



# Code of Ethics Policy



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Dear Employees:

IntelliGenesis prides itself in maintaining strong ethical standards in the course of our day-to-day business dealings and financial transactions. As employees of IntelliGenesis, we expect the same standards of conduct from all of you. Our reputation is everything – the source not only of our pride, but the backbone of our business.

It is important to understand that we have a unique position in the Intelligence Community and that we cannot tolerate any unlawful or unethical behavior. It is not only our responsibility to always maintain integrity in all our business transactions for the Company, but personally as well. We must hold ourselves accountable and maintain integrity in and out of the work-place.

IntelliGenesis is committed to fostering a culture that not only upholds the ideals of respect and dignity in our country and global communities, but also promotes the health, wellness and safety of our employees. We believe that by starting *within* and serving as an example, our message of integrity, responsibility, respect and diversity will have a positive impact on the lives of our employees. We are dedicated to providing a safe working environment, superior health benefits and flexible scheduling that will assist our employees in finding and maintaining a work/life balance. Simply put, we are what we do. By showing respect for others, the law and our community we earn and maintain the confidence of our customers and industry partners.

In order to maintain high level of ethical standards, we have established a Code of Ethics which outlines and describes the behavior we expect from all our employees. Employees are expected to follow these rules and ask questions when confused or if they believe a violation has occurred. Each year we will update the manual and share those updates with you. It will be your responsibility to certify that you have read, understood and will comply with our Code of Ethics.

To administer this program, I have appointed Kendra Gears as our Ethics Officer. She will be responsible for implementing the policy and procedures outlined in this manual, as well as ensuring everyone has reviewed and certified on an annual basis. Additionally, she will be responsible for any training that occurs as well as enforcing our policies and procedures during an investigation for violations of our Ethics Code. Ms. Gears will report to the Ethics Committee, comprised of Senior Management personnel, and as such, she has our full support and cooperation. However, please know that at any time you have a question regarding this or any other Company policy, my door is always open.

We believe that adherence to our Code of Ethics will ensure our continued success.

Sincerely,

Angie Lienert  
President & CEO

# Chapter 1: Introduction

**What is Ethics and why do we have a policy dedicated to it?** Ethics, simply defined, means doing the right thing – even if no one is watching. A broader definition may include words such as integrity, honesty, morals or principles. As contractors, providing goods and services to the Government, we have an obligation to our country and community to maintain the highest level of ethical behavior in all our business dealings – be it with a government customer, our business partners, suppliers and/or our employees. Ethical behavior, while a seemingly simple concept, does not always mean the same thing for a government contractor as it does for a commercial company. For instance, some actions that are completely acceptable and encouraged in the commercial world could be damaging in the government contractor arena.

The government, which is responsible for spending billions of tax payers' dollars, has an obligation to the citizens it serves. To ensure transparency and accountability when purchasing goods and services, the government's response was to create laws and regulations that established guidelines regarding ethical practices and standards of conduct. At IntelliGenesis, we believe our employees are our greatest asset and we want to do our best to provide the knowledge, experiences, training and tools to ensure your success. This Code of Ethics is designed to discuss, in detail, many of the specific laws and regulations that we are legally bound to follow, and also IntelliGenesis' own stance on ethical behavior and what it means to us.

The Ethics program consists of an Ethics Policy, Internal Training, Internal Control Systems and when necessary, investigation of Suspected Ethics Violations and Corrective Action. All employees should familiarize themselves with the ethics guidelines that follow. If at any time, you have any questions, suggestions or concerns, please feel free to reach out to your manager, our Ethic's Officer or the anonymous Hotline number located at the end of this handbook.

We note that this Ethics Policy does not necessarily create a contractual relationship where none already exists.

## **Definitions**

Code of Ethical Conduct:	The written statement of acceptable behavior by the company's directors, management and employees that ensures that IntelliGenesis operates according to the highest ethical standards.
Ethics Officer:	The company official designated by the President/CEO to be responsible for implementing and administering the Code of Ethical Conduct. In the case, where the Ethics Officer is not available, the President will be responsible for implementing and administering the Code of Ethical Conduct.
Ethics/Compliance Program:	The written policies used by the company that are designed to ensure that all directors, managers and employees are aware of the Code of Ethical Conduct and adhere to the standards. This program is implemented and administered by the Ethics Officer.
Employee:	Any person employed by or otherwise working for

IntelliGenesis, including managers, directors, employees or any persons authorized to act on behalf of the company. We note that utilization of the term “employee” is for convenience purposes herein and is not meant to confer an employer/employee relationship where one does not already exist.

