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	<i>Issue Date:</i> 11/18/2015	<i>Revision Date:</i> 2/9/2021	<i>Version #:</i> 3.0
	<i>Description:</i> Ethics Policy		

THREE WIRE SYSTEMS, LLC

And


VetAdvisor, LLC

Code of Ethics

and

Business Conduct

February
2021

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Three Wire Systems, LLC’s and VetAdvisor, LLC’s (individually and together, “Three Wire Systems” or “company”) policy is to conduct all of our business activities in accordance with the highest standards of ethics and comply with all legal and regulatory requirements. Three Wire Systems conducts much of its business with federal, state, and local governments. Our government client base reinforces our commitment and mandates that as a company and as individual employees that we must meet all applicable requirements. These requirements include various government regulations, and our obligations to our clients, business associates, the public, and the business community of which we are a part, to:


- Administer our performance for our customers and our contracts in a manner that complies fully with the letter and intent of the law, and;
- Deliver our services in full compliance with all contractual and legal obligations as well as our own high standards of honesty, integrity, and quality.

To fulfill the company's commitment to compliance, each employee needs to understand the rules that apply to the job at hand. Employees without such an understanding risk noncompliance. For the company, noncompliance could lead to civil or criminal fines and/or penalties and suspension of the privilege of doing business with the government; for the employee, it could result in disciplinary action up to, and including, termination of employment, as well as civil or criminal fines or penalties including imprisonment. These risks can be avoided if each of us makes a personal commitment to understand and abide by the rules.

Numerous laws have been passed that greatly complicate the federal procurement contracting process. In addition to increased civil and criminal penalties for noncompliant firms, many of these laws specify fines and imprisonment of employees guilty of violations. The Federal Acquisition Regulation (FAR) and various statutes and regulations also provides for suspension and debarment of a firm or individuals involved in significant misconduct and violation of these laws.

Purpose of the Policy Booklet

The purpose of this Policy Booklet is to provide our employees with general guidance in applying Three Wire Systems’ Code of Ethics and Business Conduct to specific work

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situations. The information herein will help each employee to recognize his/her specific responsibilities and act as a guide in determining:


- Your responsibilities to Three Wire Systems, its owners and its clients;
- Measures for maintaining compliance with applicable laws;
- Your obligations regarding issues that may arise on your own time, particularly conflicts of interest; and
- Appropriate actions for preventing and resolving non-compliances.

After you have read this Policy Booklet, you should have a clear understanding of the business behavior required and expected of Three Wire Systems’ employees. Because each employee is expected to know the rules and is ultimately responsible under company policies and the law for his or her own actions, you are urged to have any questions about Three Wire Systems’ Code of Ethics and Business Conduct answered by the Chief Financial Officer of the Company (or the person designated by the Chief Financial Officer for that purpose through written notice) (the “CFO”).

In keeping with our commitment to compliance, Three Wire Systems will investigate any reported violations of laws, regulations, and policies and will, based on the results of the investigation take such disciplinary action as it determines, up to and including termination of employment, against any employee who violates them. Three Wire Systems has a responsibility to demonstrate to its clients, business associates, the public, and to the business community of which we are a part, that we are accountable for our actions and that we conduct our business in an honest and trustworthy manner.

Policy

Three Wire Systems is committed to fair and ethical behavior, and the company's reputation for adhering to high ethical standards is one of its most valuable assets. Company policies, in combination with Three Wire Systems’ Code of Ethics and Business Conduct, establish criteria for business ethics and conduct for Three Wire Systems, and its subsidiaries. All Three Wire Systems, employees, officers, directors, and agents, as well as all non-Three Wire Systems personnel working on Three Wire Systems projects, are required to comply with these standards and with applicable local, state, and federal laws.

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These standards apply to your conduct both on and off the job. All Three Wire Systems' employees are required and expected to avoid unethical actions, including actions that may appear unethical to others. As a Three Wire Systems employee or representative, you are required to:

- Reject any plan, transaction, or arrangement involving unlawful or unethical conduct;
- Avoid any arrangement, agreement, investment, employment, relationship, act, or interest that is, or appears to be, contrary to the best interests of Three Wire Systems or its clients and business associates, or that in any way might impair the objective performance of duties or the exercise of independent judgment or action, with respect to the interests of Three Wire Systems, its clients, or business associates;
- Protect and maintain the security of company confidential and privileged, or government- designated classified information related to Three Wire Systems or associated with its activities, including financial data related to Three Wire Systems and its operations (including information furnished by clients, business associates, suppliers, contractors, or others under conditions of confidentiality); and
- Provide professional and impartial opinions and judgments and act in accordance with the best interests of Three Wire Systems, its clients, and business associates.

Because there may not always be regulations to guide you in every situation, you, as a Three Wire Systems employee or representative, are expected to apply your own high standards of ethics, which should extend beyond minimum compliance with applicable laws, in the day-to-day performance of company business. If there is, or appears to be, an issue that you are unable to resolve, then you should consult your supervisor/manager or cognizant Vice President, or the CFO.

Government Compliance and Business Ethics Oversight

The Senior Management Team of Three Wire Systems is responsible for defining and

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developing Three Wire Systems Code of Ethics and Business Conduct, and for developing and implementing related education and training programs.

