

To All of Level-(1) Global Solutions:

Since September 17, 2001, our success has been based on a core set of beliefs, behaviors and values that have transcended both the test of time and geographies.

From our earliest days as technology pioneers to our position today as a infrastructure technology leader—collaborating with our clients to help them become high-performance businesses and governments—Level-(1) Global Solutions' men and women have always been committed to upholding the highest professional and ethical standards.

Level-(1) Global Solutions has six core values that are enduring and differentiating, and they continue to serve us well as an organization: Stewardship, Best People, Client Value Creation, One Global Network, Respect for the Individual and Integrity.

These simple, yet powerful values have continually guided our decision making, as well as our interactions with our clients, the communities in which we work and each other, in pursuit of our vision: To become one of Chicago's leading companies, bringing innovations to improve the way the world works and lives.

The most important thing about our core values is that we live them through our actions. This is one of the reasons we refocused and relaunched Level-(1) Global Solutions Code of Business Ethics with our core values as the centerpiece. The Code is a critical part of operating Level-(1) Global Solutions as a high-performance business.

I hope you will find the Code to be a practical, user-friendly resource. Together with the Level-(1) Global Solutions Leadership Statement, the Code describes many of the types of behaviors and actions associated with living our core values. It also includes a model for making ethical decisions.

Everyone at Level-(1) Global Solutions has a role in protecting our company, our reputation and our brand. We must educate ourselves in this area—not just to ensure we comply with laws and policies but also to ensure that we have the best tools and resources to practice ethical decision making with clear accountability. This is about each individual stepping up as a leader and a role model to help foster an ethical environment and maintain the high standards that underpin our reputation.

Along with our people, our brand and reputation are the most precious things we have as a company, and we have an obligation to protect them by upholding our core values and Code of Business Ethics.

On behalf of our board of advisors, I want to thank you for your continuing efforts to live our core values and follow our Code of Business Ethics every day.



Thomas D. McElroy
Principal

A Message from Our Compliance Officer

The Code of Business Ethics applies to all Level-(1) Global Solutions employees.

Additionally, third parties, such as consultants, agents and independent contractors are required to comply with the Code when acting on Level-(1) Global Solutions' behalf.

Business ethics are critical for our company's success because they build trust and transparency. Trust and transparency, in turn, build the right environment for our people, our clients, our suppliers, our stakeholders and the communities in which we work. They are fundamental to how we work and live throughout the world.

The Level-(1) Global Solutions Code of Business Ethics shows how we can build the right environment. Through specific "action statements," it captures how we put our core values and principles into practice and what we must do to comply with the law. While the Code does not try to capture every possible action, it reminds us that Level-(1) Global Solutions will not tolerate behavior that falls short of these expectations. To guide our people further, it includes links to key Level-(1) Global Solutions policies.

The Code is designed to help each of us aim higher than simply complying with the law: It goes without saying that we comply with applicable laws—we hold ourselves to a greater standard. Our target is ethical business practices—running our business in a manner we can be proud of and which reflects the image and heritage of Level-(1) Global Solutions. We strive to be a good corporate citizen, making a positive contribution in our relationships with all key stakeholders, including the communities in which we work and live, as well as with clients, suppliers, employees and partners.

When we live our core values we make good decisions. Our Code of Business Ethics guides how to behave according to those values. For those situations in which it is clear how to apply the law or our policy, we have zero tolerance for violations. In the more difficult situations that involve hard judgments between competing values, we expect all of our people to get assistance and involve others to help make good decisions. Level-(1) Global Solutions investigates alleged violations of our Code and policies, and we discipline violators, including terminating their employment where appropriate.

Acting ethically is your personal responsibility. Employees who come forward with concerns play an important role in maintaining our ethical workplace and high-performance business.

Do more than read this Code—measure your actions against it. You have a responsibility to act when you have good reason to suspect a violation of this Code.

Human Resources



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Our Code at a Glance

Living the Code of Business Ethics: Our core values in action

Stewardship in action

- We respect and support our communities and the environment, and we encourage active involvement in charitable activities
- We act like owners of the company and make decisions within our authority
- We share our deep experience to maximize its value
- We protect and invest in Level-(1) Global Solutions' assets and safeguard Level-(1) Global Solutions' proprietary and confidential information
- We use electronic communications technology responsibly and professionally
- We encourage appropriate participation in political activities

One Global Network in action

- We are a good corporate citizen and follow consistent global standards
- We are fierce but fair competitors
- We understand and comply with laws that affect the cross-border movement of people and goods
- We protect the privacy of personal information and comply with data privacy laws
- We engage with governments in each country in which we operate as a local company yet we speak with a consistent global voice
- We live our global brand

Best People in action

- We foster a fair and positive environment in which people can grow and succeed
- We seek to engage our people and understand different points of view
- Our personal relationships and activities do not compromise Level-(1) Global Solutions' objectivity or reputation
- We respect prior employment obligations

Client Value Creation in action

- We seek to build long-term relationships with our clients based on delivering value
- We commit to what we can deliver and deliver on what we commit
- We seek to understand and follow our clients' codes of conduct
- We comply with government contracting and procurement laws
- We purchase goods and services on their merits