**Core Values**

IntelliGenesis’ Core Values define our corporate culture from the way we conduct business to how we govern our decisions. They are the basis for our organization and build on the basic values of integrity, responsibility, respect, and diversity.

**Mission**

To enrich our customers’ missions by directly applying our multi-disciplined analysts, mission-focused software developers, and machine learning data scientists to solve the most difficult challenges. Our dedication to our employees reinforces our commitment to mission success and our ability to collaborate and innovate strengthens our partnership with our customers.

**Innovation**

We invest corporately in Internal Research and Development (IR&D) to seek out better, more efficient approaches to the services we provide; identify solutions to our customers’ most difficult challenges; and stay current using cutting edge technologies.

**Passion**

We demonstrate passion and dedication in all we do. We feel a great sense of pride knowing that we are directly and indirectly responsible for protecting National Security resources and Intelligence Community missions.

**Commitment**

We pledge to provide the best services, technologies, methodologies, and value to our customer. We demonstrate our commitment through the quality of dedication in the services we provide to the Intelligence Community mission, our family-friendly corporate culture, our involvement in local and national organizations and charities, as well as our loyalty and support to our troops worldwide.

**Purpose**

The intent of this policy is to establish a culture of openness, trust and integrity in our business practices. All employees are obligated to comply with all applicable laws in a manner that excludes considerations of personal advantage or gain. Effective ethics is a team effort involving the participation and support of every employee.

# Chapter 2: Code of Conduct Overview

IntelliGenesis prides itself on maintaining the highest standards of ethical conduct and fair dealings. Although no list advocating ethical behavior and cautioning against misconduct could ever cover every circumstance, the following Code of Conduct has been designed to protect both IntelliGenesis and our customers.

Under this code each employee shall do all of the following listed below. While these are the overarching ideas that comprise our Code of Ethics Policy, more in-depth and comprehensive discussions are detailed in the following sections.

❖ Conduct all aspects of company business in an honest, ethical, and legal manner and obey the laws of the United States and of every state and locality where we conduct business.	❖ Protect and maintain confidential information that belongs to IntelliGenesis, its customers, suppliers, and fellow workers.
❖ Conduct work on behalf of IntelliGenesis with customers, suppliers, fellow employees, and the public with the highest standards of honesty, integrity, and fairness.	❖ Ensure that all financial transactions and other documentation are handled honestly and recorded accurately. This commitment extends to the reporting and charging of time.
❖ Be responsible for his/her actions and their consequences. No one will be excused from misconduct because another person ordered or asked the employee to participate in misconduct.	❖ Avoid conflicts of interest, both real and perceived. Conflicts of interest are those outside activities or personal interests that could influence or interfere with objective decisions made in the performance of your responsibilities.
❖ Alert his/her company manager or senior management whenever he/she observes, learns of, or suspects any dishonest, destructive, or illegal act.	❖ Recognize that even the appearance of misconduct or improper behavior can be very damaging to our reputation and you will act to prevent such appearances.
❖ Respect the rights of all employees to fair treatment and equal opportunity without illegal discrimination or harassment of any type	❖ Encourage open dialogue, give/receive honest and objective feedback, and support ethical behavior.
❖ Cooperate fully in any investigation of misconduct.	❖ All employees will ensure all oral and written communication relays the most accurate, complete and timely information

# Chapter 3: Security & Privacy

## Confidential Information

Employees should be aware that the Company's operations, activities, and business affairs are confidential and must be treated as confidential. During employment with IntelliGenesis, you are likely to acquire confidential and/or proprietary information.

Proprietary information includes financial, personnel, technical, or business information owned or possessed by IntelliGenesis, its government customer or business partners. You are required to handle such information in strict confidence and not to discuss it with anyone outside IntelliGenesis or with any employees of IntelliGenesis who do not have a legitimate business reason and need to know the information. Employees are responsible for the security of all such information. Information on IntelliGenesis databases and all other information on IntelliGenesis computers belong to the Company and are confidential and proprietary to IntelliGenesis.

