



Code of Conduct

Our Commitment to Integrity



Abt Associates Inc.

Our Mission



Abt Associates is committed to improving the quality of life and economic well-being of people worldwide.

We apply our energy and creativity to helping our customers – governments, businesses, and private organizations – make better decisions and deliver better products and services by providing them with the highest quality research, technical assistance, and consulting services available in the marketplace.

We strive to exceed our clients' expectations for the integrity of our methods and findings, the objectivity of our thinking, and the practical utility of our results.

In support of our mission we are committed to sustained financial health and increased shareholder value. We are committed to hiring and retaining a diverse staff with the highest-quality technical, management, and entrepreneurial talents. As an employee owned company, we aspire to provide our staff with a quality of work life characterized by mutual respect and a continuous learning environment that fosters creativity and high performance.

Our Values

Collaboration Across a Diverse Community

We highly value the diversity of our workforce, our multidisciplinary competencies, and our diverse contributions to our shared mission and values. Through collaboration and teamwork, we nurture a company-wide community built on respect and trust for all: individuals, divisions, and departments. Our collaboration and teamwork creates value for our clients and ourselves.

Civic Responsibility and Work That Makes a Difference

Whether we work to shape public policy or business decisions, we believe that our credible approach can make a difference to our clients, our community, the nation, and the world.

Commitment to Integrity

We are committed to act with the highest levels of honesty and integrity.

Creativity and Technical Excellence

In all of our work, we strive to meet the highest standards of professional excellence. We take pride in our technical achievements and seek creative and innovative solutions to meet our clients' needs.

Commitment to Our Employees

We value the exposure our work provides our employees to new concepts and ideas and to different disciplines, methods, and tools. We will continue to provide them opportunities for learning and development. We are responsive to our employees' needs and value their commitment. We support the ideal of work-life balance.

Commitment to Our Clients

Our accomplishments on our clients' behalf are a source of satisfaction and pride for both our clients and ourselves. We work hard to represent our clients' interests, to understand their expectations, to respond effectively to their needs, and to earn their loyalty.

Culture of Entrepreneurship

We provide a supportive environment for exercising entrepreneurial skill. We encourage measured risk-taking in developing new ventures and clients, in expanding our geographic reach, and in conceiving of new ways to meet internal and external client needs.

Corporate Financial Health

We are committed to the efficient use of resources and share responsibility for the financial health of the enterprise.

Communication with Candor and Respect

We are committed to open communications at all levels of the company, to opportunity for candid and respectful feedback and discussion, and to transparent decision-making in which the employee-owners of Abt Associates have an appropriate and valued voice.

Competence in Management and Leadership

We embrace professionalism and excellence in company management and leadership. Our leadership performance is measured against our leadership model. We will invest in the development of management and leadership skills at all levels.

Table of Contents

Our Mission	2
Our Values	3
A Letter from the President and CEO	5
Our Code of Conduct	
Introduction	7
Scope of the <i>Code of Conduct</i>	7
Waivers to the <i>Code of Conduct</i>	7
Employee Responsibilities	7
Additional Responsibilities of Leaders	8
Ethics Abroad.....	8
Consequences of Wrongdoing	8
Our Ethics and Compliance Processes	
Seeking Guidance and Reporting Issues	10
Ethics and Compliance Steering Committee	10
The Ethics and Compliance Helpline	10
Non-Retaliation Policy	12
Investigations	12
Our Employees	
Using Fair Employment Practices	14
Embracing Diversity	14
Eliminating Discrimination and Harassment	14
Fostering a Healthy and Safe Workplace	16
Non-Fraternization Policy	16
Our Customers	
Working Ethically with Clients	18
Ensuring Accuracy and Impartiality	18
Invoices to Clients	18
Appropriate Gifts and Entertainment.....	18
Truth in Negotiations Act	19
Our Company	
Accurate Business and Financial Records	21
Accounting for Time and Expenses	22
Protecting Company Assets	22
Avoiding Conflicts of Interest	23
Purchasing Practices	24
Cooperating with Audits.....	25
Our Communities	
Nonpartisanship, Political Activity, and Political Contributions	27
Adhering to Anti-Corruption Laws	27
Anti-Money Laundering	28
Environmental Protection	28
The Marketplace	
Complying with Relevant Laws and Regulations	30
Protecting Confidential Information.....	30
Hiring Former Government Employees.....	32
Insider Trading Laws	32
Respecting Copyright Laws and Intellectual Property	33
Preventing Anti-Competitive Practices	34
Respecting U.S. and International Customs, Laws, and Regulations	34
Communications with the Media	36
Government Requests and Subpoenas	36
Index	38

A Letter from the President and CEO

Dear Abt Associates Colleagues:

"Whether we work to shape public policy or business decisions, we believe that our credible approach can make a difference to our clients, our community, the nation, and the world." Abt Associates has lived and grown by these words of our founder, Clark Abt, for over 40 years. This document, while called a *Code of Conduct*, is really about our reputation – a reputation built carefully over those years. Our reputation of integrity, trust, and outstanding performance with our customers, suppliers, and the public is a valuable asset that is vital to the success of our company. Reputations are fragile; they take a long time to build and an instant to lose.

One of our core values is *Our Commitment to Integrity* which means doing the right things in the right way. It means complying with laws and Abt Associates policies, and conducting ourselves according to sound business standards. It means never compromising our standards or bending rules to reach our goals.

Our *Code of Conduct* is a critically important resource to help ensure that each of us knows how to do the right thing, every day, in our highly regulated industry. That said, it is not a substitute for good judgment and it cannot address every issue we may face. It's in these situations, where there is no written rule, that our decisions need to be based on our mission, our values, consultation with experts, and our own good sense. Each of our decisions and actions shape the reputation of Abt Associates.

Living up to our high standards is not necessarily the easiest path, but by doing so we ensure that Abt Associates will always be recognized for both its excellent work and unyielding integrity. Thank you for your commitment to integrity and for your contribution to Abt Associates' strong reputation.

Wendell J. Knox
President and CEO

Our Code of Conduct

Introduction

Standards for business ethics can be difficult to define, but they are critical to our ongoing success. The goal of our *Code of Conduct* is clear – to establish standards of business conduct that are applied uniformly at all Abt Associates locations and followed by all employees. While businesses and customs vary – and each individual who works for Abt Associates is unique – certain standards and responsibilities are shared wherever we do business. This *Code of Conduct* serves as a common sense reminder of the business responsibilities we share.

Consider this Code your guide to working ethically and honestly in our highly regulated business environment. The *Code of Conduct* is divided into subsections of our shared responsibilities to our various stakeholders and describes the standards and rules that apply to our work. In each area, we focus on some of the main issues that may arise and provide basic guidance that will enable you to be in compliance with this Code, our policies, and the law. We also provide references to additional guidance and policy documents if you need more information.

This *Code of Conduct* does not give answers for every situation you might face. Although the company expects that it will be a helpful resource to you, no document can make a decision or a tough choice for you. In the end, Abt Associates relies on you to make the right decision, and when necessary, the tough choice. You may encounter situations where no written guidance is available, or where you suspect a violation. In these cases, please contact one of the resources available to you as described in this Code.

Scope of the Code of Conduct

The *Code of Conduct* applies to all employees, officers, and directors of the company worldwide. Employees, officers and directors cannot use a contractor, agent, consultant, broker, or other third party to perform any act prohibited by law or by Abt Associates policy. If compliance with the *Code of Conduct* appears to conflict with local law, employees should discuss their concerns with the Chief Ethics Officer, the Vice President

of Human Resources, or the Chief Administrative Officer, the Chief Financial Officer, or contact the Ethics and Compliance Helpline.

We go beyond legal compliance to uphold the highest ethical standards in our role with the company. By maintaining the highest ethical standards, we can all help sustain a work environment of trust and respect – one of which the company's many stakeholders can be proud.

Waivers to the Code of Conduct

In the unlikely event a waiver of, or amendment to, the *Code of Conduct* seems to be necessary, contact the Chief Ethics Officer. All waivers must be approved by the Audit Committee of the Board of Directors.

Employee Responsibilities

Working and behaving ethically is a commitment that starts the day you join Abt Associates and continues for as long as you work here. During that time, your commitment to upholding our ethical standards must never falter or diminish.

