

Code of Business Ethics and Conduct

Standards for ethical conduct, risk management, safety, security, and responsible business

Document ID	SCMC-ETH-001	Effective date	September 1, 2026
Policy owner	Owner	Review cycle	Annual

1. Purpose and Commitment

Strong Campus LLC is committed to lawful, ethical, transparent, safe, and responsible business conduct. This Code establishes the standards governing the owner-operator and any future employees, officers, agents, consultants, suppliers, and subcontractors acting on behalf of the company.

The owner provides executive sponsorship, approves this Code, oversees implementation, and reviews its effectiveness at least annually.

2. Professional Foundation

Strong Campus LLC's ethical culture reflects the professional foundation developed by its founder through nearly 25 years of service in the United States Air Force. The company's standards are informed by Air Force Policy Directive 1, Air Force Culture, and Air Force Instruction 1-1, Air Force Standards. These publications do not independently impose military authority or jurisdiction over Strong Campus LLC or its civilian personnel. The company adopts their enduring principles as organizational values.

- Integrity First: Practice honesty, moral courage, accountability, humility, transparency, accurate reporting, and conduct that withstands scrutiny.
- Service Before Self: Place lawful mission, client, public, and contractual responsibilities ahead of improper personal gain while demonstrating duty, respect, stewardship, self-discipline, and concern for others.
- Excellence in All We Do: Pursue competence, disciplined execution, continuous learning, innovation, teamwork, reliable performance, and responsible stewardship of resources.

These principles guide company decisions, client service, leadership, risk management, supplier relationships, and individual conduct. Strong Campus LLC seeks to exceed minimum compliance by building habits of honorable thought, sound judgment, accountable action, and continuous improvement.

3. Compliance With Laws and Contractual Requirements

- Comply with applicable federal, state, local, and international laws, regulations, client requirements, and contract terms.
- Maintain accurate registrations, certifications, representations, records, invoices, time charges, expenses, and other business information.
- Promptly identify, report, and correct suspected violations, overpayments, false statements, conflicts, or other compliance concerns.
- Cooperate with authorized audits, reviews, investigations, and corrective actions.

4. Anti-Corruption, Anti-Bribery, Gifts, and Kickbacks

Strong Campus LLC prohibits bribery, corruption, kickbacks, facilitation payments, extortion, improper commissions, and anything of value offered or accepted to influence a business or government decision.

- Gifts, meals, entertainment, travel, or favors may never be offered or accepted when prohibited, excessive, intended to influence, or likely to create an appearance of impropriety.
- Company funds, third parties, charitable contributions, or political activity may not be used to conceal an improper payment or benefit.
- Suppliers and subcontractors must follow these standards and permit reasonable compliance verification.
- Suspected corruption, bribery, fraud, or kickbacks must be reported immediately to the owner and, when required, to the appropriate client or government authority.

5. Conflicts of Interest and Fair Competition

- Disclose actual, potential, or perceived personal, financial, organizational, and post-employment conflicts before participating in an affected decision or engagement.
- Protect procurement-sensitive, source-selection, proprietary, classified, controlled, and nonpublic information.
- Compete fairly and avoid collusion, bid manipulation, coercion, intimidation, or misuse of another party's information.

6. Respectful Workplace, Equal Opportunity, and Labor Rights

Strong Campus LLC prohibits discrimination, retaliation, harassment, intimidation, coercion, manipulation, threats, abusive conduct, and exploitation. Employment and contracting decisions will be based on legitimate qualifications, performance, capability, and business requirements.

- Provide equal opportunity without unlawful discrimination based on age, race, color, national origin, sex, gender, disability, veteran status, religion, genetic information, or other protected status.
- Respect lawful freedom of association, worker representation, and collective bargaining rights.
- Prohibit forced labor, child labor, trafficking in persons, and unlawful recruitment or employment practices.
- Provide a reporting path to the owner and prohibit retaliation against anyone who raises a good-faith concern.

7. Health, Safety, and Well-Being

The company will maintain working conditions appropriate to its home-office and professional-services operations and will assess workplace, project, travel, ergonomic, information-security, and client-site risks before new or materially changed activities.

- Use safe work practices, suitable equipment, emergency contacts, and client-site safety requirements.
- Document incidents, near misses, hazards, and corrective actions when they occur.
- Review health and safety risks at least annually and before work involving a new site, activity, or material hazard.
- Support reasonable breaks, workload planning, ergonomic practices, and access to emergency and occupational-health resources as appropriate.

8. Risk Management Process

Strong Campus LLC uses a proportionate risk-management process for company operations and engagements:

- Identify risks involving ethics, performance, schedule, cost, safety, security, privacy, legal compliance, suppliers, and reputation.
- Assess likelihood, consequence, urgency, and contractual or mission impact.
- Assign controls, responsible parties, due dates, and escalation requirements.
- Monitor material risks and document changes, incidents, and corrective actions.
- Report significant risks to affected clients or authorities when required and review the process annually.

9. Data Security, Cybersecurity, Privacy, and Consumer Protection

- Collect, access, use, retain, transmit, and dispose of information only for authorized business purposes.
- Use access controls, strong authentication, current software protections, secure communications, backups, and appropriate device safeguards.
- Evaluate cybersecurity, privacy, and data-handling risks before engaging suppliers or subcontractors and include applicable security requirements in agreements.
- Report suspected loss, unauthorized disclosure, cybercrime, fraud, or security incidents promptly.
- Protect personal, client, government, proprietary, and consumer information according to applicable requirements.

10. Responsible Suppliers and Subcontractors

Suppliers and subcontractors are expected to comply with applicable laws and with the principles of this Code, including anti-corruption, fair labor, nondiscrimination, health and safety, information security, accurate records, and reporting. Strong Campus LLC may assess supplier risk, require certifications or corrective action, and discontinue relationships involving material misconduct.

11. Community Responsibility

Strong Campus LLC supports education, mentorship, professional development, responsible technology, and community participation. Community activities will respect cultural, social, civil, and political rights; remain voluntary; avoid unlawful discrimination; and comply with applicable ethics and conflict-of-interest requirements.

12. Training, Acknowledgment, and Reporting

- The owner will review and acknowledge this Code upon adoption and annually thereafter.
- Future employees and applicable personnel will receive Code and anti-corruption training upon engagement and annually thereafter.
- Suppliers and subcontractors will receive or be directed to applicable standards before performing covered work.
- Concerns may be reported directly to the owner. Reports will be assessed promptly, handled as confidentially as practical, and protected from retaliation.

13. Monitoring, Corrective Action, and Review

The owner will maintain applicable acknowledgments, risk reviews, incident records, training records, supplier reviews, and corrective actions. Material concerns will be investigated and addressed through remediation, discipline, disclosure, contract action, or referral as appropriate. This Code will be reviewed at least annually and updated as operations, personnel, contracts, and legal requirements change.

Authoritative References

- Air Force Policy Directive 1, Air Force Culture, 16 October 2019:
https://static.e-publishing.af.mil/production/1/af_cc/publication/afpd1/afpd1.pdf
- Air Force Instruction 1-1, Air Force Standards, 18 August 2023, incorporating Change 1, 24 August 2025:
https://static.e-publishing.af.mil/production/1/af_cc/publication/afi1-1/afi1-1.pdf

Approval and Initial Acknowledgment

Approved by	Crystal R. Shaw, Owner
Effective date	September 1, 2026
Initial review completed	September 1, 2026
Acknowledgment	I have reviewed, adopted, and agree to comply with this Code.