

RPSEA Standards of Business Ethics and Conduct

1. Purpose
 2. Scope
 3. Policy
 4. Responsibilities
 5. Disclosure
 6. Requirements
 - 6.1. Conflicts of Interest
 - 6.2. Timecharging
 - 6.3. Expense Reports
 - 6.4. Use of RPSEA and Customer Property, Equipment and Facilities
 - 6.5. Copyrighted or Licensed Materials
 - 6.6. Financial Integrity
 - 6.7. Proper Recording and Disbursement of Funds and Other Assets
 - 6.8. Proprietary Information
 - 6.9. Relationship with Customers and Suppliers (Gifts/Gratuities/Bribes)
 7. Applicability
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1. Purpose

The purpose of this document is to describe RPSEA's principles of business ethics and conduct, as well as those practices intended to promote an organizational culture that requires, encourages, and rewards ethical conduct and legal compliance.

2. Scope

This policy sets forth general standards for the conduct of RPSEA employees, consultants, subcontractors, and suppliers in carrying out RPSEA business and provides guidance on activities of particular interest in the conduct of that business. In addressing certain specific activities, the policy is not intended to be all-encompassing; but rather to highlight core principles of the company's ethical culture. Ethical behavior is both an individual and a shared responsibility.

3. Policy

RPSEA is committed to conducting its business in accordance with all applicable federal, state, and local laws and regulations, and in accordance with high standards of business ethics. RPSEA employees are expected to comply and to assist the company in complying with each of these obligations.

4. Responsibilities

RPSEA's President shall have primary responsibility for rendering advice regarding activities that may be proscribed or regulated by this policy.

Employees are encouraged to consult with the president with regard to ethics and compliance issues.

4.1 General Responsibilities for All Associated with RPSEA

RPSEA directors, employees, agents, consultants, subcontractors, and suppliers are expected to observe a basic code of conduct in all activities related to RPSEA. Each must:

- Conduct RPSEA business in accordance with high ethical standards.
- Comply with the letter and spirit of the laws of the United States and other jurisdictions in which RPSEA does business.
- Use RPSEA and customer resources appropriately.
- Never participate in, condone, or ignore illegal or unethical acts.
- Raise ethical concerns immediately, and escalate them as necessary to all appropriate resources within the company.

4.2 Responsibilities of Consultants, Subcontractors, and Suppliers

RPSEA policy is (1) to instruct its consultants, subcontractors, and suppliers that they are expected and required to comply fully with RPSEA's standards of business ethics and conduct and (2) to inform appropriate company officials immediately of any illegal or unethical conduct in their dealings with RPSEA officers or employees.

5. Disclosure

RPSEA employees must not tolerate violations of RPSEA's ethical standards. If an employee knows of or suspects a violation of law or ethical misconduct, the employee must disclose it to an appropriate company resource. Disclosure of actual or suspected violations of RPSEA's standards of conduct is critical to the well-being of the company.

RPSEA's management is committed at all levels to take disclosure communications seriously, to listen carefully, to investigate when necessary, and to take appropriate corrective action when warranted. Employees should understand that raising ethical concerns or reporting misconduct is expected and required. Retaliation of any sort against employees reporting legal or ethical misconduct is strictly prohibited and will not be tolerated. Employee concerns about any such retaliation should be reported immediately to the President.

6. Requirements

6.1 Conflicts of Interest: Other Employment, Outside Interests, or Related Transactions

6.1.1

RPSEA employees must refrain from any private business or professional activity and from having any direct or indirect financial interest that would create a conflict between their private interests and their legal or moral responsibilities to this corporation. In their transactions with others, all employees are expected to act in the best interest of the consortium and not to their own private advantage. They are not to engage in any private business or professional activity or to enter into any financial transaction that involves the direct or indirect use of inside information (information that has not become public information) gained through their position with the company to further a private interest or for private gain for themselves or another person or entity. They are not to use their position in the company in any way, nor to induce or coerce any person or entity to provide any financial benefit to themselves or another person or entity.

January, 2007

6.1.2

No employee may serve as a director, officer, or employee of; serve in any managerial capacity for; or be retained or compensated in any capacity by any private or public entity, including the federal or any state or local government, that is a customer, vendor, or competitor of this consortium without the prior written approval of RPSEA's president.