All Employees are required to:


- Be thoroughly familiar with Three Wire Systems’ Corporate policies and Three Wire Systems Code of Ethics and Business Conduct guidelines, and always adhere to them;
- Be sensitive to situations that could lead you or others to engage in illegal, improper, or unethical conduct; and
- Report illegal, improper, or unethical behavior. If you encounter such behavior or any behavior that is in violation of this Policy Booklet, then inform your supervisor/ manager, or your cognizant Vice President (unless such behavior involves such person) and the CFO. (Any such behavior carried out by a Three Wire Systems employee with a personal security clearance, and/or with any engagement with a classified contract or program, should also be reported to the Facility Security Officer (FSO) (see also Three Wire Systems security program documentation for compliance requirements).

Supervisors are required to:

- Maintain a work environment that encourages open communication regarding ethical problems and improper behavior and concerns.
- Make a personal commitment that your group will operate in accordance with the highest standards of ethical business conduct. Communicate this commitment to your employees.
- Periodically discuss ethical and improper issues and review Three Wire Systems’ Code of Ethics and Business Conduct with your employees.
- Require that all Three Wire Systems’ employees and Three Wire Systems’ subcontractors, consultants, etc. working on Three Wire Systems contracts attend appropriate training sessions on government and business conduct issues.
- Be familiar with the resources available to resolve questions and concerns related to ethical and improper behavior.

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Managers are required to:

- Be knowledgeable about the laws, regulations, and industry practices applicable to your activities;
- Implement Three Wire Systems' Code of Ethics and Business Conduct and develop a work environment and culture that promotes a high standard of ethics and business conduct;
- Provide all Three Wire Systems' employees and non-Three Wire Systems personnel working on Three Wire Systems projects with clear guidelines on matters of everyday business conduct, and provide education relevant to their individual job responsibilities;
- Communicate clearly that Three Wire Systems does not tolerate nor condone illegal, unethical, or improper behavior; set this standard of conduct by personal example;
- Oversee administration of appropriate disciplinary action for policy violations;
- Inform employees about resources that may help them in addressing ethical and improper behavior concerns; and
- Develop an open atmosphere in which ethical and improper behavior concerns may be brought forward by employees and resolved without fear of retribution; protect the confidentiality of employee reports, to the extent practical, and advise the employees of the outcome of such reports.

GENERAL GUIDELINES

Three Wire Systems' business operations involve interaction with numerous other companies and organizations; it is Three Wire Systems' policy to have business dealings only with those entities that have ethical standards that are comparable with its own. Three Wire Systems employees are required to report to the appropriate company manager/supervisor and the CFO, any conduct or behavior they might encounter in the course of their work, that they believe is inconsistent with Three Wire Systems' policy, and report unethical, unlawful, or unsafe situations, including situations that potentially

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involve such conduct or behavior. In addition, they should observe the following general standards in their business dealings with other companies or business associates:

Fair Treatment

- All persons with whom you, as a Three Wire Systems employee, do business are entitled to fair treatment. This standard applies no matter what your job entails; and
- Whether or not you directly influence business transactions, you must avoid doing anything that might create the appearance that clients, business associates, or suppliers have "a friend at Three Wire Systems" who could exert improper influence on their behalf.


No Misrepresentation

You are not, as a Three Wire Systems employee or representative, to misrepresent your role, events or facts, or any aspect of the company to anyone. For example, an employee or representative should not misrepresent his or her position within the company, and by extension his/her authority to obligate the company, to internal stakeholders, or current or potential customers. Alternatively, an employee or representative should not misrepresent (current) project or program status, or the company’s current or anticipated business activities and plans, to current or potential customers. If you believe someone may have misunderstood you, then try to clarify the situation immediately. Honesty is an integral part of ethical or moral behavior, and trustworthiness is essential for productive and lasting business relationships.

Judgment in Specific Situations

If you are unsure whether a particular action complies with Three Wire Systems’ Code of Ethics and Business Conduct you should ask yourself the following questions:

- Is the action legal?
- Is it ethical?
- Does it comply with or conflict with company policy?
- Might it appear or does it appear inappropriate?

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- If it becomes known, might it result in embarrassment either within or outside the company?

Any concerns raised by asking oneself the preceding questions must be resolved before proceeding. Your supervisor or manager should be initial first point of contact for questions; you can also contact the CFO for assistance.

Confidential and Proprietary Information


You must not use or disclose proprietary or other confidential information except as authorized by Three Wire Systems. Proprietary information must be kept confidential. This information includes but is not limited to:

- Three Wire Systems intellectual property;
- Three Wire Systems business and project plans associated with outside suppliers, business associates, and contractors;
- Business, financial, marketing, strategic, and operating plans associated with Three Wire Systems and its clients; and
- Confidential Information as is defined in your Employment Terms and Conditions.
- Personnel and salary information.

You must ensure that proprietary and/or other confidential information is not disclosed to others; protection of this information is vital to Three Wire Systems continued growth and ability to compete for business.

Confidential information that you receive in the course of your job should only be used for its intended purpose, and should only be shared with other employees on a "need-to-know" basis.

To avoid being accused of misappropriating or misusing someone else's confidential information, first determine whether the information actually is confidential. Second, do not accept confidential information unrelated to your job. If someone tries to pass along confidential information or if there is reason to believe that its release is unauthorized,

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please inform your supervisor or cognizant Vice President and the CFO.

(Refer to Three Wire Systems’ security program documentation for guidance and instruction regarding security clearances and classified contracts and programs.)

If you leave Three Wire Systems


If and when you leave Three Wire Systems, you are not allowed to disclose or misuse any proprietary or confidential information that you might have been privy to during your period of employment with the company.

