

# Business Ethics and Code of Conduct Policy

Property of: Numark Associates, Inc. 7200 Wisconsin Avenue Suite 500 Bethesda, MD 20814 202-466-2700

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#### 1 OVERVIEW

This policy represents Numark Associates, Inc.'s (hereinafter "NUMARK" or "the Company") Business Ethics and Code of Conduct Policy.

The purpose of this code is to prevent and detect criminal conduct and promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law.

Should NUMARK have credible evidence that a principal, employee, consultant, or subcontractor has committed a violation of Federal criminal law involving fraud, money laundering, conflict of interest, bribery, kickback or gratuity violations or a violation of the False Claims Act, NUMARK will timely disclose the violation, in writing, to the appropriate Office of the Inspector General (OIG), with a copy to the Contracting Officer anytime during the award, performance, or closeout of a contract or subcontract.

Moreover, NUMARK requires agents, employees, executives, management, consultants, contractors, and subcontractors to report, using the instructions outlined in section 6 hereto, any of the activities mentioned above. The report can be made anonymously. NUMARK strictly prohibits retaliation against any personnel reporting suspicions of law violation activities.

Unless otherwise noted, this policy supersedes all the Company's previous statements and or documents pertaining to the Company guidelines described herein, including any previous handbooks, manuals, memoranda, job offer letters, and oral or written statements. The entire contents are applicable to all NUMARK personnel regardless of their date of employment (unless specifically noted).

NUMARK retains the absolute right to modify, update, disregard, suspend, or rescind any or all such guidelines, policies, procedures, and benefits at any time. These policies and procedures are only guidelines provided for informational purposes and are designed to enhance the Company's operations. NUMARK may choose to revise or delete any of the provisions, policies, procedures, and benefits discussed in the policy and retains the sole discretion to interpret and apply the language.

Violation of any policy can result in disciplinary action up to and including termination of employment.



#### 2 OPEN DOOR POLICY

NUMARK personnel are encouraged to share their concerns, seek information, provide input in order to address and resolve any problems/complaints through their immediate supervisor, and when necessary, progressively consult with the next levels of management, including senior corporate leadership. If your concern relates to harassment or discrimination, please see the harassment and discrimination policies in this policy.

Supervisors are expected to listen to the concerns of their personnel, to encourage input, and seek resolution to such problems/complaints. Once a problem has gone "up the chain of command" and the Company has made a decision regarding whether or how to resolve an issue raised by personnel, the Company's decision on that matter is final.

Furthermore, the Company believes that personnel are an excellent source of constructive and valuable suggestions. One of our primary goals is to guide and develop new ideas to enhance Company operations and productivity. Such an attitude is vital to the Company's success and growth. NUMARK personnel are encouraged to submit suggestions for the improvement of operations, systems, or procedures to their supervisor.

#### 3 EQUAL EMPLOYMENT OPPORTUNITY AND NON-DISCRIMINATION

As an Equal Opportunity Employer in the State of Maryland, it is the policy of the Company to conduct all employment practices for NUMARK personnel at all levels without regard to race, color, creed, genetic characteristics, gender, marital status, religion, sex, mental or physical disability, age, national origin or ancestry (except where a bona fide occupational requirement), or sexual orientation, as well as other classifications protected by applicable state, federal or local laws.

The equal employment opportunity policy applies to all aspects of employment with the Company including advertising, recruiting, hiring, training, transfer, promotion, demotion, job benefits, dismissal, layoffs, compensation, social/recreational activities, and all other aspects of employment.

In addition, discrimination based on any of the classifications listed above, or on any other classification protected by federal, state, or local law, is strictly prohibited by the Company. If you believe that you are the victim of discrimination, please follow the complaint procedure set forth below for reporting claims of harassment.



Any personnel of the Company, whether supervisory or non-supervisory, who practice discrimination, will be subject to disciplinary action up to and including permanent discharge from the Company.

Please note, however, that as a federal government contractor, The Company must observe contract requirements imposed by the federal government for employment where applicable, and that such requirements must be observed above all others with regard to that federal government contract.