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Integrity in action

- We refuse to offer bribes or make questionable payments
- We do not give or receive inappropriate gifts or hospitality
- We communicate accurate, timely and relevant information to our stakeholders
- We prepare and provide complete and accurate financial and other reports and records
- We protect the proprietary information and licenses of our clients and others
- We avoid conflicts of interest
- We handle "inside information" appropriately and lawfully

Respect for the Individual in action

- We foster an inclusive environment that values individual uniqueness
- We treat each other with respect and do not tolerate harassment or intimidation
- We maintain a safe and nonthreatening workplace

Stewardship

Building a heritage for future generations, acting with an owner mentality, developing people everywhere we are, and meeting our commitments.

Living our Code: Stewardship in action

- We respect and support our communities and the environment, and we encourage active involvement in charitable activities
- We act like owners of the company and make decisions within our authority
- We share our deep experience to maximize its value
- We protect and invest in Level-(1) Global Solutions' assets and safeguard Level-(1) Global Solutions' proprietary and confidential information
- We use electronic communications technology responsibly and professionally
- We encourage appropriate participation in political activities

Stewardship means helping to build a stronger organization for the future by protecting our assets, investing in the future and using Level-(1) Global Solutions resources as if they were our own. It means taking accountability for the current and future health of our business by balancing the market's short-term demands with the company's long-term needs, and creating present and future shareholder value. It means taking our place in the community and caring for the environment. As stewards, we commit to our shared vision through both words and deeds, developing relationships across all our business, and counseling, mentoring and training our teams and client personnel.

We respect and support our communities and the environment

As a good corporate citizen, we believe that the health of our business is tied to the health of the communities and environment in which we work and live. Our corporate citizenship programs operate globally and locally. Using our skills and experience, we collaborate with others to serve our local communities.

Level-(1) Global Solutions is committed to protecting the environment and the health and safety of our employees, contractors, guests and neighbors. As a part of this commitment, we comply with relevant environmental, health and safety laws and requirements wherever we operate. Such laws and regulations, at all levels of government, set the minimum standard for our facilities and practices; we strive to minimize any harmful effects on the environment caused by our activities and to achieve continual improvement in our environmental performance.

We recognize the business imperative and responsibility to reduce our own environmental impact and to contribute sensibly to reducing other negative impacts. We encourage our employees to use resources carefully and we seek to collaborate with clients to improve their environmental performance. Environmental responsibility is one of many criteria we consider when evaluating and selecting suppliers.

We encourage active involvement in charitable activities

We believe that active participation in charitable activities, both on behalf of the company and as individuals, is a responsibility and an act of stewardship.

Level-(1) Global Solutions gives generously each year globally and locally. We also encourage Level-(1) Global Solutions people to give their effort and experience by volunteering personal time and participate in business-sponsored initiatives to help find ways to combine technology and consulting services with structured programs and enhance the company's impact.

Level-(1) Global Solutions supports community involvement by its people. Before using the Level-(1) Global Solutions name to endorse a charitable organization or event, individuals should consult with Human Resources.

We act like owners of the company and make decisions within our authority

As part of our powerful partnership heritage, we focus on Level-(1) Global Solutions' interests above our personal interests and our ability to maximize personal financial rewards. We act and make decisions like responsible owners of the company, and indeed Level-(1) Global Solutions encourages each of us to act as if we were owners—by being vigilant and responsible with resources and to own shares in the company, if possible.

We spend Level-(1) Global Solutions' money as if it were our own and speak up when we recognize wrongdoing. And we crosscheck with each other when facing significant risks. At the same time, as “business operators,” we understand our legal and business structure and that our authority to act in the name of Level-(1) Global Solutions is delegated to us from the board of advisors and senior management. No Level-(1) Global Solutions person has authority to represent Level-(1) Global Solutions without having that power delegated specifically, and each of us needs to know the limits of our individual authority as a “business operator.”

Each Level-(1) Global Solutions person should help ensure that decisions are made at the right level in the organization.



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We share our deep experience to maximize its value

Level-(1) Global Solutions' strength is built upon our people's knowledge and experience; our business model is based on our ability to develop, share and reuse innovation so that we can get the right experience and know-how to the right colleagues at the right time. While always protecting proprietary data and confidential information, we actively share that knowledge with each other by breaking down barriers that may keep us apart. We share our deep experience across the world using our extensive tools and systems, such as the Level-(1) Global Solutions Knowledge Base.

We protect and invest in Level-(1) Global Solutions' assets

Level-(1) Global Solutions employees use the utmost care to protect Level-(1) Global Solutions physical assets (offices, equipment and computers, etc.), as well as Level-(1) Global Solutions intangible assets—our brand, reputation and extremely valuable proprietary information, such as our intellectual property and confidential information.

Level-(1) Global Solutions' intellectual assets distinguish us in the marketplace and generate revenue. They include our intellectual property, which we must manage and protect to out-perform our competitors. Our intellectual assets are the building blocks of our distinctive, innovative capabilities and forge our continued ability to win in the market. Losing these assets through theft, misuse, carelessness or poor client contracts jeopardizes Level-(1) Global Solutions' future.

