work Environment

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

Diversity

We believe diversity and inclusivity make SourceAmerica better. We believe that we best serve and enrich our culture through the diverse skills, experiences and backgrounds that each of us brings to the Company. Therefore, SourceAmerica maintains a safe and inclusive work environment where all dimensions of difference are valued and respected. We want everyone to feel welcome and able to be their authentic self to create value and drive growth. All employment-related decisions must be based on Company needs, job requirements and individual qualifications. Always take full advantage of what our Team Members have to offer; listen and be inclusive.

We will provide reasonable accommodations to enable any qualified employee with a known disability to perform the essential functions of their job and to enjoy the benefits and privileges of employment equal to those enjoyed by all other similarly situated employees with disabilities so long as that accommodation does not impose undue hardship on SourceAmerica.

For more information, see our Disability and Reasonable Accommodation Policy.
Human Rights and Fair Labor

SourceAmerica does not condone the use of slave labor or human trafficking and denounces any degrading treatment of individuals or unsafe working condition. We are committed to upholding fundamental human rights and believe that all human beings should be treated with dignity, fairness and respect. We ask that our suppliers, affiliated nonprofit agencies and anyone doing business with our Company demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws.

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

For more information, see our Trafficking in Persons Policy.

Harassment

Each of us is responsible for creating a culture of trust and respect that promotes a positive work environment. This means treating one another with fairness and courtesy in all of our interactions in the workplace. We are committed to the principles of equal employment opportunity, inclusion and respect. We prohibit discrimination in employment, employment-related decisions and in business dealings on the basis of an individual's race, national origin, age, color, sex, domestic partner status, sexual orientation, gender identity, disability, or protected veteran status or any other characteristic protected by federal, state or local laws, rules or regulations. We should provide an environment free of discrimination to our associates, customers, affiliates and suppliers.

Harassment is conduct that inappropriately or unreasonably interferes with work performance, diminishes the dignity of any person or creates an intimidating, hostile or otherwise offensive work environment based on an individual's legally protected status. Verbal, visual or physical conduct of a sexual nature is not acceptable in the workplace and may be determined to be sexual harassment. Examples include:

- 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

We prohibit other forms of harassment based on an individual's legally protected status, such as:

- Using slurs or negative stereotyping
- Verbal kidding, teasing or joking
- Intimidating acts, such as bullying or threatening
- Any other conduct that shows hostility toward, disrespect for, or mistreatment of, an individual based on the individual's legally protected status

Harassing conduct in the workplace, such as those described above, is prohibited regardless of whether individuals involved are of the same or different sex, sexual orientation, race or other status.

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

For more information, see our Non-Discrimination and Anti-Harassment Policy.
Personal Relationships

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

For more information, see our Non-Discrimination and Anti-Harassment Policy.

Nonprofit Agency (NPA) Network

The NPA Recommendation Process is the process that SourceAmerica utilizes to make recommendations for the development of project opportunities to be added to the Committee for Purchase From People Who Are Blind or Severely Disabled’s (U.S. AbilityOne® Commission) Procurement List. The NPA Recommendation Process is an integral component of the AbilityOne Program and its related regulations, thus we must follow our process each and every time. We are committed to making recommendations to the U.S. AbilityOne Commission that represent the best interest of the AbilityOne Program and the federal customer.

NPA and Customer Confidential Information

Just as we are careful in protecting our own confidential information and intellectual property, it is equally important for us to protect that of our network and customers. We are responsible for using only the information needed to accomplish our business objective and for storing and safeguarding it in a manner that we would our own and that complies with applicable laws.
Allegations Regarding NPAs
Providing a positive work environment where employees with significant disabilities can grow their skills, contribute and make a positive impact are fundamental values and expectations that both SourceAmerica and the U.S. AbilityOne Commission share. Therefore, when made aware, we promptly respond to allegations regarding unethical or illegal behavior by NPAs by gathering as much information as possible. We then inform the highest level of authority at the NPA of the allegation, discuss next steps and request that they communicate any corrective actions with us, and where appropriate, report the allegation or concerns to the U.S. AbilityOne Commission.

Workplace Health, Safety and Security
SourceAmerica strives to provide a safe and healthy workplace for employees, customers and visitors to its premises. All Team Members have a responsibility to contribute to our Safety Culture. This means we come to work every day looking out for ourselves and those who share our workspace. We speak up about conditions or actions that could lead to accidents. As part of our Safety Culture, we are committed to maintaining industry standards in all areas of employee safety and health, including industrial hygiene, ergonomics and safety. As Team Members, we are responsible for immediately reporting accidents, injuries, occupational illnesses and unsafe practices or conditions.