Keys to Compliance:

- *Understand and follow the Code of Conduct and company policies*
- *Conduct your work and professional activities ethically and in accordance with all applicable laws and regulations*
- *Speak up and report any business activity that you believe may violate the law or the Code, using the resource that is most comfortable for you*
- *Cooperate with investigations when requested and protect the integrity of the investigation by maintaining its confidentiality*
- *Use resources to ask a question or get help when something is unclear or doesn't feel right*

Managers and leaders are role models who are expected to exemplify the highest standards of ethical business conduct and encourage discussion of the ethical and legal implications of business decisions. Managers have an additional responsibility to create and sustain a work environment in which employees, consultants, subcontractors, and contract workers know that ethical and legal behavior is expected of them.

Keys to Compliance:

- *Maintain a positive, ethical work environment*
- *Make certain that employees understand what is expected of them both professionally and ethically*
- *Maintain an open door policy on a routine basis for employees to ask questions and raise concerns*
- *Address issues raised by employees by listening and taking action, when appropriate.*
- *Be fair and objective*
- *Be a positive role model*

Ethics Abroad

Working internationally raises additional ethics issues that must be addressed clearly by Abt Associates at all levels. Abt Associates operates globally. Local business and cultural practices often are different from our own. While we respect the norms of our clients and colleagues throughout the world, in the event that local practices conflict with the standards prescribed in this document, all Abt Associates employees must remain committed to abiding by the business conduct principles described in this Code. In short, your business ethics must remain the same no matter where you are working.

Violations of the standards contained in this *Code of Conduct* put Abt Associates, our customers, and our relationships with our customers at risk. Violations or breaches of the *Code of Conduct* can result in termination of employment or removal from the Board of Directors. The Vice President of Human Resources, the Chief Administrative Officer, the Chief Financial Officer, the Chief Ethics Officer, the Chief Executive Officer, and/or the Audit Committee, as appropriate, shall determine the actions to be taken in the event of violations of the *Code of Conduct*. Such actions shall be reasonable and designed to deter wrongdoing and to promote accountability for adherence to the *Code of Conduct* and may include termination of employment.

The key components of the Ethics and Compliance program include this *Code of Conduct*, policies, training, communications, the Ethics and Compliance Helpline, auditing, monitoring, and remediation of wrongdoing. The Chief Ethics Officer provides regular reports to the Audit Committee of the Board of Directors regarding the status of the program.

Our Ethics and Compliance Processes

Seeking Guidance and Reporting Issues

Employees of Abt Associates operate at the highest levels of ethical behavior. If you have questions about the *Code of Conduct*, or are concerned about conduct that you believe violates Abt Associates standards or the law, talk to your manager. If this seems inappropriate, or if you don't believe the person to whom you've reported your concern has taken appropriate action, you may also talk to:

- A higher level of management
- Human Resources
- The Chief Administrative Officer
- The Chief Financial Officer/Chief Compliance Officer
- The Chief Ethics Officer
- A member of the Ethics and Compliance Steering Committee

All of these resources are available to you. Regardless of the resource you choose to talk to, the company is committed to responding to each situation quickly and completely.

Ethics and Compliance Steering Committee

To provide employees with a local resource for ethics and compliance questions or concerns, each line of business as well as key administrative areas have an appointed member of the Abt Associates Ethics and Compliance Steering Committee. Steering Committee members provide leadership and direction to our ethics and compliance initiatives and are there to ensure that any employee question or issue is addressed expeditiously and by the appropriate resource.

The Ethics and Compliance Helpline

If you have questions or if you want to report any concerns or complaints regarding any matter under this Code and you don't wish to contact any of the individuals listed above, Abt Associates has an Ethics and Compliance Helpline available to you by phone or a web-based reporting option. The Ethics and Compliance Helpline and the web-based reporting option allow Abt Associates employees to confidentially or anonymously ask questions or communicate potential ethical or noncompliance matters.

Helpline issues are reviewed and investigated by the Chief Ethics Officer and/or members of the Board of Directors' Audit Committee. Human Resources may be involved as circumstances warrant.

When you give your name, all issues you submit will be treated in as confidential a manner as possible. This means your name will be shared only with those who need to know to answer your question or conduct an investigation. The only exception to our confidentiality commitment is in the case of a legal violation or litigation, where your name may need to be shared with authorities.

The Ethics and Compliance Helpline includes:

The Ethics and Compliance Helpline Phone Number 888-928-4231

This number provides anonymous reporting through a third party company. The third party company will ask you a series of questions and provide a report of your concern to the company for investigation and/or response. You can receive a follow-up to your concern and remain anonymous. A report number and PIN number, along with a follow-up date, are provided for this purpose. The line is available 24 hours a day, 7 days a week, toll free.

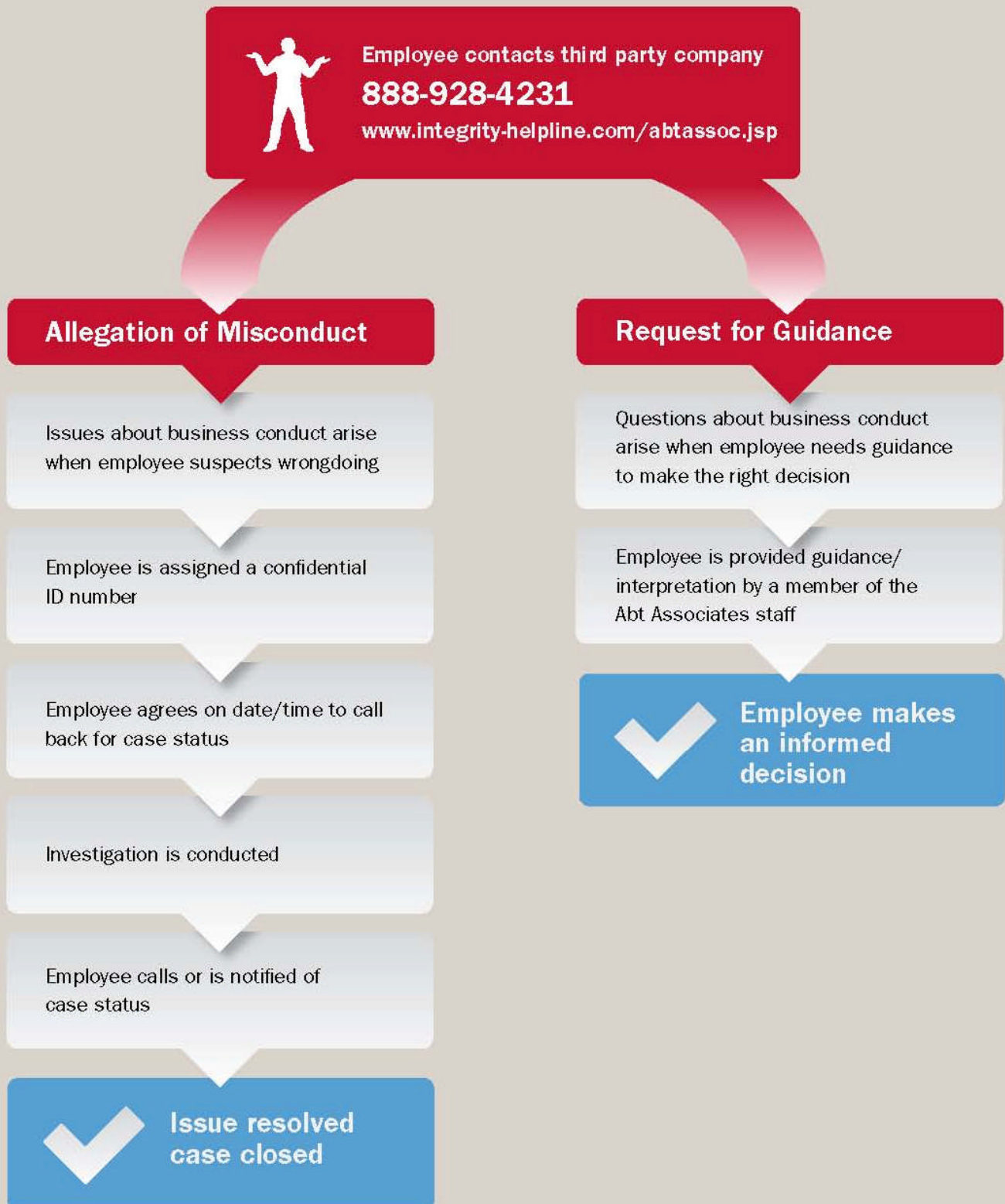
The Ethics and Compliance Web-based Reporting Tool

www.integrity-helpline.com/abtassoc.jsp

This web-based tool provides anonymous or confidential reporting through a third-party company. The third party website will ask you a series of questions and provide a report of your concern to the company for investigation and/or response. Like the toll-free phone number above, you can receive a follow-up to questions or concern and remain anonymous.

