

The Company has a Code of Ethics (the "Code") contained in a separate document that you have been asked to review and sign. Your signature at the end of the Code signifies that you understand the Code and that you pledge to adhere to the Code. The discussion that follows is a summary of some of the more important topics covered by the Code. Please refer to the actual Code for any specific situations that may arise.

The commitment of the Company to conduct its business lawfully and ethically is fundamental to its continued success as an enterprise. All employees must 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 integrity. In order to foster a workplace culture that encourages the Company's employees to conduct themselves ethically and with the highest degree of integrity and honesty, we have developed standards of conduct and an internal control system. We want to facilitate the prompt discovery and correction of improper conduct in connection with the Company's Government contracts, among employees, and with our vendors. The Company will swiftly undertake investigations and will take disciplinary action and all other steps necessary to rectify any ethical misconduct. Every employee is required to understand and comply fully with the principles contained in this Code of Ethics. Failure to comply shall constitute grounds for disciplinary action, up to and including termination.

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 contact your Manager or the Project Manager for assistance. Ignorance of the law is not an acceptable excuse for misconduct.

Accurately record hours of labor and sign time control log. Intentionally wrongful or inaccurate execution of employee labor records can lead to administrative, civil, and even criminal proceedings, as well as discipline from the Company. In order to maintain the accurate recording of time worked, each employee will personally sign the daily Time Control Log and by doing so, the employee is certifying the correctness of the entry. The manager will review the Time Control Log and approve it by affixing his signature thereto, in accordance with Company Policy Letters.

Comply with all requirements and fulfill all obligations under the contract which are applicable to your job. It is incumbent upon managerial level employees to be well versed in and to effectively communicate contract requirements to all employees under their supervision. Employees must thoroughly understand what is expected of them and should ask questions until they do. Effective communication up and down the chain of command and throughout our entire organization is of paramount importance.

Be truthful and upstanding in all dealings. The Company expects its employees to deal honestly and fairly with the Company, the Government, with business partners and competitors, and with each other. Discrimination and harassment are strictly prohibited. Also, every employee must be aware that any statement or submission made to the Government which is false, incomplete, or misleading can result in civil and/or criminal liability for the Company, the employee involved, and the managers and supervisors that condoned such a practice.

Use Company and Government resources properly. Treat Company and Government-owned property with the same degree of care you would use with your own most important possessions. Never be wasteful or abusive of such property and never appropriate any item of it, large or small, for personal use.

Avoid conflicts of interest. As an employee of this Company, you are expected to devote your time and attention to the performance of your job for the benefit of the Company. You must avoid any activity that might detract from or conflict with the Company's business interests, including the disclosure of any proprietary or sensitive information.

Do not offer or take gratuities. Never offer to accept from a Government employee, another Company employee, or anyone else doing business with the Company, any money or any other thing of value which is or could appear to be offered in exchange for favorable treatment or advantage. We must avoid even the appearance of

impropriety.

Maintain a safe and professional work environment. Employees of the Company may not engage in conduct which endangers the health and welfare of others. Use of alcohol, drugs, or other prohibited substances is banned. No weapons of any kind are allowed anywhere near the workplace. Violent, threatening, or unsafe behavior will not be tolerated.

Report suspected violations. Employees have the responsibility to report credible evidence of fraud, conflicts of interest, bribery, the offering or acceptance of improper gratuities, the commission of Federal crimes, or the violation of Company rules applicable to the workplace. The means of reporting are discussed in the next section.

Reporting Violations of the Code

Strict adherence to the Code of Ethics is essential and a requirement of continued employment. Managers have the primary responsibility 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. Failure to report improper conduct is itself a violation of the Code and can result in disciplinary action.

There are four ways to report a suspected violation of improper, unethical, or illegal conduct. You may either:

- (1) talk to your Manager, Area Manager, the Deputy Project Manager, or the Project Manager in the Project Office at Forney and Sumter Streets on Fort Jackson;
- (2) write or call Jim Ed Rice, the Company's offsite Ethics Compliance Officer at Post Office Box 207, Smithville, TN 37166-0207; phone: 615/597-6278 (you do not have to identify yourself if you want to remain anonymous);
- (3) use the Company's Toll-Free Confidential Hot Line at 877/271-0958 (this call may also be anonymous); or
- (4) report complaints online at www.ascfoodservice.com. Click on "Code of Ethics" link to find the form for a Fraud, Waste, and Abuse Report.

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, civil or criminal liability or prosecution.

In all cases, the employee charged with the violation will be informed of the charges. The charged person(s) will be given the opportunity to explain the action or conduct being questioned before any disciplinary action is taken by the Company.

I have read and understand the provisions and requirements described in this policy summary.

Employee Signature		Printed Name	
Employee Number		Date	