6.1.3

No employee, nor any member of the employee's household or immediate family (relative of the employee or the employee's spouse), may speculate in materials, equipment, supplies, or property to be purchased by the consortium based upon information gained in the performance of the employee's duties and not available to the general public

6.1.4

No employee, nor any member of the employee's immediate family, shall be involved in any business transaction with the consortium wherein a conflict of interest exists, could exist, or appears or is perceived to exist. No employee, nor any member of the employee's immediate family, may have a substantial financial interest in an organization with which the consortium does business. Substantial financial interest includes being a proprietor or partner or owning stocks or bonds in excess of 10 percent of the total stocks or bonds of a corporation. If any departure from this policy is contemplated, the following conditions must be fulfilled before the business transaction commences:

6.1.4.1

The personal or financial interests of the employee must be fully disclosed in writing, via normal channels, to the president. This disclosure will include a description of and the dollar amount involved in the proposed transaction.

6.1.4.2

If the proposed business transaction is approved, adequate internal controls must be prescribed by the president to ensure that the transaction is carried out at arm's length and in a manner that will adequately protect the company's best interests.

6.2 Timecharging

RPSEA prepares billings to the government and other customers from its time records. Inaccuracies in such records could subject the company or its personnel to criticism and, under certain circumstances, could be deemed a violation of federal law. It is the responsibility of RPSEA personnel to abide by this policy. When paper timecards are used, the employee's signature on the timecard is the attestation that the document reflects an accurate distribution of time charges in accordance with company policy. For electronic timecharging, the employee's electronic submittal of the time record is the attestation that the record reflects an accurate distribution of time charges in accordance with company policy.

6.3 Expense Reports

RPSEA uses an expense report as support for preparing bills to the government and other customers. Invoices that contain inaccurate costs can be considered a false claim resulting in penalties for RPSEA. By signing an expense report and submitting it for approval, the employee is verifying that the request for reimbursement is valid and in accordance with company policy. The employee's signature on the expense report is the attestation that the expenses are accurately stated and recorded against the proper account.

6.4 Use of RPSEA and Customer Property, Equipment, and Facilities

Employees are not authorized to use or allow the use of RPSEA property, software, equipment, or facilities for non-company business unless the use is approved in advance by the president. Examples of activities that might be approved include the incidental and insignificant use of: (1) email between employees for communications of a social nature; (2) reproduction or facsimile equipment to perform personal tasks that would otherwise require that the employee leave the company's facilities during business hours; (3) personal computers to support further education and training, preparation of professional papers intended for publication, and (where the activity is to be accomplished outside of normal business hours) occasional word processing, scheduling, or financial planning of a personal nature; and (4) local telephone calls.

Employees are on notice that they have no expectation of privacy in the use of company computers, voice mail, and email systems. Although employees have certain passwords or codes to restrict access to computers, voice mail, and email to protect those systems against unauthorized access by external parties, employees should understand that these systems are intended for business use, and all computer information, voice mail, and email messages are considered company records and are not private. Therefore, RPSEA maintains the right to enter into any of those systems without notice to inspect and review all data recorded.

Since RPSEA reserves the right to access these systems without notice, employees should not assume that any information is private, including messages or data that are ~~deleted~~.+ Employees should also have no expectation of privacy relating to any information contained in their computer, whether on a hard drive, computer disk, or any other medium.

Computer, voice mail, or email messages must not contain any material that may reasonably be considered offensive, disruptive, defamatory, or disparaging toward any employee or company. Offensive content includes, but is not limited to, sexual comments or images, racial slurs, gender-specific comments, or any comments that might offend someone on account of his/her age, sex, sexual orientation, religion, race, color, political beliefs, national origin, disability, or veteran or marital status.

6.4.1

Notwithstanding any approval(s) by the company, if the use of company property, software, equipment, or facilities has a personal or outside business purpose and the costs are reasonably ascertainable (for example, long-distance calls or the use of overnight mail), the employee shall be required to account for such expenses and reimburse the company.

6.4.2

If the employee is located at a customer facility or is otherwise using equipment that has been furnished by the customer or purchased on the customer's account, such equipment and facilities can be used only to perform tasks under the contract for which it was provided. Thus, even the incidental and insignificant use of such property, software, equipment, or facilities for non-contract business without the specific written consent of an authorized customer representative is prohibited by this policy.