Your employment with IntelliGenesis assumes an obligation to maintain confidentiality, even if your employment with IntelliGenesis ends.

## Intellectual Property

Employees may be involved in creating or handling Intellectual Property – either that of the Company's or for our customers. Intellectual Property is defined as all new ideas, know-how, concepts, software, or inventions (together, the "intellectual property") that are developed or conceived of while an IntelliGenesis employee and that relate to its business and can be covered under state or federal trade secrets law or applicable federal laws concerning patents, trademarks, and copyrights. Intellectual property, covered by U.S. copyright law, will be considered "work for hire" under the U.S. Copyright Act or similar laws. Employees will not use or disclose any intellectual property to anyone else.

## Record Retention

Employees must comply with the requirements of the IntelliGenesis records retention policy related to the retention, safeguarding, and disposition of records, including electronic records. It is unlawful to destroy, conceal, alter, or falsify any record, document, or object for the purpose of obstructing or influencing any lawsuit or other legal, regulatory, or governmental proceeding or investigation.

## Record Retention Policy:

- ❖ Personnel Records: 7 years after termination
- ❖ Medical/Benefits Records: 6 years after plan year
- ❖ I-9 Records: 3 years after termination
- ❖ Hiring Records: 2 years after hiring decisions
- ❖ Contract related materials, 4 years *after* contract close out.

## Procurement Integrity Act

The unauthorized receipt or use of government source selection sensitive data or competitor proprietary data is strictly forbidden. The unauthorized receipt or use of source selection sensitive data or competitor proprietary data could subject the Company to fines, contract termination, suspension or debarment and individuals to criminal prosecution. The knowledgeable receipt or use of such unauthorized data is a violation of law. Some examples of this data are; obtaining or disclosing bid prices; source-selection plans related to current or future federal procurement; and, any documents marked with the legend: "*SOURCE SELECTION INFORMATION — See FAR 2.101 and 3.104.*" Any employee who comes into possession of any of the above data, marked or unmarked, should immediately contact IntelliGenesis' Ethics Officer. This law also prohibits engaging in



employment discussions with, employing, or providing compensation to certain former government procurement or contract professionals.

### **Misleading Communication**

All communication from an employee in performance of their job, must be accurate, complete and timely. If an employee realizes that the information they have transmitted either through verbal communication or written document is inaccurate, the employee must take immediate action to correct the mistake. Regardless of the severity, the employee must always report any inaccurate communication to their immediate supervisor. If warranted, the manager may report it to the Ethics Officer for their review. Any employee who knowingly makes a false, inaccurate or misleading communication will be disciplined accordingly.

### **Statements & Certifications**

All statements, representations and certifications made on behalf of IntelliGenesis must be accurate, truthful, and timely. Any statements that are false, factitious, or fraudulent may not only subject IntelliGenesis to criminal liability, but the employee as well. The Company could be suspended and disbarred and the employee could be imprisoned up to five years, pay fines and / or restitution.

Employees who are routinely required to certify the Company in contractual matters, such as environment, safety, and personnel information must ensure that all certifications are accurate, not missing pertinent details nor misleading in nature.

# **Chapter 4: Business Code of Conduct**

Employees shall conduct all aspects of Company business in an honest, ethical, and legal manner and obey the laws of the United States and of every state and locality where we conduct business.

Government contractors are bound by the rules and regulations established in the Federal Acquisition Regulation (FAR) where applicable. The FAR, and related regulations, describe the entire procurement process that the (non Department of Defense) Federal government and those companies that supply goods and services must abide in order to do business. It is one of the many doctrines established by the government to ensure oversight and transparency for and during all transactions. As a government contractor, we are also responsible for abiding by FAR rules and regulations where applicable. Below are areas of conflict, that are specific to government contracting, and separates IntelliGenesis from private industry.

## **Avoid Personal Conflicts of Interest**

Avoid conflicts of interest, both real *and* perceived. Conflicts of interest are those outside activities or personal interests that could influence or interfere with objective decisions made in the performance of your responsibilities. Most often we hear of a conflict of interest when an employee benefits financially during the evaluation, selection or management of a supplier. However, this is not the only type of conflict of interest and employees should recognize whenever they are putting their personal interests ahead of the company. It is our responsibility, as purveyors of IntelliGenesis, to always maintain fairness and integrity in all our business dealings.

