

Our Commitment to Quality and Integrity

The Horne International Code of Business Ethics and Conduct

September 2006

***When clients turn to us for services, we don't just add value.
We add values.***

**— Darryl Horne
President and CEO, Horne International, Inc.**



Our Commitment to Quality and Integrity

The Horne International Code of Business Ethics and Conduct

Horne International, Inc., places the highest value on quality and integrity. Underpinning everything we do, supporting and guiding us, are Horne International's Core Values. These are a fundamental expression of who we, as a corporation and as a collection of individuals, are. Their weight must be felt in every action that we take. They are the foundation of how we conduct our business.

This Code of Business Ethics and Conduct gives detail to Horne International's Core Values. It translates these general principles into our code of corporate self-governance. It provides a framework for decision-making. Every Horne International policy, procedure, and guidance document flows, directly or indirectly, from this code.

The combination of quality and integrity yields trust, an essential component of enduring relationships. Horne International's reputation and success hinge on how we treat our customers, our suppliers, our stakeholders, the communities in which we work and live, and each other. We must behave honestly, openly, ethically, and always within the law.

Core Values

- Never sacrifice quality and integrity.
- Conduct ourselves and our business lawfully, ethically, and morally.
- Do the right thing safely and right the first time.
- Be a responsible steward of the environment.
- Make the priorities of our clients the highest priorities for all company personnel.
- Be the best, the benchmark of our industry.
- Treat employees as our most important resource.
- Be a committed citizen; support public and community activities.
- Deliver shareholder value by sustaining expansion and growth.

Compliance

Every Horne International officer and employee, no matter what his or her position in the company, must read this Code of Business Ethics and Conduct and follow its guidance in all business decisions and actions. This code will be enforced equitably throughout the company, and no excuses will be accepted for violating the code. Each employee is responsible for his or her own conduct. No one has the authority to make another person violate this code, and any attempt to direct or otherwise influence someone else to commit a violation is itself a violation of the code.

Information and Assistance

Horne International provides training on this Code of Business Ethics and Conduct to all employees as part of new-employee orientation and dedicates a section of the corporate intranet to this subject. In addition, supervisors must ensure that employees understand the code and are informed of the requirements relating to their jobs.

The company also recognizes that it is not possible to establish a rule for every situation that might emerge in the performance of our work or related to our work. Furthermore, there are exceptions and “gray areas.” If you have any questions about this code or are unsure of what is the “right thing” to do, seek guidance from your supervisor, the Horne International Business Conduct Ombudsman, or the Horne International Corporate Compliance Officer. The Ombudsman is responsible for providing employees with confidential, informal support and advice regarding ethical business practices and for investigating alleged or suspected violations of this code. The name, mailing address, phone numbers, and e-mail address for the Business Conduct Ombudsman, shown in the box on the right, are posted in every Horne International facility and on the corporate intranet. All inquiries to the Ombudsman will be treated confidentially.

**Horne International
Business Conduct Ombudsman
Metro Place IV
2677 Prosperity Avenue, Suite 300
Fairfax, Virginia 22031
703-641-1199 or
866-412-0986 (toll-free hot line)
bcombudsman@horne.com**

Reporting Violations

Any Horne International employee who observes or suspects a violation of the law or of this code must report it to his or her supervisor, a manager, the Business Conduct Ombudsman, or the Corporate Compliance Officer, regardless of whether that possible impropriety or violation was committed by a Horne International employee, vendor, subcontractor, government employee, or anybody else. Reports of suspected misconduct will be investigated, and appropriate corrective and disciplinary action will be taken. As with all matters involving disciplinary action, the company will make every effort to be fair. Any employee charged with a violation of this code will be afforded an opportunity to explain his or her actions before disciplinary action is taken. All employees must fully cooperate with any investigation, and the investigation, including its documentation, shall be kept confidential to the maximum extent allowable. The company will not tolerate retaliation or retribution for good-faith reports of suspected misconduct.