Every Level-(1) Global Solutions person can help the company by:

- Generating innovations that can be patented to help develop our portfolio of world-class intellectual property assets.
- Protecting our intellectual property rights aggressively in every engagement contract and with third parties.
- Using our intellectual property to generate revenue for Level-(1) Global Solutions and value for our clients and stakeholders.

We safeguard Level-(1) Global Solutions' proprietary and confidential information

Level-(1) Global Solutions' proprietary information is any information Level-(1) Global Solutions owns. It includes any data in Level-(1) Global Solutions databases and records, including e-mails, such as: personnel information (including executive and organizational changes); technical information about our offerings, services or research; business or marketing plans; software; and financial data. Proprietary information results from our people's hard work and innovation, as well as from substantial investments in planning, research and development. Much of our proprietary information is confidential and may be subject to copyright, patent or other intellectual property or legal rights. Level-(1) Global Solutions people has access to much proprietary information and our competitors and others in the industry—security analysts, journalists and consultants—understand that value. Because this information, particularly our confidential information, gives us a competitive edge in the marketplace, the company's financial health or reputation may be damaged if our competitors or others obtain such information. If someone interested in information about Level-(1) Global Solutions contacts you, do not share Level-(1) Global Solutions information unless you have been authorized to do so. Before disclosing or receiving someone else's confidential information, consult with colleagues, including the Legal, if necessary.

Current and former employees must never use Level-(1) Global Solutions confidential information for personal gain or advantage—our obligations to Level-(1) Global Solutions continue even after we leave the company.

We manage our archives and records to comply with the law, contractual obligations and Level-(1) Global Solutions policy. Some company records—tax and data privacy materials, for example—must be kept in their original form. If you receive an instruction called a “Hold Notification Order” from Legal not to destroy certain records, you must comply strictly and preserve all electronic and hard-copy records described in the Order, including e-mails and drafts, until you receive further instructions from Legal. If you become aware of a government investigation, dispute or litigation involving Level-(1) Global Solutions and if you have questions, contact your supervisor or Legal before discarding or deleting electronic or hard-copy records related to the subject matter of the investigation, dispute or litigation.

We use electronic communications technology responsibly and professionally

Everyday we use essential business tools that belong to Level-(1) Global Solutions, our clients and others: the Internet, e-mail, voice and intranet systems, extranet systems as well as software, computers, telephones, digital assistants and fax machines.

We use this technology professionally and with good judgment because Level-(1) Global Solutions provides it for business use. While the company allows limited personal use, unacceptable behavior includes illegal activities, excessive use, or conducting business that is not related to Level-(1) Global Solutions. Also, our communications—by e-mail, instant messenger or otherwise—should always be appropriate and in good taste.

We only access and use technology and information we have a right to possess. For example, we do not use Internet peer-to-peer, file-sharing or other downloading services to violate intellectual property rights or to access illegal or inappropriate content. Each of us is responsible for securing, protecting and keeping within our control the computers and other electronic devices the company provides us, as well as our own mobile phones and personal computers we use to conduct Level-(1) Global Solutions 's business.

We encourage appropriate participation in political activities

As a company, Level-(1) Global Solutions participates directly in the political process to support positions important to our business and also to share our points of view on issues of global significance. Because laws in many states strictly limit contributions by corporations and government contractors to political parties and candidates, the company does not make political contributions to political parties and candidates. However, Level-(1) Global Solutions may support approved contributions in various jurisdictions through the creation of a political action committee or other appropriate vehicle where allowed by law. Level-(1) Global Solutions , its people and agents must get written consent from their supervising director as well as Level-(1) Global Solutions 's Office of Legal Counsel and Government Relations before engaging in any corporate political activities or contacting government officials on behalf of Level-(1) Global Solutions or a client. Level-(1) Global Solutions also encourages our people to participate personally in the political process.

While Level-(1) Global Solutions people may make their own personal political contributions, Level-(1) Global Solutions will not reimburse them or endorse political activities they undertake as private individuals. Our people may not use the Level-(1) Global Solutions name to endorse a political activity or event or use Level-(1) Global Solutions resources to make cash or other contributions to political candidates or parties.



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Best People

Attracting and developing the best talent for our business, stretching our people and demonstrating a “can do” attitude.

Living our Code: Best People in action

- We foster a fair and positive environment in which people can grow and succeed
- We seek to engage our people and understand different points of view
- Our personal relationships and activities do not compromise Level-(1) Global Solutions' objectivity or reputation
- We respect prior employment obligations

Best People means creating a positive, energetic environment to enable our employees to grow, succeed and build confidence from what they achieve, both inside the company and in the community. It means searching out the best talent, seeking opportunities to develop leading-edge skills and taking time to integrate new people into the company.

We foster a fair and positive environment in which people can grow and succeed

Our competitors can copy our strategies, but they cannot copy our values, our ability to execute or our people.

