

## **Business Conduct Program**

### **Frequently Asked Questions**

#### **Is integrity a condition of employment?**

Yes. All employees are responsible for their actions. Employees are not to engage in conduct or activity that may raise questions as to Delex's honesty, impartiality, or reputation or that may cause embarrassment to the company.

#### **Why is Delex putting an emphasis on Business Conduct at this time?**

On 24 December 2007, The Government enacted Federal Acquisition Regulation (FAR) Clause 52.203-13 which requires businesses with contracts over \$5 Million in value to implement an Ethics and Business Conduct program for its employees. Delex has always upheld a policy of ethical standards of conduct for its employees and business practices as defined in the Delex Policy Manual. The employee awareness and oversight program we have put in place reinforces our commitment to fair and open business practices in response to this new FAR requirement.

#### **Why do I need to sign a statement that I will adhere to the company's values and Code of Conduct?**

All employees, including consultants, sign a document stating that they will adhere to the Delex Code of Conduct and uphold the values set forth for the company. This action raises our personal and collective awareness of ethical behavior and allows each of us to acknowledge ethical conduct expectations and reminds us of our responsibility to uphold integrity in our actions, relationships, and business while at Delex.

#### **If I decide to call or send an e-mail to the Delex Hotline, who will receive it?**

The telephone number will be answered by voicemail to ensure availability to all of our employees around the clock. The voicemail box and the e-mail address will be monitored by the designated Compliance Officer and the President; all issues will be expedited to the President for investigation.

#### **Will I get in trouble with my manager if I call the Delex Hotline about an ethics issue?**

No. Delex employees have a responsibility to express concerns about poor conduct or ethics and to report any suspected violations. All calls to the Delex Hotline, e-mails to [Hotline@delex.com](mailto:Hotline@delex.com), or mail addressed to the Compliance Officer are considered confidential and will be handled in accordance with established procedures. The company will not tolerate retaliation against employees who properly use company reporting mechanisms.

**If I make a report, how will it be handled? How will I know if it was resolved?**

All reports received are considered to be confidential, both for the person reporting the issue and the other parties involved. Each report will be reviewed and investigated by the President or his designated representative. Investigations will vary in length depending on the type and severity of the concern. Those Senior Managers who directly oversee the area of concern will be advised of the investigation findings and any recommended corrective actions. You will receive periodic updates on the status of the investigation; we will share with you investigation findings as we are able, recognizing that confidentiality and potential classification issues may hinder us from sharing the full investigation results.