

Code of Business Ethics and Conduct

Coast to Coast Computer Products is in business to create value for our customers, and we do so by providing the highest quality products, the most competitive prices and the most effective customer service we are capable of. Honesty and Service underlie all that we do. Honest, ethical behavior is the standard that we expect from our officers, executives, employees and business partners. We will not tolerate behavior that does not meet this standard. Any employee violating these standards will be subject to disciplinary action by the company up to and including termination.

This Code of Business Ethics and Conduct is an integral part of the company's Compliance Program, which is directed at ensuring compliance with all the rules, regulations, and laws that apply to Coast to Coast Computer Products as a government contractor. The Code of Business Ethics and Conduct sets forth the standards that guide our every action, and applies to all, officers, executives, and employees.

Honesty and Service - Honesty and Service implies highly ethical behavior; quality work and customer satisfaction; caring about our people; and serving our country and communities.

Ethical Behavior - CTC is a company that stresses personal integrity. We not only comply with laws and applicable regulations; but we also strive to conduct our affairs according to the highest ethical standards. CTC employees are expected to be honest and forthright in dealings with managers, subordinates and with one another, as well as with clients, suppliers, government agencies and their employees, business partners and the general public. CTC employees must maintain the highest level of personal integrity and encourage it in others; they must not lie, cheat, steal or do anything that would bring dishonor upon themselves or the company.

Ethical Behavior

1. Conduct Business in Accordance with High Ethical Standards
2. Treat All Employees Fairly, with Dignity and Respect
3. Deal Honestly and Fairly with Clients, Suppliers, Vendors, Contractors and Financial Partners
4. Conduct Marketing and Advertising Activities Fairly, Honestly and Accurately
5. Avoid Conflicts of Interest
6. Safeguard Company Assets
7. Protect Company Proprietary Information
8. Protect Company Records
9. Separate Personal Political Activities from Company Business

Obeying the Law

1. Duty to Obey All Applicable Laws
2. Obtain All Necessary Licenses, Permits, Certifications and Credentials
3. Hire Authorized Individuals and Comply with All Immigration Regulations
4. The Possible Consequences of Unlawful Conduct

Financial Responsibility

1. Bill for Products and Services in a Timely and Accurate Manner
2. Comply with Coast to Coast's System of Internal Controls

Quality Work and Customer Satisfaction

CTC aspires to maintain a reputation for the highest level of excellence. We seek to create real value for our clients by solving their problems, improving their efficiency, bringing them new products or services that will help them improve their business efficiency. An emphasis on quality permeates everything we do. We strive to do the best possible job in all our work; to be as efficient as possible; and to work diligently to avoid mishaps, correcting them promptly should they occur. We will not tolerate substandard performance or products. Satisfied clients are the most important mark of success in our business. We cherish our customers, we listen to them, we work hard for them, we are straightforward with them, we respect them, and we communicate freely and openly with them. If there is a problem, we are committed to its prompt resolution.

Caring about Our People

People are the most important resource at CTC. We promote and nurture a culture in which each employee knows he or she is valued and respected. We recruit the best people available; people with high personal integrity, intelligence, a strong work ethic, a positive attitude and substantive expertise. Our employees come from varied cultural, economic, ethnic and religious backgrounds. And they represent all ages, genders, races and orientations. We run our business in a way that rewards people for their performance, regardless of their background. We behave this way because it is the right thing to do, and because it is good for our business. CTC cares about its people and we expect CTC people to care about one another and the company. We treat every person with dignity and respect, regardless of his or her position. We will not tolerate harassment of any kind. CTC emphasizes teamwork, working together in harmony to achieve corporate goals. We believe that asking for help is a sign of wisdom, not weakness. We encourage supervisors and individual employees to have open communications and to be receptive to dissenting opinions. CTC employees are encouraged to be courteous, friendly and helpful.

Serving Our Country and Communities

CTC strives to be an organization that serves mankind. In doing this, our primary duty is to serve our customers well. We exist because of them and we thrive because we continually provide a high level of value to them. We set the bar high for the quality of our work, and we strive to exceed client expectations. We also believe that it is important to serve our country and society as a whole. CTC contributes time, money, and other resources to selected charitable causes. We encourage our employees to do the same.

CTC aspires to be a great place to work and to be one of the best companies in the world, by any measure. We believe that good morale comes from having an important job, doing it well and receiving recognition for it. CTC strives to create jobs that are fulfilling. We hold people accountable for their performance and reward top performers. We expect our employees to do their part by embracing the ethic of Honesty and Service that makes us who we are as a company.