The chart below depicts the general flow of activities that occur when you call the Ethics and Compliance Helpline or use the web-based reporting tool.

Ethics and Compliance Helpline Process





Non-Retaliation Policy

Abt Associates prohibits retaliation against anyone for raising a legal or ethical concern, or for cooperating with an investigation. Retaliation can also be against the law, leading to potential civil liability and criminal penalties. No one may seek revenge against, or try to “get even” with, any employee who makes a good faith report, regardless of who is implicated. Retaliation is taken very seriously at Abt Associates, and if it occurs, it will result in discipline, up to and including termination of employment.

It is Abt Associates' policy to address any complaints that allege acts or attempted acts of interference, reprisal, retaliation, threats, coercion, or intimidation against employees who report, disclose, or investigate possible improper or illegal activities. If you become aware of any act of alleged retaliation, report it immediately to the Chief Ethics Officer or the Ethics and Compliance Helpline and it will be promptly investigated.

For Additional Guidance

- *Non-Retaliation Policy*

Investigations

The company investigates all good faith reports of wrongdoing. If you are asked to participate in an internal investigation of misconduct or unethical behavior, you are required to cooperate.

Keys to Compliance

- *Cooperate with all internal investigations and audits*
- *Work with the Chief Ethics Officer to respond to litigation or requests from government agencies*
- *Tell the whole truth in response to an investigation or audit*
- *Never alter or destroy records in response to an investigation or audit, or when an investigation or audit should be anticipated*
- *Do not discuss anything about the investigation with anyone unless instructed to do so by the investigators*

Our Employees

Our continued success depends on the development and continued contributions of our employees. Abt Associates is committed to offering equal employment opportunity, and to fostering a work environment that recognizes and respects employee contributions and diversity. Our ongoing policy is to offer equal employment opportunity to qualified individuals regardless of their race, color, religion, gender, sexual orientation, national origin, age, physical or mental handicap, disability, veteran status, or other characteristics protected by law. In short, we must ensure compliance with applicable employment laws and regulations.

Keys to Compliance

- *Do not engage in discriminatory conduct in any hiring or promotion decisions*
- *Treat everyone with respect*
- *Know and follow the relevant employment policies and practices, and applicable laws*

For Additional Guidance

- *Equal Employment Opportunity Policy*

Embracing Diversity

We highly value the diversity of our workforce, our multidisciplinary competencies, and our diverse contributions to our shared mission and values. Through collaboration and teamwork, we nurture a company-wide community built on respect and trust for all: individuals, divisions, and departments. Our collaboration and teamwork creates value for our clients and ourselves.

At Abt Associates, diversity will be embraced, managed and led at all organizational levels. In exchange, we will benefit from the creativity, varied perspective, innovation, and energy that result from a diverse workforce.

We are dedicated to creating a workplace environment that is free from discrimination, harassment of any kind, or personal behavior not conducive to a productive, pleasant work environment. Abt Associates is also committed to a workplace free of violence. Offensive, threatening, or violent behavior, whether verbal or physical, should be reported immediately and will not be tolerated. To make these goals a reality requires careful attention to the way we treat others in the workplace.

Harassment of an employee by a coworker, by a customer, by a vendor, or by anyone associated with Abt Associates, can take many forms. Some examples are:

- Inappropriate physical contact
- Unwelcome sexual advances, requests for sexual favors, suggestive comments, inappropriate physical contact, and any other unwelcome verbal or physical conduct of a sexual nature
- Displaying derogatory, vulgar, suggestive or obscene pictures, cartoons, calendars, posters, or drawings
- Comments, jokes, insults, slurs, offensive language, and other unwelcome actions which are offensive or stereotypical based upon age, religion, gender, race, color, sexual orientation, national origin, disability, veteran status, and any other protected category or personal characteristic
- Depiction of harassers as victims or of victims as complainers
- Threats, acts of violence, and intimidation
- Retaliation for reporting, or threatening to report, acts of misconduct



Keys to Compliance

- *Treat everyone with respect*
- *Do not harass any employee, consultant, or subcontractor*
- *Do not discriminate on the basis of race, color, religion, gender, sexual orientation, national origin, age, physical or mental handicap, disability, veteran status, or other characteristics protected by law*
- *Do not participate in or ignore any offensive, threatening, or violent behavior*
- *Report any harassment or discriminatory treatment of you or others to the Human Resources Department or the Chief Ethics Officer*

Q

I know sexual harassment is an issue in the United States and other countries, but what about countries with different standards?

A

Respect for individuals is not limited by location. All employees throughout the world are entitled to a workplace in which their colleagues treat them with dignity and respect. Contact Human Resources or the Chief Ethics Officer if you are unsure whether certain conduct is consistent with a workplace of trust, teamwork, and respect.

Q

The person sitting next to me has been visiting a website with pictures I find to be offensive. What can I do about this?

A

If you are comfortable doing so, you should politely explain to your co-worker why you find the website offensive. If this does not work, alert your manager or use one of the many resources listed in this document to obtain assistance with the situation.

For Additional Guidance

- *Freedom from Harassment Policy*
- *HI V/AIDS Policy*

Fostering a Healthy and Safe Workplace

Abt Associates is committed to the health and safety of our employees. It is the continuing policy of Abt Associates to provide a work environment that is free of illicit drugs, alcohol, or other dangerous substances that impair performance or decision-making capabilities.

Keys to Compliance

- *Do not use controlled substances or alcohol in the workplace (at certain company-sponsored events a Senior Executive Team member can approve the serving of alcohol)*
- *Do not report to work or perform any job duties while under the influence of alcohol or any controlled substance*

For Additional Guidance

- *Drug-Free Workplace Policy*

Non-Fraternization Policy

We are proud of our collegial environment as well as the rich history of family and friends working for the company. In fact, Abt Associates encourages employees to refer people they know to apply for open positions, and even rewards successful placements through the Employee Referral Program. However, Abt Associates also realizes that when friends and family work in the same work environment, it is important to maintain neutral reporting relationships in which employees are not treated differently (positively or negatively) based on their relationships with others in the company. We want and need to avoid even the appearance of favoritism in the workplace.

Keys to Compliance

- *Do not create a supervisor/subordinate relationship with a family member*
- *Avoid reporting relationships with the potential for creating an adverse impact on work performance*
- *Disclose any romantic relationship with an employee who is a direct or indirect report*

Q My manager is dating someone in another department. Is this misconduct?

A Unless the relationship creates an appearance of favoritism or conflict of interest with duties at Abt Associates, there is nothing wrong with personal relationships between employees in different departments. Employees, however, should avoid close personal relationships with those they manage as these relationships could create the appearance of favoritism or conflict of interest. If the dating relationship is between a manager and someone who reports to him or her, it must be disclosed to Human Resources or the Chief Ethics Officer.

For Additional Guidance

- *Non-Fraternization Policy*

Our accomplishments on our clients' behalf are a source of satisfaction and pride for both our clients and ourselves. We work hard to represent our clients' interests, to understand their expectations, to respond effectively to their needs, and to earn their loyalty.

Interactions with our clients require the highest standards of professional excellence and ethical behavior. Our day-to-day interactions with clients turn these commitments into reality.

Ensuring Accuracy and Impartiality

Abt Associates is renowned for the quality, accuracy, and impartiality of our work. When working with clients at any stage – from writing a proposal to working on a project to delivering the results – you must seek to deliver the highest levels of quality. All information that you present to a client must be accurate and complete. All advice offered to a client must be objective and independent without conflicts of interest or undue influence from clients or others. Our advice must be based on careful consideration that weighs available input and data.

Keys to Compliance

- *Strive for quality, accuracy, and impartiality*
- *Never attempt to adjust data or findings in a manner that affects accuracy*
- *Always offer the best possible guidance to your clients based on your expertise, experience, and research*
- *Provide objective advice and rigorously maintain our independence*

For Additional Guidance

- *Management Intervention Policy and Procedure*

You should regard invoices and supporting data as the equivalent of sworn statements that the price, cost, or fee is what Abt Associates is entitled to be paid. Errors, undisclosed estimates, or a casual approach to invoice accuracy are unacceptable, and place the company and its employees at risk.