Discipline

Horne International will immediately discipline, to include termination if appropriate, employees or officers who fail to comply with this code. Disciplinary action will be taken against —

- Any employee who authorizes or participates in actions that violate applicable laws, regulations, or the basic tenets of business integrity and honesty set forth in this code.
- Any employee who deliberately fails to report a violation or deliberately withholds relevant information concerning a violation of this code.
- Any employee (managers included) who attempts to elicit confidential information from the Business Conduct Ombudsman.
- Any manager, supervisor, or other individual who retaliates directly or indirectly, or encourages others to retaliate, against an employee who reports a violation of this code.

In addition, in considering employees for hiring or promotion, compliance with this code will be given high importance.

How We Conduct Ourselves

Our rules of conduct appear in the accompanying box. In the pages that follow, each rule is explained in detail.

Under most of these rules are bulleted lists of “Do’s and Don’ts.” For the sake of simplicity, these directives are written as though they apply to every Horne International employee — or as though they are aimed at a single employee who performs every job function in the company. These “Do’s and Don’ts” are, in fact, relevant to every employee; most apply to every employee; but some might not directly pertain to certain job functions. For example, procedures for following equal opportunity guidelines may not directly apply to employees who are not involved in the hiring process. However, every employee should know that Horne International is committed to equal employment opportunity and that those employees responsible for hiring are required to adhere to such guidelines.

Furthermore, this code does not cover every law that the corporation and its employees must follow, nor does it cover every possible ethical issue. If you are uncertain whether a specific rule applies to you, or whether certain actions are illegal or unethical, ask your supervisor or the Business Conduct Ombudsman.

Rules of Conduct

- 1. Focus on Quality**
- 2. Follow Government Contracting Rules**
- 3. Avoid Conflicts of Interest**
- 4. Exercise Caution in Giving and Accepting Business Courtesies**
- 5. Care for Company Resources**
- 6. Avoid Insider Trading**
- 7. Compete Fairly, Obey Antitrust Laws and Regulations**
- 8. Safeguard Important Information, Honor Confidentiality**
- 9. Keep Accurate Company Records**
- 10. Engage in Charitable and Political Activities**
- 11. Provide Clear, Accurate, and Open Communication**
- 12. Provide Healthy and Safe Work Conditions**
- 13. Protect the Environment**
- 14. Provide Equal Opportunity**
- 15. Respect Personal Dignity, Reject Harassment**
- 16. Maintain a Drug-Free Workplace**
- 17. Behave Professionally**

1. Focus on Quality

Horne International's success is based on satisfied customers. The company is committed to providing products and services that meet or exceed the performance and quality expectations of our customers, our contractual obligations, and any legal requirements. The basic purpose of Horne International's Quality Management System, which is based on the ISO 9001 standard, is to ensure that the company always remains intently focused on customer satisfaction and continual improvement in meeting customer requirements. Every Horne International employee must adhere to the Quality Management System without compromise.

- Always deliver quality products and services at fair and reasonable prices.
- Ensure that contract requirements are adequately identified and communicated to personnel who have responsibility for contract performance.
- Never make any unauthorized substitutions for contracted goods and services or deviate from contract requirements without the written approval of the customer.
- Never tolerate improprieties, such as failure to perform required tests or reviews or manipulation of test procedures or data.
- Listen to, document, report, and respond to customer concerns and complaints.

2. Follow Government Contracting Rules

Doing business with the U.S. Government is subject to special, and often stringent, requirements. Horne International employees must take care to comply with the letter and the spirit of the Federal Acquisition Regulation and all other applicable laws and regulations governing the U.S. Government procurement process. In bidding on, negotiating, and administering government contracts, as well as in delivering products and services to government agencies, Horne International employees must act with the highest standard of integrity. This applies whether the company is a prime contractor or a subcontractor. Horne International shall voluntarily disclose to the appropriate government agencies any violations of federal procurement laws or regulations; this disclosure shall include a description of corrective actions that either have been or are being taken. Questions about the special requirements governing government contracting should be directed to the Business Conduct Ombudsman or the Corporate Compliance Officer.