We are committed to conducting business in an environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities and the environment. We use energy wisely and efficiently and employ best practices to minimize any risk of environmental impact. Team Members whose work involves environmental compliance must be familiar with the legal requirements, such as permits, that apply to their work. All Team Members are responsible for making sure that SourceAmerica business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

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

Substance Abuse
In order to achieve a safe, productive work environment, we strictly prohibit the unlawful manufacture, distribution, possession, sale or use of any controlled substances, as well as abuse of alcoholic beverages and misuse of prescription/over-the-counter drugs on work time or work premises or at any time while representing SourceAmerica’s interest. An exception is provided for moderate and responsible consumption of alcoholic beverages in appropriate situations outside of SourceAmerica premises.

SourceAmerica reserves the right to have any employee tested if there is a reasonable suspicion that he or she is under the influence of drugs or alcohol. If you are using prescription or non-prescription drugs that may impair alertness or judgment, or witness an employee impaired and therefore possibly jeopardizing the safety of others or the Company’s business interests, you should report it immediately.

All information supplied to Human Resources concerning the use of medications will be treated confidentially and will be shared only with staff who have a need to know.
Protecting Assets and Proprietary Information

Physical Property and Assets

Our assets are the resources we use to conduct our business. They include:
- Physical assets, such as office furnishing, equipment and supplies
- Technology assets, such as computer hardware, software and information systems
- Financial assets, such as cash and credit cards
- Our Company’s name, its brand and customer relationships
- Information assets, such as intellectual property, including information about products, services, systems and other data

Company assets should be used for legitimate Company business and appropriately safeguarded against cyber-related attack, theft, loss, waste or abuse. By protecting our assets, we protect our competitive advantage in the marketplace. You have a responsibility to extend the same degree of care to assets entrusted to our Company by others.

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

Never sell, lend or give away SourceAmerica assets, regardless of their condition or value, unless you are authorized to do so.
Privacy

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

Examples of PII include, but are not limited to:
- Name
- Physical Address
- Email Address
- Date and Place of Birth
- Mother's Maiden Name
- Social Security Number
- Bank Account Numbers
- Credit Card Numbers

We will only collect, access, use or disclose personal data for appropriate business purposes and will only use a minimum amount of personal data needed to accomplish a task. We will take reasonable steps to properly secure personal data at all times.

You should be mindful of your responsibilities to handle PII for legitimate business purposes only and to protect the information in accordance with written policy. PII gained in the course of your work must not be shared with anyone, either inside or outside the Company, who does not have a legitimate business reason to know it.

Employees who handle PII of others must:
- Act in accordance with applicable law
- Act in accordance with any relevant contractual obligations
- Collect, use and process such information only for legitimate business purposes
- Limit access to the information to those who have a legitimate business purpose for seeing the information
- Take care to prevent unauthorized disclosure

For more information, see our Privacy Policy.

Company Confidential Information and Intellectual Property

We have a special responsibility to safeguard the confidential information and intellectual property of our Company. Confidential information can be written, oral, telephonic or electronic data and can come from a variety of sources.

Confidential information can include:
- Payroll Data
- Credit Card Numbers
- Social Security Numbers
- Customer Lists
- Supplier Lists
- Pricing Data
- Accounts Payable Information
- Strategic Alliance Agreements
- Internal Audit Reports
- Internal Processes and Procedures

Intellectual property can include:
- Patents
- Trademarks
- Logos
- Copyrights
- New Technology Information
- Business Strategies
- NPA Recommendation Process
- Marketing Timetables
- Development Plans
- Computer Software and Programs
- Inventions
- Discovery
- Designs
- Trade Secrets
Confidential Information
Company confidential information, when discussed internally, must be done so on a strict need to know basis. Confidential information is not intended for distribution outside of the Company. You are required to take proper precautions to secure it and ensure that you only access what is necessary to meet business needs or to comply with applicable federal and state laws and with SourceAmerica policies and procedures. You should mark confidential information properly. If you have questions regarding marking documents, please consult the SourceAmerica Template Decision Tree. If the information is not properly marked, but is still confidential in nature, it should be treated as such.