For Additional Guidance

- *Federal Contract Billing Policy and Procedures*

Appropriate Gifts and Entertainment

Gifts are not always physical objects. They also may be services, favors, loans, or other items of value. Abt Associates employees or members of the families of employees do not give or accept gifts, material considerations, or other items of monetary value greater than \$50 in a 12-month period to or from a person or organization with which Abt Associates does business or is engaged in negotiations. Gifts of cash, or cash equivalents such as gift cards, may not be accepted or given. Unacceptable gifts received, other than those that are impractical to return, are to be returned with a letter explaining the company's policy. It is suggested that perishable gifts, such as food or fruit, be given to a charitable organization or shared with the employees with whom the recipient works. A copy of any letter written about the return or disposition of gifts is retained by the division/department.

We may accept entertainment that is reasonable in the context of the business and that advances the company's interests. For example, accompanying a business associate to a local cultural or sporting event, or to a business meal would be acceptable in most cases. Entertainment that is lavish or frequent may appear to influence our independent judgment on behalf of Abt Associates.



Keys to Compliance

- Only provide and accept gifts and entertainment that meet our policy requirements
- Exchange gifts and entertainment that foster goodwill in business relationships, but never provide or accept gifts, favors, and entertainment that obligate or appear to obligate the recipient
- Provide gifts, favors, and entertainment consistent with the policy of the recipient's employer
- Never provide any gifts, favors, or entertainment to U.S. federal, state, or local government officials
- Do not solicit gifts, favors, or entertainment

Q What should I do if returning an unallowable gift will cause me or the person who gave me the gift embarrassment?

A After a discussion with your manager, you may consider donating the gift to a charity. However, should you decide to donate the gift, you should still tell the giver that you are doing so and the reason why. Abt Associates prefers to send the message that we do business based on objective business criteria like price, delivery, and quality by declining to accept gifts of value.

For Additional Guidance

- Gifts and Other Benefits Policy

Truth in Negotiations Act

Abt Associates must comply fully with the Truth in Negotiations Act (TINA) in the conduct of its U.S. Government business. The purpose of TINA is to give the Government effective means of negotiating a fair and reasonable price. It requires disclosure of cost or pricing data to the contracting officer (or designated representative) and certification that such data is accurate, complete, and current for negotiated procurements requiring TINA certification as of a mutually agreed-to date. The requirement for TINA compliance applies to all organizations generating or receiving cost or pricing data, whether Abt Associates is a prime contractor to the U.S. Government, or is a subcontractor under a U.S. Government contract subject to TINA.

Our Company

Accurate Business and Financial Records

Abt Associates produces financial information about the company's operations for internal and external reporting purposes. Accurate records and disclosures are critical to our company's ability to meet compliance, legal, financial, and management obligations. Accurate records are also critical to our credibility in the marketplace.

All financial books, records, and accounts must accurately reflect transactions and events, and conform both to generally accepted accounting principles, and to Abt Associates' system of internal controls. Undisclosed or unrecorded funds, assets, or liabilities are not allowed. If you are uncertain about the validity of an entry or process, you are expected to consult the Accounting organization, Internal Audit, or the Ethics and Compliance Helpline.

We may never knowingly offer or enter misleading or inaccurate information in the preparation of any record or report or tamper with any record or report. Proper internal controls must be established and followed to ensure accurate reports and record keeping. Financial accounting staff may not be directed to produce financial information that is without sound business basis or support or is not in accordance with generally accepted accounting principles.

When asked to participate in the creation of any company records, we are responsible for the integrity of those records. We must never make any false or misleading entries. If anyone suggests that we engage in falsifying information, we are obligated to report it, and in no circumstances may we comply with such a request.

Keys to Compliance

- *Create business records that are professionally drafted and accurately reflect the truth of the underlying transaction or event*
- *Only sign documents, including contracts, that you are authorized to sign and that you believe are accurate and truthful*
- *Do not request improper accounting treatment or seek to influence the audit of financial statements*
- *Remember that email is a business record—avoid exaggeration, derogatory language, and other expressions that may easily be taken out of context*
- *Retain, protect, and dispose of records in accordance with applicable policy*

Q What's wrong with recording sales figures early or expenses late? It's not like we're making the numbers up, shifting them.

A Policy and the law require us to record all transactions truthfully. Shifting figures misrepresents our financial results.

Q I think I found an error in an invoice we are sending to USAID. My manager said that invoice needs to be submitted today and that what I found is not a problem. I am still uncomfortable. How should I raise my concern?

A It is critical that you notify someone with the authority to address the issue immediately. This could be a potentially serious error. You have a responsibility to raise your concern with a higher level of management, or use the Ethics and Compliance Helpline.



For Additional Guidance

- *Contract Signature Authority Policy*
- *Finance and Accounting Organization Policy and Procedure*
- *Financial Reporting Systems and Controls Policy*
- *Foreign Currency Transaction Accounting Policy and*

Accounting for Time and Expenses

Abt Associates employees must apply meticulous recordkeeping to all projects, including tracking of hours and expenditures. Hours of work by all team members must be recorded regularly and accurately – and applied only to the correct project.

Keys to Compliance

- *Maintain complete, accurate records of each project*
- *Comply with the time reporting policy*
- *Fill out time cards daily*
- *When undertaking work assignments, obtain proper charge code*

For Additional Guidance

- *Total Time Reporting Handbook*
- *Documenting CLD Charges Policy*
- *Time Reporting Policy*
- *Travel Expense Policy and Procedures*

Protecting Company Assets

Abt Associates has acquired its facilities, equipment, materials, real estate, and other assets (tangible and intangible) through the hard work and investment of many stakeholders in the company's success – employees, shareholders, banks, customers, and others. Our assets are intended to advance the many interests in the economic success of the company. Employees have perhaps the largest and most immediate interest in the company's success, and the clearest obligation to safeguard the assets necessary to achieve it.

Keys to Compliance

- *Protect our assets from loss or harm*
- *Do not appropriate, borrow, or loan company property without permission*
- *Personal use of company assets should be incidental and kept to a minimum*
- *Do not use company equipment or systems to create, store, or send content that others might find offensive*
- *Avoid any usage that might lead to loss or damage, including the introduction of viruses or a breach of our firewalls*

Q I was attending a meeting with several other Abt Associates employees in a hotel conference room. At lunchtime, everyone left their laptops in the room. I felt uneasy, but I did the same as everyone else. Was this alright?

A The laptops and the information on them are Abt Associates property and must be handled in such a way to avoid loss or theft. You also have a responsibility to ensure that the data is not inadvertently disclosed. You and the others should have either secured the room or chosen someone to stay with the equipment.

For Additional Guidance

- *Acceptable Uses of IT Resources Policy*
- *Email Policy*
- *IT Security Policy*

Avoiding Conflicts of Interest

A conflict of interest exists any time we allow personal circumstances to improperly influence the manner in which we conduct Abt Associates' business. Some specific examples of potential conflicts of interest include:

- Referring Abt Associates business to a relative or anyone with whom you have a close, personal relationship
- Holding a financial interest in any firm or corporation that is a competitor of Abt Associates, or which seeks to do business with Abt Associates if that interest might influence, or appear to influence, any decision you might make for Abt Associates
- Asking for gratuities or gifts from customers or suppliers, or otherwise misusing your position with Abt Associates for your personal gain

Abt Associates strictly avoids conflicts of interest in the work that we do for our clients, or even the appearance of conflicts of interest. Potential conflicts of interest most frequently arise in two types of circumstances:

- *Organizational Conflict of Interest* -- Where Abt Associates is dealing with a similar subject for two different clients with competing or inconsistent interests.
- *Individual Conflict of Interest* -- Where a member of the Board of Directors, an officer, or an employee has a financial, familial, previous employment, or other personal interest in the affairs of a client of Abt Associates, a competitor of that client, or one of our vendors or competitors.

Our clients' contract solicitations sometimes include organizational conflict of interest clauses that require us to disclose previous clients or work on the same subject matter, or prohibit us from doing work for other clients on the same subject matter. In all cases, our own policy requires that we take prudent steps to identify and avoid conflicts of interest.

