



CODE OF ETHICS AND BUSINESS CONDUCT GUIDE

***“Living the FirstLine
Mindset”***

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GENERAL

Mission Letter

Dear FirstLine Employees:

This guide, "*Living the FirstLine Mindset*", has been adopted as our Company's Code of Ethics and Business Conduct. It summarizes the qualities and principles that are to guide our actions in business. Doing what is right because it is the right thing to do is the foundation of FirstLine's business culture. We expect our agents, consultants, contractors, representatives, and suppliers to be guided by them as well.

We strive to conduct business in ways that reflect our Code of Ethics and Business Conduct (The Code) — collectively as a company and as individual employees within the company. Through communications and training, we continually link individuals to Our Core Values and expectations. Honesty and Integrity underlie everything that we do and are always a top priority. We must not sacrifice our integrity to achieve business objectives.

You can count on us to do everything in our power to meet FirstLine standards. We are counting on you to do the same.

There will be no end to our success as long as we continue in our commitment to provide customer-focused, security service solutions to government and commercial entities—working as a partner in the first line of homeland security and defense of our Nation's critical infrastructure—protecting and securing personnel, property, and information.

Sincerely,

Stephen P. Metzler
Vice President - Operations
FirstLine Transportation Security, Inc.

Introduction

FirstLine is dedicated to providing customer-focused, security service solutions to government and commercial entities—working as a partner in the first line of homeland security and defense of our Nation's critical infrastructure—protecting and securing personnel, property, and information.

FirstLine is focused on homeland security and helping government agencies mitigate threats to people, property, sensitive and classified information, and other vital assets.

FirstLine is one of the nation's leading security screening/guard service providers and the supplier of government solutions for technical and administrative support including but not limited to personnel security services such as adjudication/suitability determination, personnel management, physical security and training programs to support homeland security and national defense.

As a team member you are responsible for Living the FirstLine Mindset which is a guide to our Company's Code of Ethics and Business Conduct. The Code summarizes the qualities and principles that are to guide our actions in business. We expect our agents, consultants, contractors, representatives, and suppliers to be guided by them as well. There are numerous resources available to assist you in meeting the challenge of performing your duties and responsibilities to include this Code and other training programs. There can be no better course of action for you than to apply common sense and sound judgment to the manner in which you conduct yourself. However, do not hesitate to use the resources that are available whenever it is necessary to seek clarification. FirstLine aims to "set the standard" for ethical business conduct. We will achieve this through six qualities: Honesty, Integrity, Respect, Trust, Responsibility, and Citizenship.

Honesty: to be truthful in all our endeavors; to be honest and forthright with one another

Integrity: to say what we mean, to deliver what we promise, and to stand for what is right.

Respect: to treat one another with dignity and fairness, appreciating the diversity of our workforce and the uniqueness of each employee.

Trust: to build confidence through teamwork and open, candid communication.

Responsibility: to speak up - without fear of retribution - and report concerns in the work place, including violations of laws, regulations and company policies, and seek clarification and guidance whenever there is doubt.

Citizenship: to obey all the laws of the United States and the other countries in which we do business and to do our part to make the communities in which we live better.

Living the FirstLine Mindset does not address every conceivable situation, rule or law that you may encounter. What it will provide is straightforward information about the Company's operating principles and expectations.

This document is not an employment contract or any other type of contract and does not modify the terms and conditions of employee's benefits provided by FirstLine.

Report Violations of this Code

You have many different channels to report violations or potential violations of this Code, including your supervisor, manager, human resources, performance assurance and regulatory compliance, as appropriate.

If you have good reason to believe that a violation of the Code or a contract provision has occurred, or you are asked to violate the Code or a contract provision, don't remain silent. Report such violations, or suspected violations; depending on the circumstances, failure to report may itself violate the Code. Remember that no unethical or illegal acts can be justified by saying that they benefited the Company, or that they were directed by a higher authority in the organization.

In addition to reporting alleged violations, you are encouraged to contact the Code of Ethics and Business Conduct HelpLine to discuss any ethics questions or concerns. When faced with an ethical dilemma, it is always better to obtain guidance before acting.

You can communicate with the Code of Ethics and Business Conduct Official confidentially using the following information:

Code of Ethics and Business Conduct HelpLine is available 24 hours a day, seven days of week.

