



C3 Federal Systems Code of Conduct

Company Commitment

Dear C3 Federal Employees, and Suppliers,

C3 Federal Systems takes its responsibilities as a member of the International Business Community extremely seriously. In doing so we have adopted to follow the Electronic Industry Citizenship Coalition (EICC) guidelines for a responsible Code of Conduct. It is the philosophy of C3 Federal that you are never too small, or too big, to hold yourself to a higher level of standards in protecting the people and resources of this planet.

As an employee of C3 Federal we ask that you take these commitments seriously and present areas of improvement that you see. As a supplier we require that you work as quickly as possible to also meet the EICC Code of Conduct.

It should also go without mention that all of us should hold ourselves to the highest level of standards when it comes to ethics. Hold yourself to a higher level of standards in treating others and hold C3 Federal to an even higher standard than the rest of the corporate world.

If you see something, say something to management immediately! If you see an area C3 Federal can improve, please bring it to the attention of your teammates and management as quickly as possible. While we have put in place systems to monitor many physical measurable items, there are often areas that we just can not accurately monitor, report and measure. Please be assured that C3 Federal wants to know how it can improve continually in all areas of business especially in regards to the environment, the fair treatment of it workers, the ethical treatment of others, and overall safety.

Sincerely,

The Board of Directors of C3 Federal Systems



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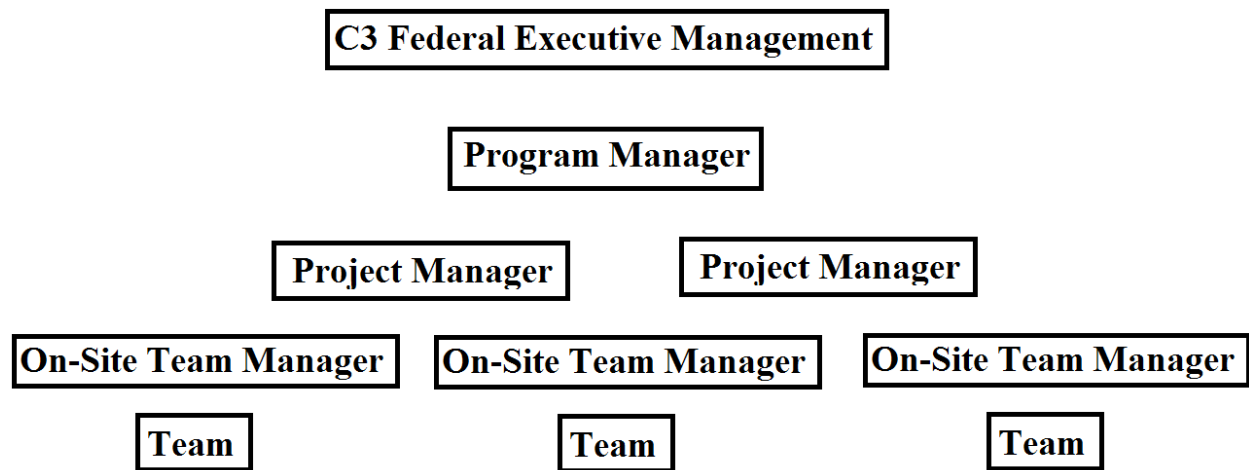


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Management Accountability & Responsibility

C3 Federal has built its organization structure to work in teams and build upwards. Every member of the C3 Federal team should feel the need and ability to manage themselves and their code of conduct. At all times you should be familiar with who your “Program Manager” is and how to reach them for all scenarios. If you are finding that your Program Manager is not taking your needs seriously please reach out to Human Resources hr@c3federal.com. Our Board of Directors is committed to you our employees, vendors, and the world wide community and will continually look to update our management systems via Senior Management Reviews on a regular basis. We look for your guidance on areas we can improve.



Risk Assessment and Risk Management

C3 Federal Program Manager’s play a critical role in the overview and compliance of C3 Federal’s Code of Conduct. Each Program Manager is responsible for yearly researching the applicable laws, regulations, and any specific particular contractual requirements. All areas are to be evaluated to find out if the work C3 Federal is performing is in compliance, easy to fix, or requires major changes to become in compliance. For minor issues Program Managers are directed to immediately make the necessary programmatic and physical changes to be compliant. For major issues program managers are required to submit to executive management within ten days of becoming aware of an issue, what the issue is, and possible solutions and remedies to become compliant. All issues once completed and resolved are to be reported to Executive Management for future reporting issues.

Executive Management will meet with Program Managers on a regular basis to ensure that all systems are being followed and look for areas of improvement.