## **Refrain from Recruitment (Hiring) of Government Personnel**

It is imperative that IntelliGenesis does not engage in any discussions regarding employment opportunities with current federal government employees, including military personnel, that are involved with or has participated in a procurement in which IntelliGenesis is also a bidder. This restriction is not only on formal discussions, such as benefits and compensation, but any informal discussions that take place in the hallways, cafeteria, symposiums and conferences.

## **Avoid Organization Conflict of Interest**

Organizational Conflict of Interests (OCIs) arise when a company has the ability to serve in conflicting roles, such as evaluator *and* bidder. For example, if IntelliGenesis is performing advisory roles and providing engineering and technical support to the government customer, and in turn, recommends or manufactures the work to be geared toward its own services and products, this is considered an OCI. IntelliGenesis will always strive for the highest of ethical standards by providing non-bias and objective judgements that do not in any way create an unfair competitive advantage. If we do provide advisory services we will take appropriate mitigation efforts to prevent an OCI from occurring.

## **Avoid Gifts & Gratuities**

Giving and receiving gifts and gratuities (or even the perception of) is not an acceptable practice in our industry. Employees should never receive nor give gifts or gratuities to any of our government customers or industry partners. Our reputation is our livelihood. An important part of our reputation is that we work hard and stand on the quality of services and products. There shall never be the perception that our success was due to preferential treatment or favoritism. Not only is this unethical, it is illegal.

## **Participate in Kickbacks, Fraud and**

## **Proposal Preparation and Contract**

<p><b>Bribes</b></p> <p>Along with receiving and giving gift and gratuities, the Anti-Kickback law prohibits employees from providing or accepting money, fees, commissions, credit, things of value or compensation of any kind to any public official or third party in connection with improperly obtaining or rewarding favorable treatment in connection with a prime (or subcontract with a prime contract) with the U.S. government. This also includes receiving of any kickbacks from customers, vendors or subcontractors or industry partners. Additionally, it is against company policy and the law to participate in any acts of fraud, bribery or corruption when conducting business on behalf of IntelliGenesis.</p>	<p><b>Negotiation</b></p> <p>The preparation of proposals for the U.S. Government for prime contracts or subcontracts and the negotiation of such contracts/subcontracts must be in compliance with all U.S. Government contracting laws and regulations. Employees involved in the negotiation of contracts or subcontracts must review and fully understand and execute in good faith all required representations and certifications. If cost of pricing data is required, the employees must ensure that all cost or pricing data are disclosed and are current, accurate and complete on the date of price agreement as required by the Truthful Cost or Pricing Data Act (formerly Truth in Negotiations Act). Any questions about compliance with the certification or representations required by a solicitation should be directed to the Contracts Manager or Executive Officers of the Company.</p>
<p><b>Anti-Human Trafficking Laws</b></p> <p>IntelliGenesis encourages the diversity of our workforce, community and country and believes that all people deserve fundamental human rights and respect. Employees, whether they are working in the United States or abroad must always conduct themselves in the highest level of ethical behavior and be mindful and respectful of others.</p> <p>IntelliGenesis supports Federal Anti-Trafficking Laws through awareness and education as a way of prevention to our employees and by only partnering with companies that partake in Anti-Trafficking policies and procedures. Human Trafficking, in its most severe forms involves the exploitation of persons either through sex or labor (“recruitment, harboring, transportation, provision, obtaining patronizing or soliciting of any persons through the use of force, fraud or coercion”) for the purpose of sex acts or involuntary servitude (22 USC §7102).</p>	<p><b>Conflict Minerals Reporting</b></p> <p>Although IntelliGenesis is a company that prides itself in providing exceptional services to our customers, we do recognize the issue regarding the use and purchase of Conflicts Minerals by our product producing industry partners and suppliers. Conflicts Minerals, also known as 3TGs, are cassiterite (tin), wolframite (tungsten), coltan (tantalum) and gold ore which are mined, extracted, and sold by armed groups from the Congo. By purchasing these raw materials, the consumer contributes to the cycle of civil conflict that leads to inhumane working conditions, violence and death. IntelliGenesis does not willingly nor knowingly conduct business with companies that use Conflicts Minerals in its supply chain.</p>

