



GSS Code of Ethics – Adopted June 7, 2012

Introduction

Government Sourcing Solutions exists for one primary reason - to support the missions of America's public procurement directors -- men and women who have some of the most challenging jobs in government and education. To honor their commitment to ethics and integrity, we need to conduct ourselves in the most ethical fashion possible. We must always remember that doing business with the government is a public trust. If you ever question whether something you are doing is appropriate, you should stop and discuss the matter as soon as possible with the management of our company.

You would not have been selected to join the GSS team if you did not have a great deal of ambition, drive and a competitive spirit that seeks successful outcomes. There may be times where achieving a goal appears more doable if an ethical corner can be cut. Don't do it. No single deal, no matter how big and attractive it appears, will ever be worth the sleepless nights, hoping that no one finds out and financial, legal and reputational risks that it poses to GSS and to you personally. Use one simple test: would you want the action you are about to commit to be on the front page of the *New York Times*. If the answer is no, don't do it.

Gifts

We often become close personal friends with procurement directors. A natural human tendency is to do nice things for friends, like buying gifts or meals. While such an action may seem like a harmless act of friendship, many governments prohibit such activities and even if they do not, we should not buy any government official a gift or a meal or provide them anything of monetary value. Doing so creates the perception of impropriety, something we must avoid at all costs.

Diversity

We believe that diversity - in gender, race, income, education, age, geography and sexual orientation - is a source of strength for any organization. We will always strive to bring greater diversity to our team. As team members, we need to cherish and value the diversity of our team. Any behavior that does not respect our team members, including discrimination or harassment, will not be tolerated and is grounds for immediate termination.

In addition, we embrace the diversity of viewpoints. GSS will only get better if it is the recipient of a wide array of opinions and ideas. Every team member shall take great



care to help foster an environment that encourages colleagues to express their opinions in an open and non-judgmental forum.

Communication

Even in small teams, communication is very important. When policy or procedural changes are implemented, successes achieved, or major and minor announcements, all the members of the team should be included in both informal and formal communications. The team is always stronger when everyone understands the mission, goals and procedures in a consistent and evenly communicated manner. And it allows everyone to be part of the discussion. The greatest teams in the world have great communication plans, and GSS should strive to be one of those as well.

Environmental Stewardship

Just as our colleagues in government must be good stewards of public funds, so should we be good stewards of our environment and our neighborhoods. Every year, we will calculate the impact that we have on our environment, from the flights we too often take to the energy used to light and heat our offices. We will make contributions to ensure that we are doing as much to develop alternative energy sources as we are to deplete those resources.

Conflicts

A conflict of interest is divided loyalty between GSS' interests and the personal interests of a team member. GSS employees are expected to act in the best interests of GSS and to exercise sound judgment unclouded by personal interests or divided loyalties. A conflict situation can arise when a team member takes actions or has interests that may make it difficult to perform his or her work for the company objectively and effectively. We must act honestly and ethically and not allow personal considerations or relationships, either actual or potential, to influence us in any way when representing GSS in dealings with other persons or organizations.

Insider Trading

We are often privy to confidential information about our business partners. It is important to know that federal securities law strictly prohibits making any investment decisions in publicly traded companies based on information obtained from non-public sources. This applies to friends, co-workers and family members as well.



Personal Conduct

Every GSS team member is given an extraordinary amount of freedom and autonomy. No one is looking over your shoulder, monitoring who you call or what websites you visit. Why? Because you are a grown up and we would not have chosen you to join our team if we didn't trust that you will work in a professional manner. We need to remember, however, that every action we take reflects not only on us personally, but on our company. Don't do anything you wouldn't do sitting in a row of cubicles.

Team Health

Team members who are not physically and mentally healthy cannot be productive and are less likely to have fun in our company. Our work environments should be comfortable and well lit. Our equipment should allow us to work without straining our eyes or our backs. And we need to remember that life is a marathon not a sprint. All team members should strive to achieve a happy work-life balance, recognizing that being happy outside of work makes us more productive during work hours. Vacations exist for a reason. Take them. And come back to work rested and energized. Your physical health is important to us. Go to the doctor when you need to. Go to the gym. Exercise. Be happy.

Open Door Policy

If you ever feel that you may have made an ethical mistake, the best thing that you can do is to immediately contact the President of GSS. We will talk through what happened and develop a strategy to remedy the issue. Similarly, if you observe another team member conducting him or herself in a fashion that runs counter to Code of Ethics, please contact David. There will never be any retaliation taken.