#### 4 HARASSMENT

#### 4.1 Sexual Harassment

Sexual harassment is verbal or physical conduct of a sexual nature where (1) submission to such conduct is made a condition of employment, (2) submission to or rejection of such conduct is used as the basis for employment decisions, or (3) such conduct creates a hostile work environment. This may include, but is not limited to: making unsolicited and unwelcome written, verbal, physical, and/or visual contact with sexual overtones; posting sexually explicit materials in the workplace or on one's computer; making unwelcome sexual advances; making reprisals, threats of reprisal, or implied threats of reprisal following a rejection of a sexual advance; engaging in implicit or explicit coercive sexual behavior which is used to control, influence, or affect the employment conditions and/or work environment of another employee or consultant; and offering favors of any type or employment benefits in exchange for sexual favors. Other sexually-oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female workers, may also constitute sexual harassment. Any unwelcome conduct based on gender is also forbidden by this policy regardless of whether the individual engaged in harassment and the individual being harassed are of the same or are of different genders. The policy of the Company is to provide a work environment free from sexual harassment, and offenders are subject to disciplinary action up to and including permanent discharge.

#### 4.2 Other Forms of Harassment

The Company prohibits all forms of unlawful harassment by supervisors, fellow NUMARK personnel, and employees of outside vendors or clients. Any forms of harassment related to an individual's race, color, creed, gender, marital status, religion, sex, mental or physical disability, age, national origin or ancestry (except where a bona fide occupational requirement), or sexual orientation, or on the basis



of other classifications protected by applicable state, federal or local laws is a violation of this policy and will be subject to disciplinary action up to and including permanent discharge from the Company.

#### 4.3 Complaint Procedure

The Company prohibits retaliation against any NUMARK personnel who rejects, protests, or complains about harassment or discrimination of any type. A complaint procedure is available for personnel to report all types of harassment or discrimination, so the Company can obtain knowledge of the event and take action as it determines to be appropriate. A NUMARK individual who believes that he or she has been discriminated against or harassed in violation of the Company's policies stated in this handbook or law shall follow the Grievance Policy and Procedure in this handbook and promptly file a written complaint with the Manager of Administration and/or their immediate supervisor and/or the President of the Company. Every complaint of harassment or discrimination will be thoroughly investigated without bias or premature judgment. The investigation will be conducted in such a way as to maintain confidentiality to the extent possible under the circumstances. Such an investigation would include but not be limited to interviews with the complaining individual, the subject of the complaint, co-workers, former personnel, and other individuals who may have knowledge of the situation. The investigation may also include a review of files and other tangible evidence as appropriate. Appropriate disciplinary action will be taken in those cases where the complaint is determined to have merit. NUMARK will, to the extent appropriate, inform the person filing the complaint and the person who is the subject of those allegations of the results of that investigation.

#### 5 GRIEVANCE POLICY AND PROCEDURE

All NUMARK personnel are expected to work with the spirit of cooperation. However, it is recognized that NUMARK personnel may occasionally have work related grievances. It is recommended that grievance resolution procedures be started promptly.

#### Step 1

Promptly bring the grievance to the attention of your immediate supervisor, or Manager of Administration, by submitting a written grievance statement. The statement should contain a summary of the facts as you perceive them and must be signed and dated by the NUMARK individual. If the grievance involves your immediate supervisor and you do not wish to resolve the grievance directly with your immediate supervisor then it is permissible to submit the grievance directly the Manager of Administration or President of the Company.



#### Step 2

Your immediate supervisor, or Manager of Administration, will investigate the grievance, and attempt to resolve.

Final decisions on grievances will not be precedent-setting or binding on future disputes unless they are officially stated as company policy. Information concerning a NUMARK personnel grievance is to be held in strict confidence to the extent possible. Supervisors, President of the Company, Manager of Administration, and other members of management who investigate a dispute are expected to only discuss it with those individuals who have a business need to know about it or who are needed to supply necessary background information.

NUMARK personnel will not be penalized or retaliated against for proper use of the grievance policy. Frivolous complaints will not be tolerated.

The Grievance Policy and Procedure is the exclusive remedy for NUMARK personnel with appropriate complaints.

