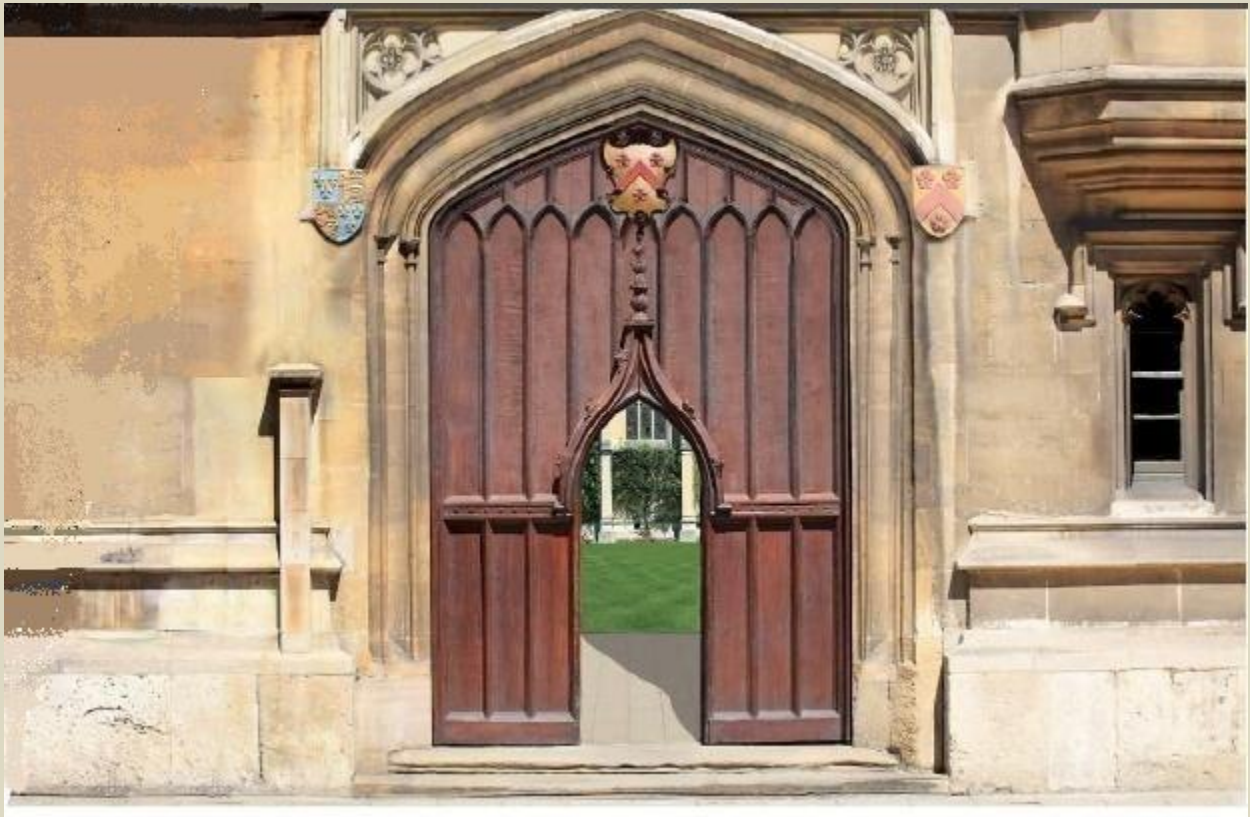


ControlPoints

Code of Ethics



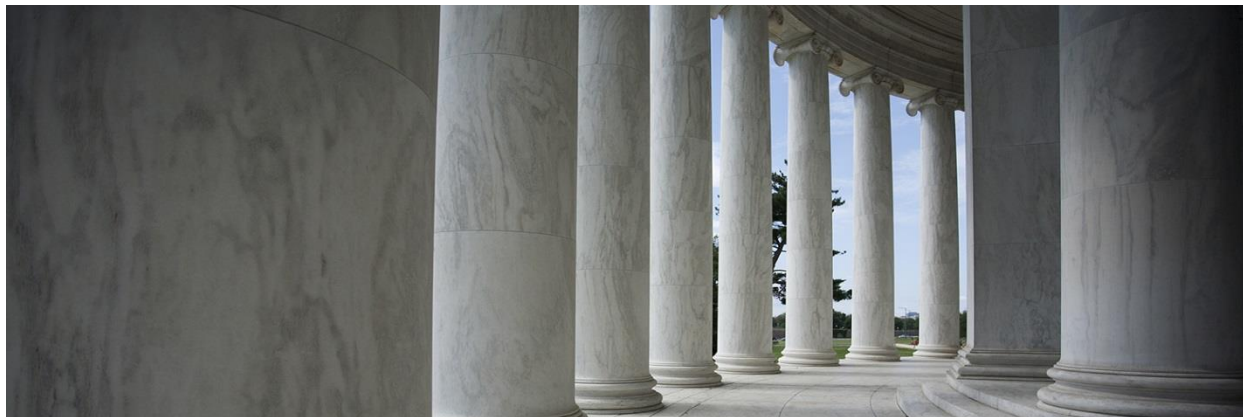
Date
January 1, 2014

Target Audience
All Employees

Issuer & Approver
Office of the President

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Ethics, Compliance, and Professional Conduct

Preface: This Code of Ethics and Professional Conduct (the “Code”) is to be applied in accordance with federal, state, and local law. ControlPoints has adopted this Code for use by its personnel. In addition, unless otherwise specified in this Code, references to “we,” “our,” or “the firm” are references to the personnel and firm of ControlPoints.

The current business environment has put professional services firms at a crossroads. The values of individuals, and the integrity of the organizations they belong to, are being tested.

The trust placed in ControlPoints by clients must never be taken for granted. The responsibility for ethical behavior must be taken seriously — by everyone, at every level of the organization.

While the inherent risks in the marketplace, the potential for business failure, or the possibility of human mistakes cannot be entirely eliminated, the people of ControlPoints can, should, and must be required to conduct themselves honestly, and in accordance with applicable professional standards.

The Ethical Principles and shared values are specifically designed to provide guidance to all of the people of ControlPoints, despite the diversity of their backgrounds and professional disciplines.

These principles and values are an integral part of this Code, and of the rigorous commitment ControlPoints has made historically (and continue to make today), to sustain the public trust. They will guide you in conducting business honorably, ethically, and with the utmost professionalism.

This Code provides the detailed information, helpful guidance, and references to written policies and resources that you need to help you make the right choices on a daily basis. It will empower you to apply your best professional judgment at all times. You are expected to use these policies and practices as a means to discuss your responsibilities openly and honestly with clients, with regulators, and with each other.