# **Chapter 5: Time & Expense Reporting**

## **Time Charging**

Employees will provide accurate, timely, and well documented information when providing personal information, to include hours worked, in compliance with U.S. Government laws and regulations. It is the responsibility of employees to ensure that their labor costs are properly recorded and to ensure that no improper or false entries are made. Employees are required to complete daily time records and are responsible for ensuring that the information included on such records are accurate and completed in a timely manner in accordance with the Company's Timekeeping Procedures contained within the Employee Handbook. This also includes certifying and submitting timesheets on a weekly or semi-monthly basis, depending on the employee's work schedule. Inaccuracies in such records could constitute a violation of federal law and subject the Company and its employees to serious fines and penalties. Managers also have an obligation to review their employees' timecard for accuracy and to examine questionable entries.

## **Expense Reporting**

Depending on the position and job duties, employees may be issued a Corporate Credit Card to make business-related purchases. It is the employee's responsibility to comply with the Company's policies and procedures when purchasing items on behalf of IntelliGenesis.

This includes:

- ❖ Using the Corporate Credit Card for official-use, never for personal use or gain.
- ❖ Sufficiently documenting all purchases on a monthly expense report.
- ❖ Submitting receipts for all purchases made to your manager on a monthly basis.
- ❖ Certifying that the purchases made are valid, accurate and complete by signing the expense report.

Managers reviewing submitted expense reports are required to certify that they understand that the employees' charges were authorized and reasonable.

For more information and to obtain expense report templates, employees should refer to their Employee Handbook.

# Chapter 6: Keeping a Safe Workplace

## Prohibited & Restricted Items

In order to promote and maintain a safe workplace, the following items are Prohibited:

- ❖ Firearms, weapons, ammunition
- ❖ Flammable liquids, solids, or gases
- ❖ Explosives or incendiary devices
- ❖ Radioactive material
- ❖ Hazardous materials
- ❖ Illegal drugs, narcotics, or other contraband

The following items are Restricted:

- ❖ Cameras
- ❖ Radio Transmitting devices
- ❖ Recording devices

## Drug & Alcohol Free Workplace

IntelliGenesis is committed to ensuring a substance-free working environment for all of its employees. Therefore, the use of intoxicants and/or illegal drugs prior to reporting to work or during work, will be cause for immediate dismissal. During Company functions if alcohol is served, it will be limited to no more than 2 drinks per employee. Employees will be held responsible to limit their alcohol consumption to avoid being under the influence. Alcohol abuse will not be tolerated and will be cause for dismissal. Employees using prescribed medication, which may have an influence on performance, must advise their manager or HR prior to commencing work.

All employees may be required to submit to random drug and urine testing subject to the requirements of local, state and federal law. Similarly, the Company reserves the right to require any employee who is suspected of illegal drug use or who is involved in a work-related accident to report to a certified laboratory for a drug use screening test subject to the requirements of local, state and federal law.

## Harassment and Illegal Discrimination

IntelliGenesis prohibits all forms of illegal discrimination and unlawful harassment. Harassment of any individual by managers, coworkers, or nonemployees is unacceptable and will not be tolerated.

### Sexual Harassment

Sexual harassment is not limited to demands for sexual favors. It may also include (but is not limited to) actions such as inappropriate remarks, jokes, or other offensive language; unwelcome physical contact; sexual innuendoes, references or materials and any other sexually offensive behavior.

### Other Harassment

Harassment, including race, color, religion, national origin, age, marital status, sexual orientation, or disability is also prohibited and will not be tolerated. Harassment may include (but is not limited to) actions such as inappropriate remarks, jokes, degrading comments, epithets, or other offensive language, the display of offensive objects and pictures, and any other conduct an employee may reasonably find to be offensive.

# **Chapter 7: Keeping a Safe Workplace**

Regardless of whether you are an office employee, working in the Maryland or Georgia offices, or working remotely, IntelliGenesis requires that employees using corporate property (to include software, equipment, facilities) is for official business *only*.

Employees should refrain from using Company equipment for personal use. This is especially important when downloading software on Company or customer sponsored equipment.

Additionally, employees should not have an expectation of privacy when using company resources, especially email.

