



Code of Business Ethics and Conduct

SCOPE: This Code of Business Ethics and Conduct (“Code”) applies to THTBC employees, including all officers and managers. The Code also applies, where applicable, to THTBC customers, contractors, vendors, and suppliers (“Business Partners”).

BRIEF OVERVIEW: THTBC employees are expected to understand and comply with THTBC’s Code. THTBC employees should read this Code, be sure to understand its requirements, ask questions as necessary, and report any concerns that they may have about violations or potential violations of the Code. All reports will be taken seriously and investigated in accordance with the provisions of the Code. As stated within the anti-retaliation provisions of the Code, employees who report a concern will be protected from retaliation.

If you are not sure whether a given matter is in conflict with the Code, consider the following questions:

- Is it legal?
- Is it honest?
- Is it fair?
- Is it in the Company’s best interest?
- Does it fit the Company’s culture?

REPORTING A CONCERN: Ultimately, THTBC’s ability to enforce this Code is based in large part on the willingness of THTBC employees to follow the Code’s requirements and on the willingness of THTBC employees to report violations of the Code. Indeed, reporting a Code violation is a duty, and a failure to make a report can itself lead to disciplinary action. This Code provides guidance as to how to go about reporting a violation. For deliberate reasons, the Code provides employees with multiple options for reporting a violation, including to your immediate supervisor, Human Resources, an Ethics Committee member, and/or any member of the senior leadership team. For those situations where a reporting individual wishes to remain anonymous, THTBC has established a telephone hotline with Lighthouse. Please be assured that your calls will be handled with seriousness and discretion.

This Code is not an employment contract and all THTBC employees are employed “at will,” which means that either THTBC or its employees may terminate the employment relationship at any time, with or without cause and with or without notice. THTBC has the right to amend, modify or revise this Code at any time.

SECTION I - SAFETY AND RESPECT IN THE WORKPLACE

We all deserve to work in a safe environment in which we are treated with dignity and respect. THTBC is committed to creating such an environment because it brings out the full potential in each of us, which in turn contributes directly to our business success.

Section 1.1: Equal Employment Opportunity/ Discrimination / Accommodation

THTBC is an equal opportunity employer and complies with all applicable federal, state, and local fair employment practices laws. The Company’s policy on Equal Employment Opportunity extends to all applicants for positions with the company and to all aspects of the employment relationship with existing employees, including, but not limited to hiring, training, promotion, discipline, compensation, benefits, and termination of employment.

THTBC strictly prohibits and does not tolerate discrimination against employees, applicants, or any other covered persons because of race, color, religion, national origin, sex (including pregnancy), sexual orientation, gender identity, age, disability, military or veteran status, citizenship status, genetic information, or any other applicable status protected by federal, state or local law. To further the principle of equal employment opportunity, all employment decisions will be based upon an individual's qualifications for the position to be filled. We have an enduring commitment to hire and develop the best people we can find because it is morally right, legally required, and a good business practice. THTBC further complies with all accommodation and affirmative action requirements imposed on it by law. For further information, please see **THTBC's Equal Employment Opportunity Discrimination Policy, THTBC's Americans with Disabilities Act Policy and THTBC's Religious Accommodation Requests Policy in the Employee Handbook.**

Section 1.2: Respect in the Workplace/Anti-Harassment

THTBC is committed to providing a work environment in which employees are treated with respect, decency, and dignity. THTBC strictly prohibits and does not tolerate unlawful harassment against employees or any other covered persons because of race, color, religion, national origin, sex (including pregnancy), sexual orientation, gender identity, age, disability, military or veteran status, citizenship status, genetic information, or any other applicable status protected by federal, state or local law.

All employees are expected to conduct themselves in a professional and businesslike manner at all times. This policy not only applies to the workplace during normal business hours, but also to business travel and all work-related functions, even if activities are held off-site.

No form of harassment will be tolerated.