While policies are important, ultimately the success of our Ethics and Compliance Program rests with you. You must make decisions every day in your work — decisions that may have wide-ranging economic, legal, and ethical implications. Whatever the circumstances, you are expected to act with complete integrity, at all times.

It’s our expectation that, after reading this Code, you will have a better sense of your vital role, and of the broad support you have from the highest levels of management. In addition, we believe you will also gain a wider understanding of the privileges and responsibilities that come with working at one of the finest professional services organizations in the world.

- Office of the President

Code of Ethics Policy

The following Ethical Principles have been adopted by ControlPoints:

Honesty and Integrity — “We act with honesty and integrity.”

- We are straightforward and honest in our professional and business relationships.
- We are truthful about the services we provide, the knowledge we possess, and the experience we have gained.

Professional Behavior — “We operate within the letter and the spirit of applicable laws.”

- We comply with professional standards and applicable laws and regulations.
- We avoid any action that may discredit our firm or our professions.
- We strive not only to do what is legal, but also what is right.

Competence — “We bring appropriate skills and capabilities to every client assignment.”

- We understand that the public and our clients expect our work to meet high professional standards.
- We use due care to ensure that client needs are matched with ControlPoints personnel who have the competence required for their assignments.

Objectivity — “We are objective in forming our professional opinions and the advice we give.”

- We do not allow bias, conflict of interest, or undue influence of others to override our professional judgments.
- We address differences of opinion and handle them constructively and professionally.

Confidentiality — “We respect the confidentiality of information.”

- We prohibit disclosure of information to anyone inside or outside our firm without the legal or professional right to know.
- We do not misuse information of our clients, our firm, or our people for personal advantage or for the benefit of third parties.

Fair Business Practices — “We are committed to fair business practices.”

