

# AMERICAN SERVICE CONTRACTORS, L.P. • CODE OF ETHICS

May 1, 2008

## INTRODUCTION

The commitment of American Service Contractors, L.P. to conduct its business lawfully and ethically is fundamental to our continued success as an enterprise. It is of paramount importance that all employees strive to uphold the highest standards of legal and ethical conduct on a daily basis. Anything less is simply unacceptable. Each one of us has an important obligation to behave at all times with honesty and propriety because such behavior is morally and legally right. Furthermore, American Service Contractors, L.P. is dependent upon its reputation for integrity and trustworthiness as a key ingredient in our success in the business community. In order to insure that American Service Contractors, L.P. conducts itself with the highest degree of integrity and honesty, we have developed standards of conduct and an internal control system that are designed to promote such standards, to facilitate the timely discovery and disclosure of improper conduct in connection with its Government contracts, and assure that corrective measures are promptly instituted and carried out. Every American Service Contractors, L.P. employee is required to understand and comply fully with the principles contained in this Code of Ethics. Failure to comply shall constitute grounds for dismissal.

## CODE of ETHICS

### **1. Comply With All Laws and Regulations.**

You must strictly comply with all applicable laws and governmental rules in the state and other governing bodies controlling the area where you work. If you need an interpretation or a clarification of a legal requirement, you should ask your immediate supervisor. Ignorance of the law is not an acceptable excuse.

### **2. Accurately Record Hours of Labor and Sign Time Control Log.**

Wrongful execution of employee labor records can lead to civil, criminal and administrative proceedings. In order to help ensure properly charged labor costs, each employee will personally sign the daily Time Control Log which represents that the employee is certifying the correctness of the entry. The manager will review the

Time Control Log and certify its correctness by affixing his signature thereto.

### **3. Comply with all requirements and fulfill all obligations under the contract which applicable to your job.**

It is incumbent upon managerial level employees to be well versed in and to effectively communicate these requirements to employees at lower levels. People cannot work by rules of which they are unaware. Effective communication throughout our entire organization is of paramount importance.

### **4. Deal honestly and fairly with all customers, competitors, and with one another.**

Be accurate and complete in all representations. The submission to a United States Government customer of a proposal, quotation, or other document or statement that is false, incomplete, or misleading can result in civil and/or criminal liability for the company, the employee involved, and supervisors who condone such a practice.

### **5. Use company and government resources properly.**

Treat company and government-owned property with the same degree of care a reasonably prudent person would use with his or her own possessions. Never be wasteful or abusive of such assets.

### **6. Avoid conflicts of interest.**

As a American Service Contractors, L.P. employee, you are expected to devote your full working time and attention to the interests of American Service Contractors, L.P. and you must avoid any activity which might detract from or conflict with the company's interests, including disclosure of sensitive information. Outside employment may constitute a conflict of interest if it lessens the efficiency, alertness, or productivity normally expected of employees on their jobs. All outside employment which raises any questions in this regard must be approved by the employee's immediate supervisor as well as the home office. Never accept anything of value from someone doing business with American Service Contractors, L.P. where the gratuity is offered or appears to be offered in exchange for any type of favorable treatment or advantage. We must avoid even the appearance of impropriety.

### **7. "Quality and Service" is to be our watchword and ever present goal.**

The Bible quotation "As ye sow, so shall ye reap" is a statement of fact in our company. If we measure our success by the quality and quantity of service we provide to our customers and our community, we will not be disappointed with our rewards.

## REPORTING VIOLATIONS of THE CODE and DISCIPLINARY MATTERS

Strict adherence to this Code of Ethics is essential. Supervisors are responsible primarily for ensuring that employees adhere to the provisions of the Code. However, all employees at all levels have an ongoing duty to report any violations of the Code which come to their attention. Reports should be made on the Fraud, Waste, and Abuse Report forms which have been provided. As an alternative, you may write us a letter in a format similar to the report form.

Report forms should be mailed to:

American Service Contractors, L.P.  
ATTN: Ms. Annette Rhody  
501 West Broad Street  
P.O. Box 207  
Smithville, Tennessee 37166-0207

No adverse action or retribution of any kind will be taken against an employee because he or she reports a suspected violation of the Code or some other irregularity. Such reports shall be treated confidentially to the maximum extent consistent with fair and vigorous enforcement of the Code. Violations of the Code may result in disciplinary action ranging from warnings and reprimands to dismissal or, in the worst cases, to the filing of a civil or criminal complaint. In all cases, the employee will be informed of the charges against him or her and then given the opportunity to explain their actions before any disciplinary measure is imposed on the individual.