If you are asked for information

If someone outside the company asks you a question that you are not authorized to answer, you should refer the question to the appropriate person, supervisor or manager. For example, if a bank calls requesting employment verification about one of your coworkers, you should refer the caller to the Human Resources Department. Similarly, you should refer any questions from a lawyer to the Human Resources Department, and whenever you become aware of a government agency investigation in connection with your work, immediately notify your Senior Manager or cognizant Vice President. (If you are not sure where to refer a question, then ask your supervisor or manager.)

Government-Classified Information

Only individuals who have a government-granted security clearance and a need-to-know may have access to classified information. These individuals are responsible for protecting and controlling all classified material in their possession. Any questions regarding classified information control should be referred to your government security representative or the Three Wire Systems FSO. If a non-cleared individual comes into possession of classified material, then he or she should contact the Three Wire Systems FSO immediately for instructions and guidance. In addition, individuals should not solicit or obtain government-classified or proprietary information, except through proper channels and by established means. (Per above, refer to Three Wire Systems’ security program documentation for guidance and instruction regarding security clearances and classified contracts and programs.)

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Your Obligations Related to Confidential Information, Inventions, and Trade Secrets


When you joined Three Wire Systems, you signed an employment terms and conditions agreement that sets forth your obligations related to confidential information, inventions, trade secrets, non-solicitation, non-competition, etc. Your obligations to protect confidential information are discussed above in "Confidential and Proprietary Information." Under the agreement, all ideas and inventions you develop in the course of your employment with Three Wire Systems are company property. In addition, any writings, including plans, drawings, reports, and computer software that arise from your employment belong to Three Wire Systems. If you believe, however, that your idea or invention falls outside Three Wire Systems' business interests, then you may ask the CEO of Three Wire Systems for a written disclaimer of ownership.

Workplace Security and Protecting Three Wire Systems and Client Assets

You are responsible for adhering to all security procedures and for protecting company and client property entrusted to you. Your attention to security and to situations that could lead to the loss, misuse, or theft of company or client property is the best way to help ensure a secure workplace and protection of the company's and client's assets. Be sure to promptly report any unusual or suspicious situation to your supervisor, or cognizant Vice President and the CFO.

Three Wire Systems assets range from physical property to intangible goods such as proprietary and confidential information and stored data. Protecting these assets against loss, theft, and misuse is of prime importance.

Three Wire Systems and client-furnished supplies and equipment are not intended for the personal use of employees. Three Wire Systems facilities, equipment, and supplies may be used only for company business or associated purposes specifically authorized by Three Wire Systems management. This rule applies, but is not limited, to office supplies and equipment, personal computers, software, and associated support items. Proper authorization must be obtained before Three Wire Systems or client property is removed from the workplace. Internal information systems, communications facilities and systems (including e-mail, interoffice mail, and voice mail networks), and databases are to be used for business purposes only. Unauthorized use is considered a violation of Three Wire Systems policy and grounds for disciplinary action, up to and including dismissal.

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Searches at work


Three Wire Systems strives to maintain a balance between company business needs and individual personal rights, including employee safety and employee privacy. However, Three Wire Systems reserves the right, for security, business, or other reasons, to conduct searches of company property or any other property on company premises (i.e., company offices, field operations, work at home offices, company-owned vehicles, client-/government-furnished offices or vehicles, or any other location where Three Wire Systems work is being performed), including computer hard drives and networks.

E-mail, network, and Internet access

All Three Wire Systems and/or government-furnished, internal information systems, communication facilities and systems (including e-mail, interoffice mail, and voice mail), networks, and databases are provided solely for the purpose of conducting Three Wire Systems' business and/or, when appropriate, the business of our clients. Three Wire Systems provides, and may revoke at its discretion, your access to these systems. Unauthorized use constitutes a misappropriation of Three Wire Systems or government-furnished assets, and may be seen as grounds for disciplinary action up to and including dismissal.

You must familiarize yourself and comply with Three Wire Systems policies and procedures regarding e-mail, network, and Internet access. When you access Three Wire Systems' e-mail, network, and Internet systems, you are expected to do so in a responsible manner, and to uphold company policies and procedures of professional and personal courtesy and conduct. You should not transmit anything in an electronic message that you would not think is appropriate to write in a printed letter or memorandum.

All Three Wire Systems policies and procedures apply to the use of these systems, including Three Wire Systems' policies and procedures on intellectual property, misuse of company resources, harassment, information and data security, and confidentiality. Using the system to send fraudulent, illegal, harassing, offensive, or obscene messages and files, including racial or sexual slurs, or for accessing pornographic websites, is strictly prohibited, and may be seen as grounds for disciplinary action up to and including dismissal.

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E-mail, network, and Internet communications are not private, and confidentiality cannot be guaranteed. Three Wire Systems' reserves the right, in its sole discretion, to monitor all e-mail messages and network and Internet connections. Three Wire Systems also reserves the right to disclose specific use of these systems to others.

Employees may use Three Wire Systems' e-mail, network, and Internet systems for incidental personal use, provided such use does not interfere with Three Wire Systems' or our client's business operations or your employment obligations to Three Wire Systems. Excessive personal use of e-mail, network, and Internet systems is prohibited. If you have any questions or concerns, please contact the CFO. Personal use of systems, networks, and Internet connections supplied by our clients is prohibited without prior written approval by the client or Contracting Officer.