If there is a legitimate business need to disclose SourceAmerica confidential information to any third party outside of the Company, prior to disclosure there must be a fully executed non-disclosure agreement (NDA) between SourceAmerica and the third party. SourceAmerica NDAs can be requested through the Procurement Department as well as the Contract Management Department through its Intranet page. An NDA may not be required if the confidential information must be disclosed as required by applicable federal or state law. In those instances, there must be a legitimate business need and you must contact the Legal Department prior to any disclosure. Additionally, you have a responsibility to protect confidential information disclosed to you under an NDA from a customer or NPA.

If it is suspected that confidential information has been lost or disclosed to unauthorized parties, you must notify the information owner, your Vice President and the Ethics Officer immediately.

Your responsibility to protect this confidential information also applies to information from your prior employer before coming to SourceAmerica. Any confidential information from a prior employer should not be disclosed unless it has already been made public through no action of your own.

Similarly, when leaving SourceAmerica, no such information can be taken whether in paper or electronic form or any other format, nor can confidential information or intellectual property be retained, misused or disclosed after employment.

Intellectual Property
SourceAmerica owns and has exclusive rights to any invention, discovery, concept, process, work, patent, copyright, trademark or other intellectual property you develop in the course of your employment with the Company. SourceAmerica asserts the legal ownership of the contents of all information systems under its control and reserves the right to access and use this information at its discretion.

Team Members may be directed to document innovations, maintain records of attempted solutions regardless of success and collaborate with the Chief Legal Officer throughout the stages of intellectual property development to manage the safeguarding, registration and potential public disclosure or use of the intellectual property.

For more information, please refer to the Intellectual Property Policy.
Records Management

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

The Chief Legal Officer occasionally may issue Preservation Orders notifying you to preserve certain records in the case of an actual or threatened litigation or government investigation. Team Members must abide by the directions contained in these Preservation Orders, as failure to do so could subject the Company and employees to serious legal risks.

For more information, see our Information Governance Policy and the Document Retention and Destruction Schedule.

Information Systems

The information and communication technologies we use every day to conduct our business make up SourceAmerica’s information systems and are critical to the work we perform. This includes, but is not limited to, all computers, emails, voicemail, Intranet, Internet, network systems, and devices that store electronic data that is owned by or administered by SourceAmerica. All information created, sent, received, downloaded or stored on our information systems is Company property.

We reserve the right to monitor, access and disclose communications and information as we deem appropriate, subject to applicable laws and regulations. You should not have any expectation of privacy when using Company resources.

Any and all work that you do (for example, emails, voicemails, letters, reports, computer files, Jabber messages, etc.) using our information systems may be disclosed internally where a business need exists. This could include, for example, internal audits to protect employees and users, and to investigate suspected employee misconduct. Additionally, this work could be disclosed externally, for example, in response to litigation, a subpoena or a warrant. Therefore, you are expected to use our information system wisely and to exercise thoughtful consideration, good judgment and integrity when creating and sending work product, emails and voicemails.

It is up to you to protect our information systems. You must follow all applicable Company policies regarding the creation, storage and changing of passwords; the use of approved external storage devices; and the prohibition of installing, removing or changing software and system settings that are not allowed.

You must also use extreme caution in opening email attachments from unknown or suspicious senders. Any activity that jeopardizes our information systems (for example, detected viruses, spam, etc.) must be immediately reported to the HelpDesk, and all policy violations must be reported to the Ethics Officer and Vice President of Information Technology.

For more information, see our Acceptable Use Policy.
Social Media

Social media has become an effective tool in how SourceAmerica conducts business, both inside and outside the Company. It enables us to learn from and share information with our NPA community and to communicate with government decision-makers and the public about our mission. When using social media as part of your job or on personal time, it is important that you make responsible decisions while following relevant SourceAmerica policies.

In addition to following all SourceAmerica policies, a general rule to remember is to think about the effect or impact your statements might have. Keep in mind that your social media postings are permanent and easily transferable and can affect SourceAmerica’s reputation and your relationships in the workplace.

When posting on internal sites, your posts should be respectful and follow all applicable Company guidelines and policies. Also, remember that your posts to the internal sites are not private conversations and can be read by everyone, so exercise good judgment and common sense when posting.

For more information, see Community Rules and Etiquette and Privacy Guidelines on the Source.

