



ACS CODE OF ETHICAL BUSINESS CONDUCT

Second Edition

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Rev 2.11



TO ALL ACS EMPLOYEES:

Our company is dedicated to its clients and employees. As such, maintaining the highest ethical standards Worldwide will always be a top priority. When faced with ethical decisions in the workplace, the attached Code of Ethical Business Conduct will serve as a useful guideline to shape your decisions. As a fast-growing, leading provider of business process and information technology outsourcing solutions to government and commercial clients worldwide, ACS continues to pursue global ambitions and leadership in a variety of marketplaces. Our Reputation, individually and collectively, is our most important asset.

Every ACS officer, director, and employee is expected to adhere to the Code. Unethical or illegal activities will not be tolerated. Each of us must always use our best judgment when faced with an ethical dilemma. Our actions should always be guided by the principles of honesty, trustworthiness, integrity, dependability, respect, and citizenship.

Many resources are readily available to assist you with inquiries pertaining to business ethics, domestic and internationally. If you have any questions or concerns about business conduct issues, you should promptly notify your immediate supervisor or local human resources representative. Your concerns will be addressed expeditiously and you will be informed of the outcome as soon as possible. There will never be any retaliation for reporting business conduct issues and any concerns you may have in that regard may also be discussed with the ACS Ethics Officer.

Making choices based on the ACS Code of Ethical Business Conduct is doing business the right way. Thank you for helping to preserve our most important asset – **Our Reputation.**

A handwritten signature in black ink, appearing to read 'Lynn Blodgett', with a long horizontal flourish extending to the right.

Lynn Blodgett
President and Chief Executive Officer

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CHAPTER 1: INTRODUCTION AND REPORTING PROCEDURES

The purpose of this Code of Ethical Business Conduct is to ensure that all corporate business is conducted with the highest standards of integrity in compliance with all applicable laws and regulations. The company does business in many countries around the world and, as a good business citizen; we must observe the applicable laws of the countries in which the Company does business. Further, many United States laws are applicable to ACS' international locations and employees because our parent company is organized under U.S. laws. The Code sets forth the Company's policy with respect to business ethics and conflicts of interests. It is applicable to all directors, officers, employees, and agents of ACS, its subsidiaries and controlled affiliates on a worldwide basis.

This Code is a formal operating guide approved by the ACS Board of Directors. The Code comprises the principles included in this booklet as well as the formal ACS policies. The ACS policies provide more detailed information and each employee should familiarize himself or herself with the policies that apply to his or her assigned duties in the country in which he or she is working. ACS managers are required to familiarize themselves with all ACS policies and ensure compliance with those policies. All ACS employees may obtain the policies in written form from their supervisor or the ACS Ethics Officer. Additionally, the policies are available to all U.S. based employees in electronic form on the ACS Infobank Internet site at <http://infobank.acs-inc.com>.

The principles and policies included in the Code address two main areas – compliance and ethical conduct. Compliance means following applicable laws, regulations, and Company policies that govern our business worldwide.

Ethical behavior is harder to define. In essence, it means performing your job in a responsible way, conducting yourself properly, and using common sense. Qualities like honesty, trustworthiness, integrity, dependability, respect, and citizenship are the hallmarks of ethical behavior. These qualities, along with compliance, form the framework for conducting ACS' business around the globe.

The ACS Code of Ethical Business Conduct details three basic expectations:

1. Obey all applicable laws and regulations;
2. Provide a positive and safe work environment; and
3. Protect ACS' assets and reputation.

This Code is not meant to be an encompassing list of Do's and Don'ts. It is not possible to list all of the activities or practices that could cause difficulties. Nonetheless, this Code will provide familiarity with some basic principles and help with situations likely to cause problems. The ACS Ethics Officer, ACS management, and the ACS Legal Department will be available to provide guidance when questions arise. You should feel free to contact any of the ACS officers listed in the Contact List found at the end of this Code.

It is ACS' policy to never tolerate unethical or unlawful business behavior by any employee. No business or financial purpose – no matter how noble – could justify improper or unethical employee conduct. In many instances, the appearance of impropriety can be as damaging to the Company and employee as actual impropriety. Every effort should be made to avoid the appearance of impropriety in our business dealings.

