



# Business Ethics and Conduct Policy

Symmetric Program Management LLC

SPM 02 | Version 1.0 | Prepared October 11 2026

Policy owner Dr. Thomas Jackson Founder and Chief Executive Officer

Approval signature: *Thomas Jackson* Effective date: October 11, 2026

## **Purpose and standards**

SPM requires truthful representations, accurate billing, fair competition, responsible handling of information, and honest dealings with clients, officials, workers, and subcontractors. This policy applies to the CEO, employees, agents, and persons performing SPM work. No sales target, deadline, or client request excuses misconduct.

## **Accountability**

The CEO administers the policy, ensures orientation, reviews conflicts and proposed disclosures, and documents corrective action. Each project manager verifies qualifications, proposal statements, contractual commitments, and invoice support. Anyone acting for SPM must disclose relevant conflicts and report suspected misconduct promptly. An independent reviewer handles concerns involving the CEO.

## **Integrity in proposals and performance**

Use only supportable qualifications, certifications, availability, past performance, business status, and pricing statements. Obtain permission before naming personnel or using a partner's material. Separate corporate past performance from an individual's experience. Submit accurate timesheets and invoices; bill only authorized, supported work. Record errors and promptly correct affected submissions or bills through the authorized channel.

## **Conflicts of interest**

Disclose financial interests, family relationships, outside employment, government relationships, and access to competitor or nonpublic procurement information that could affect impartial judgment. The CEO documents the risk, restrictions, recusal, and mitigation before the person proceeds. For an organizational conflict, obtain any required contracting officer decision; do not assume internal mitigation alone permits participation.

## **Gifts and fair competition**

Do not offer bribes, kickbacks, facilitation payments, or anything intended to influence an official or purchasing decision. SPM prohibits gifts and entertainment to government personnel in connection with company business. Any private-sector courtesy requires advance CEO approval and a written business purpose. Do not coordinate bids, prices, markets, or customer allocation with competitors.

## **Information and company resources**

Protect client, employee, pricing, procurement, and proprietary information. Use it only for authorized purposes. Respect intellectual property and license terms. Do not solicit or use unauthorized source-selection information. Protect company funds and equipment, keep complete business records, and preserve records subject to an audit, investigation, dispute, or legal hold.

## **Reporting and nonretaliation**

Report concerns verbally or in writing to the CEO through a verified company channel. If the CEO is implicated, use the designated independent reviewer or the appropriate external authority. A person may report directly to an agency inspector general, regulator, or law enforcement without company permission. SPM prohibits retaliation for good-faith reports or cooperation. Confidentiality is limited to those who need the information; absolute secrecy cannot be promised.

## **Investigation and disclosure**

The reviewer records the allegation, safeguards evidence, assesses immediate harm, determines independence, and investigates objectively. The CEO consults qualified counsel as needed and evaluates external reporting duties promptly; internal review must not delay mandatory disclosure. Where FAR 52.203-13 applies, credible evidence of specified fraud, conflict, bribery, gratuity, or False Claims Act violations requires timely written disclosure to the agency OIG with a copy to the contracting officer.

## Correction and oversight

Correct inaccurate records and invoices, restrict affected access or duties, and address root causes. Consequences may include training, reassignment, discipline, termination, or subcontract remedies, consistent with applicable law and agreements. Review conflicts, proposal representations, and a sample of invoices quarterly. Provide orientation before assignment and a refresher annually.

## Ethics records

| Record                    | Minimum contents                                                                           |
|---------------------------|--------------------------------------------------------------------------------------------|
| Conflict disclosure       | Person; relationship or interest; affected work; reviewer; restrictions; review date       |
| Gift request              | Recipient; value; purpose; government status; approval or rejection                        |
| Concern and investigation | Date; facts; evidence; independent reviewer; findings; external notices; corrective action |
| Training acknowledgment   | Name; role; policy version; training date; signature                                       |

## Acknowledgment

I have read this policy, understand my reporting obligations, and agree to follow it. I understand that reporting misconduct or cooperating with an investigation is protected.

Name \_\_\_\_\_

Role \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

## Reference

FAR 52.203-13, <https://www.acquisition.gov/far/52.203-13>. Apply the version and flowdowns incorporated in each award. Its paragraph (c) includes small business and commercial acquisition exceptions; SPM's internal training and review requirements apply independently.