- Never knowingly make a false claim or false statement to the government — it is a felony to do so. Always be truthful and accurate.
- Only prepare government solicitations, specifications, or evaluation criteria when doing so is a legitimate part of Horne International's work for the government.
- Request reimbursement only for costs that are reasonable in amount and that are allowable under government regulations.
- Formally require consultants and subcontractors performing work related to a government contract or subcontract to comply with the laws and regulations relating to government contracting and with this Code of Business Ethics and Conduct. All consulting and subcontracting agreements shall expressly provide for termination in the event the consultant or subcontractor violates either the laws or regulations relating to government contracting or this Code of Business Ethics and Conduct while performing work under the agreement.
- Follow effective procedures to ensure that reports, certifications, employee credentials, statements, and proposals are current, accurate, and complete.
- Report any violations, or possible violations, of federal procurement laws or regulations to your supervisor, a manager, or the Business Conduct Ombudsman. The company shall ensure that any actual violations, along with the corrective actions taken or being taken, are reported to the appropriate government authorities when those violations are known to management.

3. Avoid Conflicts of Interest

All Horne International employees must avoid conflicts of interest, or the appearance of such conflicts, between their own personal or professional interests and the interests of Horne International. In addition, employees must not encourage or contribute to situations that would cause conflicts of interest for others.

The following are examples of situations where an employee might have a conflict of interest:

- Having an existing or potential, direct or indirect, personal or financial interest in any Horne International supplier, partner, competitor, or customer that might affect the employee’s ability to make impartial decisions on behalf of Horne International. Similarly, a conflict may occur if such an interest is held by a member of the employee’s immediate family or household or by an organization in which the employee or family member has a significant management, ownership, or material association.
 - Seeking or accepting anything of value from suppliers, customers, or others doing business, or seeking to do business with Horne International (see 4, Exercise Care in Giving and Accepting Business Courtesies).
 - Gaining personal enrichment through access to company assets, intellectual property, confidential information, or proprietary interests.
 - Placing business with a firm in which the employee or close family member has a substantial ownership or management interest.
 - Accepting outside employment that adversely affects work performance for Horne International.
 - Hiring, or influencing the hiring of, friends or relatives to work directly for you at Horne International, especially when you have control or influence over their work assignments, compensation, or promotional opportunities.
- As a Horne International employee, never accept employment by, or act independently as a consultant to, a Horne International customer, supplier, or competitor.
 - Never employ or discuss employment with current or former government employees, or use them as consultants or subcontractors, in violation of relevant laws or regulations.
 - Notify your supervisor, the Business Conduct Ombudsman, or the Corporate Compliance Officer if you believe that you might be involved in a matter in which a conflict of interest may exist. Fully disclose the possible conflict, refrain from further participation in the matter until the question is resolved, and follow any directions given by Horne International management concerning the matter.

4. Exercise Caution in Giving and Accepting Business Courtesies

Horne International purchases and sells products and services on the basis of quality, price, service, and reliability. All of our business transactions must be in the best interest of the company and our customers — impartial, objective, and free of outside influence.

In general, the giving or receiving of gifts in return for the use or purchase of Horne International products or services, the recommendation to purchase or use Horne International products or services, or for otherwise doing business with Horne International is strictly prohibited. However, business courtesies of moderate value, as defined in this section of the code, are usually acceptable.

Government Personnel and Higher-Tier Contractors: Stringent and complex rules apply to government employees, and these rules flow down to prime contractors and higher-tier subcontractors who conduct government business. Some government agencies prohibit their personnel from accepting anything of value from contractors or suppliers. Because of the complexity and sensitivity of the situation, Horne International employees must strictly adhere to the rules when dealing with employees of government agencies with which the company either does business or seeks to do business.

Non-Government Personnel: Employees may provide and accept meals, refreshments and modest entertainment to or from non-government personnel in connection with discussing business. The business courtesy accepted or provided must be reasonable in cost (generally less than \$20), consistent with acceptable marketplace practices, and made in the proper course of business.

If you are not sure whether a particular item or gift may be given or accepted, seek guidance from your supervisor, the Business Conduct Ombudsman, or the Corporate Compliance Officer.