In your own personal social media interactions, if you mention or express an opinion about SourceAmerica or write about work-related activities, you must include a disclaimer that states that those are your opinions alone and that you are speaking for yourself and not on behalf of SourceAmerica. Additionally, you must never post confidential information about SourceAmerica, colleagues or SourceAmerica’s customers, NPAs, suppliers or business partners regardless of whether you identify yourself as a SourceAmerica employee or not. The above does not prohibit activities protected by Section 7 of the National Labor Relations Act, such as employees’ rights to discuss terms and conditions of employment or to seek public support during a labor dispute.

For more information, see our Social Media Policy.
Accurate and reliable records are crucial to our business. We are committed to maintaining accurate Company records and accounts to ensure legal and ethical business practices and to prevent fraudulent activities. The U.S. AbilityOne Commission counts on us to use and provide accurate information so they can make good decisions. We are responsible for helping ensure that the information we record, process and analyze is accurate, in accordance with applicable legal or accounting principles. We also need to ensure that it is made secure and readily available to those with a need to know the information on a timely basis.

**Examples of prohibited activities:**
- Maintaining undisclosed or unrecorded funds or assets for any purpose
- Making or asking others to make false, misleading or artificial entries on an expense report, time sheet or any other report
- Giving false quality or safety results
- Recording false sales or recording sales outside of the time period they actually occurred
- Understating or overstating known liabilities and assets
- Delaying the entry of items that should be current expenses
- Hiding the true nature of any transaction
- Providing inaccurate or misleading information for Company benefit programs
We must ensure that the accounting and financial records of our Company meet the highest standards of accuracy and completeness. Reporting accurate, complete and understandable information about our business, earnings and financial condition is an essential responsibility of each employee.

It is also your responsibility as an employee of our Company to make open and full disclosure to, and cooperate fully with, outside accountants in connection with any audit or review of our Company’s financial statements. If you have a reason to believe that any of our Company’s books and records are being maintained in a materially inaccurate or incomplete manner, you are required to report this immediately to the Ethics Officer or SourceAmerica’s Ethics Helpline.

We rely on you to come forward if you feel that you are being pressured to prepare, alter, conceal or destroy documents in violation of our Company policy. In addition, you must report to any of the individuals mentioned above if you have any reason to believe that someone has made a misleading, incomplete or false statement to an accountant, auditor, attorney or government official in connection with any investigation, audit, examination or filing with any government agency or regulatory body.

**Interactions with the Government**

Our work sometimes involves working closely with government entities. You are responsible for knowing and following all Company policies, laws, rules and regulations that govern those interactions. These rules may be stricter and more complex than those governing interactions with nongovernmental entities.

Any conduct that could appear improper should be avoided when dealing with government officials and employees. Payments, gifts, meals or other favors given to a government official or employee are strictly prohibited by SourceAmerica policy, as it may appear to be a means of influence or a kickback. Failure to avoid these activities may expose the government agency, the government employee, our Company and you to substantial fines and penalties. As further guidance:

- Always be honest and accurate in all dealings with government officials and government agencies
- Ensure certifications and representations made in connection with government contracts and subcontracts are current, accurate and complete
- Never seek or obtain confidential information about a government purchase or contract, including information about a competitor’s bid or proposal or the agency’s selection process before the award of a contract

Employees may not use government property, including computer systems and individual electronic devices, for commercial purposes, to send solicitations, lobby or engage in prohibited political activity, or for activities that are illegal, inappropriate or offensive to fellow employees or the public. We must properly manage, use and account for all government property that is issued or acquired in the performance of a given contract and in accordance with applicable regulations as well as any guidance or directives issued by our government customer. You should be mindful of your responsibilities to make an honest effort to use government property for official business only and to protect and conserve government property.

We must follow all applicable rules and regulations that govern how we engage current or former government employees in discussions about potential job opportunities at SourceAmerica, whether as an employee or consultant. You must not conduct any discussions regarding, or make any offer or promise of, future employment or business opportunity to any government official.

For more information, see our Hiring & Recruiting Current and Former Government Employees Policy.
Speaking on Behalf of the Company

It is important that public statements given on behalf of the Company are accurate, consistent and concise; that they adhere to the Company’s branding and messaging strategy; and that they are given by authorized Team Members only. The Communications team will facilitate that continuity and consistency using the proper communications channels. If you are asked for any information by an outside party, such as a member of Congress, a journalist, a financial analyst or attorney, please direct these inquiries immediately to the Communications team at communications@sourceamerica.org. Do not provide “off-the-record” statements under any circumstances.

