

CODE OF CONDUCT: THE ACUITY INTERNATIONAL COMMITMENT

Our Code of Conduct demonstrates our commitment to integrity, honesty, and professionalism. It recognizes that our success depends on always doing the right thing and outlines our commitments to one another, to our business partners, and as corporate citizens. All directors, officers, and employees must adhere to standards of conduct outlined in the Code and act with integrity in all contacts with customers, stockholders, suppliers, government officials, business partners, fellow employees, and members of the general public. No piece of business is as important as our reputation for honesty and doing the right thing. The Code of Conduct:

- ▶ promotes honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- ▶ promotes compliance with all applicable governmental laws, rules, and regulations;
- ▶ promotes the protection of Company assets, including corporate opportunities and confidential information;
- ▶ promotes fair dealing practices;
- ▶ promotes the proper treatment of our employees in a workplace free from discrimination; and
- ▶ deters wrongdoing.

ETHICS & COMPLIANCE



Acuity International is committed to the guiding principles of the Defense Industry Initiative on Business Ethics and Conduct and follows the DOJ guidelines, "Evaluation of Corporate Compliance Programs."

PROMOTING A CULTURE OF EXCELLENCE

Our offices of Ethics and Compliance and Performance Management provide leadership and expert advice, training, and assistance in the areas of ethics, quality, safety, privacy, and export controls. We encourage best practices, monitor legal and regulatory compliance throughout Acuity International's business processes, and investigate reports of where we may have fallen short. Our 5 programs are:

- ▶ **Ethics and Investigations:** Provides new employee and annual ethics training and advice to employees on ethics issues and investigates violations of the Code of Conduct, company policies, laws, and regulations.
- ▶ **Quality Management:** Monitors and audits the processes and methods used to prevent mistakes, inconsistencies, and defects in Acuity International's products and services.
- ▶ **Health Care Compliance:** Provides guidance and oversight on issues related to HIPAA and privacy, health care provider credentialing, patient safety, health care risk mitigation, and quality of care services.
- ▶ **Export Control and Trade Compliance:** Identifies risks and monitors export control and trade compliance activities, regulations, licensing, training, auditing, and reporting.
- ▶ **Employee Safety and Health:** Develops and implements corporate and contract-specific programs, procedures, training, and outreach initiatives. Certified staff provide consultation services for both internal and external clients.



Commitment to Human Rights

Acuity International is committed to respecting internationally recognized human rights principles. This obligation is documented in our "Statement of Commitment: Human Rights" policy. Acuity's policy requires every employee, every operation, and every business process to be aligned and comply with accepted international standards of law, human rights requirements, and our ethical value system. This policy is available for review at www.acuityinternational.com.

Acuity International Hotline

Employees, subcontractors, or others can report concerns 24 hours a day from anywhere in the world.

United States: 1.844.665.2945

Iraq: 1.704.526.1182

www.acuityinternational.ethicspoint.com

Contact us

Ethics advisors can be reached at: ethics@acuityinternational.com.