

Code of Ethics

Systemart (SAL) is committed to maintaining the highest possible standard of ethical business conduct. We conduct our business in accordance with both the letter and spirit of the applicable laws of the United States. Likewise, we adhere to the policies and guidelines of our customers where applicable, because we desire to build and maintain an outstanding reputation in our industry. In an effort to clearly communicate our expectations regarding professional behavior, **SAL** has developed this Code of Ethics. We believe this Code of Ethics will help ensure our success and we expect all employees, contractors to follow this protocol. Any violation of such ethics could be a cause of immediate termination.

RESPECT

Respect for the individual is an important characteristic of **SAL's** culture. As associates, we are to treat our customers, peers, managers, vendors, and competitors with respect. No associate shall direct inappropriate language or disparaging remarks towards another person or company in the workplace. Associates shall also refrain from disrespectful behavior of any kind.

INTEGRITY

Be honest and forthright in your dealings with customers and associates. Do not overstate your capabilities, experience, or education. Do not commit to deadlines that you are not able to keep.

PERSONAL RESPONSIBILITY

The acceptance of personal responsibility is another important characteristic of **SAL's** culture. Associates are required to accept personal responsibility for their work. Problems will inevitably arise in the workplace. Associates must not "point fingers" or assign blame. Instead, they are to work with team members to find viable solutions.

ACCURATE REPORTING

All associates must complete reports of one sort or another. The most common types of reports include time, expense reimbursement and status reports. You must be accurate when reporting information. All facts should be communicated in such a way that they do not mislead the reader. Failure to accurately report information could have a negative impact on **SAL** or personal financial accounting functions.

SYSTEMART AND CUSTOMER ASSETS

SAL believes that every associate has the responsibility to use our or our client's business assets appropriately and respectfully. If you are unsure as to whether or not something is appropriate, you should discuss the situation with your manager. Assets include, but are not limited to, the physical facilities, and equipment, methodologies that make up business offerings, business and product plans, customer lists, and general business information. These assets must be protected from willful and calculated misappropriation and inadvertent mishandling.

MOONLIGHTING

Moonlighting is defined as working at a job that is supplemental to one's regular job. In this situation, there is the potential for a conflict of interest. If the moonlighting assignment has the potential to be a conflict of interest, you



are required to discuss the specific situation with your manager before engaging in the activity. Additionally, outside work cannot be performed during company time or with company assets.

TIPS, GIFTS, AND ENTERTAINMENT

SAL associates or members of their immediate families cannot accept gratuities, gifts, or money from a supplier, customer, or anyone in a business relationship unless they have the authorization of their manager. They cannot accept a gift or consideration that could be perceived as being a bribe.

PROHIBITED ACTIVITIES

1. Use of **SAL** or Client Systems or Assets for any of the following activities is strictly prohibited:
 - Installing, downloading, sending, soliciting, displaying, printing, or otherwise disseminating material that is sexually explicit, pornographic, profane, obscene, harassing, fraudulent, racially offensive, defamatory, or otherwise unlawful, inappropriate, or that may be offensive to others
 - Disseminating or storing commercial or personal advertisements, solicitations, promotions, destructive programs (e.g., viruses, worms, or self-replicating code), or any other unauthorized material, including but not limited to e-mail spam
 - Wasting computer resources by spending time on the Internet playing games, engaging in on-line chat groups, printing multiple copies of documents, or otherwise creating unnecessary network traffic
 - Participating in any form of online gambling
 - Installing and using personal software, including games
 - Using or copying software in violation of any license agreement
 - Accessing the Internet for any of the following activities:
 - A) Using Internet file sharing tools (e.g., Yahoo Briefcase, etc.)
 - B) Using non-approved software (e.g., Peer-to-Peer like Gnutella, Internet Instant Messaging beyond the CAI standard, etc.)
 - C) Sharing of copyright material (e.g., MN, music, etc.)
2. **SAL** believes in alcohol and drug free workplace environment. Employees are advised not to report to work under the influence of alcohol or illegal drugs or controlled substances. Any such occurrence will be a cause of immediate termination.

PROTECTION OF DATA

SAL associates and contractors have an obligation to protect the confidentiality of **INSYT** data, as well as any customer data, to which they have access. Of particular concern, is the proper handling of data placed on external storage devices. The following standards must be adhered to when handling external data storage (e.g., floppy disks, CD's, DVD's, USB drives, tapes, zip disks, etc.)

- Protect removable storage devices by locking them away overnight
- Follow clean desk practices
- Print documents only as required for productivity gains or testing requirements.
- Shred confidential papers when no longer required
- Destroy CD's and DVD's etc so they can't be stolen when no longer required

Workplace Violence

Systemart's (SAL) policy is to maintain a work environment free from all forms of violence. Acts or threats of physical violence, possessing a weapon, threatening another individual with bodily harm, or to assault another individual, occurring on **SAL** or its client's property or during the performance of **Systemart's (SAL)** business off **Systemart's (SAL)** property, are prohibited.