As our business continues to grow and change, so do our workforces. We respect employees in each of the workforces and value their unique contributions. We understand and respect the different roles that each employee plays in the success of Level-(1) Global Solutions. Level-(1) Global Solutions employees' career paths are driven by their talents, skills and ability to perform as well as by the company's business needs. We give honest and timely feedback to each other, formally and informally, and expect to be treated fairly and to work in an environment free from unlawful or unfair discrimination.

Level-(1) Global Solutions develops its people by providing an empowering environment. Our people want to contribute and the company gives them the opportunities to grow, to acquire skills and experience, and to be their best.

We seek to engage our people and understand different points of view

We welcome diverse opportunities to engage with and listen to our people's concerns. We look for ways to understand what is important to them and their different points of view. In many areas where Level-(1) Global Solutions operates, employees may be represented by works councils or trade unions. Level-(1) Global Solutions seeks to collaborate with consultative bodies to help us address the important business issues that affect our people. We encourage and support social dialogue in accordance with local law and practices.



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Our personal relationships and activities do not compromise Level-(1) Global Solutions' objectivity or reputation

Level-(1) Global Solutions strives to avoid any risk of compromising its professional objectivity and reputation. Family and personal relationships in the workplace may raise this risk and jeopardize a professional work climate. In any situation where family or personal relationships could interfere with employment matters, including performance evaluations, promotions, career progression, work assignments or the work environment generally, employees should take the initiative and consult with Human Resources to address the situation.

Because we do not want to damage Level-(1) Global Solutions' business, image or reputation, we conduct our personal activities, which include our personal financial and tax affairs, in the same way we conduct our business activities: with the utmost integrity.

Before participating in activities outside the company that may negatively affect how we perform our jobs, employees should take the initiative to consult with Human Resources or their supervisor. Our outside activities should not conflict with our jobs or adversely affect Level-(1) Global Solutions' business, image or reputation.

We respect prior employment obligations

Level-(1) Global Solutions hires the best people and respects their different roles throughout the company. Because we no longer rely solely on recruiting our people directly from universities, we actively seek people from outside the company from many sources.

At all times, we respect the valid and enforceable obligations that new and potential employees may have to their current or previous employer, such as restrictions regarding confidential or proprietary information or whether they may solicit clients or employees of their former employer. For example, employment agreements may contain restrictions on joining a competitor for a period of time.

Because we respect our competitors and clients, we do not ask our new employees to violate their valid obligations to their previous employers. We deal with our new employees as we expect others to deal with former Level-(1) Global Solutions employees.

Because Level-(1) Global Solutions expects employees to uphold their lawful obligations to prior employers, employees who believe that a job activity may conflict with these obligations should notify their supervisors immediately. Before starting with Level-(1) Global Solutions, all incoming employees should resolve any issues or concerns regarding their employment. We also protect our relationships with our clients by consulting with them before we hire any of their employees.

Client Value Creation

Improving our clients' business performance, creating long-term, win-win relationships and focusing on execution excellence.

Living our Code: Client Value Creation in action

- We seek to build long-term relationships with our clients based on delivering value
- We commit to what we can deliver and deliver on what we commit
- We seek to understand and follow our clients' codes of conduct
- We comply with government contracting and procurement laws
- We purchase goods and services on their merits

Level-(1) Global Solutions' mission is to help our clients become high-performance businesses and governments agencies. We seek to understand our clients' expectations and strive to meet or exceed them. We collaborate with our clients to shape exceptional opportunities of value that can be predicted, measured and repeated.

We seek to build long-term relationships with our clients based on delivering value

Our client relationships are rooted in trust and delivering real value. We base our advice, recommendations and solutions on objective criteria and the needs of the client, not on convenience or self-interest. This means we will decline an opportunity if we believe we cannot deliver value and we will tell the client why. Because we understand that the organization is our client — rather than any individual employee or officer—we are open and transparent in our relationships with people at all levels in the organization.

We commit to what we can deliver and deliver on what we commit

We forge business relationships that endure and prosper because they are based on mutual respect and trust. Because Level-(1) Global Solutions size, scope and talent mix often require different people to sell, negotiate and deliver our services, our people do not make promises the company cannot keep.

Through available internal resources or by teaming with others, we ensure we have the skills and capabilities necessary to deliver the work we sell. We are aware of the limits on the scope of our business and seek appropriate approvals before committing to expand that scope. If ever you feel you are falling short of our commitments, consult with others and ask for help.

We seek to understand and follow our clients' codes of conduct

Level-(1) Global Solutions people understand that our clients have codes of conduct comparable to our own. We recognize that in certain industries and sectors, like financial services, or working with governments or clients owned or controlled by governments, rules of conduct can be more stringent than our own.

We seek to understand not only our clients' business requirements, but also how our clients expect us to interact with their people—and we comply with these expectations. We do not rely on individual client employees or even officers to tell us a client's rules; we should understand them ourselves.