Call: 1-866-417-7960, extension 109

**Write: FirstLine Transportation Security, Inc.
RE: Code of Ethics and Business Conduct Official
4401 Rockside Road, Suite 401
Cleveland, OH 44131**

Fax: 216-674-5395

Email: ethics@firstlinets.com

In addition you may visit Other Ethics Sites for more information.

Perspective on other organizations and companies deal with ethics issues. FirstLine does not specifically endorse the content of external sites.

Defense Industry Initiative <http://www.dii.org/>

U.S. Department of Defense Standards of Conduct Office http://www.dod.mil/dodgc/defense_ethics/

Ethics and Compliance Officers Association <http://www.theecoa.org//AM/Template.cfm?Section=Home>

Ethics on the Web http://commfaculty.fullerton.edu/lester/ethics/ethics_list.html

Ethics Resource Center <http://www.ethics.org/>

U.S. Office of Government Ethics <http://www.usoge.gov/>

Computer Professionals for Social Responsibility <http://cpsr.org/>

Contacting the Code of Ethics and Business Conduct Official

How the Ethics Process Works at FirstLine

FirstLine's process for investigating an alleged violation of the Code, as part of our internal control system, is to gather information and consider if the evidence is credible. The investigation may include conducting interviews of other witnesses or parties involved and/or review of other forms of documentation that may be available.

The Vice President of Performance Assurance & Regulatory Compliance – the Code of Ethics and Business Conduct Official, will lead the investigation and has the authority to make independent decisions in response to the alleged violation without management interference. At the conclusion of the investigation to the alleged violation a determination will be made to the validity of the violation. If it is determined that there is credible evidence, the party(ies) involved in such violation will be disciplined and/or terminated accordingly based on company policy. Additionally, FirstLine will report any and all illegal acts (criminal and/or civil) and/or false claims to the government as required.

What can you expect when you contact the Code of Ethics and Business Conduct Official?

- Your concerns will be treated seriously and fairly.
- You will be treated with dignity and respect.
- You need not identify yourself.
- Whether you identify yourself or not, your communication will be kept confidential to the greatest extent possible.
- If your concerns are not resolved at the time you call, you will be informed of the outcome. If you report anonymously, you can call the Code of Ethics and Business Conduct HelpLine to learn the outcome of the case.
- Due to privacy considerations, you likely will not be informed of the details of any discipline that may result from the investigation into your concerns.
- The Company takes its obligations very seriously and will take the appropriate actions in response to violations of the Code, even if these actions are not visible to you.

Remember, there is never a penalty for contacting the Code of Ethics and Business Conduct Office in good faith. People in a position of authority cannot stop you. Efforts to try and stop a report of violation of the Code are subject to disciplinary action which may include termination of employment. ***FirstLine will not tolerate retaliation against employees who raise concerns to any source in good faith.***

Compliance and Ethics
FirstLine Obligations as a Corporate Citizen

We are committed to the highest ethical standards of conduct to those whom we have an obligation.

For our employees we are committed to honesty, a just management, fairness, providing a safe and healthy environment, and respecting the dignity due everyone.

For our customers we are committed to produce reliable products and services, delivered on time, at a fair price.

For the communities in which we live and work we are committed to acting as concerned and responsible neighbors, reflecting all aspects of good citizenship.

For continued success of our business we are committed to pursuing sound growth and earnings objectives and to exercising prudence in the use of our assets and resources.

For our suppliers we are committed to fair competition and the sense of responsibility required of a good customer.

Obey the Law

We will conduct our business in accordance with all applicable laws and regulations. The laws and regulations related to contracting with the United States government are far reaching and complex, thus placing burdens on FirstLine that are in addition to those faced by companies without government contracts. Compliance with the law does not comprise our entire ethical responsibility. Rather, it is at a minimum, an absolutely essential condition for performance of our duties.