# 6 REPORTING MECHANISM AND FRAUD DISCLOSURE PROTOCOL FOR NRC CONTRACTS

In accordance with the requirements set forth in Federal Acquisition Regulation (FAR) 52.203-13, incorporated by reference into our contractual relation with NRC, NUMARK has implemented a confidential and, where permissible, anonymous reporting mechanism through which employees, consultants, agents, and subcontractors may report suspected violations of law, regulation, or contractual obligation, including but not limited to fraud, money laundering, bribery, gratuities, kickbacks, conflicts of interest, and violations of the Civil False Claims Act. Suspected violations may be reported to the following:

#### Fraud Reporting Hotline:

- □ Toll-Free Number: 800-233-3497
- ☐ Email: OIGHOTLINE.Resource@nrc.gov
- Web Portal: https://nrcoig.oversight.gov/oig-hotline
- Availability: 24 hours per day, 7 days per week

With such a reporting mechanism, NUMARK's objective is to facilitate timely discovery and disclosure of improper conduct with regards to the implementation of NRC contracts. Reports submitted through the hotline shall be received by the



designated Compliance Officer or third-party ethics administrator, who shall ensure that all allegations are promptly and thoroughly investigated.

NUMARK strictly prohibits retaliation against any person who, in good faith, reports suspected misconduct or participates in an investigation. Any act of reprisal shall constitute a violation of this Code and may result in disciplinary action, up to and including termination.

Where NUMARK has credible evidence that agents, employees, executives, management, consultants, contractors, and subcontractors have committed a violation of Federal criminal law involving fraud, money laundering conflict of interest, bribery, kickbacks or gratuities, or has violated the Civil False Claims Act in connection with the awards, performance, or closeout of a Government contract or subcontract, NUMARK shall timely disclose such evidence to the appropriate Office of the Inspector General and the Contracting Officer, as required by FAR 52.203-13(b)(3)(i).

#### 7 CONDUCT AND WORKING ENVIRONMENT POLICY

It is the Company's policy to encourage a congenial work environment of mutual respect and professionalism. Therefore, the Company expects all Company personnel to conduct themselves honestly, lawfully, with sensitivity to others, and with due regard for the Company's performance, its property, its personnel, and its public image. The Company is committed to the highest degree of integrity in the conduct of its business. Each of us is expected to follow these principles:

Principle 1: We must not engage in practices that violate laws regulating the Company's business. We must avoid any act we know is unlawful or unethical, including paying to secure an improper advantage for the Company.

**Principle 2:** We must maintain a congenial work environment of mutual respect and professionalism. Each of us is expected to conduct ourselves honestly and courteously with due regard for the Company's public image. We must never: (1) use obscene, abusive, or threatening language in any of our dealings; (2) use Company property for personal purposes without permission; or (3) engage in theft of property from the Company, co-workers, or clients.

Principle 3: Each of us should conduct ourselves in a way that promotes a safe and healthy workplace. While on Company premises, each of us is expected to: (1) follow rules and regulations that establish a safe, smoke-free, and



drug-free workplace; and (2) report any unsafe or potentially unsafe condition, and any unusual or suspicious people or happenings that come to our attention.

Principle 4: We must not discriminate on the basis of race, religion, sexual orientation, or other protected classifications. We are committed to conducting our business and employment practices without regard to race, color, creed, genetic characteristics, gender, marital status, religion, sex, mental or physical disability, age, national origin or ancestry, or sexual orientation.

**Principle 5: We must maintain the confidentiality of Company and client information.** We must avoid disclosing, without Company written permission, any confidential or proprietary information about the Company or its clients.

Principle 6: We must not engage in outside activities that give rise to conflicts of interest or reflect poorly on the Company. Each of us commits to avoiding: (1) employment by another company that is a Company competitor or supplier; (2) having a substantial position in ownership or management of a company to which the Company makes sales or from which it makes purchases; and (3) accepting substantial gifts or excessive entertainment from clients.

Principle 7: Each of us should feel free to express concerns about conduct that would be deemed improper under this Code. NUMARK personnel should express such concerns to immediate supervisors and, if necessary, to the next levels of management. Supervisors are expected to listen to such concerns and see that corrective measures, when appropriate, are carried out.

Principle 8: Each of us is responsible for reporting credible evidence of violations of federal criminal law involving fraud, money laundering, bribery, or gratuity offenses, or violations of the False Claims Act, that pertain to the award, performance, or closeout of a government contract or subcontract. Employees, clients, consultants, contractors, and subcontractors are required to report any suspicion of violations of the laws and regulations outlined above. The reports can be done anonymously using the process described in Section 2.