Every employee is responsible for his or her own actions with respect to proper business conduct and behavior. Employee responsibilities and obligations are paramount. Proper business conduct and ethical behavior are fundamental conditions of employment. Any employee regardless of job, title, or grade level, who observes or becomes aware of unethical or unlawful activity, is obligated to report such activity

immediately to the Ethics Officer. The Ethics Officer works collaboratively with the Legal Department, Human Resources, and management to investigate concerns, violations, or allegations of unethical or unlawful behavior. Employees are urged to discuss any concerns regarding improper conduct with the individuals identified above. In those cases where violations have occurred, prompt disciplinary action will be taken, ranging from reprimand to termination and/or possible criminal prosecution.

CHAPTER 2: OBEY ALL APPLICABLE LAWS AND REGULATIONS

GENERAL POLICY. It is the Company's general policy to conduct its business in accordance with all applicable laws and regulations; to adhere to standards of safety and care for the protection of its employees, the public and the environment; and to promote these policies through education, supervision, and regular reviews. Any conflicts regarding which country's laws apply will be resolved with the Ethics Officer and the Legal Department.

INSIDER TRADING AND DISCLOSURE. Securities laws prohibit a person from trading the stock or other securities of any company when the person executing the trade has knowledge of non-public material information. To comply with such laws, ACS prohibits employees from trading the stock or other securities of ACS or our clients or business partners based on material information that has not been made public. Material information is any information that an investor might consider important in the decision to buy, sell, or hold securities. Examples of material information are: financial results; financial forecasts; possible mergers, acquisitions, divestitures, or joint ventures; and information concerning major changes in business direction. Managers have specific prohibitions against trading during certain periods as described in the Company's Insider Trading Policy. Employees are also prohibited from providing non-public material information to persons outside the Company.

Only authorized officials of the Company are permitted to respond to inquiries from the media, the financial community, investors, and others. Employees should promptly refer all such inquiries to the ACS Chief Marketing Officer or the ACS Chief Financial Officer.

The penalties for violations of the illegal insider trading laws are severe and include criminal as well as civil remedies.

Questions concerning the material nature of specific information or disclosure protocol should be directed to the ACS General Counsel. If an employee possesses non-public material information, he or she should abstain from publicly trading Company stock or other securities or disclosing such information to people outside the Company until notice is released stating that the specific information is not material or has been appropriately disclosed.

DOING BUSINESS WITH FEDERAL, PROVINCIAL, AND LOCAL GOVERNMENTS. ACS will deliver high-quality products and services to federal, provincial and local governments at fair and reasonable prices, and we will propose, negotiate, and administer our contracts with these government entities in accordance with their respective procurement statutes and regulations. These laws and regulations differ from country to country and from municipality to municipality and often impose different and more demanding requirements than those associated with purely commercial business transactions. As such, it is the responsibility of each employee involved in contracting with these

government entities to familiarize themselves with all applicable legal obligations prior to entering into a federal, provincial or local contract.

ACS and its employees must take sufficient care to ensure that all statements, communications and representations to any federal, provincial or local government client are accurate and truthful and that all costs and charges are properly recorded.

Employees participating in a contract with the federal, provincial or local governments will be required to take specific training relevant to their contractual requirements. Any questions regarding this policy should be forwarded to the Legal Department or the Ethics Office.

COMPLIANCE WITH ANTITRUST LAWS. The antitrust laws around the world generally prohibit agreements among competitors that unreasonably restrain trade. Violations can include agreements among competitors to: fix or control prices; boycott specified suppliers or clients; allocate products, territories or markets; or limit the production or sales of products. We must be especially careful that any activities or relationships with representatives of other companies are not viewed as violations of any applicable antitrust law. Antitrust laws are complex and violations could lead to substantial personal and corporate civil and criminal sanctions. Many antitrust laws extend to cover conduct that takes place in another country.

ACS employees should consult with the ACS Legal Department prior to engaging in discussions with competitors. You should also inform the ACS Legal Department if a competitor initiates a conversation with you that you believe could be perceived as a violation of antitrust law. Any deviation from antitrust policy can occur only upon the prior written approval of the responsible corporate or operating officer and the ACS General Counsel.

Occasionally, one ACS business unit may have dealings with a customer or supplier that places it in a competitive or other sensitive role with respect to another ACS business unit. Safeguards must be taken to ensure that confidential information is not disclosed improperly by either business unit to the other unit.

INTERNATIONAL BUSINESS PRACTICES. ACS is committed to conducting its activities free from the unfair influence of bribery and to fostering anti-corruption awareness among its employees and business partners throughout the world. Many national laws prohibit corruptly giving, offering, or promising anything of value to government officials, political parties, or candidates for the purpose of obtaining favorable government action or keeping government business. These laws may also prohibit using intermediaries (i.e., foreign affiliates, agents, consultants, and distributors) to channel payments to government officials for the same purposes as well as knowingly falsifying a company's books and records or knowingly circumventing or failing to follow necessary accounting controls.