Employees who believe they have been subjected to any conduct they believe violates this policy or witness any such conduct must promptly report it. No employee will be subject to, and the Company prohibits, any form of discipline, reprisal, intimidation, or retaliation for good faith reporting conduct prohibited by this policy. For further information, please see **THTBC's Respect in the Workplace/Anti-Harassment Policy, THTBC's Sexual Harassment Policy and THTBC's Complaint Procedure in the Employee Handbook.**

Section 1.3: Violence-Free Workplace

THTBC has a strict policy prohibiting workplace violence which involves or affects THTBC and its employees, or which occurs on THTBC property. For further information, please see **THTBC's Workplace Violence Policy in the Employee Handbook.**

Section 1.4: Drug Free and Alcohol Abuse Free Workplace and Workforce

THTBC has a strong commitment to promote high standards of employee health and safety for all its employees by providing a safe and healthy workplace. Substance abuse, including both drug and alcohol use, is a serious problem which threatens the health and safety of everyone. You are required to report to work in an appropriate mental and physical condition to perform your job in a satisfactory manner. For more information, please see the **THTBC Drug-Free Workplace Policy in the Employee Handbook.**

SECTION II - MAINTAINING ACCURATE AND COMPLETE RECORDS

THTBC strives to maintain accurate business records and to protect customer and Company funds and assets. THTBC is committed to maintaining a system of internal controls that ensures compliance with applicable laws and regulations, and that promotes the full, accurate and timely disclosure of information in THTBC's reporting to customers, internal management, external auditors, and external parties, including regulatory and governmental authorities.

Section 2.1: Company Records

It is the responsibility of all THTBC employees to ensure that THTBC's records, including documents, electronic information, voicemails and any other form of media, are properly managed, handled, stored, and where applicable, destroyed as appropriate in accordance with retention guidelines. In the normal course of performing the job, employees will likely receive, create, and transact with Company records. Employees are required to properly and accurately create and maintain these records, to ensure that they are properly filed, labeled, and that access is appropriately limited to those with a business need to access the records.

Section 2.2: Financial Reporting

THTBC must maintain accurate financial records of its business transactions and must ensure proper reporting to customers and auditors of its financial results. Financial records could include Company-wide timekeeping records, financial records, specific business unit transactions, as well as individual travel and expense reimbursement invoices. These and many other forms of financial information must be managed properly and must be appropriately presented when requested. To the extent that employees create, handle, or are otherwise involved in the handling of financial records they must ensure that the records are accurate, properly maintained, and appropriately represented in internal and/or external financial disclosures. Dishonest financial record keeping violates the law and Company policies and will not be tolerated.

Section 2.3: Travel and Expense Reimbursement

THTBC reimburses employees for expenses incurred for the benefit of the Company. Employees must submit accurate business expenses in accordance with THTBC's travel & expense policies and procedures. Travel and expense reimbursement requests that are inaccurate, inflated, or based on fictitious expenses will be considered fraudulent. THTBC has zero-tolerance for employees who submit inappropriate or fraudulent reimbursement requests, and such conduct will be the basis for discipline, up to and including termination.

Section 2.4: Document Retention and Litigation Hold Procedures

Document management is critically important to THTBC's business operations. All business records, including documents, electronic records, email, voicemail, and other forms of electronic media should be maintained as required by your management and in accordance with any applicable retention schedule. In addition, from time to time, similar to many companies, THTBC will be involved in a lawsuit. In the event of litigation, THTBC may need to issue a Litigation Hold Notice advising certain individuals of the Company's need to retain, for legal purposes, specific types of records including documents, electronic records, emails, voicemails, and other forms of Company information. If you receive a Litigation Hold notice memorandum from THTBC management, you are required to immediately follow the requirements of the notice. Litigation Hold Notices supersede any other retention schedule that would otherwise apply to the records at issue. It is important that records subject to a Litigation Hold Notice not be destroyed or in any way altered. THTBC employees must follow the Litigation Hold procedures.

Section 2.6: Employee Time Records

THTBC employees are required to properly and accurately account for their time worked in THTBC's designated timekeeping and expense systems. All time worked is to be recorded in accordance with THTBC's timekeeping policies.

For more information, please see **THTBC's Timekeeping policies in the Employee Handbook**.

SECTION III - COMMUNICATION

Section 3.1: Open and Honest Communication

At THTBC, everyone should feel comfortable speaking his/her mind, particularly with respect to ethical concerns. Managers are responsible for creating an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Section 3.2: Setting the Tone at the Top

THTBC's successful business operations and reputation are built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity. Management is responsible for demonstrating, through its actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communications of behavioral expectations, modeled from the top, and demonstrated by example. Ultimately, our actions are what matters.