Be mindful that when speaking about our business at industry events or on expert panels, you may be perceived as someone who is representing or speaking for SourceAmerica. Be aware that what you say could be attributed to SourceAmerica and possibly quoted by the media without your express knowledge or consent.

For more information, see our Media Policy.

Political Activities

We understand the many ways in which Team Members express their fundamental right of freedom of belief and are actively involved in personal political and charitable activities. However, when we participate in those personal activities, we should do so on our own time and at our own expense, and we should ensure that our activities do not interfere with our work, do not involve the use of Company property and do not conflict with the Code.

Lobbying activities (seeking to influence a politician or public official on an issue) are highly regulated, and we must not make any contact with government officials to influence legislation, regulation, policy or other governmental actions on SourceAmerica’s behalf without authorization from the Government Affairs department.

We will comply with all statutory and regulatory requirements relating to lobbying activities, including, but not limited to, the Lobbying Disclosure Act of 1995, as amended by the Honest Leadership and Open Government Act of 2007, as well as the gift and travel rules of the House, Senate and Executive Branch.

Failure to comply with the Lobbying Disclosure Act may result in civil penalties of up to $200,000. Criminal penalties may be imposed for knowingly and corruptly failing to comply with the law, including up to five years in prison and/or criminal fines under the federal criminal code.

For more information, see our Lobbying Policy.
Conflicts of Interest

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

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

While it is impossible to list all activities that could pose a conflict of interest, the following are common examples:

- **Financial Interest:** Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business or competes with our Company.
- **Outside Employment:** Holding a second job that interferes with your ability to perform your regular job.
- **Board Memberships:** Employing, consulting or serving on the board of a competitor, customer, supplier, affiliated nonprofit agency or other service provider.
- **Employment of Relatives and Friends:** Hiring a supplier, distributor or other agent managed or owned by a relative or close friend.
- **Gifts and Entertainment:** Soliciting or accepting any cash, gifts, entertainment or benefits in any value from any competitor, supplier or customer.
- **Corporate Opportunities:** Taking personal advantage of corporate opportunities.

Team Members must avoid any relationship or activity that would make it difficult to perform our duties and responsibilities to SourceAmerica objectively and effectively. We must never use Company property or non-public Company information for personal gain or allow a relationship or activity to impede our duty.

Conflicts may also be created when a member of your household or immediate family member is the individual involved.

We must avoid any investments in any business, including the businesses of SourceAmerica’s customers, suppliers or competitors, that could cause divided loyalty or the appearance of divided loyalty.

Team Members who have investments in the businesses of customers, suppliers or competitors or who plan to make such investments must file a disclosure form. As a general rule, a Team Member’s investment in securities traded on a recognized stock exchange does not create a conflict of interest provided the securities are purchased on the same terms and with the same information available to the general public.

You must never compete with SourceAmerica. You must not personally exploit any business opportunity in which you know or reasonably should know SourceAmerica is or would be interested, nor help anyone else, including family members and friends, to do so.

You must ensure that any outside employment, including work with or for an outside professional organization, does not create a conflict of interest. This could include accepting employment or affiliation with a competitor to SourceAmerica or with a firm or entity that you have reason to believe may be a prospective competitor.

Additionally, no Team Member may accept honorarium or speaking fees, nor receive compensation for consultations that draw upon ideas or data derived from their official duties at SourceAmerica. You must never use SourceAmerica’s materials, facilities or resources to conduct non-SourceAmerica business.
You must ensure that you avoid participating in any potential or existing SourceAmerica business relationships that involve your spouse, immediate family or close friends. The mere situation of having an immediate family member or close friend working for or being a business partner of SourceAmerica does not mean there is an actual conflict of interest. However, if you are involved in that business relationship (for example, managing, bidding, negotiating or contracting with, etc.) it can be sensitive and should be disclosed to the Ethics Officer should that situation arise.

You must avoid accepting any improper benefits that could be provided to us by the mere nature of our position at SourceAmerica or to immediate family members by people and entities with which we do business. Such benefits could come in the form of gifts, loans, invitations or other means through which an external party seeks to bestow anything of value upon you or your immediate family members.

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

For more information, see our Conflict of Interest Policy.

Fraud and Anti-Kickback

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

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

It is the responsibility of all Team Members to immediately report suspected fraudulent activity or any knowledge of kickbacks, either directly to the Chief Legal Officer or Ethics Officer or via SourceAmerica’s Ethics Helpline, if the individual wants to remain anonymous. (See Reporting Suspected Violations and Anti-Retaliation Policy for more detail).