- We receive fees that reflect the value of services provided and responsibilities assumed, and are considered fair and reasonable by our clients.
- We respect our competitors and do not compete unfairly.

Responsibility to Society — “We recognize and respect the impact we have on the world around us.”

- We take our role in society seriously and do not cause intentional harm.
- We support contributions to the communities where we operate.

Respect and Fair Treatment — “We treat all our colleagues with respect, courtesy, and fairness.”

- We understand the impact that our individual behavior has on our firm, our colleagues, and society, and always work to take responsible action.
- We encourage and value the diverse mix of people, viewpoints, talents, and experiences found at ControlPoints.
- We are fair in our behavior and our policies promote equal opportunity for all.

Accountability and Decision Making — “We lead by example, using our shared values as our foundation.”

- We recognize that we are role models and that we set behavioral standards for our professions and each other.
- We make decisions based on our shared values and expect our leaders and colleagues to do the same:
 - Integrity
 - Outstanding value to markets and clients
 - Commitment to each other
 - Strength from cultural diversity

About Your Responsibilities

A Duty to Know, Understand, and Comply

It is the duty of all firm personnel to know, understand, and comply with this Code of Ethics and Professional Conduct.

Failure to comply with the Code could result in significant risk to the firm and its people, and will subject that individual to disciplinary action, up to and including termination or severance of association.

In addition, certain professionals may have to comply with additional requirements of certain professional codes of conduct given their specializations or certifications. (For example, CPAs must also comply with the AICPA Code of Conduct and International Federation of Accountants (IFAC) Code of Ethics for Professional Accountants; attorneys must adhere to their professional codes of responsibility.)

ControlPoints reserves the right to modify, revise, discontinue, or amend any or all of this Code as it deems appropriate, at any time, in whole or in part, for any reason, and without prior notice, consent, or approval.

ControlPoints retains the absolute right to terminate its personnel at any time, without cause, without prior notice, and without prior discipline, subject, if applicable, to compliance with any contract.

A Duty to Report

The Ethics and Compliance Program is designed to educate and foster an atmosphere where open communication of ethics and compliance inquiries and issues is encouraged, and to provide all personnel with a reasonable understanding of how to identify and report potential violations. Each of you is responsible for appropriately addressing — through reporting, consultation, or other means — potentially fraudulent, illegal, or unethical issues that may come to your attention.

If you observe or become aware of a potential fraudulent, illegal, or unethical act, or other violation of firm policy, whether committed by a colleague, client, supplier, contractor, alliance, or others associated with or doing business with the firm, it is your responsibility to report the circumstances through an appropriate reporting channel, and to cooperate fully with any investigation.

Where to Go for Help and How to Report

For assistance with ethics and compliance matters, and to report potential violations, you should contact your supervisor. If they are unable to resolve the issue (or if you are uncomfortable discussing the issue with them), you should seek assistance from the Chief Ethics and Compliance Officer of ControlPoints by sending a message to the integrity email:

info@controlpoints.com

Practical Advice: Using the Integrity Email

The Integrity Email is a confidential, 24-hours-a-day, 365-days-a-year service you can access from any location. Reports may be made on either an anonymous or named basis.

The Integrity Email is administered by the Chief Ethics and Compliance Officer to maintain confidentiality and, when requested, anonymity.

Anyone can use the Integrity Email to request assistance or report a potential violation regarding an ethics and compliance issue. Every reasonable effort will be made to keep the identity of anyone reporting a potential violation confidential to the extent possible, consistent with good business practice. In order to assist in the investigation, those reporting potential violations are encouraged to identify themselves. However, anonymous reports will also be accepted and investigated to the extent possible.

The Power of Shared Values

Shared values unite the people of ControlPoints and are the basis for a common culture. These values form the foundation for always doing the right thing, and for sustaining the public trust, fulfilling client obligations, and meeting commitments to each other.