Improvement Objectives

C3 Federal feels that it is not only important to meet the minimum requirements of today, but to set goals for ourselves to surpass the “minimum.” Each department and site is expected to track metrics for greenhouse emissions, solid waste, recycling. It is also our goal that employees of C3 Federal will attend continuing education courses as defined by C3 Federal in areas that can help in improving overall corporate performance. These courses will include topics such as Business Ethics, Decreasing



Environment Impact, Identifying Laws and Regulations, and Cost Saving Metrics. The Program Management Office at C3 Federal will maintain all goals and constantly measure metrics to ensure compliance, growth, and improvement across the board from year to year.

Training

C3 Federal provides employee training in various areas. All employees are able to receive training in courses such as Business Ethics and Improving Our Environment From Work. All employees are encouraged to take these courses in their first year of employment and to continue to take yearly refresher courses. For specialized environmental systems, foreign regulations, and other governing law C3 Federal requires and will provide all courses to make sure the necessary employees have adequate knowledge to help C3 Federal meet regulations and procedures as well as to help meet our improvement objectives. Your Program and Project Managers will work with you to make sure all necessary courses are identified and timelines are identified to meeting these requirements.

Communication

All documents related to the C3 Federal Code of Conduct as well as employee manuals and required training are provided to employees and suppliers in their native language. If your native language is any language besides English please tell your Program Manager so that a copy can be provided to you in your native language. This includes not only written material but coursework as well too.

C3 Federal in its ongoing transparent principles will disclose voluntarily all regulatory fines and penalties that have occurred in the previous month and show the corrective actions that will be performed to ensure compliance. All information will be posted to the C3 Federal website (www.c3federal.com) under EICC Compliance.

C3 Federal also requires all contractors to set forth a goal as to when they will be compliant with EICC. If you are a supplier for C3Federal please reach out to your Program Manager to receive any help on getting started. We require all suppliers to be compliant within 6 months of starting work.

Worker Feedback & Participation

As an employee of C3 Federal, no matter what level you are at, you are critical to our success in helping to make C3 Federal the best company for our clients and to lead an example for others to follow. We want to empower each and everyone of you to bring to our attention any issues you see and to bring them to management's attention immediately. Not only do we want you to bring to our attention areas we are deficient in laws, regulations, and other matters – but bring to our attention ways we can better educate the rest of the staff. If your Team Manager is not asking you regularly for your input, ask for time for the team to come together and have an open air conversation on ways we can all improve.



Audits and Assessments

Please see ***Risk Assessment and Risk Management*** for how C3 Federal deals with these topics.

Corrective Action Process

C3 Federal already identifies its Risk Assessment and Risk Management the management process in how it deals with corrective actions. It is important to note that when deficiencies are recognized the Program Manager is tasked with immediately implementing all low cost issues to make the “Project” compliant. If the issue appears to be a high cost area, it will be brought to the attention of Executive Management where action will be taken to fully resolve the issue.

Documentation, Monitoring, and Record Keeping

C3 Federal maintains records from all Self Assessments that are performed as well as regulatory compliance. Records can be provided to prime contractors as necessary to ensure compliance.

Supplier Responsibility

As C3 Federal is committed to ensuring that all regulations are met, it has enacted a management policy to require suppliers to sign off on all compliance and acknowledge areas that C3 Federal is specifically requiring them to take part of and meet, besides just being a part of EICC.



Labor Standards

It is important that C3 Federal be a leader in the area of Labor Practices. As an employee and a Supplier of C3 Federal we ask that if you see an area where we are not exceeding the expectation that you bring it to our attention immediately.

Forced or Involuntary Labor

C3 Federal will never use any form of Involuntary Labor or knowingly ever use suppliers that have involuntary labor. This includes but is not limited to, indentured labor, involuntary prison labor, slavery or trafficking, coercion, abduction, and fraud for the purpose of exploitation. All workers at C3 Federal and those of the suppliers of C3 Federal should feel they are voluntary employees and can leave at their convenience. As an employee you should never be required to surrender any form of government issued identification as a condition of employment.

Child Labor

C3 Federal nor any suppliers will ever violate any child labor laws or regulations. No one under the age of 15, or 14 where the law of the country permits, or under the age for completing compulsory education, or under the minimum age for employment in that country, whichever is greatest will be permitted to work for C3 Federal or its suppliers. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety. Child labor laws are dear to C3 Federal and any violations of this should be reported immediately, and employees should rest assure that reporting any child labor violations to management will never cause repercussions.

Wages and Benefits

C3 Federal will always abide by all applicable wage and benefit standards both in reference to minimum wages and pay standards for overtime. C3 Federal will also provide all mandated benefits. C3 Federal will never deduct wages as a disciplinary measure. All employees will be paid in a timely manner or be provided proof of timely payment.

