



**BUSINESS CONDUCT POLICY**



A VETERAN-OWNED SMALL BUSINESS

## **COMPANY POLICY STATEMENT**

The management of Surfacemode, Inc. deems it to be in the best interest of the company to adopt this Business Conduct Policy. This document applies to and requires the highest standards of business ethics and integrity of all Employees, Representatives, Consultants and Subcontractors of Surfacemode, Inc. (hereinafter referred to as the "Company") in the conduct of the business affairs of the Company.

It is the Company's policy to comply with all applicable laws and regulations in the conduct of its business, including export control laws. Therefore, Company Employees, Representatives, Consultants and Subcontractors are prohibited from engaging in any transaction on behalf of the Company, which violate any applicable law or regulation.

The Company's management will vigorously enforce this Policy and will take prompt and appropriate action, including termination, against any Employees, Representative, Consultant or Subcontractor found to be in violation.



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## STANDARDS OF CONDUCT

The Company must observe special standards of conduct in contracting, directly or indirectly, with Prime Contractor or Subcontractor (hereinafter referred to as the "Government").

1. A bribe, kickback, or any payment of a similar nature, must not be made to any official of the United States, state or local, or foreign governments to influence a decision or recommendation of that official.
2. The Company must neither offer nor give gratuities to Government officials or employees or reimburse expenses for their entertainment where applicable Government regulations prohibit such practices.
3. Government information that is national security classified, procurement sensitive, or proprietary shall not be accepted from any source, either directly or indirectly, in circumstances where there is reason to believe that the release is unauthorized.
4. Representatives, Consultants and Subcontractors shall be required by Contract or Agreement to comply with the laws and regulations relating to Government contracting and the Government contracting standards of conduct applicable to employees of the Company. This policy shall be incorporated into present and future independent contractor contracts and agreements, and each contract or agreement shall expressly provide for termination in the event the Representative, Consultant and Subcontractor violate either the laws or regulations relating to Government contracting or standards and policies set forth in this policy.

## CONFIDENTIAL INFORMATION AND DATA

Employees, Representatives, Consultants and Subcontractors are required to protect Company confidential information or knowledge from disclosure to third parties during the course of their relationship with the Company.

"Confidential Information or Knowledge" shall mean any information (whether or not patentable or copyrightable), including without limitation trade secrets, know-how, data, processes, formulas, methods, technology, techniques, pricing, sales and marketing information and other data or sensitive information regardless of form or method of recording.