



### **Ethics and Code of Conduct of Cloudburst Consulting Group, Inc.**

*“At Cloudburst, we are committed to delivering the best service and value to our clients while maintaining the highest ethical standard. This commitment is our hallmark and is expressed by our Code of Conduct, which all Cloudburst employees and partners follow, and is embodied in the work we do each and every day.”*

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J. Patrick Moynahan  
Co-Founder, President  
Updated 12/9/13

### **Statement of Company Values**

*Cloudburst Consulting Group, Inc. (Cloudburst) has embraced a set of core values and established high ethical standards for the conduct of our business. Our core values include:*

- Integrity - Doing the right thing at all times;
- Dependability - Being able to be trusted and relied upon;
- Professional Pride - Taking pleasure in doing your best work;
- Team Work - Working together to accomplish shared goals;
- Outstanding Attitude - Doing what it takes to provide excellent service; and
- Continuous Improvement - Ongoing effort to improve services and processes.

Cloudburst considers adherence to our company Business Code of Conduct, as well as strict observance of all applicable U.S. and foreign laws and regulations, to be an ethical obligation for all persons and entities associated with Cloudburst.

Everyone associated with Cloudburst is expected to make this a personal commitment. This includes officers, employees, non-employees such as subcontractors, consultants, contract labor, suppliers, vendors, and anyone who represents the company in any capacity regardless of their position. Individuals are responsible for the integrity and consequences of any actions that they take on behalf of Cloudburst.

## Valuing Cloudburst's Employees

*At Cloudburst, we are committed to producing quality products that meet all contractual obligations and our own quality standards. The foundation of that commitment is built with a highly skilled group of professionals. We appreciate that our people are our greatest resource.*

- **Equal Opportunity** - Cloudburst embraces diversity through an inclusive work environment that fosters respect for all our coworkers, clients and business partners. We treat all employees and job applicants fairly. All decisions related to hiring and job promotion will be based on qualifications and job performance regardless of age, sex, color, race, religion, or any other classification protected by law.
- **Harassment and Workplace Violence** - Diversity can only be achieved through appreciation of, and respect for, our differences. Therefore, all forms of harassment and violence in the workplace are unacceptable and will not be tolerated.
- **Workplace Health, Safety, and Security** - Employees owe a duty to themselves, their co-workers and our clients to detect and prevent potential health and safety hazards in their work environment. Also, due to the mobile nature of our environment, employees must always be aware of the security of their conversations and mobile devices while traveling or working in public places.
- **Confidentiality of Employee Information** - Employee's personal information, especially around their health situations, is kept confidential with limited access only to those who need to know for human resources or benefits purposes.

## Respecting relationships with Customers, Government Officials, and Suppliers

*We expect our customers to select our products/services based on quality, service and price. We conduct our business in a transparent way, and we do not seek any improper influence. Our policies, procedures and practices are designed to prevent even the appearance of improper conduct and influence, and to reflect our reputation for impartiality and fair dealing.*

- **Gifts and Gratuities** - We respect the restrictions that our government customers have with regard to business courtesies and want to avoid any actions that conflict with those restrictions. As a general rule, business courtesies such as gifts, entertainment, services or favors are prohibited from being offered to or accepted from any actual or potential government customer or representative. Also, no one associated with Cloudburst or members of his/her immediate family may solicit or accept gifts, payments or gratuities from our suppliers. Exceptions to this policy must be approved in writing by a company officer.