To make this Code work, managers must promptly address ethical questions or concerns raised by employees and take the appropriate steps to deal with such issues. Managers should not consider employees' concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At THTBC, we want ethics dialogue to become a natural part of daily work.

Compliance with this policy of Business Ethics and Conduct is the responsibility of every THTBC employee.

SECTION IV - CONFLICTS OF INTEREST

THTBC strives to encourage and promote objectivity in business decision-making. THTBC employees have a duty of loyalty to the organization and are expected to make business decisions with THTBC's best interests in mind and to exercise business judgment independent of external influences such as personal financial interests, external business relationships, outside employment and familial relationships. It is improper for employees to use their position, and any knowledge that is gained as a direct result of employment with THTBC, for private gain. Avoiding conflicts of interests is critical to maintaining integrity and honesty in the way THTBC conducts its business. Potential conflicts of interest can arise in any of the following circumstances – when a THTBC employee:

- Accepts gifts from a potential Business Partner
- Accepts additional employment by another company
- Has a financial interest in a Business Partner or competitor
- Places business with any firm in which the employee or an immediate family member of an employee has a financial interest
- Inappropriately communicates with a competitor
- Accepts bribes or kickbacks from a third party, in exchange for referral

This means avoiding all situations where your personal interests might conflict or create the perception of conflict with the interest of THTBC. These potential conflicts are discussed further below.

It is each employee's duty to report, either to his or her manager, to Human Resources, or to THTBC's Ethics Committee any known or potential conflicts of interests within the Company.

Section 4.1: Outside Employment

Non-management employees may hold a job with another employer as long as: (1) that outside employer is not a Business Partner, (2) the employee satisfactorily performs his/her job responsibilities with THTBC; and (3) there is no conflict of interest with THTBC. Management employees (including Employee Managers and above "Management Employees") are not permitted to work for another employer while working for THTBC.

Outside employment will present a conflict of interest if the outside employment competes or conflicts in any way with THTBC's operations or strategy or interferes with the employee's ability to perform. A violation of this rule may subject an employee to termination of employment. If an employee has any doubt or questions as to whether specific outside employment presents a conflict of interest, the employee should immediately contact the Human Resources Department. Employees should also consider the impact that outside employment may have on their health and physical endurance. All employees will be judged by the same performance standards and will be subject to THTBC's scheduling demands, regardless of any outside work requirements.

If THTBC determines that an employee's outside work interferes with the performance or the ability to meet the requirements of THTBC, the employee may be asked to terminate the outside employment if he/she wishes to remain with the Company.

Section 4.2: Outside Business

Employees are not permitted to conduct the business of any outside employment during their work time at THTBC. This includes work for any "direct sales" companies such as Pampered Chef, Amway, etc. Further, THTBC assets, including email, voicemail, computers, copiers, administrative support, and the like should not be used in furtherance of non-THTBC business.

Section 4.3: Outside Directorships

Employees who wish to serve on the board of directors of any for-profit organization, must disclose in advance to their immediate supervisor their plans so that a determination can be made by THTBC management whether such a position is in conflict with employment at THTBC. Similarly, employees receiving remuneration for such positions should notify their immediate supervisor.

Section 4.4: Financial Interest in Business Partners

Employees must disclose to the Chief Operating Officer any direct or indirect (via family members) financial interest in THTBC's Business Partners or customers. For purposes of this paragraph, "financial interest" is an ownership interest of greater than 5% of the entity at issue.

A "Financial Interest" is defined as a monetary investment (including, but not limited to, by way of a purchase of corporate stock, bonds, corporate securities of any kind, or other financial instrument, whether obtained directly through, for example, the purchase of stock or indirectly such as by inheritance, providing you with an ownership interest or a right of return, profit, dividend or any other form of financial return on the revenues, growth or profits of such organization or business enterprise), of any amount or any percentage, in an organization or business enterprise.

Please note that a financial interest in an entity does not include investments in publicly-traded companies listed on a public stock exchange by way of a commercially available mutual investment fund that is generally available to the investing public and for which the buying and selling of securities is managed and administered by a professional third-party financial investment firm.