Listed below are some (but not all) actions which do not meet the Company's standards of conduct and will not be accepted:

- Willfully violating any Company rules, regulations or policy; any deliberate action that is obviously detrimental to the Company's efforts to operate effectively.
- Violating any governmental law or regulation that governs how you perform your job. Laws and regulations may include but are not limited to: Foreign Corrupt Practices Act, False Claims Act, export and import laws and



- regulations, Anti-boycott laws, anti-lobbying regulations, embargo laws and regulations, and insider trade laws and regulations and regulations.
- Paying anything of value to any person in the country or overseas for the purpose of influencing that person to use his or her position to help the Company secure an improper advantage in obtaining or retaining business.
- Falsifying employment or other Company records.
- Failing to preserve documents and essential Company's records and documents.
- Failing to accurately report work hours in the timesheet and failing to charge clients with the correct charge codes and according to allowable costs.
- Violating the company's harassment policies.
- Soliciting or accepting gratuities from customers or clients.
- Excessive absenteeism or tardiness.
- Excessive, unnecessary, or unauthorized use of Company property and supplies, particularly for personal purposes.
- Working while under the influence of drugs or alcohol, and the illegal manufacture, possession, use, sale, distribution or transportation of drugs.
- Bringing or using alcoholic beverages on Company property or using alcoholic beverages while engaged in Company business off the Company's premises, except where authorized.
- Fighting or using obscene, abusive, or threatening language or gestures.
- Theft of property from co-workers, customers, or the Company.
- Unauthorized possession of firearms on the Company premises or while on Company business.
- Disregarding safety or security regulations.
- Insubordination.
- Failing to protect and maintain confidentiality of Company information, including compensation and benefits information, as well as customer or client information.

The above list is not intended to be all-inclusive and is for illustration only. Violation of these standards, or any other reasonable workplace behavior standards, including the standards of clients when NUMARK personnel are working at client sites, will not be tolerated.

# 8 ELECTRONIC AND TELEPHONIC COMMUNICATIONS

#### 8.1 Use of Internet

The Company uses various forms of electronic communication including, but not limited to computers, e-mail, telephones, voicemail, and the Internet. All electronic



devices, including all software and hardware provided by the Company, remain the sole property of the Company and are to be used only for Company business. Likewise, all electronic communications sent via the Company's email system and computer network (or otherwise sent in performance of Company work) remain the sole property of the Company. Company e-mail is not to be used for personal matters. The Company recognizes that from time-to-time NUMARK personnel may use personal electronic communication devices for personal reasons, but such use should not occur on Company time, should not involve the use of Company email, and may not ever interfere with Company business. Regardless of whether personnel are working at Company headquarters or remotely, personal use that is excessive or interferes with Company business are violations of this policy.

Electronic communication/media may not be used in any manner that would be discriminatory, harassing or obscene, or for any other purpose which is illegal, against Company policy or not in the best interest of the Company.

Misuse of electronic communications, engaging in defamation, copyright or trademark infringement, misappropriation of trade secrets, discrimination, harassment or related actions are violations of this policy.

NUMARK personnel may not install personal software or unlicensed software on Company computer systems. All electronic information created by any NUMARK personnel in relation to his or her work for the Company using any means of electronic communication, and all electronic information created with any software or hardware provided by the Company, is the property of the Company and remains the property of the Company. Personal passwords may be used for purposes of security, but the use of a personal password does not affect the Company's ownership of the electronic information.

The Company may, from time to time, override all personal passwords and review personnel computer files and email, voicemail, or other electronic data created on Company computer systems or otherwise involving his or her work for the Company. NUMARK personnel should maintain no expectation of privacy in anything that the NUMARK personnel creates, sends or receives on his or her computer or telephone that the Company has provided, even if "password protected" or marked "confidential" or "personal."

The Company reserves the right to access and review electronic files, messages, mail, etc., and to monitor the use of electronic communications as is necessary to ensure that there is no misuse or violation of Company policy or any law.

The Company computer network is to be used exclusively for Company business. All information residing on the network is open for use by all personnel. Therefore,



users of such media do not have a reasonable expectation of privacy while using any media, device or electronic means and methods.

Full-time and part-time NUMARK personnel should not use cell phones for personal use on Company time unless it is an urgent matter.

Access to the Internet, web sites and other types of company-paid computer access are to be used for Company-related business, and personal use should be kept to a minimum and not interfere with any Company business.