Copyright Compliance

It is Three Wire Systems' policy to fully comply with provisions of applicable law and licensing agreements pertaining to copyrighted materials, including written materials, photographs, and software. Unauthorized reproduction or transmission of written materials or software is illegal and against Three Wire Systems policy.


Written material guidelines

“Written material” includes newspapers, trade journals, magazines, educational and training materials, books, technical and scientific journals, and other printed matter, whether textual or graphic or in printed or electronic form. Making multiple copies normally requires the permission of the copyright holder; a single copy also may require permission, especially if copying is systematic or part of a pattern.

Software guidelines

There are times when Three Wire Systems may license certain software and make it available to employees for use on Three Wire Systems hardware. Three Wire Systems policy prohibits the copying of software it has acquired unless the applicable license permits such copying (e.g., for backup or archival purposes). You are responsible for strict compliance with this policy and must:

- Use such software only in accordance with the license agreement between Three

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Wire Systems and the software licensor, and only for the software's intended use;

- Refrain from duplicating software acquired by Three Wire Systems for use on a specified computer and refrain from using it on other computers within Three Wire Systems or anywhere else in violation of any license agreement; and
- Refrain from copying any computer software materials, regardless of the medium (electronic or printed manuals, etc.) except as necessary for backup or archiving, and then only as the license agreement allows.

Proper Records Maintenance and Reporting


You are required to make sure that all of Three Wire Systems records and reports for which you are responsible are as accurate as possible. Inaccurate or dishonest reporting, both inside and outside the company, is strictly prohibited and could expose both the company and the employees involved to civil liability and/or criminal prosecution and exposure. Dishonest reporting includes conveying or organizing information in a way that is intended to mislead or misinform those who receive it. It is also a criminal violation and a felony offense to knowingly make a false statement to an agency or branch of the U.S. government. The U.S. government may also consider the intentional omission of material information to be a false statement.

Types of reporting include time sheet records, expense reports, educational qualifications and work history listed on your employment application, material and equipment test reports, completion of technical data sheets, and Controller recording of revenues and costs. Accuracy in these and all reports is essential.

Three Wire Systems retains a private CPA firm to annually audit the books and records, and review the various aspects of our compliance with government regulations. External auditors such as the Defense Contract Audit Agency and client auditing firms also may audit our activities from time to time.

Time sheet records and expense reports

It is essential that all Three Wire Systems employees and other personnel working on Three Wire Systems projects charge their labor costs to the proper account. Every error on your time sheet record has the potential to be a criminal and civil false claim and/or statement.

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Therefore, every claim for payment carries a legal and ethical responsibility for accuracy. You have been provided with detailed guidelines on Three Wire Systems' time-charging policies and procedures, and are expected to understand and pay strict adherence to them. Each employee is to complete his or her time record daily in accordance with company policies and in doing so, certifies it is correct and accurate.

Business expenses incurred in performing Three Wire Systems business must be documented promptly and accurately. Three Wire Systems' preferred method of travel expense reimbursement includes automobile mileage, tolls, commercial transportation of economy or tourist fare, plus (actual lodging cost plus the per diem rate for meals and incidental expenses). However, when appropriate, lodging, meals, and incidental costs may all be reimbursed at actual cost at the discretion of your cognizant Vice President. Your supervisor will help you obtain detailed guidelines on the completion and filing of expense reports. In addition, you are responsible for complying with any special or more stringent reporting requirements that may be imposed by a specific client or contracts. *Contract terms and conditions and federal regulations impose strict limitations on government contractors with respect to what can and cannot be reimbursed. You are strongly advised to review the guidelines and limitations with your supervisor before you incur any business expense.*

Accounting standards and documentation

Three Wire Systems is responsible for maintaining accurate and auditable records of all financial transactions within the established accounting system. Accounts must be maintained in conformity with generally accepted accounting principles so that information is readily available to auditors.

Funds or accounts may not be established or maintained for purposes that are not properly documented. Receipts and disbursements must be described fully and accurately in the company's financial books and records. No false entries in the books or records may be made nor may any false or misleading reports be issued. Payments may be made only to the contracting party or valid assignee and only for the actual services rendered or products delivered. No false or fictitious invoices may be paid.

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Working with Suppliers, Contractors, and Third Parties

You are expected to treat all suppliers and contractors fairly and equally.

When Three Wire Systems contracts for goods and services, every employee involved in the process must avoid any appearance of favoritism in the allocation of company business. You may not accept money or benefits from any supplier or potential supplier for advice or services related to the supplier's business—and any such offers must be reported immediately to your supervisor/manager.

Although there may be exceptions under special programs established by the company, you, the employee, may not be a supplier or contractor to Three Wire Systems or work for or represent any supplier/contractor to Three Wire Systems.

Business courtesies from suppliers and contractors that could be perceived to affect an employee's impartiality must also be rejected.


Contracting Activities and Other Representational Activities

Selling and marketing

Do not make a payment or attempt or offer to make a payment, either directly or indirectly or as a bribe or kickback, to influence others. Payment for or receipt of anything of value as an inducement for the award of a contract or order, or any favorable treatment in connection with a prime contract or subcontract related to a prime contract, is a crime punishable by a substantial fine and imprisonment under U.S. law.