- Never give or accept (either directly or through a third party) any item that could be construed as a bribe or kickback, that could be perceived as trying to influence a business decision, or that could place you in a difficult, embarrassing, or prejudicial position.
- Never accept cash or its equivalent in connection with the negotiation of a business transaction.
- Never offer or give any payment, gift, or other thing of value to obtain or acknowledge favorable government or commercial treatment in any form.
- Never seek or accept any payment, gift, or other thing of value from anyone seeking to enter into a contract with or sell something to Horne International, other than customary business courtesies that are reasonable in frequency and value.
- When offering a business courtesy, do not violate the recipient organization's own rules or standards of conduct.
- Fully document all expenditures for meals, entertainment, and other business courtesies in a reimbursement request for company review and approval.
- Notify your supervisor, the Business Conduct Ombudsman, or the Corporate Compliance Officer if you hear of any offer of money or gifts intended to influence a business decision.
- Never give government employees any service, entertainment, meal, gift, transportation, or other item of value, unless you are certain that it is permitted under the agency's rules.
- Do not offer or give, directly or indirectly, anything to a government employee who is a procurement official, who performs a procurement function, or who is the technical representative of a procurement official except beverages at a business meeting and light snacks for a business meeting attended by government employees in travel status.
- Never make loans, guarantee loans, or make payments to or on behalf of any government employees.

Note: As an exception to these prohibitions, promotional items and other widely available items of nominal value, such as pens, hats, note pads, coffee mugs, inexpensive golf balls, and modest refreshments, may usually be given or accepted.

5. Care for Company Resources

Every Horne International employee is responsible for the proper and efficient use, conservation, and protection of the corporation's resources, including its facilities, equipment, vehicles, furniture, supplies, documents, data, computers, and communications systems. This responsibility applies equally to customer-owned resources entrusted to the company for the performance of work for the customer.

Company and customer-owned resources are provided for the legitimate conduct of company business. However, incidental and occasional personal use of company-owned resources may be permitted when it does not compromise Horne International's interests and when it does not violate the guidelines listed in the box at the right.

- Use Horne International and customer-owned resources only for authorized purposes.
- Never borrow or remove Horne International or customer-owned resources from company premises without authorization from your supervisor or company management.
- Never sell, loan, give away, or dispose of Horne International property without authorization from your supervisor or company management.
- Avoid diminishing the value of these resources, adding significant cost for the company, or using them in a manner that harms the company's reputation.
- Follow Horne International controls and policies designed to protect resources against theft and fraud.
- Exercise prudence in expenditures on resources, pursuing best value and return on investments.
- Adhere to the following guidelines regarding the use of company resources for personal reasons:
 - Verify with your supervisor that personal use of a specific resource is permitted
 - Restrict usage to personal time, and do not charge this time to the company or any of its clients
 - Do not allow usage to interfere with your job responsibilities, with the job performance of any coworkers, or with any other organizational requirement
 - Do not use company-owned resources in support of a personal business, consulting effort, or similar private venture, or to support the business of another company or firm, outside fund-raising activity, political activity, or lobbying
 - Do not use company-owned resources to support any illegal, unethical, or other purpose that could cause embarrassment to Horne International or otherwise adversely affect its interests.

6. Avoid Insider Trading

Horne International employees must not use material inside information obtained through their work at Horne International to buy or sell publicly traded securities, and they must not pass such information on to others.

Securities include common stocks, bonds, and other financial instruments.

Information is “material” if it could be reasonably expected to affect the market value of securities or to influence investor decisions regarding securities transactions. Such information includes, but is not limited to, financial and key business data and forecasts; merger, acquisition, or divestiture discussions; award or cancellation of a major contract; changes in key management; significant litigation; and gain or loss of a substantial customer or supplier. Information is “inside” if it is not readily available to all current and potential investors. Once the information is public, it no longer compromises the trading of stock.

Any employee could obtain material inside information during the normal course of business when dealing with prime contractors, subcontractors, vendors, suppliers, partners, and others. Spectrum policy and securities laws prohibit the trading of securities based on material nonpublic information. In addition, employees must not disclose material, non-public information to anyone, including co-workers, unless the person receiving the information has a legitimate need to know the information for purposes of carrying out the company’s business. Employees who use material nonpublic information to make an investment decision or provide this information to another person may subject themselves and Horne International to substantial civil or criminal penalties.