Moreover, NUMARK policy requires personnel to be vigilant to protect the Company's networks, electronically accessed information and devices from cyberattacks, malware and other attempts to gain unauthorized access to the Company's information by not opening suspicious e-mails, unverified links or attachments or otherwise engage in any action that could damage or compromise the Company's network.

If NUMARK personnel are working on client sites using client provided electronic or telephonic communications equipment or client provided networks and the client adheres to a stricter policy than detailed above, NUMARK personnel should abide by the client's policy.

## 8.2 Blogging, Electronic Social Networking or Other Online Discussion Group Participation

The Company recognizes that being online is a personal activity but seeks to regulate such activity when it impacts the Company, the Company personnel or third parties who deal with the Company.

During personnel's working time, personnel are prohibited from writing, posting, or otherwise contributing to: blogs, personal websites or webpages, personal listservs or mailing lists; social or other networking sites (such as Facebook, LinkedIn, or Instagram); audio or video-sharing websites (such as YouTube, Google Video or TikTok); or other user-generated electronic media, unless such activity is directly related to, and necessary, for an individual's performance of his or her job responsibilities. Per FAR 52.204-27 if you use your personal mobile phone or other devices to transmit emails to the government you must not have ByteDance applications including TikTok installed on the device.

With regard to their activities outside of work, NUMARK personnel should remember that information placed on any electronic medium, and data sent via other electronic methods (e.g., email and text messages), may become public. Specifically, other NUMARK personnel, potential NUMARK personnel, vendors, and customers of the Company, and third parties may use electronic



media to obtain information about the Company and its business activities. As such, all NUMARK personnel must consider the impression they create about themselves and the Company when they place information relating to or identifying the Company or its personnel on any electronic medium. The Company expects that its personnel will act responsibly and exercise good judgment and the highest degree of professionalism and confidentiality, as outlined below, when communicating any information that concerns or identifies the Company or any of its personnel. If a NUMARK individual fails to act responsibly in that regard, the information that he or she communicates may have a harmful effect on the Company, its personnel, or others.

Accordingly, if you choose to blog or participate in other electronic media when you are not working, on your own time and equipment, you must observe the following guidelines:

First, should you discuss the Company or your position at the Company online, you must take care to follow the Company's guidelines for appropriate workplace conduct and its policies, including, but not limited to, its policies against workplace harassment, discrimination and retaliation. You should not discuss the Company, its management, or your supervisors or co-workers in a manner that is maliciously false, defames any individual or their reputation, or disparages the Company's services.

Second, you may not disseminate any information about the Company or its personnel that could be considered proprietary, confidential, or intellectual property, and you may not use the Company's logo, graphics, trademarks, trade names, or corporate slogans. Remember that blogs and other media may be public and accessible to third parties, including vendors and customers. Thus, it is critical that you maintain the confidentiality of non-public Company information and abide by the terms of the confidentiality agreement that you have signed as well as the Company's confidentiality policy.

Third, you should not discuss information you have obtained at work regarding the Company's customers, suppliers or vendors.

Fourth, you should respect all copyright laws. As a general rule, you should not distribute or incorporate material that you have retrieved or copied from another web site or publication, unless your usage of such material meets the legal definition of "fair use." If you have any doubts, you should first contact Company management and obtain a determination that your usage complies with the copyright laws.

Please remember that the Company may monitor blogs or other electronic media. If you fail to abide by the above guidelines or the Company's guidelines



for appropriate workplace conduct or policies while online, you may be subject to legal or disciplinary action by the Company and/or others.

#### 9 CONFIDENTIAL / PROPRIETARY INFORMATION

The Company's competitive position in the industry and marketplace is often dependent on confidential and/or company proprietary information to which you may be exposed. This may include trade secrets, specially developed techniques. new adaptations to equipment, special skills, client relationships, manuals, documents, customer lists, systems, procedures, databases, fee schedules, source lists, financial information, client lists, and other proprietary information that gives the Company or the Company's clients an advantage. Sensitive and/or confidential information of the Company or its clients shall be stored in locked files except during use. Reports and memos shall bear confidential markings on every page, when appropriate. This information is the property of the Company and must not be disclosed to anyone without the Company's prior written permission, even if you should leave the Company. Information obtained in the course of your employment must not be used in any manner that is in conflict with the best interests of the Company. Further, you should carefully read and follow the provisions of the specific non-disclosure agreement you signed with the Company. In the event of any conflict between this manual and that non-disclosure agreement, the terms of that agreement shall be controlling.