ACS is also committed to comply with the anti-boycott laws and regulations of the United States. The anti-boycott laws also extend to ACS' U.S.-controlled foreign subsidiaries. No employee may refuse to do business with any country, company, or person for boycott-related purposes in consideration for receiving a contract with a foreign company or person. Furthermore, no employee may enter into a contract requiring that ACS provide information, statements or certificates concerning the race, sex, religion, or national origin of ACS employees or subcontractors working under a contract with a foreign company or person. Finally, no employee shall enter into a contract requiring that ACS provide information regarding the Company's relationship with a boycotted country or nationals of a boycotted

country, whether in positive or negative terms, or provide any other information for boycott-related purposes.

Exports of equipment or technology may also be subject to laws and regulations that may contain prior approval for licensing and reporting requirements. For example, technologies related to defense, nuclear, high performance computers or encryption items are controlled by many countries for export purposes. Employees should check with the ACS Legal Department to determine if an export license is required to export.

It is always important that employees conducting international business know and comply with the laws of the countries where they are working. If you participate in ACS' international business activities, you should know, understand, and strictly comply with all federal, provincial and local laws, regulations and ACS policies governing our international operations. If you are not familiar with these rules, consult with your supervisor and the Legal Department prior to negotiating or performing any contract with any foreign corporation, citizen, or government for work outside the U.S.

POLITICAL CONTRIBUTIONS. ACS encourages its employees to become involved in civic affairs and to participate in the political process in the countries and communities in which they live. Employees must understand, however, that their involvement and participation must be on an individual basis, on their own time, and at their own expense. Certain federal, provincial and local laws governing political contributions specifically prohibit corporations from donating funds, goods, or services (directly or indirectly) to candidates seeking office.

As permitted by law, the Company supports political parties or candidates who represent our interests through Political Action Committees. This support will always be within the law and does not obligate any employee to support the same issues, parties, or candidates. Any political activity involving Company funds, facilities, or resources must first be approved by the ACS Senior Vice President of Public Affairs.

GIFTS AND GRATUITIES. It is essential that the sale of ACS goods and services be free from even the perception that favorable treatment was sought, received, or given in exchange for the furnishing or receipt of personal payments, favors, loans, or services from clients, contractors, suppliers, vendors, or competitors. Each can be construed as a form of kickback or payoff.

Receiving Meals, Refreshments, Gifts, or Other Gratuities. Although an employee may not use his or her position at ACS to obtain business courtesies, it is permissible to accept unsolicited meals, refreshments, entertainment, and other business courtesies on an occasional basis provided:

- The acceptance will foster goodwill and successful business relations;
- The courtesies are not lavish or extravagant under the circumstances. While it is difficult to define lavish or extravagant by means of a specific dollar amount, a common sense determination should be made consistent with reasonable marketplace practices and the social customs and norms in the particular country, province or location;
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance from the same entities or persons; and
- The employee accepting the courtesies would feel comfortable about discussing the courtesies with his or her manager or co-worker, or having the courtesies known by the public.

Solicitation of gifts or receiving a cash gift or gratuity, in any amount, is strictly prohibited. If you have any question as to the appropriateness of receiving any gift or favor from another person, you should seek approval in writing from your immediate supervisor prior to accepting the gift or favor.

If an employee receives a gift that is not permitted by this policy, it must be reported to the employee's supervisor and returned. If returning the gift is not practical, it should be reported to the ACS Ethics Officer who will determine where the gift can be used as a charitable contribution or such other disposition as the Company determines is appropriate.

Providing Meals, Refreshments, Gifts or Gratuities to Non-Government Clients or Business Associates. Employees may be authorized to extend entertainment, gifts, or favors to business associates or non-government clients under the following conditions:

- It is legal;
- It is not offered for a specific gain or a specific action;
- It follows the generally accepted ethical and cultural standards of the country where the activity occurs;
- Public disclosure of the gift or favor would not embarrass the Company; and
- Tender of gift(s) does not violate the client's internal policies.

Under no circumstance may you give or receive a cash gift or gratuity to/from any person, including a business associate or client. It is also improper to use consultants or other third parties as a means to circumvent these rules. If an employee has any questions regarding the appropriateness of any gift, you should seek approval in writing from your immediate supervisor prior to extending the gift or gratuity.