The following practices are to be observed while you are on contract in customer facilities:

- ❖ Use of the computer, phone, etc. is for official contract use only. Do not use the computer for personal email or to visit personal websites. Limit personal phone calls.
- ❖ All Company IT assets (including email) are subject to monitoring.
- ❖ Refrain from jokes or conversations that could be considered offensive and inappropriate.
- ❖ If you will be away from your desk for more than 30 minutes, leave a note on your monitor and/or update JSignout with your whereabouts and ETA.
- ❖ Do not contact the Contracting Officer Representative (COR) for any reason. Coordinate through your respective contract Task Lead or your IntelliGenesis Program Manager.

## **Cyber Security Tips**

- ❖ Use a complex alphanumeric password with a combination of numbers, symbols, and letters (upper and lowercase)
- ❖ Change your passwords regularly.
- ❖ Do NOT open emails or attachments from unfamiliar sources, even if they look official.
- ❖ Do NOT install or connect any personal software or hardware to the company's network without permission from the Chief Technology Officer (CTO).
- ❖ Report all suspicious or unusual problems with your computer to the CTO.

## **Social Media Policy**

At IntelliGenesis, we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media.

## **Social Media Guidelines**

Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with IntelliGenesis, as well as any other form of electronic communication.

- ❖ You are solely responsible for what you post online.
- ❖ Before creating online content, consider some of the risks and rewards that are involved.
- ❖ Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow associates or otherwise adversely affects members, customers, suppliers, people who work on behalf of IntelliGenesis or legitimate business interests may result in disciplinary action up to and

including termination.

Maintain the confidentiality of Company trade secrets and private, proprietary or confidential information. Trades secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.

- ❖ Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager.
- ❖ Do not use company email addresses to register on social networks, blogs or other online tools utilized for personal use.
- ❖ Employees should not speak to the media the company's behalf without contacting the President/CEO. All media inquiries should be directed to the President/CEO.

# Chapter 8: Reporting

## **Reporting Possible Illegal or Unethical Conduct**

IntelliGenesis recognizes the sensitivity created when you encounter another employee's suspected or actual ethics violation. You will not be penalized or suffer reprisal for reporting this information to the Company under any circumstances. In fact, IntelliGenesis encourages you to demonstrate good judgment, concern for the Company's reputation, and moral courage by reporting all violations.

Discuss suspected or actual violations of ethics with at least one of the following:

- ❖ Discuss with your Program Manager
- ❖ Discuss with IntelliGenesis' Ethics Officer / Human Resources Manager:  
Kendra Gears: 443-563-1871  
kendra.gears@igenmail.com
- ❖ Submit a Question on-line (anonymously) to Ethics Committee at [www.RedFlagReporting.com](http://www.RedFlagReporting.com)
- ❖ Call the Ethics Hotline Number:  
1-877-647-3335 Client Code: 1870
- ❖ Contact IntelliGenesis' Security Officer  
Brittany Kakellos: 443-563-1862  
brittany.kakellos@igenmail.com

## **Whistle Blower Protection**

Retaliation against any employee who raises any questions, concerns or complaints concerning the honesty and integrity of our operations is strictly prohibited. Any employee who feels that he or she has been retaliated against or threatened with retaliation for these reasons should report the issue to their manager, Human Resources or the Executive Officers.

## **Investigation of a Violation**

If the Company receives information regarding an alleged violation of the code of conduct, the Ethics Officer shall:

- ❖ Evaluate such information as to gravity and credibility.
- ❖ If necessary, initiate a formal inquiry or a formal investigation with respect thereto.
- ❖ If appropriate, prepare a report of the results of such inquiry or investigation, including recommendations as to the disposition of such matter.
- ❖ If appropriate, prepare a report of the results of such inquiry or investigation available to the executive officers.

If appropriate recommend changes in the code of conduct necessary or desirable to prevent further similar violations.

**\*\*Please note that Red Flag Reporting instructions are posted in both the Georgia and Maryland IntelliGenesis offices.**

## **Corrective Measures**

The Company shall enforce its code of conduct through appropriate means of discipline. The executive officers



shall determine whether violations of code of conduct have occurred and, if so, shall determine the disciplinary measures to be taken against any employee of the Company who has violated the code of conduct.

Acknowledgement