Horne International’s Insider Trading policy (SHD 01) further describes employees’ obligations with regard to insider trading. Questions about compliance with securities laws and regulations should be directed to the Corporate Compliance Officer or an attorney.

- Do not trade on information not available to the public.
- Do not disclose such information to others and thereby give them an unfair advantage in the financial marketplace.

7. Compete Fairly, Obey Antitrust Laws and Regulations

Horne International competes for business on the merits of our products and services. We compete vigorously, but our marketing and selling practices must be honest and in complete compliance with antitrust and competition laws and regulations of those jurisdictions where we do business. Violations of antitrust laws, whether deliberate or accidental, would expose our company and employees to serious civil or criminal penalties or lawsuits.

If any issues arise concerning antitrust compliance, consult your supervisor, the Business Conduct Ombudsman, or the Corporate Compliance Officer.

- Only use publicly available information (such as published articles, market analyses, or reports) or otherwise lawfully obtained information to learn about our competitor’s products, services, and prices.
- Do not seek or accept a competitor’s confidential information or discuss customers, territories, or price lists with competitors.
- Advertise, promote, and label our products and services in a factual, honest, informative way, in compliance with all laws and requirements.
- Do not disparage a competitor through inaccurate statements.
- Never have a discussion or reach an agreement with a competitor on any of the following: prices or credit terms; submission of bids or offers; allocation of markets, orders, or customers; limits on production or distribution; and boycotts of suppliers or customers.
- Never encourage any individual acting on behalf of Horne International to have such a discussion or reach such an agreement.

8. Safeguard Important Information, Honor Confidentiality

Horne International employees must protect the company's proprietary information and act responsibly with the proprietary information of competitors, customers, suppliers, other stakeholders, and previous employers. Proprietary information should be broadly interpreted as including company private, sensitive, and confidential information and intellectual property. Trade secrets, discoveries and inventions, employee or personnel records, medical records, contracts, business plans and proposals, sales forecasts, marketing strategies, client and customer lists, pricing or pricing strategies, construction plans, vendor supply data, government source selection information, and business leads are among the many items included in this category.

Horne International is also committed to strict compliance with all laws and regulations pertaining to the handling of government-classified documents and information. Before allowing employees access to classified information, Horne International requires them to have a Personnel Clearance and a need to know. Cleared Horne International employees have a life-long responsibility to safeguard any and all classified information to which access has been granted, and they are required to perform within the guidelines of the National Industrial Security Program Operating Manual (NISPOM), any other pertinent security program manuals, and Horne International policies and procedures for safeguarding classified information.

- Safeguard all proprietary information concerning customers, employees, Horne International business, and other matters under your control
 - Use the information for company business only; disclose it only to those Horne International employees with a legitimate need to know
 - Do not discuss it with or divulge it to anybody outside of Horne International unless that person has executed a Nondisclosure Agreement and also has a need to know
 - Do not leave confidential records or documents where other people can easily read them.
- Never use any means to access or attempt to access, either directly or indirectly, proprietary information from any source without authorization.
- Do not disclose any proprietary information obtained as part of your work for Horne International, unless authorized in writing by the owner of that information.
- If you leave Horne International, never divulge any proprietary information obtained during your work for Horne International.
- Respect your coworkers' rights to privacy about personal matters.
- Respect the trade secrets, copyrights, and trademarks, and patent rights of others. Do not duplicate copyrighted material (printed or electronic), copyrighted computer software, or recorded materials.
- Never seek or accept, directly or indirectly, proprietary or source selection information regarding any government procurement, unless the contracting officer or head of the agency has specifically and lawfully authorized release of such information.
- Do not disclose the proprietary information of a previous employer, do not attempt to elicit such information from any other Horne International employee, and immediately inform your supervisor if you are put in a position that could violate any previous obligation of confidence.
- Retain and properly dispose of company records in accordance with Horne International's record retention policies and all relevant laws and regulations.
- Refer subpoenas and any other request or demand for the release of information for a legal proceeding to a corporate officer of or legal counsel for Horne International.
- Do not accept, attempt to access, retain, or handle government-classified information unless you have been authorized to do so by the U.S. Government and have received appropriate training.
- Never divulge classified information to any person not authorized by the U.S. Government to receive that information.
- Report to the Facility Security Officer, your supervisor, or the Federal Bureau of Investigation any attempt by an unauthorized person to solicit government-classified information.
- Do not accept government information that is national security classified from any source, either directly or indirectly, in circumstances where there is reason to believe that the release is unauthorized.