#### 10 COPYRIGHTS

Works and writings prepared by personnel of the Company are the property of the Company, and the Company holds the exclusive copyright. Such materials may not be reproduced, other than for Company use, during or following an individual's period of employment without the prior written permission of the Company.

#### 11 CONFLICT OF INTEREST

The Company recognizes and respects the individual personnel's right to engage in activities outside of his or her employment that are private in nature and do not in any way conflict with or reflect poorly on the company. The Company reserves the right, however, to determine when an individual's activities represent a conflict with the company's interests and to take whatever action is necessary to resolve the situation—including terminating the individual. Listed below are some (but not all) activities which represent a potential conflict of interest warranting action by the Company:



- Simultaneous employment by another company, particularly if the other company is a competitor or supplier.
- Carrying on Company business with another company in which the individual, or a close relative of the individual, has substantial ownership or interest.
- Holding a substantial interest in, or participating in the management of, a company to which the Company makes sales or from which it makes purchases.
- Borrowing money from customers, clients, or companies, other than recognized loan institutions, from which the Company buys services, materials, equipment, or supplies.
- Accepting substantial gifts or excessive entertainment from an outside organization or agency that does business with NUMARK or its customers or clients.
- Speculating or dealing in materials, equipment, supplies, services, or property purchased by the Company.
- Participating in civic or professional organization activities in a manner whereby confidential company information is divulged.
- Misusing privileged information or revealing confidential data to outsiders.
- Using one's position in the Company or knowledge of its affairs for outside personal gains.
- Engaging in practices or procedures that violate Anti-Trust Laws or other laws regulating the conduct of company business.

The above list is not intended to be all-inclusive and is for illustration only. Whenever a situation arises in which the individual has a real or apparent conflict of interest involving their work for NUMARK, the individual shall notify NUMARK as soon as possible to facilitate appropriate action. In addition, at the Company's request, NUMARK personnel are required to certify in writing that they have no conflict of interest in connection with working for the Company.

#### 12 DRUG-FREE WORKPLACE

You must be in a fit condition to perform your duties. No Company personnel shall engage in any work on behalf of the Company while under the influence of drugs, alcohol, or other intoxicating substances, or be unfit for duty because of their use.

It is the policy of the Company to strictly prohibit the manufacture, distribution, dispensing, possession, use, and/or sale of a controlled substance, including any of the following items by any individuals while on or off Company and/or the Company client's premises:



- Illegal or unauthorized drugs (including excessive quantities of prescription or over-the-counter drugs or any quantity of prescription drugs if the holder of those drugs does not have a proper prescription for those drugs).
- Drug-related paraphernalia.

Any NUMARK personnel directly observed engaging in the prohibited conduct described above on Company premises shall be subject to termination. NUMARK personnel should report observed violations of the policy to senior management as soon as possible. To the fullest extent possible, all discussions will be kept confidential.

#### **Drug Testing**

The Company does not require NUMARK personnel to submit to random drug testing. However, upon reasonable suspicion, the Company reserves the right to require personnel to submit to a drug test. Further, if NUMARK personnel are working at a client site that does have a drug testing policy, such NUMARK personnel must adhere to the client's policy.



### NUMARK PERSONNEL COPY - Acknowledgment of Receipt Please sign and retain for your own information.

I am in receipt of a copy of the NUMARK Associates, Inc. Business Ethics and Code of Conduct Policy. I understand and agree that I am responsible for familiarizing myself with the information contained therein, abiding by the policies and procedures, and I have been given sufficient work time to do so. Moreover, I hereby acknowledge that I have read, and do understand, the provisions contained herein.

Signed					
(Print Nam	ie)				
Dated					



### **EMPLOYER COPY - Acknowledgment of Receipt Employer's File Copy - Please sign and return to the Company.**

I am in receipt of a copy of the NUMARK Associates, Inc. Business Ethics and Code of Conduct Policy. I understand and agree that I am responsible for familiarizing myself with the information contained therein, abiding by the policies and procedures, and I have been given sufficient work time to do so. Moreover, I hereby acknowledge that I have read, and do understand, the provisions contained herein.

Signed	<u></u> k	
_		
	(Print Name)	
Dated		