



**JR Conkey & Associates, Inc. and JR Conkey & Associates, Inc./dba
Solar Power Integrators
Code of Business Ethics and Conduct
January 2012**

Applicability

The JR Conkey and Associates Code of Business Ethics and Conduct (The Code of Ethics) applies to all personnel of JR Conkey and Associates and Solar Power Integrators and covers in broad terms what is expected of management and employees.

Dissemination

The Code of Ethics shall be posted in the offices that JR Conkey & Associates, Inc. and Solar Power Integrators operate. It will be read and signed by all new recruits as part of the job acceptance process. It will be reviewed and signed by existing employees on an annual basis.

JR Conkey & Associates, Inc. and Solar Power Integrators, as a company and each employee in it shall not discriminate on the bases of race, gender, sexual orientation, religion or age.

Stewardship

1. We only allow authorized Company personnel to contract with Clients.
2. We comply with all lobbying registration and reporting requirements.

People

1. We follow restrictions applicable to employment discussions with current private and federal government employees.
2. We participate in and support the communities in which we do business.



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Client Value

1. We diligently prepare proposals for private Clients and federal government work.
2. We submit current, accurate, and complete Cost or Pricing to the Client.
3. We comply with the specifications, terms, and conditions of all Client contracts.
4. We promote open and fair competition for all subcontractors and suppliers.
5. We do not solicit or accept kickbacks from subcontractors and suppliers.
6. We submit accurate invoices when we bill our Clients.

Network

1. We are fair competitors and follow rules applicable to federal government competitions and others.
2. We will not seek or obtain competitors' non-public proprietary information or federal government-sensitive information relating to a procurement.
3. We do not make improper "contingent payments" to obtain federal government business.
4. We cooperate with federal government investigations and audits.

Individual

1. We seek to understand and support our private Clients and the federal government's ethical standards for its employees and avoid exposing employees to personal conflicts of interest.
2. We seek to understand and follow our private Clients' as well as federal agencies' codes of conduct.
3. We strive to create opportunities for small businesses, including those owned by women, minorities, and military veterans.
4. We promote a workplace free from alcohol, drugs and illegal substances.
5. We shall protect and respect the confidentiality of information acquired in the course of our work except when authorized or otherwise legally obligated to disclose and shall not use the confidential information acquired in the course of work for personal advantage.



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Integrity

1. We discourage providing gifts to federal government employees and those of our private Clients, and inviting them to attend Company sponsored events without appropriate approval.
2. We avoid putting the Company in the position of an organizational conflict of interest.
3. We protect our private Clients' and the federal government's confidential information.
4. We protect our Clients' property.
5. We keep complete and accurate records.