References

For more information regarding the topic discussed in the Code as well as other FirstLine policies, employees should consult the following:

Employee Handbook policies as amended or revised

102 Employee Relations
103 Equal Employment Opportunity
104 Ethical Business Conduct
108 Conflicts of Interest
112 Safeguard and Use of Information, Documents, and Records
114 Disability Accommodations
401 Timekeeping
403 Pay Administration
501 Safety
502 Work Schedule, Rest and Meal Periods, and Overtime
505 Tobacco Use (Smoke/Smokeless)
508 Use of Equipment, Property, and Vehicles
518 Physical Security and Workplace Monitoring
522 Workplace Violence Prevention
701 Employee Conduct and Work Rules
702 Drug and Alcohol Use
703 Sexual and Other Unlawful Harassment
850 Possession of Firearms or Other Weapons
851 Borrowing and Lending Money
852 Gambling and Related Activities
853 Protection of Whistleblowers from Retaliation
854 Reporting Violations

Company Standard Operating Procedures / General Operations Guide

FirstLine Training Programs

Customer Standard Operating Procedures / Contract

OUR EMPLOYEES

General Employee Responsibilities

All employees are responsible for behaving in a way that does not reflect poorly or discredit FirstLine or our customers. All employees are subject to Code as well as our agents, consultants, contractors, representatives, and supplies. Failure to adhere to this policy will result in disciplinary action up to and including termination. The following conduct reminders highlight key rules of conduct for all employees and personnel when they are representing or acting on behalf of the company. When dealing with the public and each other:

- Employees shall be patient, courteous and respectful.
- Employees shall be tactful in the performance of their duties, shall control their tempers, and exercise patience and discretion.
- Employees are expected to conduct themselves professionally in the workplace.
- Employees shall conduct their personal and business affairs in a manner that does not discredit or otherwise bring the organization into disrepute or compromise their ability to perform duties.
- Employees shall conduct themselves at all times, both on and off duty, in such a manner as to reflect most favorably upon FirstLine.

Supervisor Responsibilities

In addition to the general employee responsibilities described above, supervisors are responsible for applying FirstLine's conduct and discipline policies to employees under their supervision. In this context, the term supervisor includes management official; and team leaders officially designated as Supervisory. In this capacity, supervisors must provide positive leadership and serve as a role model for subordinates by demonstrating commitment and sense of responsibility to their job and loyalty to the organization. Supervisors will fully support and comply with the Government and FirstLine regulations, policies and programs taking corrective action when necessary, if an employee commits an offense in violation of those regulations, policies and programs.

Equal Opportunity

Promote a Positive Work Environment

All employees want and deserve a work place where they feel respected, satisfied, and appreciated. Harassment or discrimination of any kind and especially involving race, sex, age, national origin, religion, and veteran or disability status or any other protected characteristic as established by law will not be tolerated in our work place environment. Providing an environment that supports the honesty, integrity, respect, trust, responsibility, and citizenship of every employee permits us the opportunity to achieve excellence in our work place. While everyone who works for the Company must contribute to the creation and maintenance of such an environment, our executives and management personnel assume special responsibility for fostering a context for work that will bring out the best in all of us.

Work Safely

Protect Yourself, Your Fellow Employees, and the World We Live In

We are committed to providing a drug-free, safe, and healthy work environment, and to observe environmentally sound business practices throughout the company. We will strive, at a minimum, to do no harm and where possible, to make the communities in which we work a better place to live. Each of us is responsible for compliance with environmental, health, and safety laws and regulations. Observe posted warnings and regulations. Report immediately to the appropriate management any accident or injury sustained on the job, or any environmental or safety concern you may have.

Record Keeping

Keep Accurate and Complete Records

Employees must ensure that, within their sphere of business activity, FirstLine carries out its contractual obligations in a proper and timely manner and is not in breach of contract. No employee shall commit FirstLine to contractual obligations which are beyond the scope of that employee's internal authority. All transactions and records must be documented in a manner that clearly describes and identifies the true nature of business transactions, assets, liabilities or equity and classifies and records main a proper and timely manner, entries on the books of account in conformity with applicable accounting standards. No record, report, entry or document shall be falsified, distorted, misdirected, deliberately misleading, incomplete or suppressed. Improper accounting and documentation and fraudulent financial reporting are not only contrary to FirstLine policy but also violation of law and government regulations. Such violations potentially include personal liability, both civil and criminal, as well as sanctions against FirstLine. Employees are expected to maintain and comply with internal control standards and procedures to ensure that financial records and reports are accurate and reliable.

No one should rationalize or even consider misrepresenting facts or falsifying records. It is illegal, will not be tolerated, and will result in disciplinary action.