9. Keep Accurate Company Records

All Horne International business transactions must be properly authorized and be completely and accurately recorded on the company's books and records in accordance with generally accepted accounting practices and all relevant laws and regulations. Honest accounting and labor-charging practices are essential.

In addition, it is essential to retain and preserve all records that may be responsive to a subpoena, litigation, or a government investigation. Destruction of such records, even if inadvertent, could seriously prejudice Horne International. Questions regarding whether a particular record may pertain to a subpoena, litigation, or investigation should be directed to the Corporate Compliance Officer.

- Only use company funds or assets for business purposes that can be recorded promptly and accurately in our books and records.
- Record revenue and expense data in a timely and accurate manner.
- Never make false or intentionally misleading entries in company records (for example, misclassification of transactions as to accounts, departments, or accounting periods), and never cause another person to do so.
- Base budget proposals and economic evaluations on the best available information — do not misrepresent information relevant to the decision being requested or recommended.
- Ensure that all transactions are supported by accurate, reasonably detailed documentation.
- Only alter or sign documents when you have the proper authority to do so.
- Do not make or approve payments on behalf of Horne International if the purchase will not be used or might be used for something other than the stated purpose.
- Do not maintain cash or other assets for any purpose in a secret, unrecorded, or "off-the-books" fund.
- Complete time sheets accurately and on a daily basis. Time charged must reflect time actually worked, and time must be charged to the correct account (charge number), regardless of the status of the budget for that account.
- Record travel, material, and other expenses truthfully and correctly.
- Promptly advise customers and suppliers of any clerical or accounting errors and make adjustments through mutually acceptable means.
- Upon learning of a subpoena, pending or contemplated litigation, or government investigation, immediately contact the Corporate Compliance Officer or Horne International's legal counsel; retain and preserve all records that may be responsive to the subpoena, litigation, or investigation until informed by the Corporate Compliance Officer or legal counsel as to how to proceed; and take steps to preserve from destruction all relevant records that, without intervention, would automatically be destroyed or erased (such as e-mail and voice mail).

10. Engage in Charitable and Political Activities

Horne International encourages employees to be good citizens by contributing to the community and participating in the political process. In all cases, personal participation, including contributions of time or financial support, shall be entirely voluntary.

Charitable Causes: Horne International strongly supports community involvement. The corporation itself shall endeavor to support worthwhile community and charitable causes, and it shall also support employee-initiated efforts to support such causes. However, management approval is required before any Horne International resources may be used for such purposes, and Horne International shall never pressure employees to contribute to particular causes.

Political Activities: Horne International will comply with all national, state and local laws regulating participation in political affairs, including contributions to political parties, national political committees, or individual candidates. The company will not pressure any employee to make political contributions to individual campaigns, political parties, or political action committees. Employees, in turn, must keep political activities separate from their work, pursuing them as individual private citizens, not as representatives of the company.

- Support the community causes of your choice.
- Be an involved citizen, but keep political activities separate from your work.
- Unless specifically authorized, never create the impression that you are representing the views of Horne International when speaking or writing on public issues.

11. Provide Clear, Accurate, and Open Communication

Company: Horne International strives to provide its employees with timely and accurate information on business results, product performance, customer relations, employee achievements, and other items of interest. Employees, in turn, are provided communication channels to make suggestions and report concerns, anonymously or otherwise.

Public: Horne International's communications with the public must always be accurate, consistent, fair, and in compliance with the law, while still protecting our confidentiality and interests. Only employees who are specifically trained in particular areas should communicate with the public or the media. Horne International's External Communication and Fair Disclosure Directive (SHD 02) provides further direction regarding how communication with people and organizations outside the company must be controlled and handled.