Our shared values are:

- Integrity
- Outstanding value to markets and clients
- Commitment to each other
- Strength from cultural diversity

About the Code of Ethics and Professional Conduct

The Code reflects our expectations for all personnel of ControlPoints. The sections of the Code that follow contain ethics and compliance standards covering our responsibilities to the public trust, to clients, and to each other. In complying with these standards, you should ask

yourself the following questions to aid in making the right decision about a possible course of action:

- Are my actions illegal or unethical?
- Am I being fair and honest?
- Would I be unwilling or embarrassed to tell my family, friends, or co-workers?
- Would ControlPoints' reputation be harmed if the action were revealed in the newspapers?
- Am I personally uncomfortable about the course of action?
- Could someone's life, health, safety, or reputation be endangered by my action?
- Could the intended action appear inappropriate to a third party?

If you are still unsure of what to do, ask questions and seek additional guidance through your supervisor or through other sources described in this Code.

Sustaining the Public Trust

Letter of Law vs. Spirit of Law

The letter of the law is the literal, stated interpretation of the law as it's written. The spirit of the law is usually broader, and reflects the intention behind the law. While usually obvious, this may not be explicitly stated.

Integrity: A Core Value

Integrity means always trying to do the right thing, the first time, every time. At every level, the people of ControlPoints are expected to be honest, trustworthy, candid, and straightforward in both personal and business dealings, in accordance with both the letter and the spirit of all applicable laws and regulations. All personnel are encouraged to exceed the expectations of clients — and each other — by seeking to do not only what is legal, but also what is right. Our commercial ambitions should never be allowed to overtake professional and ethical responsibilities.

Quality of Work Product

Our reputation is wholly dependent not only on the integrity of our people, but also on the quality of the services provided by ControlPoints. This quality expectation is very simply stated — in the perceptions of both the public and clients, the work product of ControlPoints should meet all applicable professional standards.

Each person is individually responsible for the quality of the professional services provided. Commitment to quality operates at three levels: the individual, the team, and the organization. At every level, it requires a dedication to having pride in your work product and an appropriate sense of professional skepticism in the conduct of all our work.

Independence and Objectivity of Professional Advice and Conclusions

In working with clients, our policy is for ControlPoints to be forthright, direct, and independent in conveying advice or rendering an opinion. Prejudice, bias, conflict of interest, or undue influence of others must not be allowed to override objective professional or business judgments.

In return, clients are expected to meet the letter and the spirit of all applicable laws and regulations. There is no client or engagement that is more important than our responsibility to sustain the public trust, our commitment to do the right thing, and our concern to maintain our good reputation. We will always support the personnel of ControlPoints who stand up to a client they reasonably believe may be engaging in illegal or inappropriate financial reporting or other business activities.

Corporate Responsibility

We have a responsibility to be a good neighbor and a contributing corporate citizen in the communities in which our people work. We are committed to conducting our business activities in ways that honor ethical values and respect people, communities, and the natural environment. We continue to work toward the sustainable improvement of life, the environment, and business by:

- Rendering high-quality professional services with the utmost integrity.
- Providing a workplace that contributes to the professional growth, the development, and the personal success of our people.

Our people share a long tradition of supporting the communities in which they live and work. In addition to financial contributions made by ControlPoints and its people, many of our people also volunteer their time to worthwhile causes. We actively offer, encourage, support, and reward volunteerism for several important reasons:

- Helping others and sharing is simply the right thing to do.
- Community involvement is a manifestation of our shared values.

- A healthy community depends on the active involvement of all who live and work there.
- Community involvement helps people become better professionals by enhancing their skills and leadership abilities outside the workplace.

In addition, we practice our responsible stewardship of the earth's natural resources by continuously looking for ways to reduce our impact on the environment, both as an organization and as individuals.

Government Transactions and Relations

ControlPoints business transactions frequently involve governmental entities. The laws and regulations pertaining to doing business with governmental entities impose special rules and may have a more stringent set of requirements, not typical of other businesses. For example, providing meals or hosting social events may be acceptable for a "non-governmental" client. However, they may be restricted or prohibited when a government employee is involved. All personnel involved in providing services to governmental entities are required to adhere to the government's ethical standards as they apply to the services provided, as well as this Code.

We comply with all applicable rules, laws, and regulations relating to political lobbying or attempting to influence government officials.