Section 4.5: Corporate Opportunities

THTBC prohibits employees from using THTBC property, information, resources, or position for personal gain or to compete with THTBC in any way. THTBC also prohibits employees from taking from or diverting to any third party any business opportunity that is discovered through the use of any of THTBC's services, property, information, or resources.

Section 4.6: Employment of Relatives

THTBC permits, but does not encourage, the employment of relatives of employees. Please see the **THTBC "Employment of Relatives" policy in the Employee Handbook.**

SECTION V - INTEGRITY IN THE MARKETPLACE

THTBC strives to conduct business with customers and competitors with complete honesty and integrity. THTBC expects employees to eagerly service customers and contend with competitors in a professional and ethical manner.

THTBC personnel have a fundamental responsibility to the government sources of funds to use such funds prudently, ethically and for the purposes for which they were intended.

THTBC recognizes that the Federal Government is the major source of business and corresponding revenue to its operations. Accordingly, THTBC recognizes that business with the Federal Government imposes additional responsibilities and requirements in contractual engagements.

THTBC procurement staff are expected to assume personal responsibility and accountability for understanding relevant procurement laws, regulations, and contract requirements to ensure compliance. In this respect, it is THTBC's policy to fully comply with all such laws and contract requirements, as well as to its own high standards of integrity and quality.

Section 5.1: Relationships with Suppliers/Business Partners

Buying decisions must always be based on competitive price, quality, value, and delivery. THTBC expects employees to maintain professional relationships with suppliers, consultants, and other Business Partners; employees must be honest, open, business like, and completely ethical.

Confidential information such as bids submitted to THTBC in connection with the purchase of equipment, supplies, and services must be maintained in the strictest confidence in order to avoid giving or removing any competitive advantage as between suppliers. Disclosure of such information is unethical, even if THTBC appears to be benefitting from such disclosure.

We expect our suppliers to observe ethics and compliance programs that are consistent with our deeply held ethics and values. Our suppliers must ensure the quality and reliability of their products, work, or service. THTBC expects its suppliers to maintain a sufficient level of credibility and experience and for them to be committed to our Company. Our stakeholders are expected to explain the Company's expectations for the needed work or services and establish the required level of quality and delivery schedules.

Reciprocity will not be considered a factor whenever THTBC selects suppliers/subcontractors. Each procurement decision must be awarded solely on the basis of the quality, delivery, service, and price and not on the promise of future business or the recognition of past business during the selection process.

Section 5.2: Truth of Statements in Advertising

All business communication will be factual, in good taste, and free from false or exaggerated claims or statements. This includes business correspondence, advertisements and sales and promotional materials, newsletters and news releases, and any other communication prepared for internal or external use.

Section 5.3: Gifts

Federal, state and local government departments and agencies are governed by laws and regulations concerning acceptance by their employees of entertainment, meals, gifts, gratuities and other things of value from firms and persons with whom those government departments and agencies do business or over whom they have regulatory authority. THTBC is committed to comply strictly with those laws and regulations.

To avoid the appearance of impropriety, it is important that employees decline to give any gifts or business courtesies which would raise even the slightest doubt of improper influence. A "business courtesy" is a present, gift, hospitality, or favor for which fair market value is not paid by the recipient. A business courtesy may be a tangible or intangible benefit such as meals, drinks, entertainment, recreation, door prizes, honoraria, transportation, discounts, promotional items or use of a donor's time, materials, facilities, or equipment.

Under no circumstances should cash or cash equivalents be given or accepted as a business courtesy or gratuity. Gifts or money given as a bribe, payoff, or kickback (e.g., in order to obtain or retain business, or to secure an improper advantage) are never appropriate.

Section 5.4: Entertainment

Entertaining customers must always be reasonable and have a legitimate business purpose. THTBC prohibits entertainment activities that compromise the business judgment, impartiality or loyalty of employees or customers.

Employees may accept a reasonable level of entertainment from customers and Business Partners. However, THTBC employees must decline: any entertainment offered as part of an explicit or implicit agreement to do, or not to do, something in return for the activity; any entertainment offered that might compromise THTBC's reputation or ethical standards; and participating in any activity the employee knows or should know will cause the party offering the entertainment to violate any law, rule, regulation, or the ethical standards of their own employee.