Certain selling, marketing, and other representational activities by former U.S. government employees (including consultants) are prohibited by law, and individual employees, as well as the employer, may be assessed penalties for engaging in these prohibited activities. These activities are specified in numerous separate provisions of law, and most require detailed interpretations that may not be obvious or clear. If you are a former U.S. government employee, then you should discuss your status and restrictions with a Three Wire Systems executive officer before engaging in any direct marketing, selling, or representational activities.

Negotiations

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Employees involved in negotiation of contracts should make reasonable efforts to ensure that all statements, communications, and representations made to client representatives are accurate and current. They must comply with the provisions of the Truth in Negotiations Act (TINA). While negotiating government contracts subject to TINA, the negotiator must disclose to the government negotiator all current, accurate, complete, and reasonably available cost and pricing data. Failure to submit or disclose such information as required can result in civil and criminal proceedings against both the company and the individual responsible.

Contract performance and administration

Once a contract has been negotiated, and/or awarded, it is imperative that employees who manage and control the contracted work understand the detailed requirements for the performance of the work as delineated in the contract, and its related plans and specifications. Care should be taken that there are no material substitutions or deviations from specifications and that the final product meets contractual requirements. Changes on government contracts require written approval by an authorized government contracting representative. Improprieties, such as the failure to conduct required testing, manipulation of test procedures, or unauthorized material or product substitution, are considered violations of Three Wire Systems standards and may also lead to criminal prosecution or substantial civil penalties. Personnel with management responsibility for the contracted work must ensure that all required reports and documentation are accurately prepared, issued, and filed.

Payment requests and invoices

In government contracts, it is especially important to understand and adhere to regulations concerning requests for payment. It is specifically prohibited for any employee to submit, or to concur in the submission of, any claims, bids, proposals, billings, or other documents of any kind that are false, fictitious, or fraudulent. Requests for progress payments and provisional payments are documents expressly covered by this prohibition; all employees involved in the process of submitting these documents must familiarize themselves with the regulations governing their submission. Failure to properly adhere to the regulations can result in substantial civil penalties and criminal prosecution of both the company and the employees involved.

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Transactions and Interactions with Non-Government Employees

You may not give, solicit, accept, or attempt to give or accept any favors or gratuities that may be perceived as kickbacks or bribes to or from anyone Three Wire Systems does business with (including any customers or suppliers) or to, or from, any Three Wire Systems competitor. Business transactions should always be free from even the perception that favorable treatment was sought or received as the result of a gift, gratuity, entertainment, or similar transaction.


A business courtesy is a gift or favor for which fair market value is not paid by the recipient. It might be a tangible or intangible benefit, and it includes all forms of hospitality, recreation, transportation, discounts, tickets, passes, promotional material, and the recipient's use of the donor's time, material, or equipment.

It is recognized that in the normal course of business you may offer or receive a business courtesy. Gifts, entertainment, or business meals provided by or to a potential or current client or supplier must be reasonable, must be for a specific business purpose, and must not occur repeatedly. Gifts of money may not, at any time or under any circumstances, be given or received without prior written approval by senior management. If you receive an unsolicited gift of more than nominal value, you are required to return it with an explanation that this is prohibited by company policy. If you have any questions or concerns, you should seek guidance from your supervisors or cognizant Vice President, Three Wire Systems' Code of Ethics and Business Conduct, and contact the CFO.

Relationships with Government Personnel

Gratuities

The government has particularly restrictive and complex rules regarding the acceptance of meals, entertainment, gifts, and other business courtesies by government personnel and officials. Each government agency may establish its own interpretation of these rules and what it considers to be nominal value. Gratuities could include meals, transportation, lodging, services, conference fees, vendor promotional training, and discounts not available to the general public. Thus, you are prohibited from offering any of these gratuities or gifts to government personnel without the advance approval of your Senior Manager or cognizant Vice

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President. Such a gesture, intended to promote goodwill, may have the opposite effect by making the government employee uncomfortable about having to turn down (and possibly report) the offer. There may be limited circumstances where exceptions would apply; please consult your cognizant Vice President and the CFO for guidance.

Meals incidental to a business meeting may be offered to government personnel only with their prior understanding that they will pay the stated meal prices. You should exercise reasonable attempts to obtain the exact amounts, and if you are not successful, document the situation on your expense report.

Three Wire Systems’ employees may generally offer government employees light refreshments, such as soft drinks, coffee, and doughnuts, when not part of a meal. Also, very modest advertising or promotional items, such as Three Wire Systems’ coffee mugs, calendars, or pens, are acceptable to give to government employees.

Employment offers and discussions


Complex rules govern the circumstances when a government employee or ex-government employee may discuss potential future employment with a government contractor such as Three Wire Systems. Such offers and/or discussions of employment will be done in strict compliance with the Government-wide Ethics Regulations (GER) promulgated by the Office of Government Ethics (OGE) and the Procurement Integrity Act (PIA) as implemented in FAR. You must obtain clearance from your cognizant Vice President and the CFO before engaging in such discussions.

Diversity

Three Wire Systems is committed to diversity in its workforce. The company strives to ensure that its employees are respected and valued for their individual uniqueness, knowledge, experience, and skills. By respecting and valuing differences, we enhance teamwork and thereby build a better company.

Work Environment

Three Wire Systems strives to provide all employees with a healthy, safe, and supportive work environment. This environment must also be free of unlawful discrimination; free of

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harassment of any kind, including sexual harassment; free from violence or the threat thereof; and free of retaliation against individuals who report an actual or potentially unethical or illegal conduct. Three Wire Systems does not tolerate any conduct that creates an intimidating or otherwise hostile, offensive, or unprofessional work environment, including violent behavior; threats of violence; possession of weapons; and the use, distribution, sale, manufacture, or possession of alcohol, illegal drugs, or other controlled substances (except for approved medical purposes).