You may be asked to make facilitating or expediting payments to an official or employee of a government outside the United States, the purpose of which is to expedite or to secure the performance of routine governmental action by such government official or employee. In very limited circumstances, such facilitating payments may not be illegal under the U.S. Foreign Corrupt Practices Act (FCPA) or local law. In any event, it may be difficult to distinguish a legal facilitating payment from an illegal bribe, kickback or payoff. Accordingly, facilitating payments must be strictly controlled and every effort must be made to eliminate or minimize such payments. Facilitating payments, if required, will be made only in accordance with the advance guidance of the Legal Department. Any facilitating payments must be recorded accurately and fairly as such in the accounting records of the Company. Violations of the record-keeping requirements of the FCPA are punished severely.

Government Clients. Some ACS business units - like those that service United States federal (and some state, foreign and provincial) government clients - have established formal and specific policies regarding receiving and giving meals, trips, entertainment, gifts, and favors. Copies of these policies can be provided by your supervisor. Employees working in these business units are expected to comply with the more restrictive policies.

DRUGS AND ALCOHOL. ACS is committed to maintaining a safe and productive work environment consistent with our professional and legal responsibilities to our employees and clients. Additionally, we comply with federal, provincial and local laws regarding drug-free workplaces and all substance abuse programs specified in contracts with our clients.

Depending upon local customs and practices, ACS may prohibit the use, sale, purchase, transfer, or possession of alcohol or controlled substances, other than medically prescribed drugs, while on Company

premises. You must follow the rules and regulations of the country in which you are working. Failure to follow such rules and regulations may result in disciplinary actions.

CHAPTER 3: PROVIDE A POSITIVE WORK ENVIRONMENT

EQUAL EMPLOYMENT OPPORTUNITY. The Company is committed to ensuring a work environment free of all forms of discrimination and to adhere to all national, provincial and local employment regulations. No employee or applicant for employment will be discriminated against for improper reasons. Protected classes vary from country to country, but may include race, color, religion, national origin, age, gender, marital status, disability, sexual orientation, or military/veteran status.

PREVENTING HARASSMENT IN THE WORKPLACE. ACS is committed to providing a workplace that is respectful to all employees and free from all forms of harassment. ACS expects that relationships among persons in the work environment will be business-like and free of bias, prejudice, and harassment. ACS will not tolerate actions, comments, inappropriate physical contact, sexual advances, or any illegal conduct that is intimidating, hostile, or offensive. Further, ACS will comply with all federal, provincial and local laws regarding retaliation against employees.

PRIVACY. The Company strives to conduct business in a manner that respects the rights and privacy of all employees, consistent with sound business practices. However, the Company has specific duties and obligations that require the collection, retention, use, and possible disclosure of employee data. If you become privy to confidential or otherwise highly personal information concerning another ACS employee, you are expected to safeguard this information in accordance with applicable ACS policies.

ACS is committed to complying with privacy laws wherever we conduct business throughout the world. In the United States, this includes the Health Insurance Portability and Accountability Act of 1996 (HIPAA). HIPAA has privacy requirements that impact ACS due to the handling of personal medical information through ACS' benefit plans and through ACS' numerous healthcare clients. As a result, it is imperative that you protect all individually identifiable health information that belongs to ACS and our clients.

ACS also encounters privacy laws in countries other than the U.S. One example is the Data Protection Directive enacted by the European Union. The EU Directive requires strict controls in the collection, use, processing and transfer of personal data that relates to an identified or identifiable person, whether that person is an ACS employee based in Europe or an employee or customer of one our clients that operates in Europe. ACS is committed to complying with the EU Directive and all similar requirements in the various countries in which we conduct business.

HEALTH, SAFETY, AND ENVIRONMENT. We are committed to protecting the safety and health of our employees as well as promoting environmental stewardship around the world. We continuously strive for improvement in these areas and are committed to compliance with safety, health, and environmental regulations.

Employees are expected to understand the laws and regulations in the country in which they are operating that affect their business activities. The failure to comply with these laws and regulations can result in

risk for fellow workers, the Company and others. Any employee who intentionally violates legal requirements related to health, environment, and safety, or who intentionally fails to take reasonable steps to correct such violations, will face disciplinary action. In addition, intentional violations can result in penalties, fines, or imprisonment of the employee who commits the violation.

Employees are also responsible for knowing the corporate and operating unit policies regarding health, safety, and environmental matters that apply to their jobs. Consult with your supervisor, if you have any questions.