External Inquiries

You should always exercise care not to disclose confidential, personal, or business information through public or casual discussions with the media, government officials, or others. External inquiries (e.g., media and regulators) must be referred to the ControlPoints President for a response. This includes newspapers, magazines, trade publications, radio, television, and government inquiries, as well as any other external source seeking information about ControlPoints or its clients. While it is standard policy to respond to external inquiries in an honest, candid, and appropriate manner, responses may be limited by confidentiality requirements and other related concerns.

When public comment is requested on proposed regulations or professional standards, it is ControlPoints' practice to provide informed feedback and perspective based on what's believed to be in the long-term best interest of the professions. Communication with regulators and standard-setters is conducted through ControlPoints using publicly sanctioned means. Inappropriate or unethical efforts to influence regulation or professional oversight are not condoned.

Truth in Communications

Our people are committed to representing the firm with honesty and candor. Similarly, it is our policy to communicate facts about our capabilities, policies, and people accurately and responsibly in advertisements, sales, marketing, recruiting, and all other promotional materials.

Respect for Competition

We will not pursue any competitive tactic or goal that we believe might damage our reputation or is inconsistent with our vision for ControlPoints to be recognized as the best in professional services. We do not condone any attempts to gather competitive information in a deceptive, unlawful, or inappropriate manner. We honor valid non-compete agreements (sometimes known as restrictive covenants) of competitors. The restrictive covenants applicable to existing and former ControlPoints personnel are also strictly enforced. Furthermore, given that our reputation is affected by the reputations of competitors, ControlPoints does not condone any competitive action that could be harmful to the integrity of our competitors.

Records Accuracy

Accurate and complete records are required for compliance with regulatory, tax, and financial reporting requirements, among other things, as well as for meeting obligations to clients. Personnel who enter information into ControlPoints' business records (including, but not limited to, time, expense, and client billing records, regulatory, or other financial reports) have a responsibility to do so in a truthful, accurate, legible, complete, and timely manner and in accordance with ControlPoints' policies and all legal and professional standards and regulations.

Records Management

We will maintain all records in accordance with the legal and business requirements appropriate to our professions. To help preserve the integrity of the record-keeping and reporting systems, all personnel have an obligation to know and comply with all current applicable records retention policies and procedures. These include how data is shared, stored, and retrieved, and the circumstances under which it may be disposed of. Changes to and destruction of records are specifically forbidden in the following circumstances:

- Where prohibited by law, by government regulation, or by ControlPoints policy.
- Where there exists an overriding governmental, regulatory, or contractual requirement.
- Where there is knowledge of — or anticipation of — a subpoena or other request for documents, a regulatory investigation, or a lawsuit.

We never destroy, alter, or cause the destruction or alteration of documents for any illegal or improper purpose. Records include — among other things — paper copies, electronic files, and video and audio recordings.

Anti-Corruption

ControlPoints is committed to ethical business conduct in the global marketplaces and is against corruption in any form. ControlPoints expects all of its personnel, particularly those conducting international business, to know, understand, and abide by anti-corruption laws applicable to the business they conduct. Any and all payments made by, or on behalf of, ControlPoints must be lawful and made only for legitimate business purposes. Under no circumstances is it acceptable to offer, give, solicit, or receive any form of bribe or kickback. You should be mindful that offering or providing anything of value (including, but not limited to, gifts, entertainment, hospitality, political contributions, charitable contributions, employment opportunities, and facilitation payments) to a third-party for a corrupt or inappropriate purpose could constitute an illegal bribe or kickback under applicable laws and could lead to serious civil and criminal penalties.

Fulfilling Obligations to Clients

Independence from Clients

ControlPoints and its personnel are committed to complying with all laws and regulations dealing with professional independence requirements, including the applicable requirements of Sarbanes-Oxley.

The people of ControlPoints are pledged to maintaining independence, both in fact and appearance, from ControlPoints clients in exercising appropriate professional responsibilities. All applicable personnel must maintain an independent and objective attitude in performing services for all clients. ControlPoints monitors its services and relationships to ensure these goals are achieved.

Scope of Services

As an organization that offers many skills and capabilities in the professional services marketplace, naturally we want to be competitive and successful. Nevertheless, ControlPoints personnel will not overstate their ability to deliver services, nor will they offer or provide any services that will damage their reputation or the reputations of clients. Their skills, experience, and desire to do the work are fairly represented in proposals to clients. They also make it a point to stand behind service commitments made to clients.