6.5 Copyrighted or Licensed Materials

It is both illegal and unethical to engage in practices that violate copyright laws or licensing arrangements. It is the policy of RPSEA that all employees respect the rights conferred by such laws and arrangements and refrain from making or purchasing unauthorized copies of protected materials such as printed matter and computer software.

January, 2007

6.6 Financial Integrity: Accurate Disclosure, Record Keeping, and Record Retention

RPSEA is committed to providing full, fair, accurate, timely, and understandable disclosure in all periodic reports and documents that the company files. The company has zero tolerance for fraudulent financial activities. These types of activities include, but are not limited to, the following fraud risks:

- Financial statement manipulation (i.e., improper revenue recognition, over/understatement of assets, significant management estimates, and significant/unusual transactions).
- Asset misappropriation (i.e., check kiting, personal purchases, creation of a fictitious vendor by an employee or using shell companies, and falsifying sales/hours).
- Other schemes with potential material effect on financial statements (i.e., unauthorized receipts or expenditures, and unauthorized acquisition, disposition, or use of assets).
- Financial misconduct by management (i.e., business expense fraud, conflicts of interest, insider trading, and unauthorized compensation).
- Disclosure fraud (i.e., financial statement and footnote manipulations, and misrepresentation of filings).
- Aiding and abetting any type of fraudulent financial activities.

All RPSEA employees must assist the company in maintaining sufficient financial internal controls and procedures to provide a reasonable assurance of accurate financial disclosure and business records in accordance with our policies and procedures, U.S. generally accepted accounting principles, and the rules and regulations of the federal and states' security laws by:

- Always maintaining accurate books and records that fully, fairly and accurately reflect the company's financial information and reporting of direct or indirect transactions.
- Assisting as appropriate to their roles and responsibilities in preparing financial statements and other financial information included in periodic reports in a manner that fairly presents in all material respects the financial condition, results of operations, and cash flows of the company.
- Refusing to tolerate the creation or insertion of false or misleading information in any RPSEA financial or other business record.
- Cooperating fully with the internal auditors and the independent auditors in their work and not impeding their efforts in any way or concealing information from them.
- Not authorizing or condoning the use of any "off book" accounting, unrecorded bank accounts, "slush funds," or any other device which may be utilized to distort records or true operating results and financial statements.

Reporting false information is strictly prohibited. Misrepresentation of any nature may lead to severe civil or criminal liability. Misrepresentation may take the form of omissions and inaccuracies, as well as organizing information in a way that is intended to mislead or misinform.

RPSEA must ensure that business records are available to meet the business needs of the company, including the legal, tax, and other regulatory requirements, wherever RPSEA conducts its business. Failure to comply with the requirement to preserve documents and other information as required can result in serious adverse consequences to RPSEA and its employees. Specifically, it is unlawful to destroy, conceal, alter, or falsify any RPSEA business or other record, document, or object for the purpose of obstructing or influencing any lawsuit or other legal, regulatory, or governmental proceeding or investigation. Doing so may subject

January, 2007

RPSEA and any offending persons to severe civil and criminal penalties including substantial damage awards, fines and imprisonment.

6.7 Proper Recording and Disbursement of Funds and Other Assets

Funds and other assets of the company are to be used only for legal and proper business purposes.

No false, improper, or misleading entries shall be made in the company's books and records. Complete and accurate information is to be given in response to inquiries from the company's internal auditors and certified public accountants. All payments made by or on behalf of the company for any purpose must be fully set out in, and are to be made only for the purpose described in, the company's documents and records that support the payment.

6.8 Proprietary Information

6.8.1 General

RPSEA does business honestly, fairly, and in accordance with the law. Accordingly, all employees are required to respect the confidential, proprietary, or trade secret information (collectively, ~~proprietary information~~) of others, and of the company. No employee shall use or disclose, directly or indirectly, any proprietary information of the company or another, except in the course of his/her employment, and always in strict accordance with applicable copyright laws and with the terms upon which the proprietary information was disclosed, including the terms of any confidentiality or teaming agreement executed by the company. Any representation of proprietary information in writing, graphics, computer code, or other embodiment shall be safeguarded from disclosure to unauthorized persons and shall be removed from company premises only as needed for company business.