Due to the sensitive nature of these types of violations, Team Members should not, under any circumstance, investigate suspected violations on their own.

For more information, see our Fraud and Anti-Kickback Policy.

Anti-Trust

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

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

Attempts to discriminate in prices or terms of sale among our customers, or to otherwise restrict the freedom of our customers to compete, could be illegal. Legal issues may also arise if we refuse to deal with certain customers or competitors, a practice known as “boycotting.”

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

We will not collaborate with competitors. When working with a competitor on a “multi-source” contract, we will limit our use of the competitor’s information to purposes legitimately related to the contract for which it was made available.

We will Speak Up through established channels if we become aware of a situation that gives even the appearance of anticompetitive behavior.

For more information, see our Anti-Trust and Anti-Competitive Behavior Policy.

False Claims

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

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

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

For more information, see False Claims Act in 31 U.S.C.§§ 3729-3733.

Procurement

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

You must not solicit or accept any proprietary or source selection information during any procurement action. Proprietary information can include, but is not limited to, items such as cost or pricing data or any information within a competitor’s bid or proposal they have designated as proprietary. Source selection information includes items such as listings of offerors and prices, bidders prior to bid opening, technical evaluations or proposals, source selection board reports and evaluations, and recommendations.

For more information, see Procurement Integrity Act in 41 U.S.C. §§ 2101-07.

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

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

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

All SourceAmerica employees with purchasing authority must comply with the requirements contained in the Procurement Policy.

For more information, see our Procurement Policy and our Contract Management Policy.

Gifts and Entertainment

The exchange of gifts and entertainment can build goodwill in business relationships, but some gifts and entertainment can create improper influence or the appearance of impropriety.

Team Members may not give or receive a business courtesy that violates the law, regulations, contracts or agreements, or SourceAmerica's policies.

Gifts should not be accepted from suppliers and business partners or potential suppliers and business partners during or in connection with contract negotiations with the supplier.

Gifts intended for personal use that are marked with SourceAmerica or the AbilityOne logo are generally appropriate.

Never offer, provide or approve any gifts or entertainment to government officials and employees.

For more information, see our Gifts and Entertainment Policy.
Internal Controls

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

All Team Members must familiarize themselves with all applicable internal control policies.

SourceAmerica Internal Control Policies
(this list is not exclusive)
- Gifts and Entertainment Policy
- Fraud and Anti-Kickback Policy
- Trafficking in Persons Policy
- Anti-Trust and Anti-Competitive Behavior Policy
- Conflict of Interest Policy
- Privacy Policy
- Intellectual Property Policy
- Internal Investigations Policy
- Reporting Suspected Violations & Anti-Retaliation Policy
- Hiring & Recruiting Current and Former Government Employees Policy
- Procurement Policy
- Non-Discrimination and Anti-Harassment Policy
- Contract Management Policy
- Lobbying Policy
- Acceptable Use Policy
Business Integrity Decision Guide

Stop. Think.
Identify the situation or conduct...
Consider what ethical issue or challenge it is...

At times you may be uncertain of the most appropriate action. In those cases, as you are deciding what action to take, use this guide to help you determine the most appropriate way to proceed.

If you think you may have an ethical issue or challenge, ask yourself:

Does the issue involve an NPA in our network?

YES
Contact Ethics Officer*

NO
Please consult the decision guide on the next page.

Does the issue involve litigation, allegations or knowledge of violation of federal law?

YES

NO
Consult with your chain of command for potential follow-up with NPA.

* Time Sensitive
Is there an appearance of impropriety? 

YES Stop Contact Ethics Officer*

NO

Have you consulted the Code of Conduct? 

YES, but my question was not answered. 

Did you check to see if SourceAmerica has a policy that covers your topic? 

YES 

Does it violate Code of Conduct or SourceAmerica policy? 

YES 

Did you speak with your manager? 

YES, but my question still was not answered. 

NO 

All clear. OK to proceed. 

YES, and he/she is OK with it. 

NO 

Please speak with your manager or reach out to SourceAmerica internal resources in Ethics or Human Resources. 

NO 

Were you able to answer your question, either from the Code of Conduct or a policy? 

YES Well done! You have used available resources to solve your question. 

NO 

Please check the Code of Conduct and search for relevant policies via The Source. 

NO