Overview

1) Business Ethics
2) Conduct
3) OCI’S
4) Policies and Procedures
5) JLMII’s COI and Code of Ethics
6) JLMII’s Corporate Quality Policy
7) Review/Checklist
JLMI understands that whether we are the Prime Government Contractor or Partnering with another company the highest degree of “Honesty and Integrity” are key in a successful business environment.

Each JLMI employee is given a handbook and must acknowledge the importance of proper business conduct in today’s ever changing Government Contracting World.
As “Contractors” we must uphold an ethical position at all times. For Example:

Gifts- Contractors should not seek or accept following:

• Any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item having monetary value.

• It includes services as well as gifts of training, transportation, local travel, lodgings and meals, whether in-kind, by purchase of a ticket payment in advance or reimbursement.
Responsibility:
- Wear your badge at all times for identification purposes
- Contractors are “Partners”

- “The lines became too easy to cross, and no one was paying attention. I don’t even think most people know where the lines are anymore.”

- Re-establish the LINES

- Recognize when contractors and Federal employees must be distinguished and know what rules apply.
JLMI Corporate office has the same standards of conduct as our Government Counterparts in their settings as well.

Understanding your surroundings is paramount in discovery or disclosure of proper conduct in connection with Government Contracting.

It is imperative that we conduct ourselves in a manner that will have a professional impact on our customers.
OCI is providing information from one contract that provides a substantial undue influence in bidding on another contract.

Example: You cannot define specifications on one contract and execute them on another.

Being proactive and safeguarding strict policies and procedures ensure that OCI are not a part of JLMII’S Business Conduct.

Key points to combat OCI in JLMII’S workplaces whether Corporate or Contract Site are:

- Identifying
- Avoiding
- Neutralizing
- Mitigating actual or potential conflicts
Organizational Conflict Of Interest can be avoided by not releasing your company or government privileged information.

To effectively manage real potential OCI and JLMJ Management has a vigilant effort to:

Institute process and procedures for obtaining a NON-OCI environment.

Compliance with any Team Member, Partners and customers to eliminate OCI
Reference Sources for “OCI” & “COI”

- Certain COI laws (e.g. bribery)
- False statement / false claims laws
- Procurement Integrity Act
- Federal Acquisition Regulation (FAR)
  - (3.1) Contractor Code of Business Ethics & Conduct (FAR 52.203-13 & 52.203-14)
  - (9.5) Organizational COI
  - (37.104) Personal Services Contracts
  - (DFARS 203.70) Contractor Standards of Conduct
Homeland Security Disaster Fraud Hotline: If you have knowledge of fraud, waste, abuse, or allegations of mismanagement involving disaster relief operations, you can:

Call the Homeland Security Disaster Fraud Hotline at (866) 720-5721 Fax the Homeland Security Disaster Fraud Hotline at (225) 334-4707

Email: disaster@leo.go

Or write: Homeland Security National Center for Disaster Fraud Baton Rouge, LA 70821-4909

The above information is a poster form from Homeland Security and is posted within JLMCI offices and contract locations.

You can also call your JLMCI Corporate office 804-733-0933. Note when reporting an incident follow the proper chain of command.

On all JLMCI Contracts the site manager will have a professional relationship with the Contract Officer.
Each JLMl Employee has signed and accepted an Employee Handbook that states our polices.

Individual Procedures have been prepared and acknowledged by each employee and reviewed for cross-training purposes.

Conflict of Interest and Non-Disclosure forms have been signed and each employee has a copy in their personnel file with HR.
JLMI’S reputation for integrity is our most valuable asset and is directly related to the conduct of its employees. Therefore employees must never use their positions with the company, or any of its customers, for private gain, to advance personal interest or to obtain favors or benefits for themselves members of their families or any other individuals corporations or business entities.
JLMI’S COI/Code of Ethics Policy

- JLMI adheres to the highest legal and ethical standards applicable in our business. The company’s business is conducted in the strict observance of both the letter and spirit of all applicable laws and integrity of each employee is of utmost importance.

- JLMI employees of the company shall conduct their personal affairs in such a fashion that their duties and responsibilities to the
company are not jeopardized and/or legal questions do not arise with respects to their association or work with the company.
Periodic review of JLMI’S Code of Business ethics and polices is conducted at all sites.

Internal reporting from all aspects of management at all sites.

Quality Assurance internal and external audits.

Keeping the lines of communication open between management, HR and employees.

Disciplinary action for improper conduct at all sites.
Joint Logistics Managers, Inc. (JLMI) is committed in being a responsive team that is ready, willing and able to provide cost effective logistics support, management support and information management services that enhance emerging systems challenges through the development and continual improvement of our QMS this includes OCI and COI.