Typically, proprietary information is appropriately marked as such. However, even absent such a written designation, if information is received under circumstances where the employee knows or reasonably should know that the information disclosed is intended to be proprietary information, then it shall be treated as such. Any questions concerning whether particular information or data should be treated as proprietary information should be referred to the president.

6.8.2 New Hires

No proprietary information shall be solicited or obtained from any prospective employee of the company. New employees of the company shall not bring to the company any proprietary information belonging to their former employers. No employee of the company will be assigned to any task that would require the employee to use, disclose, or rely upon any proprietary information of any third party. Any actual or apparent violation is to be brought to the attention of president.

6.8.3 Terminating Employees

The obligation to protect proprietary information survives the termination of employment. Absent a specific agreement to the contrary, the obligation to protect proprietary information extends indefinitely.

6.8.4 Competitors

Employees must not solicit or obtain, from any source, any proprietary information concerning a competitor. Information concerning competitors shall be obtained only through publicly available sources, or through unrestricted disclosures made by the competitor. So-called industrial

January, 2007

espionage is prohibited, and no employee shall knowingly induce a competitor or third party to disclose a competitor's proprietary information. Should an employee inadvertently come into possession of information known or suspected to be the proprietary information of another (including, in a U.S. government procurement, bid-and-proposal or source-selection information) the employee must safeguard and segregate that information, prevent copying or further disclosure, and seek immediate advice from the president.

6.8.5 Antitrust Laws Compliance

RPSEA believes in fair and open competition. Under no circumstances should arrangements affecting pricing, terms of sale, production volume, or marketing policies, such as allocation of customers or territories, be entered into with any competitor or potential competitor. Any RPSEA employee must immediately leave any meeting or conversation in which such a discussion arises and report it to his or her management.

RPSEA is subject to the U.S. antitrust laws. Their objective is to benefit consumers by promoting vigorous competition. The company believes strongly in fair and open competition, and is committed to complying with the laws that promote it. Because some activities of the company are sensitive under the antitrust laws, it is important that each employee comply fully with these laws. Among other things, employees may not engage in activities that :

- Restrict competition among clients (e.g., price fixing or allocating customers in the market) or unfairly restrict the ability of others to compete with our clients in the marketplace.
- Place other competitors at an unfair disadvantage in their offerings of similar services to our clients (e.g., by disparaging their services or improperly obtaining or using their proprietary information).
- Improperly favor RPSEA products over those of others in the development of technical requirements or performance of certification of clients.

The application of the antitrust laws to particular situations is not always clear, and employees are encouraged to seek legal advice as appropriate.

6.9 Relationship with Customers and Suppliers (Gifts/Gratuities/Bribes)

RPSEA's business relationships must be free from even the perception that favorable treatment was sought, received, or given as the result of a gift or gratuity. Therefore, except as provided herein, employees shall not offer or give any gift or gratuity to any customer nor shall employees accept or solicit any gift or gratuity from any supplier. In no instance shall a gift or gratuity be offered, given, or accepted if it would violate law, regulation, or the policies of the company or the recipient, or cause embarrassment to or negatively reflect on the company's reputation.

The scope of this policy applies to both RPSEA employees and any member of an RPSEA employee's household or immediate family.

6.9.1 Gifts and Gratuities to Federal, State, and Local Government Employees

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 government departments and agencies do business or over whom they have regulatory authority. It is the policy of RPSEA, at minimum, to comply strictly with those laws and regulations.

6.9.1.1 Federal Executive Branch Employees

RPSEA employees are prohibited from giving anything of value to federal Executive Branch employees, except modest refreshments such as soft drinks, coffee, and donuts on occasional basis in connection with necessary and legitimate business activities. In instance of office parties, picnics, and other RPSEA-sponsored gatherings attended by Executive Branch employees, to avoid providing an improper gift or gratuity, it is acceptable practice to estimate the fair value of food, drink, or other incidental items provided, and to have the Executive Branch employee contribute the appropriate amount in cash.

Any exceptions to this policy must be approved in writing by the president, since the provision of gifts, gratuities or other items of value to federal Executive Branch employees may expose the giver, the recipient, and the company to potential civil, criminal and administrative liability.

Note that employment, including the possibility of employment, may be considered a thing of value under the applicable regulations, hence any discussion of future employment with any U.S. government employee is prohibited.