Additionally, we adhere to all requirements found under the **US Trafficking Victims Protection Act** or TVPA specifically the US Trafficking Victims Protection Act or TVPA specifically prohibits the trafficking in persons primarily involving the use of force, fraud, or coercion to compel a person to provide labor or commercial sex.

As defined by the Trafficking Victims Protection Act (TVPA) of 2000 {22 U.S.C. Section 7102(10)}, sex trafficking involves the recruitment, harboring, transportation, provision, patronizing, soliciting, or obtaining of a person for the purpose of commercial sex. As defined in the Federal Acquisition Regulation (FAR) Subpart 22.17, severe forms of trafficking involve the recruitment, harboring, transportation, provision, patronizing, soliciting, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of forced labor.

Violation of the Trafficking Victims Protection Act allows the Government to terminate a contract if the prime or subcontractor is found to have committed an act that directly supports or advances trafficking in persons. In support of awareness of this act, the Government has imposed reporting and compliance requirements on federal agencies, including the Department of Defense, to ensure United States Government taxpayer money does not support human trafficking. To that end annual Combatting Trafficking in Persons (CTIP) training is required of all personnel supporting DOD contracts. Three Wire ensures all Three Wire employees supporting DOD contracts complete the CTIP training annually.

Antitrust Laws

Three Wire Systems' business activities are subject to antitrust and competition laws of numerous jurisdictions, including individual states and the federal government. Antitrust

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law violations expose both the company and any participating employees to civil lawsuits or criminal prosecution, including fines and imprisonment, and to the payment of punitive treble damages.

In general, the antitrust laws prohibit agreements or actions that may restrain trade or reduce competition. Violations include agreements among competitors to fix or control prices or rig bids; to boycott particular suppliers or clients; to allocate products, territories, or markets; or to limit the production or sale of products or services. In some instances, the antitrust laws may prohibit price discrimination in the sale or purchase of goods.

The antitrust laws apply to both formal and informal communications. If you are involved in trade association activities or in other situations involving informal communication among competitors, clients, business associates, or suppliers, be especially alert to the requirements of the law in that jurisdiction. In such situations, do not discuss prices, pricing policy, terms and conditions, marketing plans, and similar matters of competitive interest. If a competitor tries to initiate improper discussions regarding these topics with you, disengage from the discussion and contact your cognizant Vice President.


Contracts Department

Please note that there are a number of special antitrust concerns related to U.S. government contract teaming agreements. You are encouraged to read portions of Part 9 of the Federal Acquisition Regulation, which discusses antitrust restrictions on teaming agreements, and when negotiating teaming agreements, you should contact the CFO for guidance regarding antitrust issues.

If you have questions about the applicability of antitrust laws to your activities, then you should contact the Executive VP/CFO or the Contracts Department.

Foreign Corrupt Practices Act and International Anti-Bribery Laws

The U.S. Foreign Corrupt Practices Act (FCPA) prohibits the offer or payment of money or anything of value to an official of a foreign country or public international organization, foreign political party or official thereof, or any candidate for political office of a foreign country ("foreign official") for the purpose of inducing the official to use his or her

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influence to affect a government act or decision in order to obtain, retain, or direct any business or obtain any other improper advantage. The prohibition applies both to offers and payments made directly by Three Wire Systems and to those made through intermediaries such as business associates, partners, agents, consultants, and family members. Directors, officers, and employees of government-owned companies and members of royal families may be considered to be foreign officials subject to these restrictions. Prohibited offers or payments may include entertainment money, and other gifts.


Violation of any of these laws may result in severe criminal penalties for the company and the individual, including imprisonment, as well as disciplinary action by Three Wire Systems.

Because determining what the law allows or prohibits is complicated, you should consult the CFO of Three Wire Systems before initiating any business relationship, whether direct or indirect, with any person who might be considered to be a foreign official. Particular care should be taken in selecting partners and retaining marketing and other consultants operating outside the United States. In accordance with company policies, you must obtain approval from the CFO of Three Wire Systems prior to engaging such consultants and partners, and you must obtain appropriate assurances that no improper payments will be made by or on behalf of such consultants or partners. You must also properly account for all payments on the company's financial books and records.

Anti-boycott Law

The U.S. anti-boycott laws prohibit the company from complying with or supporting a country's boycott of another country that is "friendly" to the United States.

An illegal boycott request can be made in documents such as bid invitations, purchase contracts, and letters of credit, or orally in connection with a transaction. Such a request might even take the form of a contractual provision requiring compliance with a country's law that mandates participation in a prohibited boycott. Even when a company refuses to comply with a prohibited boycott, U.S. law requires companies to report promptly to the U.S. government any request the company receives to support or furnish information regarding a boycott. The rules governing Three Wire Systems' obligations under the anti-

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boycott law are complex, and the penalties for violating them are severe. Therefore, in all cases, you should be attentive to situations where boycott requests may occur, and immediately consult the CFO when a boycott-related matter comes to your attention.


Export Control Laws

Three Wire Systems must comply with all applicable U.S. export control laws and regulations. Under U.S. law, an export occurs when a commodity, software, or technology is transferred from the United States to a foreign national, a foreign company, or a foreign country. Export laws apply to intercompany transactions; transactions with suppliers, equipment manufacturers, and alliance or joint venture or consortium partners; and disclosures to Three Wire Systems, employees who are foreign nationals. Software or technology can be exported during meetings, or electronically, or through a facsimile transmission.