Abt Associates also respects the right of all employees to engage in personal activities outside the scope of their employment. However, we must take care to avoid situations that might conflict with our responsibilities to Abt Associates – or with the interests of the company and our clients. A conflict of interest occurs when an employee's private interests interfere, or appear to interfere in any way, with the interests of the company. We must take care to avoid conflicts of interest or the appearance of conflicts of interest.

Keys to Compliance

- *Be aware of special conflict of interest rules for government contracts*
- *As a rule of thumb, avoid situations where a reasonable person would question whether there was inappropriate influence involved in a business decision*
- *Deal with suppliers, customers, and everyone doing business with Abt Associates objectively, professionally and fairly*
- *Never seek or accept payment, fees, loans, or services from any person or firm as a condition of or result of their doing business with Abt Associates*
- *Never do business on behalf of Abt Associates with a relative or a person with whom you have a close, personal relationship*
- *Do not hold any financial interest in any firm or corporation which is a competitor of Abt Associates, or which does, or seeks to, do business with Abt Associates, if such interest may influence any decision that Abt Associates personnel might make in the performance of their company responsibilities*
- *If you are asked to serve on the Board of Directors of any for-profit company, you must receive written consent from the Chief Ethics Officer. In most cases, you may serve on boards of not-for-profit organizations as a community service*

Q I own stock in a competitor. Do I have to sell it?

A In most circumstances you do not have to sell the stock. However, you may need to do so if the company does or seeks to do business with Abt Associates or if ownership of the stock may influence or appear to influence any decisions that you might make in the performance of your Abt Associates responsibilities. Check with the Chief Ethics Officer if you have any questions about stock ownership.

Q My sister is a contractor whose skills would be an asset to my project. I do not want to violate Abt Associates policy, but I want my project to be successful. What do I do?

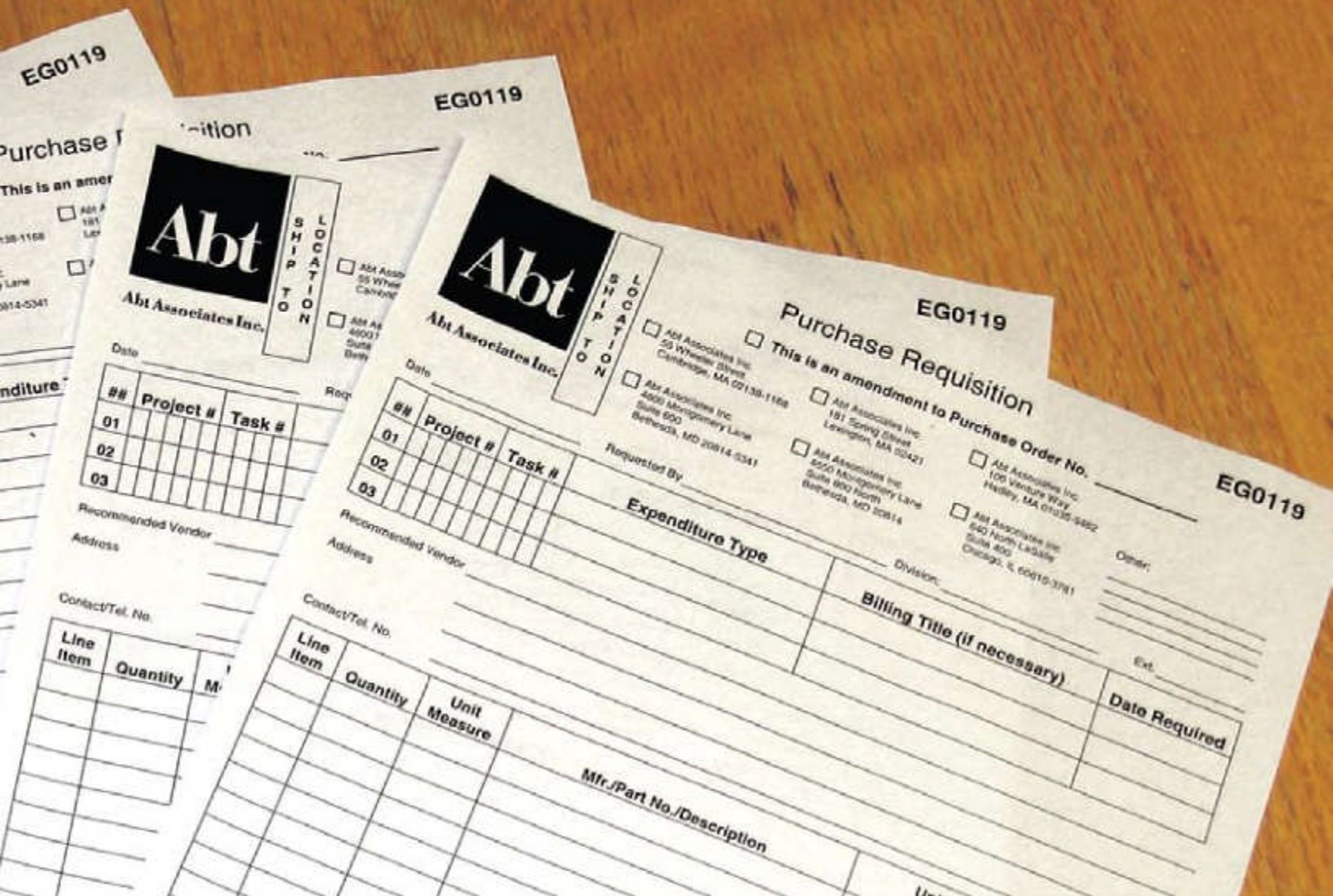
A You should immediately remove yourself from this decision. Notify your manager of the situation and disclose the nature of your relationship. Your manager and/or the Contract Operations Department should then make any decisions about whether your sister should assist with the project, and may need to take additional steps to ensure there are no ongoing actual or perceived conflicts of interest if your sister is contracted to do work for Abt Associates.

For Additional Guidance

- *Conflict of Interest Policy*
- *Conflict of Interest Review Procedure: Contracts*

Purchasing Practices

All purchasing decisions must be made based on the best value received by Abt Associates. Employees should take care that personal or family relationships not influence or appear to influence objective business decisions. Obtaining competitive bids, verifying quality and service claims on a regular basis, and confirming the financial and legal condition of the supplier are all important steps in a good purchasing decision.



Agreements should be written, and clearly set forth the services or products to be provided, the basis for earning payment, and the applicable rate or fee. The amount must not be excessive in light of industry practice and must be commensurate with the services provided.

For Additional Guidance

- *Purchasing Policy*
- *Subcontracting Policy*

Cooperating with Audits

External and internal audits are essential business tools, and important to preserving the confidence of our clients and stakeholders. To ensure the accuracy and integrity of audits, no officer, director or employee shall provide false, incomplete, or misleading information to any auditor, nor shall auditors be encouraged to produce results that are unsupported by the facts or the governing accounting principles, or would render such financial statements misleading.

Keys to Compliance

- *Cooperate fully with internal and external auditors*
- *If requested, provide complete information to auditors*

Our Communities

Nonpartisanship, Political Activity, and Political Contributions

Abt Associates' mission is to perform research and evaluation, consulting, and technical assistance that improves the quality of life and economic well-being of people worldwide. By our work, we help governments, businesses and private organizations make better decisions and deliver more effective products and services. Our clients rely on the integrity of our methods and findings, the objectivity of our thinking, and the practical utility of our results.

While Abt Associates employs staff with divergent views on many public policy and political issues, an essential aspect of our work is that it is nonpartisan and unbiased. We use rigorous research methodologies, and we report the results indicated by data and sound analysis. Our work should never be influenced by political considerations, conflicts of interest, or any factor that may compromise its objectivity and integrity. Staff who publish partisan political opinions in any printed materials, auditory or video format, or on electronic forums, e.g. websites and newsgroups, must do so as private individuals using a personal address or email address (not their Abt Associates email address) and may not reference their position or employment at Abt Associates.

Abt Associates does not make political contributions, nor does the company support political candidates. Employees, officers, and directors may make lawful political contributions and may be involved in political activity as individuals. However, such activities must be conducted in strict compliance with federal and state law, and must avoid even the appearance that the company is seeking or receiving undue political advantage.