6.9.1.2 Federal Legislative and Judiciary Branches, and State and Local Government Employees

Employees of the federal Legislative and Judiciary Branches and employees of state and local government departments or agencies are subject to a wide variety of different laws and regulations. These laws and the regulations pertaining to them must be consulted prior to offering such employees anything of value.

6.9.2 Gifts and Gratuities to Non-Government (Commercial) Persons

It is an acceptable practice for RPSEA employees to provide meals, refreshments, entertainment, and other gifts and gratuities of reasonable value to non-government persons in support of domestic commercial business activities, provided:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization. It is the responsibility of the providing RPSEA employee to inquire about and understand any prohibitions or limitations of the recipient's organization before offering any business courtesy.
- The business courtesy must be consistent with customary marketplace practices, infrequent in nature, and may not be lavish or extravagant.
- The employee has received management approval prior to offering or giving tangible gifts (including tickets to sporting, recreational, or other events) to a non-government person or entity with which the company does or seeks to do business.
- The gift or gratuity is not a "quid pro quo" for the award of a specific and definable business engagement.
- The gift or gratuity does not arise under or relate to a government contract on either the federal, state, or local level. It is the responsibility of the RPSEA employee to confirm the commercial, non-governmental nature of the relationship between the company and the intended recipient before offering any business courtesy.

Employees who approve these gifts or gratuities, including meals, refreshments and entertainment of value to non-government persons with which the company does or seeks to do business, are responsible for the propriety and reasonableness of expenditures and for proper recording.

6.9.3 Gifts and Gratuities to Foreign Government Personnel, Public Officials and Non-Government Persons

When conducting commercial and international business, good judgment and moderation must be exercised to avoid misinterpretation or even the appearance of impropriety, which could have an adverse effect on the reputation of the company or its employees. When considering offering gifts or gratuities (including entertainment and meals) to individuals of another company, country, or culture, it is important to assess the impact not only by RPSEA standards but also by those of the recipient, who may ascribe a different value to it than was intended. Customer entertainment or gifts and gratuities should be consistent with local, customary business practices and business needs, must not violate the Foreign Corrupt Practices Act (in the case of foreign government and public officials, including persons associated with government owned or controlled entities), and must be legal in the local jurisdiction. Keep in mind that gifts or gratuities which are lawful or commonplace in foreign countries may still violate the FCPA.

Under the U.S. Foreign Corrupt Practices Act, it is a crime for a U.S. company, its officers, employees, agents, and so forth, to promise to pay, pay, promise to give, give, or authorize the paying or giving of anything of value, directly or indirectly, to foreign government officials in order to influence the official's acts or decisions, or to induce the official to use his or her influence with others to affect the acts or decisions of a foreign government or international organization, if this is done in order to obtain or retain business or an unfair advantage. The term "foreign government official" includes anyone acting in an official capacity, employees of state-owned enterprises, officials of public international organizations (such as the UN, World Bank, etc.), and candidates for public office or officials of political parties. Employees may not give or offer to give, directly or indirectly, to such foreign government employees any entertainment, charitable contributions, meal or gift regardless of value, without the express written approval of corporate legal who must determine if the action is permissible under local and U.S. laws. Any meals provided to such foreign government employees should conform as closely as possible to U.S. government per diem rates. Any gifts must be limited to tokens of esteem such as company logo items. Employees also may not make loans, guarantee loans, or make payments to such federal, state and local government employees.

Individuals who approve these types of gifts gratuities or entertainment are responsible for the propriety and reasonableness of expenditures and for proper recording.

6.9.4 Acceptance by RPSEA Employees of Business Courtesies

Although an employee may not use his or her position at RPSEA to solicit a personal benefit of any kind or amount, it is permissible to accept unsolicited meals, refreshments, entertainment, and other business courtesies such as local transportation on an occasional basis, provided all of the following conditions are met:

- The acceptance will foster goodwill and successful business relations.
- The offer is from a non-governmental source (except for modest refreshments in the course of a necessary and legitimate business meeting).
- The courtesies are consistent with customary business practices and are not lavish or extravagant under the circumstances (generally \$50.00 or less).
- The courtesies are not frequent and do not reflect a pattern or the appearance of a pattern of frequent acceptance of courtesies from the same entities or persons.
- The employee accepting the courtesies is not a member of the procurement staff or an employee in a position to approve a particular procurement.