Record Costs Properly

Employees and their supervisors are responsible for ensuring that labor and material costs are accurately recorded and charged on the Company's records. These costs include, but are not limited to, normal contract work, work related to independent research and development, and bid and proposal activities. Employees and their supervisors are responsible for the Company's records.

Political Contributions

In the United States, federal law prohibits corporations from donating corporate funds, goods, or services, directly or indirectly, to candidates for federal office -- this includes employees' work time.

Any FirstLine contribution in connection with elections are made to political action committees in accordance with the law and only when approved by the Executive Management. In addition, FirstLine facilities and equipment may not be used for personal political purposes.

Follow the Law and Use Common Sense in Political Contributions and Activities

FirstLine encourages its employees to become involved in civic affairs and to participate in the political process. Employees must understand, however, that their involvement and participation must be on an individual basis, on their own time, and at their own expense. Employees must take care not to give the appearance of acting on FirstLine's behalf unless authorized to do so. Again, federal law prohibits corporations from donating 'corporate' funds, goods, or services, directly or indirectly, to candidates for federal offices -- this includes employees' work time. Local and state laws also govern political contributions and activities as they apply to their respective jurisdictions, and similar laws exist in other countries.

ENTERPRENEURIAL SPIRIT

Strictly Adhere to All Antitrust Laws

FirstLine values open and fair competition. We want to win, but only with integrity. Antitrust is a blanket term for strict federal and state laws that protect the free enterprise system. These laws deal with agreements and practices "in restraint of trade" such as price fixing and boycotting suppliers or customers, for example. They also bar pricing intended to run a competitor out of business; disparaging, misrepresenting, or harassing a competitor; stealing trade secrets; bribery, and kickbacks. Antitrust laws are vigorously enforced. FirstLine will not knowingly enter into business arrangements that eliminate or discourage competition or that provide us an improper competitive advantage, as such arrangements undermine the free marketplace and that violate antitrust laws. Violations of antitrust laws may result in severe penalties such as forced sales of parts of businesses and significant fines for the Company. There may also be sanctions against individual employees including substantial fines and prison sentences. If you are involved in any dealings with competitors, you are expected to know that antitrust laws may apply to your activities and to consult with the Code of Ethics and Business Conduct Official or the company's legal counsel before negotiating with or entering into any arrangements with a competitor. You are required to report any type of alleged violations.

Know and Follow the Law When Involved in International Business

The Foreign Corrupt Practices Act (FCPA), a federal statute, prohibits offering anything of value to foreign officials for the purpose of improperly influencing an official decision. It also prohibits unlawful political contributions to obtain or retain business. Finally, it prohibits the use of false records or accounts in the conduct of foreign business. You must strictly comply with the anti-corruption laws that govern FirstLine operations in the countries in which we do business, such laws are the FCPA and under the Organization of Economic Cooperation and Development (OECD) Convention and Combating Bribery of Foreign Officials as well as other international anti-bribery conventions.

Procurement Integrity

During the conduct of a federal government procurement, company personnel, representatives and consultants must not solicit, obtain or disclose contractor bid and proposal information or proprietary or source selection information.

The Procurement Integrity Act, *48 CFR 3.104-1-11* also places restrictions on employment discussions with current and former federal officials with regard to future non-government employment.

Truth in Negotiations

The Truth in Negotiations Act (TINA) FAR *15.403-4* states employees involved in the negotiations of contracts or other business transactions related to U.S. Government procurement must ensure that all cost and pricing statements, communications and representations of fact to customer representatives are complete, current, accurate and truthful.

Carefully Bid, Negotiate, and Perform Contracts

Only contracting officers and other designated employees, acting within the scope of their authority may enter into contracts or other arrangements. We must comply with the laws and regulations that govern the acquisition of goods and services by our customers. We will compete fairly and ethically for all business opportunities. In circumstances where there is reason to believe that the release or receipt of non-public information is unauthorized, do not attempt to obtain and do not accept such information from any source. Appropriate steps should be taken to recognize and avoid organizational conflicts in which one business unit's activities may preclude the pursuit of a related activity by another Company business unit.

If you are involved in proposals, bid preparations, or contract negotiations, you must be certain that all statements, communications, and representations to prospective customers are accurate and truthful. Once awarded, all contracts must be performed in compliance with specifications, requirements, and clauses.