- **Procurement Integrity** - Cloudburst believes in fairly competing for government contracts. We will not ask for bid, proposal or source selection information prior to the award of a federal contract. No employee, officer, or agent of Cloudburst will participate in the selection, award, or administration of a federal contract if a real or apparent personal conflict of interest would be involved. A conflict would arise if the person, or any member of his or her family, has a financial or other interest in the firm selected for the award. We will also remain alert to organizational conflicts of interest and other noncompetitive practices that may restrict or eliminate competition. If you are unsure if a situation creates an organizational conflict of interest, contact Cloudburst's Ethics Officer for guidance.
- **Fraud and False Statements** - Anyone acting on the company's behalf is strictly prohibited from circumventing the company's system of internal controls or providing misleading information on company documents. All communications negotiating or performing a government contract must be truthful, accurate, and timely.
- **Foreign Officials** - While working with foreign government officials, we will not promise, offer, or make any payments of money, products or services, either directly or indirectly, in exchange for or to induce favorable business treatment. Any questions about payments or fees associated with doing business in a foreign country must be directed to Cloudburst's Ethics Officer.

#### **Honoring and Protecting Cloudburst's Resources**

*Cloudburst resources including time, property, information, and services should be used only for authorized business purposes.*

- **Conflicts of Interest** - As employees, partners, and agents of Cloudburst, we commit to acting in the company's best interest. Acting in the company's best interest involves supporting Cloudburst's mission, values and goals. A conflict of interest is any personal interest (or interest of an immediate family member) which would negatively affect the interests of Cloudburst. It is important to bring all conflicts or potential conflicts of interest to the attention of Cloudburst's Ethics officer.
- **Time Charging** - Correct charging of time helps determine how employees are paid, customers are billed, costs are estimated for new work, contract costs are allocated, and performance is reported. Intentionally charging time to the wrong contract or account is mischarging, and is prohibited. Expenses must be documented accurately, adequately, and submitted promptly.
- **Use of Communications Tools** - Property, especially electronic media, should never be used for purposes which are disruptive or considered offensive. Company property is subject to monitoring or search at any time. All electronic communications (email, posts, tweets) should be professional and Cloudburst quality.

- **Proprietary Information** - Information is an asset as valuable as money. We do not seek information to which we are not entitled, especially sensitive procurement information, nor will we violate copyrights or licensing agreements. Company information may not be used for personal gain and proprietary information must be carefully handled and safeguarded.

### **Reporting a Possible Code Violation**

Unethical conduct by employees, subcontractors, consultants, partners or suppliers weakens Cloudburst's integrity and reputation in our ability to conduct work. Retaliation against anyone reporting a potential violation in good faith is strictly prohibited. Persons who are aware of possible violations are not to carry out an investigation on their own.

If anyone associated with Cloudburst is aware of a possible violation of our Code of Conduct that could violate the law, it must be reported immediately to Cloudburst's Ethics and Compliance Officer (CECO), via email to [ethics@cloudburstgroup.com](mailto:ethics@cloudburstgroup.com), or directly to the contact information below:

Meggan Medina  
Chief Ethics and Compliance Officer  
[meggan.medina@cloudburstgroup.com](mailto:meggan.medina@cloudburstgroup.com)  
(240) 582-3322 (office)  
(301) 535-1550 (cell)

Cloudburst's CECO will promptly and fairly review all reports regarding possible violations of the Code of Conduct, and will maintain confidentiality to the extent possible. It is a violation of Cloudburst policy to withhold information, cover up an offense, or to change or destroy evidence. Cloudburst employees are expected to cooperate fully with an investigation of a possible violation, and to answer questions truthfully and to the best of their ability.

Anyone reporting a violation should keep all information related to the report confidential and not discuss it with anyone other than Cloudburst officials who may be involved in the investigation. Depending on the violation, in the case of employees, Cloudburst can take actions that range from verbal warnings to termination of employment. In the event of any other person or entity representing the company, actions could include removal of the person(s) from the contract work, or termination of a contract. Also, the type of violation could result in criminal or civil penalties. Final decisions regarding an appropriate course of action will be made separately in each case by the President of the company.

## **Conclusion**

Our business success and reputation for integrity depends on the actions of each of our employees and partners. This Ethics and Code of Conduct outlines each of our major obligations. Be sure to read, understand and adhere to this Code as you carry out your daily activities. If you need any clarification or guidance on any point in the code, please contact the CECO for assistance.