January, 2007

- The employee accepting the courtesies would feel comfortable about discussing the courtesies with his or her manager or coworker, or having the courtesies known by the public.

It is the personal responsibility of each employee to ensure that his or her acceptance of such meals, refreshments, or transportation is proper and could not reasonably be construed in any way as an attempt by the offering party to secure favorable treatment.

6.9.5 Gifts to RPSEA Employees

Business courtesies, however, are treated differently than gifts. While neither gifts nor business courtesies may be solicited, under the narrow circumstances described in section 6.9.4 above, unsolicited business courtesies may be accepted by RPSEA employees. In contrast, virtually all gifts - even if unsolicited - must be rejected. Specifically, RPSEA employees are not permitted to accept compensation, honoraria, funds in any form or amount, or any other form of gift or gratuity from any entity, representatives of any entity, or any person that does or seeks to do business with the company. Gifts from customers, suppliers or vendors must not be accepted, except for advertising, promotional, or other items of nominal value (generally under \$25.00 or less). Any exceptions to this policy must have written approval by the president.

6.10 Environmental Compliance and Health and Safety

RPSEA is responsible for ensuring that all organizational components comply with applicable local, state, and federal environmental, health, and safety regulations. Employees are responsible for performing their activities in accordance with RPSEA's Environmental Compliance and Health and Safety (EC&HS) Manual, site-specific training in accident reporting, emergency procedures, and any job-specific hazard management procedures related to their assignment. RPSEA relies upon its compliance record in the pursuit of new business. In addition, RPSEA may be obligated to disclose and report noncompliance to its customers.

6.11 Political Contributions

Federal statute prohibits a corporation from making a contribution or expenditure of money, products, services, or any other resource in connection with any election for president, vice president, senator, or representative to Congress, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices.

In general, most U.S. states and many foreign countries have similar laws which prohibit corporate political contributions in connection with any election relating to political office or impose strict disclosure requirements on anyone making contributions permitted under the law. Failure to disclose political contributions made directly or indirectly through a lobbyist or agent on behalf of the company can result in severe penalties for RPSEA, including fines and termination of contracts.

As a result, no RPSEA employee may contribute corporate funds, or contribute personal funds in circumstances where it might reasonably be inferred that corporate reimbursement of the funds would be involved, to a political campaign, party, political committee, or organization without the prior written permission of the CEO or the president. This requirement applies to all federal, state and local political activities, foreign or domestic.

Many states frequently prohibit direct and indirect contributions or payments made in any form or through any means, such as through lobbyists, consultants, or others, and also require accurate reporting of any fees paid to such third parties for lobbying or government relations services. No RPSEA employee or organization may hire, retain or renew federal, state, local or

January, 2007

foreign lobbying or government relations services without the prior written approval of the Government Affairs Committee and must report all fees paid to such entities on a quarterly basis to the committee.

Nothing contained herein shall be deemed to prohibit officers or employees from engaging in political activities in an individual capacity on their own time and at their own expense, or from making political contributions or expenditures of their personal funds, or from expressing views and taking action as private individuals. However, no expenses incurred or contributions made for such political purposes will be reimbursed by the company.

6.11.1 Solicitation

Solicitation for personal campaign contributions from subordinate employees either inside or outside the office is absolutely prohibited. General solicitations for charity such as disaster relief are permitted, but one-on-one solicitation of subordinates is not permitted. This avoids even the appearance that the solicitation was improperly coercive in some way.

6.12 Government Investigations

RPSEA will cooperate fully with government investigation. RPSEA will cooperate fully with authorized investigatory representatives of the government (such as investigators, agents, or attorneys) when such representatives request information or documents in the possession of the company to which the government has a legitimate right. The president is designated as the focal point for coordinating responses to such requests or inquiries and for advising employees and other appropriate parties regarding the nature of the inquiry and the rights and obligations of the company, employees, and other parties in connection therewith. Experience has shown that proper coordination of such responses by the company and its employees results in a timelier and more accurate exchange of information.

7. Applicability

This policy applies to employees, consultants and agents of RPSEA. Any violations of this policy may be grounds for disciplinary action, including dismissal or termination of the agent's agreement.

I have read and understand the RPSEA Standards of Business Ethics and Conduct

_____/_____
Signature Date