Keys to Compliance

- *Do not use the Abt Associates name or resources when offering personal partisan political opinions in print or electronic formats*
- *Do not use company funds to make political contributions nor seek reimbursement for any political contribution*
- *Keep personal political activities separate from company business*
- *Do not use federally appropriated funds for lobbying activities*
- *Do not use company resources or facilities including company phones, computers, printers, copiers, or fax machines to support political candidates or parties*
- *Do not post political materials on company property*
- *Make sure that your individual political views and activities are not viewed as those of Abt Associates*

For Additional Guidance

- *Non-Partisanship Policy*

Adhering to Anti-Corruption Laws

Abt Associates complies with the anti-corruption treaties and laws of the countries in which it does business, including the U.S. Foreign Corrupt Practices Act (FCPA), which applies to its global business. We will not directly or indirectly, using personal or Abt Associates resources, offer an unlawful, improper, or corrupt payment or bribe to government officials. An unlawful payment or bribe is not just money but includes giving, or promising to give, anything of value to a U.S. or foreign government officials, employees of government-owned/government-controlled enterprise, political candidates or agents, to obtain business or special treatment for the company.

These requirements apply both to Abt Associates employees and agents working on behalf of the company, such as third-party sales representatives and our service providers, no matter where they are doing business. If you are authorized to engage agents, make sure that they are reputable and require them to agree in writing to Abt Associates' standards in this area. The FCPA also requires proper accounting for transactions.



Keys to Compliance

- *Do not offer or accept unlawful payments or bribes*
- *Do not make, offer, or promise any payment, gift, service, or anything of value (directly or indirectly) that is intended to improperly influence government personnel's actions*
- *Ensure that foreign agents hired to secure permits and approvals understand and respect the zero tolerance no-bribe policy*
- *Ask questions if the circumstances are at all unusual or unfamiliar and watch for "red flags" such as a payment or commission that is larger than is standard for the situation*
- *Investigate the business reputation of agents or consultants in high-risk countries or where you may have a concern. Make sure that all agreements are in writing, especially when you are suspicious of the activities of the other party*
- *Understand that you are strongly discouraged from making, facilitating, or expediting payments*
- *Be aware that generally accepted practices in one country, including customary gift giving, may not be lawful or appropriate elsewhere*

For Additional Guidance

- *Foreign Corrupt Practices Act Policy*

Anti-Money Laundering

Money laundering is the process by which individuals or entities try to conceal illicit funds. Abt Associates will not condone, facilitate, or support money laundering. Although most Abt Associates employees are unlikely to encounter this situation, it is important to be aware of any irregularities in the way payments are made or requested, or any customers who appear to lack integrity in their business dealings.

Environmental Protection

Abt Associates respects the preservation of natural resources and the improvement of the environment. The company cooperates with government bodies and communities in environmental protection efforts and complies with environmental laws and regulations. The company ensures that all environmentally sensitive and hazardous materials are identified and managed to ensure their safe handling, movement, storage, recycling, or reuse and disposal.

The Marketplace



Complying with Relevant Laws and Regulations

While Abt Associates values a culture of entrepreneurship and encourages measured risk-taking, we must all be clear that “measured risk-taking” does not include violation of laws, regulations, or company policies. Abt Associates is committed to principles of business ethics and conduct that acknowledge and address its corporate responsibility to the government and the public under federal, state, and local laws. We believe that compliance with federal, state, and local laws is the responsibility of every company and employee doing business with the government.

With continually changing government procurement laws and regulations – as well as government enforcement standards and practices – all employees dealing with the government must keep informed of these changes and seek advice whenever there is any question regarding appropriate conduct.

Failure to comply with these laws and regulations may result in criminal, civil, contractual, and administrative penalties being assessed against the company and individual employees. Therefore, it is important that each individual maintain high ethical standards.

Keys to Compliance

- *Deliver the services detailed in the contract*
- *Follow all applicable procurement laws and regulations*
- *Provide accurate cost and pricing data*
- *Ask your manager for guidance if you are uncertain*
- *Before signing certifications that will be submitted to the government or other clients, know what you are signing, and take the necessary steps to be sure that the certification is accurate*

Protecting Confidential Information

Sharing information with customers and suppliers is necessary to meet the needs of our clients. However, employees are responsible for protecting confidential information belonging to the company or entrusted to it by third parties. Improper disclosure can create serious financial or competitive losses or disadvantages to the company, and legal liabilities to the company and individual employees. All Abt Associates employees must sign a non-disclosure agreement upon starting their employment with the company (and are bound by its applicable terms if they should leave the company) regarding the disclosure of company proprietary information to third parties.

Company Information: Abt Associates information includes all proprietary information that is not generally available to or known by the public, and it includes information in any format including written, electronic, visual, or verbal. Examples include (but are not limited to) such items as:

- Business plans and marketing strategies
- Financial data and reports including external and internal audit reports
- Technical data, analytical processes, and trade secrets
- Information contained in a bid or proposal, whether the company's or a third party's
- Cost or pricing data
- Other information submitted, or contemplated to be submitted, to a customer or supplier and designated as proprietary in accordance with law, rule or regulation, or company policy
- Employee information such as social security numbers, health information, income, or other personal information
- Information about individuals who are involved as subjects in our research

In the digital era, it is particularly important to protect information that is shared via e-mail or the Internet as control of electronic information is easily lost.

Many of us regularly disclose company information to others and/or receive information from others for legitimate business reasons. Before disclosing or receiving such information, we must enter into a written agreement that describes how the parties can use, and how they must protect, the information. Use of a Mutual Non-Disclosure Agreement when entering into a business relationship with a competitor is a key step in ensuring that both parties understand the limits of what can be communicated and exchanged between them.

Company proprietary information in your possession is also subject to the same confidentiality concerns if you should leave Abt Associates to work for another organization.

All company documents, e-mail, and other materials containing company information (and all materials prepared from those documents) are Abt Associates property. If the company requests, or when your employment ends, these documents must be returned to the company.

Business Partner Information: Information about competitors, customers, and suppliers is a valuable asset in the highly competitive markets in which Abt Associates operates. We will obtain this information legally. Theft of proprietary information, inducing disclosures by a competitor's past or present employees, and any action that could create an appearance of an improper agreement with competitors are prohibited. Information from our business partners must be handled and used appropriately in accordance with the terms and conditions defined and specified in each contract with them, including terms and conditions relating to the intended use, management, and duration of confidentiality of such information.

Keys to Compliance

- *Know what information is considered proprietary or confidential and ask if you are unsure*
- *Protect the confidentiality of employee and research subject personal data*
- *Protect the confidentiality of information entrusted to Abt Associates by any third parties*
- *Guard against inadvertent disclosure*
- *Respect the confidential business information of competitors*
- *Do not disclose any company information to others, including other employees, unless they have a legitimate need to know it to perform their jobs, and, if they are not Abt Associates employees, have agreed in writing to maintain its confidentiality*
- *Prior to preparation of any business proposal, ensure that any business partners sign a Mutual Non-Disclosure Agreement so that both parties clearly understand the extent of appropriate communications and data use*

Q In my job I handle personal information. What should I do if I think the system has been breached?

A You should contact the Chief Ethics Officer and IT to report your concerns so that Abt Associates can investigate. In some cases, Abt Associates may have a legal or ethical responsibility to notify individuals if we have lost their personal information.

Q I used to work for an Abt Associates competitor. My new Abt Associates team members are asking me to brief them on my former company's proposal strategies. They said my knowledge of the competitor's approach is the reason why they hired me. Is this OK?

A Probably not. If the proposal strategies are not a matter of public record, in other words you would be divulging the competitor's confidential proprietary information, you have a commitment to protect that information from disclosure within Abt Associates. Abt Associates does not want information that it does not have a right to have. Make sure your immediate manager knows about your prior employment for the competitor and abide by all obligations of confidentiality owed to your former employer. If you are unsure about what can and cannot be disclosed, or if you continue to feel pressure to disclose information that you believe is protected, contact the Chief Ethics Officer right away.

Q I am working on a new proposal. One of the expected competitors is a subcontractor to us on another project. Is it OK to use the cost and pricing data that they provided to us on the subcontract to develop a competitive proposal?

A No. The cost and pricing data was provided to us for specific use on our subcontract. It is very likely that our contract with them specifies acceptable data uses. Regardless, using this data for a competitive purpose is not fair competition and it violates our *Code of Conduct*.

Hiring Former Government Employees

Current and former U.S. Government employees are subject to federal conflict of interest laws and regulations that may limit the ability of the company to recruit and hire certain individuals, and may limit the activities they will be able to perform for the company if hired. Abt Associates employees may not have discussions concerning possible employment, whether in person, by telephone, fax, or e-mail, with a potential new hire who is a current U.S. Government employee without prior authorization from the Vice President of Human Resources and the Chief Administrative Officer.