CONFLICTS OF INTEREST

Avoid Illegal and Questionable Gifts or Favors

To Government Personnel:

Federal, state and local government departments and agencies are governed by laws and regulations concerning acceptance by their employees of entertainment, meals, gifts, gratuities, and other things of value from firms and persons with whom those departments and agencies do business or over whom they have regulatory authority. It is the general policy of FirstLine to strictly comply with those laws and regulations. With regard to all federal Executive Branch employees and any other government employees who work for customers or potential customers of the Company, it is the policy of FirstLine, to prohibit its employees from giving them things of value. Permissible exceptions are offering FirstLine advertising or promotional items of nominal value such as a coffee mug, calendar, or similar item displaying the Company logo, and providing modest refreshments such as soft drinks, coffee, and donuts on an occasional basis in connection with business activities. "Nominal value" is \$20.00 or less (not to exceed \$50.00 in a calendar year). (Note: Even though this policy may be more restrictive than the U.S. Government's own policy, this policy shall govern the conduct of all FirstLine employees.) Legislative, judicial, and state and local government personnel are subject to different restrictions; both the regulations and Company Policies pertaining to them must be consulted before courtesies are offered.

To Non-Government Personnel:

As long as it doesn't violate the standards of conduct of the recipient's organization, it's an acceptable practice to provide meals, refreshments, and entertainment of reasonable value in conjunction with business discussions with non-government personnel. Gifts, other than those of nominal value (\$100.00 or less), to private individuals or companies are prohibited unless specifically approved by the appropriate Vice President.

To Foreign Government Personnel and Public Officials:

The Company may be restricted from giving meals, gifts, gratuities, entertainment, or other things of value to personnel of foreign governments and foreign public officials by the Foreign Corrupt Practices Act (FCPA) and by laws of foreign countries. Employees must discuss such situations with the Vice President prior to making any gifts or providing any gratuities other than advertising items.

To FirstLine Personnel:

FirstLine employees may accept meals, refreshments, or entertainment of nominal value in connection with business discussions. While it is difficult to define "nominal" by means of a specific dollar amount, a common sense determination should dictate what would be considered lavish, extravagant, or frequent. It is the personal responsibility of each employee to ensure that his or her acceptance of such meals, refreshments, or entertainment is proper and could not reasonably be construed in any way as an attempt by the offering party to secure favorable treatment. FirstLine employees are not permitted to solicit or accept any gift that has retail or exchange value of \$100.00 or more from actual customers, suppliers, competitors, or representatives of companies having or seeking business relationships with FirstLine. Regarding tips or gifts of cash for services, FirstLine employees may not solicit or accept any tips or gifts of currency. If you have any questions about the propriety of a gift, gratuity, or item of value, contact the Code of Ethics and Business Conduct HelpLine at 1-866-417-7960, extension 109.

If you buy goods or services for FirstLine, or are involved in the procurement process, you must treat all suppliers uniformly and fairly. In deciding among competing suppliers, you must objectively and impartially weigh all facts and avoid even the appearance of favoritism. Established routines and procedures should be followed in the procurement of all goods and services.

Steer Clear of Conflicts of Interest

Playing favorites or having conflicts of interest - in practice or in appearance - runs counter to the fair treatment to which we are all entitled. Potential conflicts of interest may occur whenever an employee is in a position to influence a decision that may result in a personal gain for the employee or an immediate family member (i.e. spouse, significant other, children, parents, siblings) as a result of the Company's business dealings. Avoid any relationship, influence, or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job. When in doubt, share the facts of the situation with your supervisor, management, human resources, or performance assurance/regulatory compliance. Here are some ways a conflict of interest could arise:

- Employment by a competitor or potential competitor, regardless of the nature of the employment, while employed by FirstLine.
- Outside employment that will prevent the employee from fully performing work for which he/she is employed at the Company, including overtime assignments.
- Acceptance of gifts, payment, or services from those seeking to do business with FirstLine.
- Placement of business with a firm owned or controlled by an employee or his/her family.

- Ownership by an employee and his or her immediate family of, or substantial interest in, a company which is a competitor or a supplier.
- Acting as a consultant to a FirstLine customer or supplier.