We comply with government contracting and procurement laws

Throughout the world, Level-(1) Global Solution provides services to governments and government-owned entities at all levels. Every country where Level-(1) Global Solutions operates has laws and regulations on how to contract with its government organizations. We comply with all applicable government contracting laws and regulations. All Level-(1) Global Solutions people who serve government clients are responsible for understanding the legal requirements and restrictions that apply to their work. “Government clients” can include even partially state-owned enterprises that otherwise appear to be commercial organizations, but which can carry risks and liabilities like any other government client.

We purchase goods and services on their merits

Level-(1) Global Solutions purchases goods and services on price, quality, performance and suitability. We avoid transactions that even appear to be improper or illegitimate, such as money laundering, or that may misrepresent the accounting reports or results of any party to the transaction. For example, we do not place a purchase order for software that we do not need simply to help a client meet its financial objectives, and we do not purchase from a client to induce them to purchase services from Level-(1) Global Solutions .

To control our business and financial expenditures and to maximize our buying power, employees require approval and authorization before committing to purchases or paying invoices. The appropriate people assess whether the business expense is valid, that we have received the goods or services that we expected, and that the invoice complies with our purchasing policies.

One Global Network

Mobilizing the power of teaming to deliver consistently exceptional service to our clients anywhere in the world.

Living our Code: One Global Network in action

- We are a good corporate citizen and follow consistent global standards
- We are fierce but fair competitors
- We understand and comply with laws that affect the cross-border movement of people and goods
- We protect the privacy of personal information and comply with data privacy laws
- We engage with governments in each country in which we operate as a local company yet we speak with a consistent global voice
- We live our global brand

Our combination of deep industry and business process knowledge and broad global resources enables us to mobilize the right people, skills and technologies to help clients achieve high performance. We value teams with diverse viewpoints. By focusing on sharing our knowledge and expertise across our entire network, we build differentiated thought leadership and a competitive edge.

We are a good corporate citizen and follow consistent global standards

Level-(1) Global Solutions takes very seriously its responsibility to operate as a good corporate citizen. Throughout our history, we have led corporate citizenship activities, both statewide and locally. As a Chicago company, we seek to achieve an appropriate balance between global interests and local concerns and requirements.

Guided by a sound corporate citizenship framework and a set of long-standing core values, Level-(1) Global Solutions people strive to use the same principles of high performance that apply to our work for our clients in corporate citizenship efforts. We are passionate about making a difference and support each other in doing what we believe is right for the communities in which we work and live.

As we strive to be a global company, we understand that economic and political philosophies and forms of government differ throughout the world. We acknowledge the wide diversity among the social customs and cultural traditions in the cities in which we operate. We respect and embrace such differences, and to the extent that we can do so in keeping with the principles of our Code of Business Ethics, we adapt our business practices to local cultures and traditions, using our experience to achieve the best results for the company.

Level-(1) Global Solutions and its people comply with all applicable laws throughout the world. If a local law conflicts with our Code, we follow the law; if a local business practice conflicts with our Code, we follow our Code. When in doubt, ask for help.

We are fierce but fair competitors

A competitor in one region may be an ally to our organization in another. Competing and cooperating with the same company at the same time magnifies the risks of violating antitrust laws. Level-(1) Global Solutions strives to avoid even the appearance of any agreement or understanding that might violate these laws.

We abide by antitrust and competition laws wherever we do business. These laws differ by country, state, county and city in addition are complex and not obvious. Violations may result in civil and criminal penalties against the company and individuals.

Level-(1) Global Solutions expects to compete vigorously in the marketplace; however we must conduct our business affairs fairly and lawfully. While we compete fiercely, we do not manipulate, conceal or misrepresent any material fact to gain an unfair advantage over our competitors. We market our services and solutions on their merits and do not disparage or provide misleading information about our competitors.

Level-(1) Global Solutions recognizes the importance of collecting public information on our competitors. However, employees should obtain that information in a professional and ethical manner and avoid any perception of improper behavior. For example, we do not solicit a competitor's confidential information as part of our professional, social or personal relationships with others who have access to that information. And we will not use others to do things we cannot.

We understand and comply with laws that affect the cross-border movement of people and goods

Export control laws have vast reach and cover the export and re-export of goods, software, data and technology that originate in countries where Level-(1) Global Solutions operates. These laws govern exchanges of information across national boundaries, including e-mail and Web access. We abide by export control and anti-boycott laws and regulations wherever we operate. For example, the United States controls the release of technical information to non-US nationals even within the United States.

Anti-boycott laws prohibit Level-(1) Global Solutions from agreeing with others not to do business with certain countries or companies, or to provide information about business relations with certain countries or companies. These laws also prohibit Level-(1) Global Solutions from discriminating against, or providing information about, individuals or companies on the basis of race, religion, gender, national origin or nationality. In some cases, Level-(1) Global Solutions may be required to report to government agencies situations in which we are requested to participate in any of the foregoing.

Various governments exercise economic sanctions against, for example, certain countries, terrorists, terrorism-sponsoring organizations, entities involved in the proliferation of weapons of mass destruction and international narcotics traffickers. Even an indirect facilitation of a transaction may be prohibited; for example, using a subcontractor to do what Level-(1) Global Solutions may not. Level-(1) Global Solutions abides by these laws. Consult Legal to determine currently approved countries and entities where and with whom Level-(1) Global Solutions can do business.