Government Investigations: Horne International is committed to fully cooperate with any government agencies responsible for either investigations or corrective actions. The company will provide requested information promptly and will be truthful in all communications.

Other Personal Interests: Written and electronic communication of personal opinions and concerns, including solicitations on behalf of personal and non-company interests, by employees or outsiders is restricted in the workplace to avoid unnecessary interruption of Horne International business and possible annoyance to coworkers. This restriction includes solicitations in the forms of raffles, betting pools, sales of merchandise, and the posting or distribution of written material or notices. The company does provide a section of the corporate intranet for such solicitations and viewpoints and allows liberal access to that section. Use of company mailboxes, bulletin boards, e-mail, and other communication modes for such purposes, however, requires formal approval from a corporate officer.

- If you receive an inquiry from the outside (for example, from the news media or another company) about a company matter, seek guidance from your supervisor or a corporate officer regarding the appropriate method of response.
- If you express a personal view in a public forum, such as a letter to a newspaper, do not use company letterhead or company e-mail.
- When involved in community, professional, or cultural activities, make it clear that you are not speaking on behalf of Horne International unless authorized to do so.
- Ask to see identification before granting an interview to a government investigator, and make sure that your supervisor is aware of the interview request.
- Release proprietary information to a government investigator only after the responsible Horne International manager or corporate officer authorizes you to do so.
- Respond politely and truthfully to all questions from a government investigator, and remember that you always have the right to decline an interview or to defer an interview until after consulting legal counsel.

12. Provide Healthy and Safe Work Conditions

Horne International is committed to providing a safe work environment for all employees. We do this by fostering a strong safety culture, integrating safety into every aspect of work planning and execution. Safety must take precedence over short-term gains. We have established a health and safety program and management system to prevent accidents and enable managers to provide employees with training and direction on health and safety matters. Horne International believes four basic tenets about safety:

- Nothing we do is worth the price of getting hurt
- We have zero tolerance for accidents — every injury or illness could and should have been prevented
- Safety and health can be managed
- Safety and health performance is everyone’s responsibility.

Our corporate health and safety program addresses work the firm conducts in the field and at the office and protects our own and our clients’ employees and resources from exposure to hazardous agents and physical hazards. Each employee is responsible through personal example for establishing a climate in which everyone shares a concern for his or her own safety and that of fellow workers.

- Comply with all corporate and regulatory health and safety standards.
- Unless explicitly authorized by Horne International management, never use, possess, or store firearms, dangerous weapons, explosives, lethal materials, or other potentially dangerous items on Horne International premises, at project sites, or at Horne International-sponsored activities, whether or not a federal or local license to possess the same has been issued.
- Promptly report any concerns about unsafe or potentially hazardous conditions, accidents, or “close calls” to your supervisor, your Site Safety Officer, or the Corporate Health and Safety Director.

13. Protect the Environment

Horne International is committed to the principles of environmental stewardship — to the management of Earth’s natural resources to preserve, restore, and sustain ecological integrity and to enhance the quality of life for all people, now and in the future. In addition to being a moral imperative, environmental stewardship creates value for our customers and therefore is good business. Environmental protection is the responsibility of every Horne International employee.

- Comply with all environmental laws and regulations.
- If you work at a field site, know the procedures that must be followed at the site.
- Immediately notify your supervisor or management of any environmental spill or discharge or of any violation of an environmental law or regulation.

14. Provide Equal Opportunity

Horne International is an equal opportunity employer committed to non-discrimination and affirmative action. The company hires, places, trains, promotes, provides facilities for, and otherwise treats employees without regard to race, color, religion, sex, national origin, or other protected status.

- Provide equal opportunity in all aspects of employment for all persons.
- Never discriminate in employment because of age, citizenship, color, disability, marital status, national origin, race, religion, personal appearance, family responsibilities, matriculation, political affiliation, sex, sexual orientation, veteran status, or other unlawful factors.
- Promote the full realization of equal employment opportunity through a positive, continuing, result-oriented program of affirmative action throughout the company.