Business Integrity. Maintain the Integrity of Consultants, Agents, and Representatives

Business integrity is a key standard for the selection and retention of those who represent FirstLine. Agents, representatives, or consultants must certify their willingness to comply with the Company's policies and procedures and must never be retained to circumvent our values and principles. Paying bribes or kickbacks, engaging in industrial espionage, obtaining the proprietary data of a third party, or gaining inside information or influence are just a few examples of what could give us an unfair competitive advantage in government procurement and could result in violations of law.

PROTECTION OF ASSETS

Work Product Ownership

All FirstLine employees must be aware that FirstLine retains legal ownership of the product of their work. No work product, including written and electronic documents, audio and video recordings, system code, any concepts, ideas, or other intellectual property created while employed at FirstLine can be claimed, construed, or presented as property of the individual, even after employment by FirstLine has been terminated or the relevant project completed.

Protect Proprietary Information

Proprietary company records and information may not be disclosed to anyone without proper authorization. Keep proprietary documents protected and secure. FirstLine related information including without limitation, documents, notes, files, records, oral information, computer files or similar materials (except in the ordinary course of performing duties on behalf of FirstLine) may not be removed from FirstLine 's premises without permission from FirstLine. In the course of normal business activities, suppliers, customers, and competitors may sometimes divulge to you information that is proprietary to their business. Respect these confidences.

Protecting Sensitive Information

FirstLine's customers, suppliers, and stakeholders trust us to protect sensitive information. Each one of us generates or has access to sensitive information whether it is company proprietary information, unclassified (For Official Use Only, Sensitive Security Information, etc.) or classified information/documents (Secret, Top Secret, etc.). In turn, each of us has an obligation to protect sensitive information in which we have authorized access and a 'need to know'. Employees may not disclose or receive sensitive information, including proprietary company information, without proper authorization and/or clearance and have a 'need to know' to conduct their job/function. You must keep sensitive information protected and secure by following all company policies and procedures as well as federal regulations as applicable. Unauthorized release - in part or in whole –of sensitive information may result in civil penalty or other actions including immediate termination from employment.

Due to our contracts with the Department of Homeland Security (DHS) and with Department of Defense (DoD), much of the information we use to conduct business is considered to be unclassified (e.g. Sensitive Security Information (SSI) 49 CFR Part 1520) or classified (Confidential, Secret, Top Secret). Employees requiring access to SSI must have completed a background investigation that meets the contractual requirements and be approved to work on the contract by the Transportation Security Administration (TSA). Employees requiring access to classified information are required to be processed by FirstLine's Facility Security Officer (FSO). Authorized access to classified information may be granted only when two conditions are met: First, the recipient must have a valid and current security clearance (reviewed and approved by FSO via government systems) at a level at least as high as the information to be released. Second, the recipient must demonstrate the need for access to the classified information. This is referred to as need-to-know.

Obtain and Use Company and Customer Assets Wisely

Proper use of Company and customer property, electronic communication systems, information resources, material, facilities, and equipment is your responsibility. Employees must use and maintain these assets with the utmost care and respect, guarding against waste and abuse. Employees may not borrow nor permit others to borrow or remove Company property without management's permission. Be cost-conscious and alert to opportunities for improving performance while reducing costs. While these assets are intended to be used for the conduct of FirstLine's business, it is recognized that occasional personal use by employees may occur without adversely affecting the interests of the Company. Personal use of Company assets must always be in accordance with company policy – consult your supervisor for appropriate guidance and permission.

All employees are responsible for complying with the requirements of software copyright licenses related to software packages used in fulfilling job requirements.

ETHICS CHECK

Here are some ways a conflict of interest could arise:

- Employment by a competitor or potential competitor, regardless of the nature of the employment, while employed by FirstLine.
- Acceptance of gifts, payment, or services from those seeking to do business with FirstLine.
- Placement of business with a firm owned or controlled by an employee or his/her family.
- Ownership of, or substantial interest in, a company which is a competitor or a supplier.
- Acting as a consultant to a FirstLine customer or supplier.

When In Doubt, Ask Yourself - as to whether your behavior is in violation of the Code...

Are my actions legal?

Am I being fair and honest?

Will my action stand the test of time?

How will I feel about myself afterwards?

How will it look in the newspaper?

Will I sleep soundly tonight?

What would I teach a child to do?

How would I feel if my family, friends, and neighbors knew what I was doing?