Examples of workplace violence include, but are not limited to, conduct such as: threats or acts of physical or aggressive conduct; threats to destroy or intentional destruction of property belonging to **Systemart LLC**, its clients or their respective employees; physically threatening phone calls or correspondence (including email, text messaging and social media); and/or stalking activities. Notwithstanding the foregoing, where applicable law expressly prohibits an employer from taking disciplinary action against an individual for storing a weapon in a parking area, **Systemart LLC** will abide by such law. The possession, transfer, sale or use of firearms, weapons, explosives or other improper materials with or without valid permit is prohibited on **Systemart LLC** or its client's premises. Employees in violation of this policy will be subject to disciplinary action up to and including termination. **Systemart LLC** requires employees to report any acts of violence in the workplace and any unlawful weapons observed should be reported.

Anti-harassment and Anti-discrimination policy

Systemart LLC promotes a workplace that is free of harassment and discrimination based on sex, race, color, religion, gender, national origin, sexual orientation, pregnancy, gender identity, marital status, age, disability, veteran status, active military status, genetic tests and information or an individual's status as a domestic violence victim, or any other applicable legally protected status. Any such harassment and discrimination are prohibited and a violation of **Systemart's (SAL)** policy. They will not be tolerated in the workplace by anyone, including supervisors, co-workers or non-employees. Any retaliation against someone reporting harassment or discrimination or individuals cooperating with an investigation is also prohibited and will not be tolerated. For purposes of this policy, "workplace" includes, but is not limited to, (**Systemart LLC**) work sites, client sites, **Systemart LLC**/client sponsored social events, employee gatherings, and work-related travel. Harassment definition In general, harassment means persistent and unwelcome conduct or actions based on a legally protected characteristic or activity. Sexual harassment is one type of harassment and includes unwelcome sexual advances, unwelcome physical contact of a sexual nature or unwelcome verbal or physical conduct of a sexual nature. It does not refer to compliments of a socially acceptable nature.

Unwelcome verbal or physical conduct of a sexual nature includes, but is not limited to:

- Unwelcomed touching
- The display of offensive sexually graphic materials
- "Quid Pro Quo" offers of employment perks or threats of adverse employment decisions conditioned upon sexual favors.

Harassment on any basis (race, sex, age, disability, etc.) exists whenever:

- There is a repeated making of unsolicited, inappropriate gestures or comments. The conduct unreasonably interferes with an employee's work or creates an intimidating, hostile, or offensive work environment.
- Verbal conduct such as epithets, derogatory jokes, comments or slurs based on a protected characteristic, whether made verbally, in writing, electronically, or communicated in any other manner.



Government agencies

If you believe you have been subjected to harassment (including sexual harassment) or discrimination, you may file a formal complaint with State or Federal equal employment opportunity agencies. The phone number for the US Equal Employment Opportunity Commission (EEOC) is 800.669.4000. This toll-free number will put you in contact with your local EEOC office. Please be advised claims must be filed with the Equal Employment Opportunity Commission within certain, limited timelines. If you are employed in Illinois, Rhode Island, Massachusetts or California and would like to file a complaint, you may also do so by contacting:

Illinois*

Illinois Department of Human Rights 100 W. Randolph Street, Suite 5-100, Chicago, IL 60601 312.814.6200 *In Illinois, a Complainant Information Sheet (CIS) must be postmarked or received by the DHR within 180 days.

Rhode Island

* Commission for Human Rights 180 Westminster Street, 3rd Floor Providence, RI 02903 401.222.2661 *In Rhode Island claims must be filed within 364 days.

Massachusetts*

Commission Against Discrimination (MCAD) Boston Office, One Ashburton Place, Room 601, Boston, MA 02108 617.994.6000

In Massachusetts claims must be filed within 300 days. California Fair Employment Housing Commission 2014 T Street, Suite 210, Sacramento, CA 95814 800.884.1684 *In California claims must be filed within one year.

ACTIONS AFTER TERMINATION OF WORK/SERVICES

Systemart’s (SAL) associates and contractors have obligation not to contact client managers or peers, colleagues except for sending “THANK YOU LETTER” after termination. **SAL** disapproves of any repeated communication through emails, IM’s which can be construed as harassment. If you think you were wrongfully terminated, please bring it to the attention of your contact at **SAL** and **SAL**’s management will take it up with client’s management.

SAL ‘s associates should immediately deliver all Client’s data, records, notes, memoranda and within 2 business days return all equipments including but not limited to laptops, CD’s, DVD’s , CD ROM’s, flash drives, cell phones, PDA’s and security batches.

I _____ agree to abide by above defined Code of Ethics policies and procedures.

CandidateSignature

Date