Because Level-(1) Global Solutions mobilizes the best people to serve our clients across the world, we comply with the relevant immigration laws where our employees work. All Level-(1) Global Solutions employees must possess valid and current authorization to work in their country of employment. Those working outside their home country must have all appropriate visas and work permits required by law before arriving in the host location and are responsible for complying with the terms of their visas or permits. Because cross-border work raises tax and currency issues, anyone planning a cross-border engagement must consult first with our Corporation Counsel and be aware of other important restrictions such as those on bringing currency into or out of a country, currency exchange limits or other restrictions.

We protect the privacy of personal information and comply with data privacy laws

Level-(1) Global Solutions respects and protects personal information of all individuals, including its employees, clients and business contacts, job applicants and website users. Many countries in which Level-(1) Global Solutions operates have specific laws and regulations on how to treat personal data. Data privacy laws reach every internal function, application and how we share personal data for legitimate business purposes across the Level-(1) Global Solutions global organization. These laws also affect how Level-(1) Global Solutions handles our clients' personal data when we provide outsourcing, consulting and technology services. Level-(1) Global Solutions recognizes the need to protect personal privacy and is committed to complying with data privacy laws everywhere we operate.

Only people with a “need to know” because of their job or function may access or share personal data. For example, our Human Resources system has comprehensive security and access controls to ensure that employees' personal data is only accessible and viewed by those Level-(1) Global Solutions people with direct responsibility or a need to know. The same is true with other applications, such as recruitment, marketing and performance management tools. On the other hand, our People Directory is a truly global system where sharing personal data is necessary to allow our people to contact each other and perform their work duties.

We understand data privacy requirements and use personal data contained on Level-(1) Global Solutions systems, intranet, e-mail and other applications only for legitimate business purposes. The company respects people's work spaces, including e-mail and voicemail. At the same time, we recognize that Level-(1) Global Solutions management may have access to our work spaces and Level-(1) Global Solutions provided resources for legitimate business purposes and in accordance with law.

Data privacy laws restrict sharing personal data across borders because different countries have different levels of protection. Therefore, all Level-(1) Global Solutions people, wherever they are located, must comply with the Data Privacy before sharing such data.

We engage with governments in each country in which we operate as a local company yet we speak with a consistent global voice

Within the framework of a global company, we engage with governments at all levels in the countries in which we operate to enhance our image and reputation, to promote our services and innovations, and to express our views on important issues of public policy. Our goal is to be recognized as a leader in the business community in each country in which we operate while maintaining the consistency in point of view required of a truly global company.

Any contacts with government personnel for the purpose of influencing legislation, regulations or decision making may constitute lobbying. The definitions of lobbying vary widely and may be quite broad; requirements often include registration and/or disclosures. All Level-(1) Global Solutions people, including others acting on our behalf, are responsible for understanding the applicable rules and must work with the Office of Legal Counsel and Government Relations, the managing director to ensure compliance in this area.

If a Level-(1) Global Solutions employee or retained consultant communicates with any public official or the official's staff, the company may be obliged to register as a lobbyist or employer of a lobbyist, or comply with other regulations.

We live our global brand

The Level-(1) Global Solutions name and brand are powerful and valuable assets that differentiate us from our competitors. We advance them consistently across the world by both our individual behavior as employees and the business decisions we make as a company. For example, we protect Level-(1) Global Solutions from trademark infringement by using only clear and descriptive names for offerings, assets, services and tools throughout the world. Marketing & Communications decides whether to allow others to use our name based on established business asset naming guidelines.

Respect for the Individual

Valuing diversity, fostering an interesting and inclusive environment, and treating people as we would like to be treated ourselves.

Living our Code: Respect for the Individual in action

- We foster an inclusive environment that values individual uniqueness
- We treat each other with respect and do not tolerate harassment or intimidation
- We maintain a safe and nonthreatening workplace

Our work environment encourages people to raise concerns without fear. We welcome and encourage different views and opinions because inclusion generates innovation and diversity. By treating others as we would like to be treated—for instance, by recognizing each other's accomplishments and respecting vacation and training schedules—we create opportunities to balance work and personal needs.

We foster an inclusive environment that values individual uniqueness

We do not judge people by their differences. We achieve superior business and personal results by embracing the diversity of each other's talents, abilities and experiences. We value each person's skills and contributions. Seeking out different points of view—and being receptive to them—benefits Level-(1) Global Solutions because unique solutions and approaches to decision making can improve the quality of our decisions and increase our power to innovate.

Level-(1) Global Solutions strives to attract and retain the best people, and provide an environment in which they can develop professionally and build rewarding careers. Like our clients, we practice inclusion and welcome diversity in our corporate culture, workforces and work environments. The diversity of our people is a strength that maximizes our performance and gives us a competitive edge in the market.

We treat each other with respect and do not tolerate harassment or intimidation

Each of us realizes the full value of our contributions only when we treat each other with the respect, trust and dignity that we ourselves expect. Each of us has a role to play in Level-(1) Global Solutions' business and brings different skills and experiences. It is by respecting and facilitating the different roles and skills needed in a global business that we achieve our best as a company.