If you are still not sure what to do, ask ... **and** keep asking until you are certain you are doing the right thing.

YOUR RESPONSIBILITY

It is the responsibility of all FirstLine Employees to read and comply with the standards of the Code, to seek advice and guidance when questions arise and to report violations of the FirstLine Code of Ethics and Business Conduct of which they have knowledge. Employees are encouraged to raise such issues with their manager first. In the event that is not possible they can contact the FirstLine Code of Ethics and Business Conduct HelpLine at 1-866-417-7960, extension 109. The company will treat such reports as confidential as possible. You may make an anonymous report if you desire. In any case, company policy prohibits direct or indirect retaliation on anyone reporting any violation to include but not limited to a violation of the FirstLine Code of Ethics and Business Conduct.

Responsibility to Investigations and Legal Actions

All FirstLine employees are required to cooperate in internal investigations to any alleged violation of company policies.

- No employee is permitted to destroy or alter documents, or electronic records, lie, or mislead an investigator (internal or external).
- No employee is permitted to obstruct the collection of information relating to an investigation or any legal action.
- If requested by FirstLine, employees are also required to cooperate with investigations conducted by the government.
- Employees are required to notify management or FirstLine Main CLE office at 1-866-417-7960 immediately if one learns that a government agency or any third party is conducting such an investigation or asking for information pertaining to a suspected violation of law.
- The Code of Ethics and Business Conduct Official and/or the company's legal counsel will help employees review information before it is released to the investigative organization.

CONSEQUENCES FOR VIOLATING THE CODE

FirstLine, as a federal contractor, is required to report credible evidence of violations in connection with the award, performance or closeout of a contract or subcontract; and of a significant contract overpayment. Violations of federal criminal laws, to include those acts involving fraud, conflict of interest, bribery, or gratuity violations or violations under the Civil False Claims Act will be reported to the contracting federal agency accordingly.

Employees who violate, the Code, especially those relating to our relationship the US Government but also those related to commercial customers, will be subject to disciplinary action up to and including termination of employment. Violations may also result in civil or criminal penalties. An employee who witnesses such a violation and fails to report it may be subject to discipline. Also a supervisor or manager may be subject to discipline to the extent that the violation reflects inadequate supervision or lack of diligence.

CLOSING

“Living the FirstLine Mindset” is to embrace the six key qualities:

Honesty: to be truthful in all our endeavors; to be honest and forthright with one another

Integrity: to say what we mean, to deliver what we promise, and to stand for what is right.

Respect: to treat one another with dignity and fairness, appreciating the diversity of our workforce and the uniqueness of each employee.

Trust: to build confidence through teamwork and open, candid communication.

Responsibility: to speak up - without fear of retribution - and report concerns in the work place, including violations of laws, regulations and company policies, and seek clarification and guidance whenever there is doubt.

Citizenship: to obey all the laws of the United States and the other countries in which we do business and to do our part to make the communities in which we live better.

Providing an environment that supports the honesty, integrity, respect, trust, responsibility, and citizenship of every employee permits us the opportunity to achieve excellence in our work place. Doing what is right because it is the right thing to do.

Working as a team – our success is endless as we live the FirstLine Mindset with customer-focused security service solutions to the government and commercial entities – working as a partner in the first line of homeland security and defense of our Nation’s critical infrastructure – protecting and securing personnel, property, and information.



Receipt and Acknowledgement Code of Ethics and Business Conduct Guide

I acknowledge that I have received my personal copy of FirstLine's Code of Ethics and Business Conduct. I have read and will abide by FirstLine's Code of Ethics and Business Conduct. I understand that each FirstLine employee, agents, consultants, contractors, representatives, and suppliers are responsible for knowing and adhering to the principles and standards of the code.

Signature: _____

Print Name: _____

Social Security # (last 4 digits): _____

Location: _____

Date: _____

Instructions:

Employees must read the Code of Ethic and Business Conduct Guide as well as complete Training Course #104, Ethic For Everyone. Please submit receipt and acknowledgement to HR/Training as well as your certificate of completion for Ethics for Everyone to the Training Department or Project Manager at assigned location.

Employees are to have access or possess a copy of the FirstLine Code of Ethics and Business Conduct, if not received; please notify a member of management or go online to www.firstlinets.com.