It is against Three Wire Systems policy and a violation of U.S. export laws to export certain commodities, technology, and software to certain countries without first obtaining a license, or to engage in exports to sanctioned countries, entities, or individuals. Management instructions provide further information and guidance concerning application of these laws. Because these laws are complex, you must seek guidance from the CEO of Three Wire Systems before entering into an activity that might implicate export control laws. U.S. economic sanctions laws also restrict exports and other transactions with governments of, and persons and entities associated with, sanctioned countries such as Iran, Libya, and North Korea, among others, and with specially designated individuals and entities affiliated with other countries. Because the list of sanctioned countries and specially designated individuals is subject to change—and because the laws regarding economic sanctions are particularly complex—it is essential that you seek guidance from the Three Wire Systems, CFO of Three Wire Systems, regarding any contact or transaction that might involve sanctions concerns.

U.S. Equal Employment Opportunity Laws

U.S. Equal Employment Opportunity (EEO) laws prohibit discrimination on a number of bases, including race, color, religion, sex, age, national origin, pregnancy, physical or mental disability, citizenship, and disabled veteran, Vietnam-era veteran, or other covered veteran status. Various state and local EEO laws may also prohibit other forms of

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discrimination, such as discrimination on the basis of marital status, sexual orientation, or HIV status.

In keeping with its EEO commitment, Three Wire Systems does not tolerate discrimination toward—or harassment of—applicants or employees by anyone, including managers, supervisors, co-workers, other employees, suppliers, business associates, contractors, and clients. These policies govern your employment regardless of workplace location, which may include a client's premises or an offsite business meeting. They also govern conduct at all company-sponsored activities. As a Three Wire Systems' employee, you must familiarize yourself with the company EEO policies, abide by them, and immediately report any conduct that you believe is inconsistent with or a violation of said policies.

Health and Safety


All Three Wire Systems employees are responsible for maintaining a safe and healthy work environment. Strict adherence to Three Wire Systems' health and safety policies and guidelines is required. Employees have a duty to immediately report any health or safety concerns to their supervisors, managers, or site safety personnel. Three Wire Systems' policy strictly forbids retaliation or reprisals against an employee for reporting a health or safety concern.

Political Activities

In the U.S. and many other countries, corporations' political activities are significantly limited by law. As a general rule, no political contribution of corporate funds or use of corporate property, services, or other assets (including employee work time spent on such activities) may be made, including costs charged to a non-reimbursable charge number. It is Three Wire Systems' policy not to apply direct or indirect pressure in any form toward employees to make any political contributions or participate in the support of a political party, the political candidacy of any individual, or a political cause. You may, however, voluntarily participate in political causes or PACs.

Alcohol and Substance Abuse

Three Wire Systems' policy and our government contracts prohibit the illegal use, sale, purchase, transfer, manufacture, possession, or impairing presence in one's system of controlled substances while on company or client's premises or jobsites. Possession and

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use of medically prescribed drugs is allowed, provided such use does not impair an employee's ability to perform his or her job. Similarly, the use, sale, purchase, transfer, manufacture, or possession of alcoholic beverages by employees while on company or client's premises is prohibited except as authorized by the company for company-sanctioned activities or events.

Conflict of Interest

A conflict of interest exists if you have any interest or activities outside Three Wire Systems that you could advance at the expense of the company's interests. A conflict of interest can arise because of circumstances alone, without any deliberate action on your part. Each situation is different, so you need to consider many factors including how substantial and how realistic the risk is to Three Wire Systems' business interests. You should consult with your cognizant Vice President, and the CFO, if you have any questions concerning whether your circumstances constitute a conflict of interest. All Three Wire Systems employees are required to adhere to and be guided by the Company's Conflict of Interest Plan.


Some common types of conflicts and their implications are explored below to help you make informed decisions.

Competing with Three Wire Systems

You may not perform services in competition with Three Wire Systems. Further, you may not, without Three Wire Systems' consent, work as an employee, consultant, officer, or member of the board of directors of a company that is an actual or potential competitor of Three Wire Systems.

Supplying Three Wire Systems

As a Three Wire Systems officer, director, or employee, you may not accept money or any benefit from a supplier or potential supplier for advice or services that relate to the supplier's business. You also may not represent a supplier to Three Wire Systems, be a part of its operating management, or work on anything that the supplier offers Three Wire Systems. Although there may be exceptions under special company programs, you may not, as a general rule, be a supplier to Three Wire Systems or work for a potential supplier while employed by Three Wire Systems. In all cases, seek advance approval from your

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cognizant Vice President, and the CFO.

Using Three Wire Systems' Time and Assets

You may not perform outside work or solicit business other than for Three Wire Systems while on Three Wire Systems' premises or Three Wire Systems' time. You also may not use Three Wire Systems' or its client's materials, resources, or proprietary information for any outside work.

Public Service

Three Wire Systems employees may actively participate in civic or community organizations. The company commends and encourages such public involvement. In that role, however, you may at times find yourself in a difficult or awkward situation. When you speak out on public issues, be sure that you do so as an individual. Do not give the impression that you are speaking or acting on behalf of Three Wire Systems.