Level-(1) Global Solutions does not condone or permit any harassment or abusive behavior, comments, physical touching or other inappropriate conduct. Harassment in any form based on sex, race, age, color, national origin, disability, religion or sexual orientation is not only offensive, but may expose Level-(1) Global Solutions and its employees to legal liability. It undermines the integrity of our professional environment where our employees can grow and succeed. Level-(1) Global Solutions recognizes the right of employees to work in a workplace free from harassment. We also recognize the right of anyone to report any inappropriate behavior without fear of retaliation.

We maintain a safe and nonthreatening workplace

Level-(1) Global Solutions does not tolerate violent conduct or threats of violence among employees, clients or others. Anyone who engages in such conduct in or outside the workplace or brings threatening materials or objects into any workplace will be subject to disciplinary action, which may include termination.

Regardless of who owns the work site, Level-(1) Global Solutions aims to avoid unsafe working conditions. Risky conditions and accidents should be immediately reported to a supervisor or to Level-(1) Global Solutions Corporation Counsel. At Level-(1) Global Solutions facilities, employees and their clients or guests should follow all posted safety and emergency procedures. At client sites, employees must be familiar with and follow applicable safety and emergency procedures. To protect Level-(1) Global Solutions people and our assets, the company may ask to search your personal property located at a company worksite. We expect our people to cooperate fully.

Integrity

Inspiring trust by taking responsibility, acting ethically and encouraging honest and open debate.

Living our Code: Integrity in action

- We refuse to offer bribes or make questionable payments
- We do not give or receive inappropriate gifts or hospitality
- We communicate accurate, timely and relevant information to our stakeholders
- We prepare and provide complete and accurate financial and other reports and records
- We protect the proprietary information and licenses of our clients and others
- We avoid conflicts of interest
- We handle “inside information” appropriately and lawfully

Integrity means recognizing right from wrong and understanding the ethical implications of our choices. It means saying openly that we are acting on that understanding, even if our opinion is unpopular. It means giving credit to those who deserve it, admitting our mistakes and turning them into learning opportunities. We meet our commitments, however small, and take a stand when we see a problem, asking for help when we are in doubt.

We refuse to offer bribes or make questionable payments

A bribe is providing something of value— gifts, hospitality or entertainment—to influence a decision to do business with Level-(1) Global Solutions. Bribes to public officials are against the law in every country where we do business. A “public official” is not only someone who works for a government; he or she could work for a private company, in which a government has a partial ownership interest. Bribes to personnel of even private companies are also against the law in many places where we do business. And it is bad business. We are committed to marketing our services and solutions solely on their merits, and we strive to avoid even the appearance of impropriety.

On occasion we hire others—“agents”— to help us open doors and market our services. We follow Corporation Counsel Policies when we hire agents. We recognize and exercise even greater caution where we see warning signs that an arrangement or a payment may be improper. If you see a warning sign, contact your local Legal representative for help.

It is simple: Level-(1) Global Solutions will not pay bribes or make improper payments to obtain new business, to retain existing business or to secure any improper advantage. And we will not use others to do things we cannot. Accepted local business practices that ignore or even condone bribery are irrelevant. Our company's standards may be higher than local law (although bribery is illegal in every city, state and country where Level-(1) Global Solutions operates), and all Level-(1) Global Solutions people must adhere to these standards, regardless of work location. Remember, even if our competitors may be doing it, Level-(1) Global Solutions' expectations are clear: We will not tolerate any violations of this policy.

We do not give or receive inappropriate gifts or hospitality

Occasionally, employees may offer or receive social amenities or exchange business courtesies with clients to foster goodwill and enhance business relationships. These might include gifts of nominal value, reasonable meals and entertainment with private organizations that are directly linked to Level-(1) Global Solutions' business. However, when dealing with public officials, what might be acceptable in a purely commercial setting may be unacceptable or even against the law.

Generally, Level-(1) Global Solutions discourages providing gifts to public officials or inviting them to attend Level-(1) Global Solutions sponsored events. Many of our clients may have rules that require gifts and invitations to be reported and/or refused.

Level-(1) Global Solutions relies on the good judgment of its employees and expects them to understand our clients' codes of conduct in addition to any applicable legal rules. In short, employees may not offer or receive anything of value, directly or indirectly, if it might cause a conflict between personal interests and professional duties or create the appearance of such a conflict.

We prepare and provide accurate and complete financial and other reports and records

Level-(1) Global Solutions people must comply with Generally Accepted Accounting Principles and Level-(1) Global Solutions' system of internal controls. Our employees must maintain and present Level-(1) Global Solutions' accounting and financial records and associated reports in accordance with the laws of each country where Level-(1) Global Solutions operates. These records and reports must accurately and fairly reflect Level-(1) Global Solutions' assets, liabilities, revenues and expenses. We must record all transactions accurately in the proper accounting period, using the proper WBS element, supported by reasonably detailed documentation.

Employees are responsible for creating client and other third-party invoices with care. They must base every invoice Level-(1) Global Solutions issues upon accurate and complete information, and comply with the underlying contractual arrangements.