SECTION VI - INTEGRITY IN GOVERNMENT RELATIONSHIPS

THTBC is committed to doing business with federal, state, and local government in a manner that is fully compliant with all applicable laws and regulations. THTBC employees must be aware of and adhere to the laws and regulations that pertain to doing business with federal, state, and local governments. These laws and regulations generally have three purposes: (1) to obtain the best possible products and services at the best value; (2) to promote full and open competition based on specifications and evaluation criteria that allow interested suppliers to respond appropriately; and (3) to eliminate fraud, waste, and abuse.

THTBC employees must comply with all rules established by government officials for procuring products and services. This includes, but is not limited to, dealing with government officials in an environment of openness and under circumstances that contradict any perception of concealment, the appearance of impropriety or any actual or potential conflict of interest.

Section 6.1: Contract Bidding Ethics.

THTBC will comply with the Procurement Integrity Act. This law aims to protect the federal agency procurement process. It bars current or former government officials or consultants from improperly influencing the bidding process by disclosing information that would help the Company win a bid. Current or former government officials are barred from disclosing the following information to the Company:

- Bid prices for sealed bids, lists or prices
- Source selection plans
- Technical evaluation plans
- Competitive range determinations
- Ranking of bids, proposals, or competitors
- Cost or price evaluations
- Source Selection Board reports and evaluations, Source Selection Advisory Board recommendations, Proposed costs or prices submitted
- Any other information marked as “Source Selection Information”

THTBC employees have a responsibility to ensure that THTBC avoids becoming ensnared in conflicts of interest related to employing or acquiring the services of a current or former government employee. This includes conducting a thorough review before employing or acquiring the services of current or former government employees with knowledge of a program or programs that the Company is engaged with and who have recently been separated from their former agencies.

No employment discussion of any kind may be had with a former U.S. Government employee or military officer who has direct ties to a project the Company is working on or is engaged in without the prior approval of the Chief Operating Officer of THTBC. An official who serves in a pre or post award position or makes pre or post award decision may be subject to a lifetime ban from that program.

The law provides for severe consequences for such violations. This includes being forced to withdraw from the bid process for a particular contract or program and facing ineligibility to bid for future contracts. If a contract has already been awarded, the federal government may void the contract and take further actions against the Company. Any officer, procurement manager, employee or contractor who violates the Procurement Integrity Act will face Company discipline, up to and including termination of employment.

Section 6.2: Gifts for Government Officials

THTBC employees are prohibited from offering any gifts, gratuities, or non-business-related entertainment for the personal use of employees or officials of any state, local or federal government municipality or agency to which THTBC is seeking to sell or is selling. Even when there is no improper intent, the offering or giving of entertainment, gifts, or other things of value to state, local or federal government officials may be perceived by others as having an improper purpose. The only exceptions to this rule are Company sanctioned gifts of a token nature with THTBC’s company logo. These gifts typically include coffee mugs, pens, and bags.

Section 6.3: Employee Political Involvement

Employees are encouraged to be involved in the political process as private individuals and they are free to express their political views and to support candidates of their choice. Employees are prohibited, however, from speaking on political matters on THTBC's behalf without the express consent of the Chief Operating Officer. In addition, no THTBC employee shall knowingly solicit or receive payment from any THTBC employee on behalf of any candidate for public office for the campaign purposes of any candidate or for the use of any political party.

Section 6.4: Corporate Political Contributions

THTBC is committed to observing all federal election laws and therefore will not make any political contributions or gifts in support of any political candidate for any federal, state, or local election. THTBC will not contribute to any fund that seeks to influence any election either directly or indirectly.

SECTION VII - COMPLIANCE WITH LAWS

THTBC is committed to complying with all applicable federal, state, and local laws. THTBC's commitment to integrity begins with complying with laws, rules, and regulations where THTBC does business. Every employee must have an understanding of the policies, laws, rules, and regulations that apply to his/her specific roles. If an employee is unsure of whether a contemplated action is permitted by law or THTBC policy, the employee should seek the advice of Human Resources. It is the responsibility of every employee to prevent violations of law and to speak up if he or she sees possible violations. Some of the laws that are more pertinent to THTBC are discussed below.