Q Someone I have worked with on a Government program is planning to retire, and I think she would make a great addition to the Abt Associates team. Can I talk to her

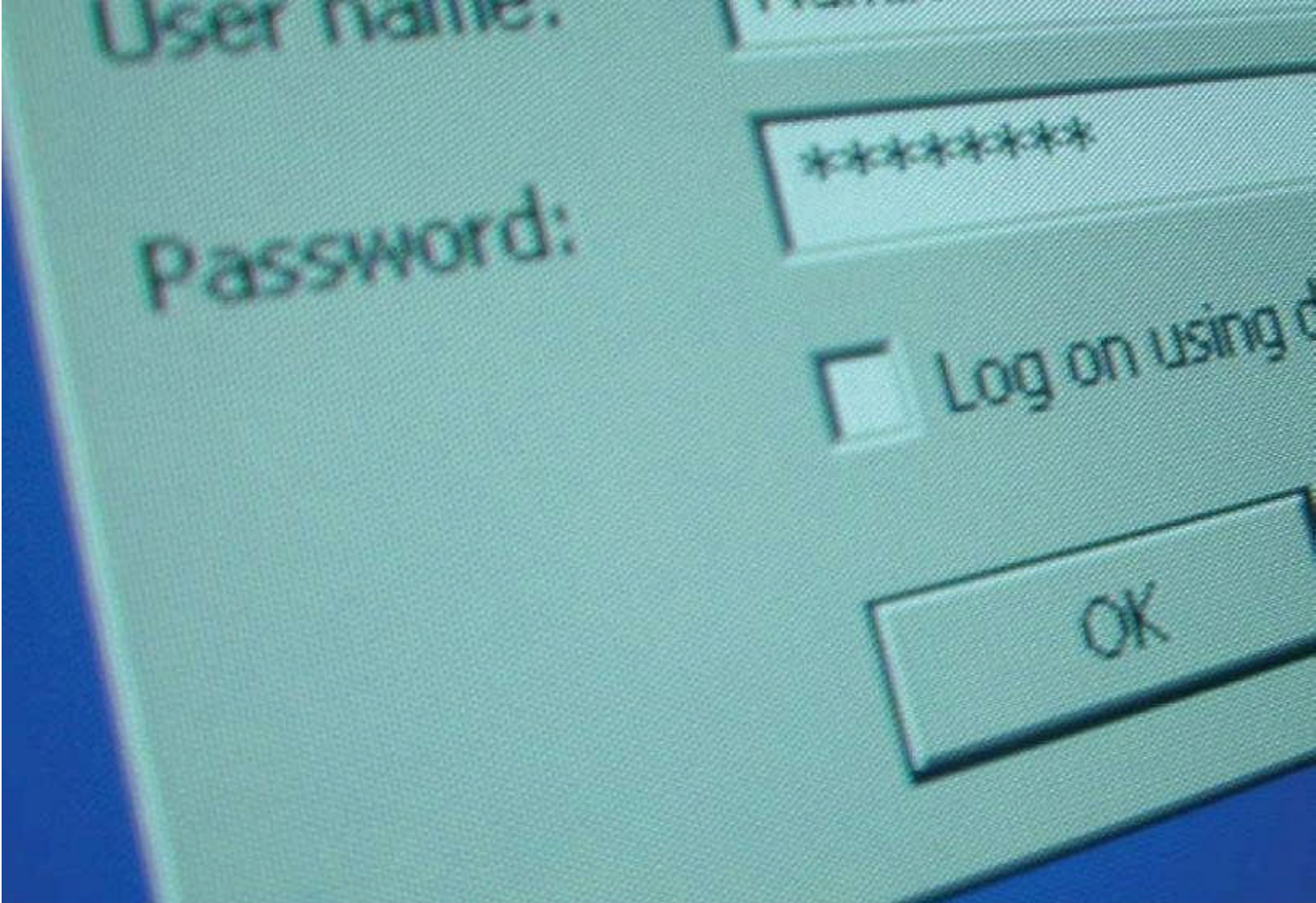
A No. You will not be able to discuss employment with her until after she retires or until she disqualifies herself from further participation on matters involving Abt Associates and complies with any other Government regulations that may be applicable to her.

For Additional Guidance

- *Conflict of Interest Review Procedure: Employment of U.S. Government Employees*

Insider Trading Laws

Federal and state securities laws regulate and forbid the buying and selling of stock and other securities by individuals possessing insider information gained via working for a specific company or via personal connections. Insider information is defined as important information about a company that is not publicly known or available. Violations of these laws can result in substantial criminal and civil penalties against the company and involved individuals.



Keys to Compliance

- *Do not engage in insider trading*
- *Safeguard potentially valuable information*
- *Do not pass on insider information to others*

For Additional Guidance

- *Securities Trading and Inside Information Policy*

Respecting Copyright Laws and Intellectual Property

Copyright laws provide the author of a work with the exclusive right to copy, distribute, adapt, perform, and sell the work. Copyright applies to materials such as computer programs, books, articles, reports, drawings, presentation handouts, music, music recordings, and audio and videotapes. Unfortunately, easy access to copying machines, scanners,

and personal computers has made copyright infringement commonplace. At Abt Associates, we are committed to respecting the rights of others by obeying the law, and we are steadfast in the protection of our own copyrights.

Keys to Compliance

- *Use only legitimately purchased software*
- *Obtain permission to use copyrighted materials*
- *Protect copyrights owned by Abt Associates, ensure copyrights are appropriately marked*

Preventing Anti-Competitive Practices

Business practices that restrict or eliminate competition can lead to excessive, distorted, or unfair pricing, and may be unlawful. When the law is broken in this area, penalties can be very severe for both the company and individuals involved. Examples of anti-competitive practices include collusive bidding, obtaining non-public information about a contract competition in progress, agreements among competitors to divide the market, or agreements to forgo bidding in exchange for a reciprocal promise in relation to other projects. Abt Associates employees must refrain from anti-competitive practices, and avoid communications with competitors that create an appearance of collusive conduct. Use of a mutual non-disclosure agreement when entering into a business relationship with a competitor documents the extent of appropriate communications between each party.

Keys to Compliance

- *Do not discuss strategy, pricing, or the contents of bids or proposals with competitors during a pending competition, and avoid any communications with competitors that could appear to be anti-competitive*
- *Do not accept non-public information about a competitor's bid or proposal, or about an in-process contract competition*
- *Enter into prime or subcontractor arrangements only for bona fide performance purposes, and not for purposes of reducing competition*
- *Prior to preparation of any business proposal, ensure that any business partners sign a Mutual Non-Disclosure Agreement so that both parties clearly understand the extent of appropriate communications*

Q I attended an industry trade association meeting and during a break in the program, a sales representative, from one of our competitors, asked me if I was aware of what our bid had been on a recent project. Abt Associates won the project, so I didn't see any harm in telling him. Was I wrong?

A Yes, it is wrong to discuss any pricing issues with a competitor. These discussions may be considered illegal price fixing. If you are approached by a competitor to discuss any issues regarding pricing or market segments, immediately advise the competitor that you will not discuss pricing or markets and notify the Chief Ethics Officer as soon as possible. Further, if a discussion of this nature is happening at an event or meeting, make a "noisy exit" and contact the Chief Ethics Officer immediately.

Q At a conference recently, I heard a competitor discuss their intent to "dominate the market." Is such language permissible?

A You should avoid the use of overly aggressive or colorful language. In particular, note that it is not Abt Associates' policy to "dominate" or "control" markets or exclude rivals from access to customers or suppliers, or engage in pricing practices that would harm customers. Such language should be avoided.

Respecting U.S. and International Customs, Laws, and Regulations

Abt Associates employees conducting business internationally must comply with applicable U.S. and foreign laws and regulations.

When we travel internationally on company business, we are subject to laws governing what we import and export, including items and information we carry with us. We are responsible for knowing the laws and for checking with the Chief Ethics Officer when in doubt.



You must maintain a basic familiarity with the principles and purposes of Import/Export Control laws and similar trade provisions and comply with them especially when involved in the following activities:

- Creation of export documentation for a location outside of the United States
- Mailing or interoffice shipment of goods or technology destined for a non-U.S. based location
- Transfer of goods or technology outside of the United States either verbally, in written form, or hand carried across borders. This includes training of specific methods and/or technologies

This list is not exhaustive. Because of the complexity of the laws discussed in this section, you should check with the Chief Ethics Officer before attempting to send or receive products, information software, or technology internationally.