Services are delivered in a professional manner according to ControlPoints policy as well as the professional standards and regulations applicable to their professions. They offer only those professional services that they are competent to perform and supervise, and only those services that will not detract from the public trust in ControlPoints' independence, integrity, and objectivity.

Billing for Professional Services

Our personnel are committed to properly recording hours worked and expenses incurred in our time and expense reporting systems, in accordance with our applicable policies, and allocate such charges to the appropriate project or client service charge codes. ControlPoints has an obligation to accurately bill clients for fees and expenses, in accordance with the terms of their engagements.

Confidential and Proprietary Information

Our personnel have access to significant amounts of client information that may not be available to the public, and you are required to preserve the confidentiality of information obtained in client service. Information of a confidential, private and sensitive nature must be used responsibly and controlled and protected to prevent its prohibited, arbitrary or careless disclosure.

Unless the client has provided its specific consent, which should preferably be in writing, or there is a legal or professional right or duty to disclose, you are prohibited from disclosing confidential client information to:

- Anyone who works outside the client's organization or ControlPoints.
- Anyone within the client organization without a need to know.
- Anyone within ControlPoints.

Confidential or proprietary information about clients, our organization, or other parties, which has been gained through employment or affiliation with ControlPoints, may not be used for personal advantage or for the benefit of third parties.

Insider Trading

You may, in the course of performing their duties, come into possession of "material non-public information" about clients and the companies with whom you do business. "Material non-public information" is any information that would affect the prices of securities, either positively or negatively, that is not generally available to the investing public. This information is generally referred to as "insider information." Buying or selling stocks using "insider information" is referred to as "insider trading."

It is illegal for any person to buy or sell any securities (i.e., stocks, bonds) based on insider information, or to discuss such information with others who might buy or sell such securities.

Gifts and Entertainment

We strive to compete on the basis of the quality and value of services provided. You should not offer or accept gifts or payments, or undertake inappropriate activities, to facilitate any engagements. Entertainment of our personnel or clients that is lavish or inappropriate in nature is also not permitted.

In addition, you have an obligation to comply with clients' policies regarding gifts and entertainment. Gifts or entertainment should not be accepted or extended by you if they could be reasonably considered to:

- Improperly influence any ControlPoints' business relationship with, or create an obligation to, a client, supplier, contractor, or alliance.
- Violate laws, professional standards and regulations, or this Code of Ethics and Professional Conduct.
- Constitute an unfair business inducement.
- Cause embarrassment to or negative impact upon our firm.

Neither you nor any member of your immediate family should use your position with the firm to solicit any cash, gifts, or free services from any client, supplier, contractor, or alliance for your or anyone else's personal benefit.

Guidelines regarding gifts and entertainment that are acceptable:

- Nominal gifts that are usual and customary for the profession (e.g., pens, calendars, and mugs).
- Reasonable invitations may be either extended or accepted to business-related meetings, conventions, or conferences (e.g., a product-training seminar, a business luncheon or dinner).
- Invitations to social, sporting, or other events may be either extended or accepted if the cost is reasonable and attendance serves a customary business purpose (e.g., networking).

In all cases, you have a responsibility to know and understand our firm's detailed guidance on acceptable client entertainment, as well as the client's own policies related to allowable gifts and entertainment involving their personnel. For example, the guidelines mentioned for acceptable gifts and entertainment may not be acceptable for a government client given their strict rules and regulations.

Supplier, Contractor, and Alliance Relationships

Our success depends on building productive relationships with all suppliers, contractors, and alliances based on integrity, ethical behavior, and mutual trust. Regardless of whether there is an existing or future client relationship, we select suppliers, contractors, and alliances based on the quality, price, service, delivery, and supply of needed goods and services. Procurement decisions should be based on objective business rationale, and not on personal interest or bias, through a fair, honest and transparent procurement process.



Meeting Commitments to Each Other

Honesty and Trust

We believe that our people work best in a culture of trust, and we are committed to fostering and maintaining such a culture.

We expect our colleagues to perform their jobs with integrity and to conduct themselves ethically at all times. Honesty in the commitments to, and dealings with, each other is essential. We are each individually responsible for both the quality and the on-time completion of our own work. We must also accurately and honestly account to each other for time worked and expenses incurred (in accordance with ControlPoints policy) for both internal and for client-related activities. At all times, it is the responsibility of each of us to safeguard the confidential and proprietary information of ControlPoints.