Section 7.1: Competitive Intelligence

THTBC requires all employees to comply with all applicable laws in acquiring competitive intelligence. THTBC prohibits acquiring competitive intelligence by means of theft, blackmail, wiretapping, electronic eavesdropping, bribery, improper inducement, receiving stolen property, threats, or any other improper method. Employees must respect the confidentiality of competitors' information and must not misrepresent who they are or for whom they work in obtaining such information. An employee should immediately notify his or her manager, and the manager should notify the Office of General Counsel, whenever the employee believes he/she has received information that the employee believes may be confidential or proprietary to another organization.

Section 7.2: Antitrust

THTBC strives to conduct business with customers and competitors with complete honesty and integrity. THTBC is committed to upholding federal and state antitrust laws, which exist to promote vigorous competition and open markets. THTBC prohibits employees from making false statements about competitors or their services or products; and prohibits employees from illegally obtaining the competitor's confidential information. Further, no employee shall discuss or agree with any competitor on prices, terms of conditions of sale, territories, customers, or any other subject of a competitive nature. No employee shall exchange prices or any competitive information with a competitor.

Section 7.3: Anticorruption

THTBC requires all employees to comply with all applicable anticorruption laws, including the U.S. Foreign Corrupt Practices Act, "FCPA". The FCPA prohibits U.S. citizens and entities from offering payment to a foreign government official for the purpose of influencing that official to assist in obtaining or retaining business for THTBC. Transactions that might give rise to a violation of the FCPA or any other anticorruption law, must be immediately reported to an employee's manager, and then to the General Counsel. Please see the **THTBC Anticorruption Laws Policy** for more information.

SECTION VIII - COMPANY ASSETS AND RESOURCES

Section 8.1: Confidential and Proprietary Information

Integral to THTBC's business success is its protection of confidential information, as well as non-public information entrusted to it by employees, customers, and /or Business Partners. Confidential and proprietary information includes any trade secrets or Company proprietary information, regardless of whether it qualifies as a trade secret, including but not limited to: processes, formulas, customer lists, prospective customers, inventions, experimental developments, research projects, operating methods, cost, pricing, financial data, payroll or compensation information, organizational structure, ownership interest, business plans and proposals, contracts, data and information the Company receives in confidence from any other party, or any other secret or confidential matters of the Company. We will not disclose confidential and non-public information without a valid business purpose and proper authorization. Employees in a leadership role will be subject to THTBC's Restrictive Covenant Agreement. For more information, please see the **Confidentiality and Propriety Rights Policy in the Employee Handbook.**

Employees must not use the Company's name, brand names, logos, taglines, slogans, or other trademarks without written permission from Human Resources. Employees are also prohibited from using the Company's IT resources and communications systems in any manner that would infringe on or violate the proprietary rights of third parties.

Section 8.2: Use of THTBC Resources

THTBC resources, including time, materials, equipment, and information, are provided for THTBC use. Occasional personal use is permissible as long as it does not affect job performance and business purpose or cause a conflict or a disruption to the workplace. Each user is responsible for using these resources and systems in a productive, ethical, and lawful manner.

Employees who represent THTBC are trusted to behave responsibly and use good judgment to conserve Company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use Company equipment (such as computers, copiers, and fax telephones) in the conduct of an outside business or in support of any religious, political, charitable or other outside daily activity, except for Company-approved support to non-profit organizations. Employees are prohibited from soliciting charitable or other contributions or distributing any non-work-related materials during work hours.

For more information, please see the **Electronic Communications Policy in the Employee Handbook.**

In order to protect the interests of the THTBC network and our fellow employees, THTBC reserves the right to monitor or review all data and information contained on an employee's Company-issued computer or electronic device, the use of Internet, or THTBC's intranet.

SECTION IX - COMMUNICATIONS WITH EXTERNAL ENTITIES

All requests for interviews and/or comments from national or local media should be referred immediately to the Chief Operating Officer or to the Office of General Counsel. Other than the Chief Legal Officer, no employee shall represent THTBC to any member of the media.

SECTION X - REPORTING VIOLATIONS OF THE CODE

THTBC seeks to foster a workplace that is conducive to open communication regarding the Company's business practices and ethical standards. In connection with these efforts, THTBC is committed to protecting its employees from retaliation for properly disclosing or reporting conduct that they perceive to be illegal, unethical, or of an otherwise questionable nature.

