

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-7

SUBJECT: Code of Ethics

Effective Date: 08-28-00

Revision Date: 02-25-13

LOYOLA conducts its business ethically and impartially ensuring compliance with all laws and regulations. The success of our business is dependent on the trust and confidence we earn from our employees and customers. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching Company goals solely through honorable conduct.

All employees deserve to work in an environment where they are treated with dignity and respect. LOYOLA is committed to creating such an environment because it brings out the full potential in each employee, which, in turn, contributes directly to our business success.

Employees are responsible for upholding their own reputation and that of LOYOLA. Each employee is responsible for ensuring that their own conduct and the conduct of coworkers they observe is honest and ethical at all times and complies with the law and LOYOLA's policies and procedures.

The highest standards of ethical conduct are required of LOYOLA employees during working hours and nonworking hours. Employees will not engage in conduct or activity that may raise question as to the Company's integrity or would cause embarrassment, reflect negatively on LOYOLA'S reputation or would potentially cause a review of our corporate and employee security clearances.

Every employee has the responsibility to ask questions, seek guidance, report suspected violations, and express concerns regarding compliance with this policy to the management staff and/or the Company Compliance Officer/Human Resources Director. LOYOLA will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the Company will take appropriate action. LOYOLA will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

As a government contractor, LOYOLA is required to disclose if we have creditable evidence of a violation of criminal laws related to fraud, bribery, gratuities, and conflict of interest. LOYOLA will disclose to their customers when there is confirmed misconduct related to work performed for them.

LOYOLA must maintain a corporate security clearance in order to maintain personal security clearances for employees who are in positions of public trust. Government information that has been classified by a national security authority, competitive or procurement sensitive, International Traffic in Arms Regulation (ITAR) designated or proprietary, shall not be solicited or accepted from (or provided to) any source, either directly or indirectly, in circumstances where there is reason to believe that the release is not authorized. All classified information in LOYOLA's possession shall be treated in strict compliance with U.S. Government mandated procedures for such classified information.

A hotline is available for employees to raise questions or report suspected misconduct. Calls may be made anonymously. The hotline number is 757-498-6118 ext. 114.

It is the employees' responsibility to read, understand, and comply with the Code of Ethics. Employees will be required to certify their review of the Code of Ethics on an annual basis.