Working Hours

C3 Federal truly believes and studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Work weeks will never exceed the maximum set by local law and further it is the policy of C3 Federal that a standard work week should not normally be more than 60 hours per week, including overtime. Occasionally employees maybe asked to put in a longer than normal work week, but this will always be in accordance with local law, and employees will be paid appropriately. All employees are allowed to at least one day off per seven day work week at C3 Federal.

Humane Treatment

As defined in the employee handbook at C3 Federal all employees at C3 Federal should expect to have work and operate in a humane environment. This includes an environment free of sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers. If an employee feels they are in such an environment they are too immediately report the incident to their direct supervisor. If the issue is with their direct supervisor or they feel their direct supervisor is not taking the issue seriously, they should report the issue up the chain of command. Employees found to be in violation of this policy will face punishments under the local



laws and possible termination. Supervisors should be advised that these issues should never be “pushed under the rug” and reminded that they have a duty to take these issues seriously at all times.

Nondiscrimination

C3 Federal is committed to providing an environment free of harassment and unlawful discrimination. C3 Federal will not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way. If an employee should feel any of these actions are taking place they should report the incident immediately so that it can be corrected.

Freedom of Association

C3 Federal agrees that open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. The rights of workers to associate freely, join or not join labor unions, seek representation, and join workers’ councils in accordance with local laws shall be respected. Workers shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment. It is the goal of C3 Federal to provide the best possible working environment and employees should always feel comfortable talking to management about issues that are taking place.

Respect and Dignity

All C3 Federal employees will be treated with respect and dignity. C3 Federal will never engage in the use of corporal punishment, threats of violence, or any other form of physical coercion or harassment.



Health & Safety Standards

C3 Federal recognizes that in addition to minimizing the incidence of work-related injury and illness, a **SAFE** and **HEALTHY** work environment enhances the quality of products and services, consistency of production and worker retention and morale. C3 Federal also recognizes that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace. Not only are you entitled to a safe workplace, but if C3 Federal is providing your housing or living quarters we will make sure that your living environment is safe as well. Life Safety is at the foremost of our attention and classes can be provided to employees that cover these issues. If your job involves ‘incident investigation’ or chemical safety’ C3 Federal will provide specialized training to help you deal with these areas. These courses will also help you to understand how to properly maintain logs and reports as part of your job.

Occupational Safety

C3 Federal takes occupational safety concerns seriously. Any worker exposed to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. As always workers shall not be disciplined for raising safety concerns.

Emergency Preparedness

C3 Federal believes that a safe environment should be maintained at all times, this includes emergency preparedness. All employees shall be aware of an emergency exit procedures, plans and responses for the facility in which they work. Managers for each location should work to make sure that everyone is aware of the necessary procedures to follow at all times. Managers should work to establish training and drills . Facilities where possible will use appropriate fire detection and suppression equipment. All exits shall be identified.

Occupational Injury and Illness

C3 Federal takes Occupational Injuries important. All C3 Federal employees at a minimum are covered with Worker’s Compensation Insurance to cover work place injuries. In addition to providing insurance to help employees return to work C3 Federal has setup a system to evaluate working environments to reduce the risk of injuries. Upon learning of an injury onsite Managers immediately document the injury in the “incident report” system. This report contains a classification system for severity and causing of the incident. These reports are used to track injuries, causes, and create more defined preventative techniques.

Physically Demanding Work

In an effort to minimize worker injuries, C3 Federal does a thorough review of all job sites and job tasks to identify scenarios that require physically demanding work. These tasks will be thoroughly evaluated to look for ways to reduce injury. When possible and feasible these tasks will be removed and or reduced.



Machine Safeguarding

All dangerous equipment and machinery at C3 Federal will be evaluated for safety hazards. Physical guards, interlocks and barriers will be provided and properly maintained where machinery presents an injury hazard to workers.

Industrial Hygiene

C3 Federal will identify and reduce any and all risks to workers exposed to chemical, biological and physical agents. All employees that work in these environments will be issued the appropriate personal protective equipment, programs, and training. C3 Federal will also use administrative controls to control overexposures.

Sanitation, Food, and Housing

C3 Federal workers will be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Participant or a labor agent will be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.



Laws, Including Regulations and Other Legal Requirements

C3 Federal will comply with all applicable laws and regulations in all locations where we conduct business.

Ethical Dealings

C3 Federal complies with all laws and regulations on bribery, corruption and prohibited business practices. C3 Federal management has a zero tolerance policy for these issues.