Section 10.1: Internal Reporting

An employee who observes a violation of any of the above policies, or suspects a violation, should immediately report this to the Ethics Hotline at 866-880-0003 (Habla Español: 800-216-1288). All reports will be kept in strictest confidence. THTBC will not retaliate against any employee who reports a violation of THTBC's Code of Ethics, even if it is determined after investigation that the allegation was incorrect or unfounded.

Section 10.2: Ethics Committee

THTBC's Ethics Committee is responsible for the proper administration of the Code and the management of Code-related complaints including concerns reported via the Ethics Hotline. The Committee is comprised of the following THTBC employees:

- Chief Legal Officer
- Chief Financial Officer
- Vice President, Human Resources
- Compliance Manager

Section 10.3: The Ethics Hotline

Some employees may be reluctant to use the Ethics Hotline because they are not sure how their call might be treated. When you call the Ethics Hotline, it does not get transferred. Please be assured that any information conveyed will be treated with confidentiality.

Section 10.4: Correspondence to Ethics Committee

In addition to contacting the Ethics Hotline via telephone, THTBC employees may elect to submit their concerns via U.S. Mail at the following address:

THTBC Attention: Ethics Committee
2751 Prosperity Avenue
Suite 315
Fairfax, VA 22031

Section 10.5: Prohibition Against Retaliation

THTBC prohibits retaliation against any individual for reporting a matter internally or externally that the employee, in good faith, believes to be a violation of this Code or any law, rule or regulation. Retaliation itself is considered by THTBC to be a violation of this Code.

If any individual believes that he/she is subject to retaliation for having made a report to THTBC management, he/she should report the matter immediately to any member of the Ethics Committee.

Section 10.6: Cooperation with Investigations

All THTBC employees are expected to fully cooperate with all investigations, to answer questions truthfully and to provide all relevant information. Any effort to interfere in investigations, knowingly offer false information, or alter or destroy any relevant documents or information, will not be tolerated.

Section 10.7: Ethics Discipline

The application of discipline for a violation of the Code's standards is mandatory. All mitigating and aggravating circumstances will be properly weighed. The Code will be consistently applied with no double standard for high performers or managers or other leaders. Similar disciplines will be imposed for similar offenses committed under similar circumstances.

Discipline will not be used as a measure of the effectiveness of the program or as a threat. It will serve as notice that there are serious consequences for intentional wrongdoing and will demonstrate that THTBC is committed to integrity as an integral part of its culture.

In considering appropriate discipline in ethical matters, it is essential that total accountability for violations be appropriately addressed. The following describes the various circumstances that may be considered before imposing discipline on an employee.

Assessing Employee Responsibility:

- Did the employee understand what the right action was?
- Did the employee have correct work instructions and adequate supervisory direction?
- Was the employee properly trained?
- Did the employee intentionally take the wrong action?
- Was the employee directed to take the wrong action?

Assessing Management's Responsibility:

- Did management direct the wrong action?
- Did management direct the right action?
- Did management's actions imply that "getting the job done any way you have to" was acceptable or necessary?
- Did management acquiesce, allow, or otherwise condone the actions of the employee?
- Did the organizational climate (employee treatment, respect, fairness, openness, teamwork, past history) support doing the right thing?
- Did management fail to recognize visible indicators of potential wrongdoing?
- Did management fail to act when it recognized visible indicators?

Other Contributing Factors:

- Were written practices, SOPs, instructions, drawings, and equipment appropriate and sufficient to promote right actions?
- Was the right thing to do made clear?
- Were there conflicting practices and/or policies?
- Is there a history of prior discipline involving the affected individual or the manager/supervisor involved?

These guidelines are a reference point and, at the Company's discretion, may be adjusted as necessary in light of the particular facts and circumstances of a given Code-related matter.

SECTION XI - WAIVERS

If any THTBC employee believes a waiver of this Code is necessary or appropriate, a written explanation must be provided to the Ethics Committee in advance of any action that is otherwise a breach of this Code. No waiver shall be deemed to have been granted unless the waiver is in writing and approved by the Ethics Committee.

SECTION XII - ANNUAL AND NEW HIRE CERTIFICATION REQUIREMENTS

All THTBC employees must certify at the point of hire and annually thereafter that they understand their responsibilities under the Code.