15. Respect Personal Dignity, Reject Harassment

General: Horne International respects the personal dignity of each individual, honors diversity, promotes harmonious work relationships, and prohibits violence, discrimination, harassment, or retribution in the workplace. All forms of harassment that create an offensive working environment are unacceptable, including, but not limited to, insulting, intimidating, or discourteous conduct, as well as derogatory jokes or comments relating to race, color, religion, sex, age, disability, national origin, or other legally protected status.

Sexual Harassment: Sexual harassment by employees, whether overt or subtle, is prohibited and will subject perpetrators to disciplinary action. Although sexual harassment often occurs when one person takes advantage of a position of authority over another, Horne International recognizes that sexual harassment may also occur between people of equivalent status. Regardless of the form it may take, Horne International will not tolerate conduct of a sexual nature that creates an unacceptable working environment.

Sexual harassment is defined as any unwelcome sexual advance, request for sexual favors, or other verbal or physical conduct of a sexual nature when —

- Submission to such conduct is made explicitly or implicitly a term or condition of an individual's employment or professional advancement
- Submission to or rejection of such conduct is used as a basis for making an employment decision affecting an individual
- Such conduct has the purpose or effect of interfering with an individual's work performance or of creating an intimidating, hostile, or offensive environment for work.

Sexual harassment may involve the behavior of a person of either gender toward a person of the same or opposite gender when that behavior falls within the operative definition of sexual harassment. Contact Human Resources if you have questions about Horne International's sexual harassment policy.

- Always treat others with dignity and respect.
- Never encourage or engage in sexual, racial, or any other form of unlawful harassment, including any activity that could be perceived as harassment.
- Alert your supervisor, Human Resources, or the Business Conduct Ombudsman if you believe you have been harassed or have witnessed harassment.
- If a manager, investigate any reported allegation of sexual harassment; consult with Human Resources about the situation; and report the matter to a higher corporate authority responsible for ensuring a prompt review and strong appropriate action.

16. Maintain a Drug-Free Workplace

Horne International is committed to preserving a drug-free workplace and to taking appropriate disciplinary action against any employee who violates Horne International's anti-drug policy. The company's drug-free workplace program includes drug testing, a drug-free awareness educational component, and the availability of counseling and treatment.

- Never be under the influence of alcohol or illegal or controlled substances when reporting to work, while on the job, when carrying out Horne International responsibilities, or when on Horne International premises.
- Never unlawfully possess, dispense, manufacture, or use illegal or controlled substances on Horne International property, in Horne International vehicles, or while conducting Horne International business.
- Report any violations or suspected violations of Horne International's drug-free workplace policy to your supervisor or Human Resources.
- Inform your supervisor of any criminal conviction of a drug-related offense committed while on company premises or while conducting company business.

17. Behave Professionally

Horne International employees are expected to behave in a professional, business-like manner at work, on Horne International premises, and whenever representing Horne International in any situation. Employees also are accountable for behavior outside of work that has a negative impact on the individual's ability to perform his or her responsibilities at work.

Managers may establish more specific guidelines based on departmental needs.

- Incorporate Horne International's Core Values in every aspect of your work.
- Use telephones, copiers, fax machines, computers, courier services, postage, office supplies, and other business equipment and supplies only for authorized purposes and not for the conduct of personal business (see 5, Care for Company Resources).
- Foster professional growth and relationships through membership in outside professional organizations, but ensure that association with such organizations does not negatively affect your ability to perform the duties of your job. Do not represent yourself as an official spokesperson for Horne International unless authorized (see 11, Provide Clear, Accurate, and Open Communication).
- Never bring potentially dangerous items to the workplace without clear authorization (see 12, Provide Healthy and Safe Work Conditions).
- Do not encourage unauthorized visitors during work hours.
- Adhere to Horne International policies regarding drug and alcohol use (see 16, Maintain a Drug-Free Workplace).
- Ensure that your dress and appearance are appropriate to your job functions and the performance standards established for your position. Maintain an acceptable level of grooming and hygiene. Horne International expectations in this regard shall not conflict with applicable federal or local statutes, including those prohibiting discrimination based on ethnic or national origins.