Diversity and Inclusion

We are committed to fostering a diverse and inclusive culture. Such a culture directly supports our mission to help our people and clients excel. The rich mix of individuals, viewpoints, talents, and experiences found at our firm is respected and valued. Our human resources policies aim for the highest standards of fairness and equal opportunity, covering recruitment and employment, promotions, team opportunities, and training programs. We are committed to compliance with all laws and regulations relating to equal employment opportunity, affirmative action, harassment, and diversity.

ControlPoints is an equal opportunity employer and recruits, employs, trains, compensates, and promotes high-quality, competent, and responsible people without regard to race, religion, creed, color, citizenship, national origin, age, sex, gender, gender identity/expression, sexual orientation, marital status, disability, genetic information, veteran status, or any other legally protected basis, in accordance with all applicable federal, state, and local laws or regulations.

Respect and Fair Treatment

All personnel are expected to treat their colleagues with respect. Providing a safe, healthy, and productive work environment is a

priority, and you are expected to support efforts to eliminate any actions or circumstances that undermine such an environment. Unlawful discrimination, verbal or physical harassment or abuse, or offensive behavior (whether or not sexually related) by personnel, agents, or clients of ControlPoints will not be tolerated.

Licensure and Professional Certifications

In order to deliver on the promise of exceptional client service, many of our professionals maintain professional licenses and certifications (e.g., PMP, CISA, CISSP, attorney-at-law).

All personnel holding professional licenses and certifications have a personal responsibility to maintain such licenses and certifications in good standing through timely renewals and (where required) the attainment of the appropriate level of continuing professional education.

Consultation

We are committed to a consultative culture. At a minimum, consultation on non-routine or emerging issues or practices is not only expected, it is required. Frequent consultation with industry resources is encouraged. ControlPoints speaks with one voice on technical and other practice-related matters. No individual partner, principal, director, or employee is permitted to ignore a technical or other practice-related determination rendered by Management. ControlPoints has an established procedure and protocol to allow any professional the right to appeal and resolve any professional disagreements that might arise. As professionals, we have a duty and an obligation to express differing points of view and appropriately resolve such matters in an open-minded and professional manner.

Conflicts of Interest

As professionals, we make business decisions every day. In making those decisions, we are responsible for remaining free from influence, or the appearance of influence, of any conflicting interests, and for conducting business ethically and legally. We have a duty to avoid making business decisions that place personal interests ahead of those of our firm.

Some examples of potential conflict situations include:

- Acting as a director, partner, consultant, or employee of an organization that provides services, supplies, or equipment to, or is a competitor of, ControlPoints.
- Holding a second job that may interfere with your employment at, or being a partner or principal of, ControlPoints.
- Ownership by you, members of your immediate family, or other ControlPoints partners, principals, directors, or employees of a financial interest (i.e. publicly traded stock) in a company that is a competitor of, supplier to, or client of ControlPoints.

Personal Relationships

From time to time, personal relationships, romantic or otherwise, may exist or develop between two people employed by the organization, or with an employee of a client organization. Such relationships can pose serious independence or conflict-of-interests issues, either in fact, or in appearance, in the minds of the public, clients, or our colleagues.

We recognize that these types of relationships may occur and appropriate notification or assignment steps may need to be taken to prevent such relationships from resulting in a professional issue for the organization or the individuals involved. Such relationships must be reported by the persons involved to the President to determine what, if any, notifications or assignment changes need to be made.

Health, Safety, and the Environment

We are committed to providing a safe working environment for all personnel. We are expected to discharge our responsibilities and perform our duties in a professional manner in the workplace (or anywhere else) while conducting business. Clients — as well as the general public — expect our organization's personnel to provide quality, professional services while being free from the effects of drugs, alcohol, or other substances that may hinder job performance or judgment. The illegal use, sale, dispensing, distribution, possession, or manufacture of illegal drugs or other controlled substances by a partner, principal, director, or employee is prohibited and could lead to termination or severance of association.