Participation in Outside Organizations

You are encouraged to participate in professional, national, regional, and community organizations, provided there is no implied Three Wire Systems endorsement or sponsorship. If your service as a trustee, director, or officer of these types of organizations will involve significant time, financial contributions, or possible Three Wire Systems endorsement, then you must first obtain authorization from your cognizant Vice President.

Your Personal Financial Interests

You should not have a financial interest in an actual or potential supplier, competitor, client, or any other organization that could cause a conflict of interest. A financial interest would be improper if the combination of your job, the amount of your investment, and the company you invest in could influence your actions as a Three Wire Systems employee. If you are considering a personal investment in such an organization, then ask yourself these questions:

- What is the nature and extent of the relationship between Three Wire Systems and the other company?

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- If the other company is in more than one line of business, how significant is the part that competes with or supplies Three Wire Systems?
- What is the amount of my investment, and how does it compare with my salary and other family income, including that from other investments?
- Could my investment influence me to take some action as a Three Wire Systems employee to protect or enhance it?
- Given my job at Three Wire Systems, to what extent could my actions as a Three Wire Systems, employee affect the value of my investment in the other company?
- Could my actions significantly enhance my investment, even if it is a relatively modest one?

In the case of a supplier, ask yourself if you have anything to do, directly or indirectly, with Three Wire Systems' decision to do business with this company. If so, you should not have any financial interest in the other company.


You may not evade these guidelines by acting through someone else, or by forming or using an entity or acting through friends or members of your family.

Compliance and Disclosure

As a Three Wire Systems employee, you are responsible for your own ethical and professional behavior. You are also responsible for promptly reporting possible violations of Three Wire Systems' Code of Ethics and Business Conduct to your supervisor. If you do not feel comfortable directing your concerns to your supervisor, then you may go directly to the CFO.

Supervisors must be careful in word and conduct to avoid placing, or seeming to place, pressure on subordinates that could cause them to deviate from ethical and professional norms of conduct. Supervisors should seek guidance from their cognizant Vice President and/or the CFO.

Questions about corporate policy and questions regarding interpretation of law should be discussed with the CFO.

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Employee reports are handled in confidence to the extent permitted by law and consistent with the company's need to investigate the matter. No employee will be subject to retaliation because of a report made to a supervisor, cognizant Vice President, or the CFO. If the reporting employee is directly involved in the violation, then the fact that he/she reported the violation will be considered in any resulting employment action.

If at any time Three Wire Systems or its representatives discover information concerning criminal activity or any other legal violations, Three Wire Systems will disclose that information to law enforcement authorities.

Employee Concerns


Three Wire Systems encourages open communication. You have an obligation to inform the company of any unlawful or unethical conduct, conflicts of interest, unsafe conditions, lack of proper security for information or property, or other violations (or potential violations) of Three Wire Systems policy that might come to your attention.

You may report in person, by phone, via e-mail, or in writing by name or anonymously. With respect to reporting anonymously you should report the matter to the CFO

Follow-Up and Disciplinary Action

What happens if you report a concern?

- Your report will be investigated promptly;
- It will be kept confidential to the extent permitted by law and consistent with Three Wire Systems' need to fully investigate the matter. However, if Three Wire Systems discovers criminal or otherwise improper activity, then it may report such activity to appropriate government or law enforcement authorities;
- Only those with a need to know will be involved in or informed of the investigation;
- Threats or acts of retaliation against you for reporting unethical or illegal conduct will not be tolerated;
- Threats or acts of retaliation against an individual who participates in or

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provides information during an investigation will not be tolerated;

- Any attempt to harm or slander another employee or Three Wire Systems through false accusations will be grounds for disciplinary action, up to and including dismissal.

A report of unethical or illegal conduct must be taken very seriously, both by the person reporting the possible violation and the person who receives the report.

A violation of the rules and standards set forth in Three Wire Systems’ Code of Ethics and Business Conduct and Three Wire Systems policies and procedures may be grounds for disciplinary action, up to and including dismissal.

Disciplinary action may be taken against any individual who:


- Authorizes or participates in a violation of the Three Wire Systems’ Code of Ethics and Business Conduct or Three Wire Systems policies and procedures;
- Improperly or negligently supervises a person who commits a violation;
- Fails to report a violation or withholds relevant information about a violation;
- Attempts to retaliate against an employee who reports a suspected violation; or
- Attempts to retaliate against an employee who participates in or provides information during an investigation of a suspected violation.

Education and Training

Three Wire Systems’ will provide education and training programs to familiarize employees with these standards of conduct, and to explain how to consistently conduct our government business in an ethical and compliant manner, and to keep employees updated as new regulations are enacted.

Training materials that you should have and be familiar with include Three Wire Systems’:

- Code of Ethics and Business Conduct booklet;
- Policy and Procedures on Alcohol and Drug Abuse;

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- Policy on Sexual Abuse/Harassment.

In addition, all employees must ensure that they are aware of the company policies, procedures, and instructions that apply to their respective activities.

The Code is not an expressed or implied contract of employment benefitting you and does not create any contractual rights of any kind that obligate Three Wire Systems.


Receipt and Acknowledgement of Three Wire Systems Code of Ethics and Business Conduct

I have received and reviewed the attached Code of Ethics and Business Conduct and understand that failure to follow the requirements and conditions established by Three Wire Systems, LLC and VetAdvisor, LLC may result in appropriate disciplinary action, up to and including termination from employment.

Employee Name

Employee Signature

Date

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Please sign and return to Human Resources

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SIGNATURE

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