Business Integrity

C3 Federal has a zero tolerance policy when it comes to any form of bribery, corruption, extortion and embezzlement. All business dealings at C3 Federal will be performed in a transparent manner and will be accurately reflected in our accounting and business books and records. In order to ensure this all cash transactions will be kept to an absolute minimum. A set of checks and balances have been implemented with the accounting department to ensure that these practices will be met and to ensure that we stay in compliance with anti-corruption laws.

No Improper Advantage

C3 Federal is against obtaining undue or improper advantage and will not offer or accept bribes.

Disclosure of Information

C3 Federal in order to maintain its stance of business integrity and a leader in the industry. In order to meet those challenges and provide transparency C3 Federal is willing to disclose information regarding business activities, structure, financial situation and performance in accordance with applicable regulations and prevailing industry practices. C3 Federal will not falsify any records or misrepresent conditions or practices in the supply chain.

Intellectual Property

C3 Federal respects all forms of Intellectual Property rights from Open Source to Proprietary information. C3 Federal will transfer technology and know how will be done in a manner that protects intellectual property rights at all times.

Fair Business, Advertising and Competition

C3 Federal upholds all standards of fair business, advertising and competition. C3 Federal will employ appropriate means to safeguard customer information which include both human based systems and encrypted server systems.

Protection of Identity

C3 Federal management has implemented a series of safeguards to protect the identities of suppliers, employees, and employee whistleblowers that are maintained at all times.

Responsible Sourcing of Materials

C3 Federal will make sure that all products it manufactures do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. C3 Federal will exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request. (As of this version of the document 09/03/2013 C3 Federal does not manufacture any products.)



Privacy

C3 Federal is committed to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers and employees. C3 Federal will comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. We recognize the importance in today's age of securing PII to protect identities. C3 Federal expects its employees to follow the safeguards that are put in place to ensure these systems are effective.

Non-Retaliation

C3 Federal management and the Human Resources department have non-retaliation policy where all employees and subcontractors should feel comfortable in knowing that they will not be retaliated against for bringing up their concerns.

Environmental

C3 Federal takes its responsibility to protecting the environment seriously. At a minimum C3 Federal meets all laws and requirements of the local area and looks to achieve even beyond that. C3 Federal has an in place recycling and waste management goals that are set for the company and each individual site.

As of this release, C3 Federal does not own or fully control any building or manufacture any products. We do however look to always lease office space from companies that meet or exceed the criteria that has been set out.

All toner and batteries are recycled at C3 Federal in an environmentally friendly way through authorized recyclers. C3 Federal currently only uses vendors that and management companies that have in place chemical and waste management and disposals, industrial wastewater treatment and discharge, air emissions controls and the environmental requirements specific to the products or services.

Hazardous Substances

C3 Federal at the time of this publication does not work with any chemicals or other materials that pose a hazard, besides batteries and ink toner. C3 Federal has a strict policy to always recycle all batteries, and computer equipment that is no longer in use following all applicable laws.

Environmental Permits and Reporting

C3 Federal maintains all environmental permits and reporting to the utmost standard.



Pollution Prevention and Resource Reduction

C3 Federal believes that it is important to reduce our impact on the environment at every level. We look for ways to reduce the amount of water and energy we consume and look for ways to decrease our demand on those resources. Through products like server virtualization, C3 Federal has dramatically reduced its energy footprint. We also believe heavily in reusing all products in their current state before recycling them. Currently C3 Federal does not operate any Production Facilities.

Wastewater and Solid Waste

C3 Federal does not own any facilities at this time. All of the facilities that it leases space at use vendors that have strict waste water and solid waste plans. These facilities meet or exceed all laws and properly monitor the amount of waste water and solid waste and ensure that they are treated and discharged appropriately.

Recycling of Products

C3 Federal takes recycling and waste management seriously. All products that are capable of being recycled are to be done at a 95% efficiency level. Products like Paper are to be accounted for and measured at the end of each year. All computer equipment is to be recycled and follow any applicable laws that are necessary in doing so.

Air Emissions

C3 Federal does not currently own any property or manufacturing facilities. In accordance though it only leases space that have air emission monitoring capabilities for its larger processes. C3 Federal makes sure that all subcontractors properly monitor their air emissions and treat them as they should.

Product Content Restrictions

C3 Federal adheres to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal. Our on site managers are given directions on how to perform these steps, and our subcontractors meet this obligation as well.

Energy Conservation

C3 Federal monitors each individual site for energy consumption. These reports are delivered on a regular basis to C3 Federal upper management. C3 Federal seeks goals to meet on reducing our energy consumption.





Document History

Document Created March 15, 2013

Document Last Edited August 1, 2013 V1.1