It is also important to remember that various governments have programs of economic sanctions and embargoes against certain countries and other designated persons. While it is Abt Associates' policy to comply with applicable sanctions and embargoes imposed by countries in which we operate, in certain cases, U.S. law may prohibit us from complying with or supporting a foreign country's boycott of another country that is "friendly" to the United States.

Keys to Compliance

- *Adhere to bilateral country agreements*
- *Abide by Import/Export Controls of U.S. and host countries*
- *Adhere to U.S. Economic Boycott Laws*
- *Adhere to economic sanctions, regulations issued by the Office of Foreign Assets Control (OFAC)*

Communications with the Media

At Abt Associates, all contact with the news media (newspapers, radio, television, industry journals, and magazines) must be coordinated through the Corporate Communications Department. Staff cannot speak with a member of the media on behalf of Abt Associates without authorization from the Corporate Communications Department. In the event you are contacted directly by the news media please inform Corporate Communications and they will provide guidance on the appropriate way to respond to the inquiry.

Q How do I respond if I am called on the phone by person from the media wanting to discuss a project I am working on?

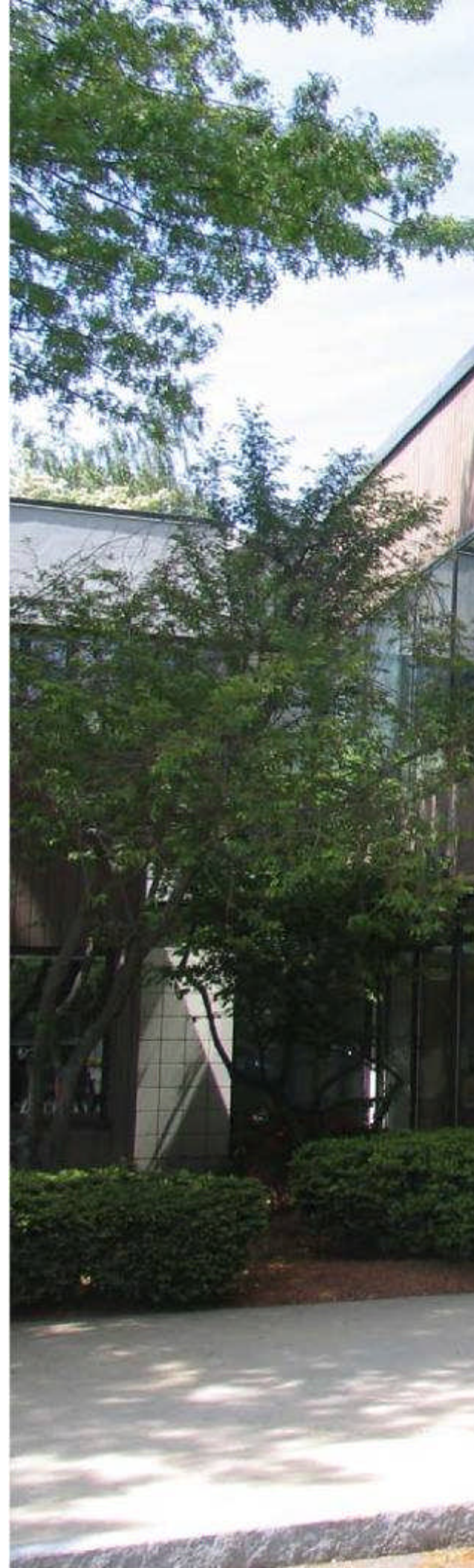
A Ask them specifically who they represent, what information they are seeking and how it will be used and let them know it is our company's policy to coordinate responses with our Corporate Communications Department; tell them once you have done that the appropriate person will respond as soon as possible.

Government Requests and Subpoenas

It is our policy to cooperate with reasonable requests for information from government agencies and regulators.

Keys to Compliance

- *Notify the Chief Ethics Officer before responding to a subpoena, search warrant, request for an interview, or other non-routine request for access to information related to company matters*
- *Always cooperate fully and be truthful in any information you provide to the government*
- *Do not alter, withhold, or destroy records related to an investigation*





Abt Associates Inc.

55

DISABLED
PARKING
ONLY

Index

Accounting, 21, 22, 24, 25, 28
Accuracy and impartiality, 18
Accurate business and financial records, 21
Agents, 27, 28
Alcohol, 16
Anti-competitive practices, 34
Anti-corruption laws, 27
Anti-money laundering, 28
Board of Directors, 7, 8, 10, 24
Business partner information, 31, 32
Chief Compliance Officer, 10
Chief Ethics Officer, 7, 8, 10, 12, 15, 16, 23, 32, 34, 35
Clients, 2, 3, 5, 8, 14, 18, 23, 24, 25, 27, 30
Communication with the media, 36
Company assets, 22
Company funds, 27
Company information, 30, 31, 32, 33
Company property, 22, 27
Company records, 21
Competition laws, 32, 33
Competitive intelligence, 32, 33, 34
Competitors, 23, 24, 30, 31, 32, 34
Confidential information, 30, 31, 32
Confidentiality, 10, 11, 30, 31, 32
Consequences of wrongdoing, 8
Conflicts of interest, 16, 23, 24, 32
Contractor, 7, 19, 24
Copyright laws, 33
Cooperating with audits, 7, 12, 25, 36
Customers, 2, 5, 8, 14, 16, 18, 22, 23, 24, 28, 31, 34
Discrimination, 14
Diversity, 14
Drugs, 16
Entertainment, 18, 19
Environmental protection, 28
Equal employment opportunity, 14
Ethics and Compliance Helpline, 7, 8, 10, 11, 12, 21
Ethics and Compliance Steering Committee, 10
Family, 16, 24
Foreign Corrupt Practices Act, 27, 28
Financial interests, 23, 24
Funds, 21, 27, 28
Gifts, 18, 19
Government, 12, 19, 23, 24, 27, 28, 30, 31, 32, 34, 35
Government requests and subpoenas, 36
Harassment, 14, 15, 16
Health, 15
Hiring former government employees, 32
Human Resources, 7, 8, 10, 15, 16, 32
Import/Export requirements, 34, 35
Inside information, 32, 33
Insider trading, 32, 33
Intellectual property, 33
Internal Audit, 7, 8, 10, 25
International customs, laws, and regulations, 34, 35
Investigations, 7, 10, 11, 12, 36
Invoices to clients, 18, 21
Non-fraternization, 16
Non-partisanship, 27
Non-retaliation policy, 12
Outside employment, 23, 24
Personal benefit, 23, 24
Political activities, 27
Political contributions, 27
Property, 22, 23, 27
Protection of employee information, 30, 31, 32
Protection of third-party information, 30, 31, 32
Purchasing practices, 24, 25
Records management, 12, 21, 22, 36
Regulations, 7, 14, 27, 30, 32, 34, 35, 36
Relatives, 16, 23
Responsibilities of employees, 7
Responsibilities of leaders, 8
Retaliation, 12, 14
Safety, 16
Sales, 21, 28, 34
Securities, 32, 33
Sexual harassment, 14, 15, 16
Substance abuse, 16
Suppliers, 5, 23, 24, 25, 31, 32, 34
Time and expense reporting, 22
Travel and entertainment, 18, 19, 22
Truth in Negotiations Act, 19
Waivers, 7
Web-based reporting tool, 10, 11



Abt Associates Inc.

Cambridge, Massachusetts

55 Wheeler Street
Cambridge, MA 02138-1168
617.492.7100

Atlanta, Georgia

2200 Century Parkway
Suite 980
Atlanta, GA 30345-3154

Bethesda, Maryland

4550 Montgomery Avenue
Suite 800 North
Bethesda, MD 208 14-3343
301.634.1700

Durham, North Carolina

4620 Creekstone Drive
Maplewood Building
Suite 190
Durham, NC 27703-8062
919.294.7700

**Abt Associates Bio-Pharma
Solutions, Inc.**

Lexington, Massachusetts

181 Spring Street
Lexington, MA 02421-8030
781.372.6500

Abt SRBI Inc.

New York, New York

275 Seventh Avenue, Suite 2700
New York, NY 10001-6885
212.779.7700