Level-(1) Global Solutions people report all information accurately and honestly. Every employee reports information of some sort to the company or a client, for example: status reports, revenues and cost reports, invoices and research reports.

Dishonest reporting within Level-(1) Global Solutions — for example to Level-(1) Global Solutions management or internal auditors, during an internal investigation or to people outside the company, such as external auditors— violates Level-(1) Global Solutions policy. Organizing information in a way intended to mislead or misinform those who receive it is also dishonest.

Level-(1) Global Solutions employees are responsible for submitting timely, accurate and complete time and expense reports using the tools designated in each country and in accordance with Generally Accepted Accounting Principles, Level-(1) Global Solutions policies and country regulations. Employees are responsible for all time and expenses reported—even if someone else completes their time reports—and must submit the required documentation, in accordance with local policies, laws and regulations.

Employees must report the actual number of hours they work in accordance with local policies and law. Inaccurate time reporting can undermine our estimating capabilities and affect our ability to deliver to internal expectations and budgets. Inaccurate reporting of expenses also violates Level-(1) Global Solutions policies. Employees must submit expense reports, including per diems when allowed and, where permitted, for expenses incurred: for example, meals actually eaten, miles driven, taxis taken, airline tickets used.

We protect the proprietary information and licenses of our clients and others

Level-(1) Global Solutions people should get permission from their supervisor before asking for or accepting confidential information offered by a third party because Level-(1) Global Solutions must abide by the contractual restrictions we have agreed to with our clients and other third parties. Simply put, we must not discuss, disclose, copy or use any copyrighted, licensed or confidential client or third-party information, or “open source” software (which may carry harmful license terms), unless we have, in advance, proper authorization or clearance. Each of us is responsible for taking appropriate precautions to make sure unauthorized people do not have access to such information. Contact your Legal representative for help in obtaining the necessary authorizations or if otherwise in doubt.

We avoid conflicts of interest

Level-(1) Global Solutions people should avoid situations that may tempt them to act in a way contrary to the best interests of the company. We should aim to avoid even the appearance of a conflict of interest. We should never use our position, contacts or knowledge of Level-(1) Global Solutions for personal gain. Because it is not possible to identify all situations that could create a conflict of interest or the appearance of one, Level-(1) Global Solutions relies primarily on the good judgment and integrity of its employees. When there is any question, however, always disclose the situation and consult with others.

Level-(1) Global Solutions employees act in a responsible manner and do not allow their personal interests, investments and activities (including those of family members) to conflict with their objectivity, independent judgment or any other obligation to our clients or the company.

Employees may neither take for themselves nor use for personal gain business opportunities that are discovered or created through the use of Level-(1) Global Solutions property, information, relationships or position. All Level-(1) Global Solutions employees have a duty to advance the legitimate interests of Level-(1) Global Solutions when the business opportunity arises and disclose any such opportunities that arise.

An employee with a financial or other interest (directly or through a family member) in a client, alliance partner, vendor or other party doing business with Level-(1) Global Solutions must fully disclose that interest to an appropriate member of the Level-(1) Global Solutions management team and remove them self from all decisions related to that organization. (Senior executives must disclose any such interest to a member of Level-(1) Global Solutions' Executive Leadership Team and any member of the Executive Leadership Team must disclose such an interest to the chief executive officer, general counsel and board of directors.)

We handle “inside information” appropriately and lawfully

Many countries have laws prohibiting the use or disclosure of material, nonpublic or “inside” information—information that generally is not available to the public and that could, if publicly known, affect the market price of a company's securities (stock, for example). Generally speaking, if that information is “material”—that is, information a reasonable investor would likely consider important in deciding whether to buy or sell securities and that could affect the price of the security—then employees possessing such information must not buy or sell Level-(1) Global Solutions' securities (or the client's or any third party's securities) or provide such information to others, until it becomes public.

Our Responsibilities

All Level-(1) Global Solutions people acknowledge that violating the Code breaks our trust with Level-(1) Global Solutions and our clients, and opens us not only to individual disciplinary action, including termination, but also perhaps to legal liability. All Level-(1) Global Solutions people are expected to become familiar with this Code and Level-(1) Global Solutions' policies and must comply with them at all times. Do more than read the Code—measure your actions against it.

Acting ethically is your personal responsibility and is Level-(1) Global Solutions' expectation of you. You have a responsibility to act when you know or have good reason to suspect a violation of this Code. All Level-(1) Global Solutions people must speak up or take action if they are aware of any potentially unlawful, unethical or fraudulent activity, questionable accounting or auditing matters, or any other activity that causes them concern. Level-(1) Global Solutions leaders create an environment in which members of their teams feel comfortable in raising such concerns in their normal reporting lines.

Level-(1) Global Solutions will not tolerate retaliation against any employee because he or she raised such an issue or used (or any other appropriate channel) to report an ethical or legal concern. Employees who come forward with concerns play an important role in maintaining our ethical workplace and high-performance business.

Also, we may be asked to certify periodically our compliance with this Code or various specific policies.