On occasion, there may be events where management approves the serving of alcoholic beverages. In these cases, all appropriate liquor laws must be followed, including laws regarding the serving of alcohol to those under the legal drinking age. Consistent with our policy, intoxication and excessive drinking at these events could lead to disciplinary action including termination or severance of association from the organization.

We each are responsible for our own safety, and that of our colleagues, in the workplace. The workplace should be free from violent and abusive behavior. Threatening, aggressive, or abusive behavior towards fellow colleagues or others in the workplace will not be tolerated. Explosives, firearms, or other weapons, whether legally permitted or not, are not allowed in any of the ControlPoints facilities.

Communications Systems

Our communications systems, including — among other things — computers, electronic mail, intranet and Internet access, instant messaging, telephones, voice mail, conferencing systems, and paper documents are the property of ControlPoints and are to be used primarily for business purposes.

You are encouraged to use the Internet and e-mail in order to make communications more effective and efficient. However, the main purpose of these communications systems is to facilitate business objectives. You have a responsibility to maintain and enhance our public image and to use all communications systems in a productive manner. The integrity of these communications systems also requires that all personnel secure their personal access information in order to prevent unauthorized access to such systems.

Our communications systems may be used for incidental and occasional personal use provided that such use is kept at a minimum and is in compliance with the Code and applicable policies and procedures (e.g., communications systems should not be used for personal gain or to access pornographic Web sites). However, because such systems are owned by ControlPoints, all users automatically waive any claims to privacy.

Furthermore, ControlPoints reserves the right to monitor all communications (e.g., e-mail, voice mail, computers, and documents).

Social Media

Social media tools - including blogs, wikis, social networks, video sharing, and community sites, among others – continue to change the landscape of the Internet as key tools for network building, collaboration, and knowledge sharing, and, as with any tool, both proper and improper uses are possible. Our people are expected to abide by basic standards — such as safeguarding confidential information and protecting the ControlPoints brand — that govern all ControlPoints communications, including those made via online collaboration tools.

In the use of all social media, including personal social media where you might not be identified as a ControlPoints person, you should be mindful of how you present yourself and treat your audience, as well as perceptions that can be created by use of social media. Along with the guidelines and best practices for your use of social media, there are policies - the same policies that you already abide by every day at ControlPoints - that you should apply as you use internal and external social media.

Use of ControlPoints Assets

The use of ControlPoints assets for individual profit or any unlawful, unauthorized personal or unethical purpose is prohibited. Our information technology, intellectual property (e.g., copyrights, patents, and trademarks), facilities, equipment, machines, software, and cash may be used for business purposes only, including responsible and accurate expense reimbursement, and in accordance with applicable policies. Other assets (e.g., computers, fax machines, printers, and copiers) may be used for minor and incidental personal purposes provided such use is kept to a minimum, and does not create any significant incremental costs, interfere with work duties, or violate any laws or ControlPoints policies.

The use of any ControlPoints resources for personal political activities is prohibited.

Computer hardware, software, data, and facilities are valuable resources that need protection from potential destruction, theft, or misuse. These resources may also include confidential client or ControlPoints information that requires safeguarding.

It is your responsibility to prevent unauthorized access through the use of ID badges, passwords, or other security codes, and physical security measures (such as using computer cable locks, not leaving computers unattended in cars, and other normal precautions).

Copyrighted materials (e.g., books, music, software, and magazines) should not be reproduced, distributed, or altered without permission of the copyright owner or an authorized agent. Software used in connection with the business of ControlPoints should be properly licensed and used only in accordance with that license.

Using unlicensed software could constitute copyright infringement and may be grounds for disciplinary action. Each partner, principal, director, and employee has an obligation to each other to comply with ControlPoints policy with regard to the incurring of expenses for which reimbursement is sought from the firm.

Policies and Procedures

This Code is not intended to cover every questionable situation or dilemma that you may encounter. Rather, it is intended to provide a perspective to guide thinking, and to direct our personnel to resources for further information. For example, internal policies established for ControlPoints and on function or legal entity-specific intranet sites are intended to provide additional guidance and address risk areas in more detail. Some of the key policies cover independence, licensure, expense reimbursement, and procurement authority.

Please remember, at all times, that it is our collective responsibility to seek guidance and assistance in the ethical performance and discharge of our professional responsibilities.