CHAPTER 4: PROTECT ACS' ASSETS AND REPUTATION

CONFLICT OF INTEREST. Employees should not engage in activities that give rise to a conflict of interest or the appearance of a conflict of interest, without making full disclosure to and obtaining prior approval from the ACS General Counsel, ACS Chief Financial Officer, or the ACS Ethics Officer. If the conflict of interest situation involves a director or officer, or it is considered significant by the Ethics Officer, it may be reviewed by the ACS Board of Directors Audit Committee in a timely manner.

It is essential that all ACS employees avoid any relationship, influence, or activity that conflicts or is inconsistent with ACS activities or business interests or that could cause a reasonable person to believe that their judgment, loyalty to the Company, or objectivity in the conduct of their business activities and assignments might be adversely influenced.

Examples of real and potential conflict situations are:

- Competing directly or indirectly with any part of ACS. For instance, operating a business outside your Company's responsibilities that is in competition with any Company business;
- Accepting a business gift that does not meet the standards stated in the Gifts and Gratuity Policy in this Code of Conduct;
- Having a direct or indirect financial interest in or financial relationship with a company competitor, supplier, or client (except for routine investments in publicly held companies). For example, your spouse may own a business that is a competitor or serves as a vendor to ACS;
- Having a full-time or part-time employment or consulting relationship outside the Company;
- Serving on the board of directors of a non-affiliated corporation, except where it is clear that no conflict of interest will arise;
- Using non-public Company information you obtain by reason of your employment for personal gain or advantage or for the gain or advantage of another; and
- Using your position or knowledge of the Company for your personal gain or advantage outside the Company. For example, seeking a discount or preferred treatment (other than those offered to all ACS employees) in a private purchase from a local vendor simply because of your position at the Company.

A relative of an ACS employee should not be in a direct supervisory role over the employee, unless such reporting relationship has been disclosed to and approved in advance by the ACS General Counsel and ACS Chief Financial Officer. It is your obligation to inform the ACS Ethics Officer if you are or become related to any ACS employee.

PROTECTING ACS' CONFIDENTIAL INFORMATION. Confidential and proprietary information is one of our most valuable assets and provides us a competitive advantage in the marketplace. Therefore,

it is of the utmost importance that this information is safeguarded, stored properly, and disclosed to and retained by only ACS employees who have a legitimate business “need-to-know.” All information deemed proprietary must always be properly marked as such and disclosed outside of ACS only after entering into a non-disclosure agreement approved by the ACS Legal Department. If the information is intentionally disclosed without necessary markings (e.g., “ACS PROPRIETARY AND CONFIDENTIAL”) and non-disclosure agreements in place, the competitive value of the information is lost.

Under no circumstances should an employee discuss with or disclose to a friend, acquaintance, or any other person outside of ACS any of the confidential affairs of ACS, its business associates, or clients. No ACS or client confidential information may be taken or retained should your employment with ACS be terminated for any reason.

PROTECTING THIRD-PARTY PROPRIETARY AND CONFIDENTIAL INFORMATION. ACS is often provided access to the proprietary and confidential information of our clients and others with whom we do business. We recognize that safeguarding this information is critical to the longstanding success and reputation of ACS. We also require that employees take all necessary steps consistent with the Company’s policies concerning the protection of ACS proprietary information to ensure that client or other third-party information is safely stored and not shared with anyone who does not have a need-to-know of the information. All ACS employees must become familiar with accepted Company practices prior to accepting third-party proprietary and confidential information.

Further, ACS employees must respect the confidentiality of previous employers’ Confidential Information. Such information must not be used or disclosed by any ACS employee in the performance of their job. All copies (whether electronic or otherwise) of such information must be returned to the previous employer prior to working for ACS.

PROPER USE OF ACS’ PROPERTY OR RESOURCES. ACS has established policies that govern the proper use of Company property, electronic communication systems, information resources, facilities, vehicles, services, equipment, and proprietary or licensed software in the workplace. These assets and resources must be treated with the utmost care and respect and should always be guarded from waste and abuse. Specific guidance concerning the proper use of these assets and resources is available from your supervisor.

While Company assets are intended to be used for the conduct of ACS business, it is recognized that occasional or incidental personal use by employees may occur without adversely affecting the interests of the Company. Under no circumstances will the company tolerate pornographic, obscene or sexually explicit material on ACS property or resources. Personal use of Company assets must always be in accordance with ACS company policy.

PROPER USE OF CLIENT PROPERTY OR RESOURCES. Client-furnished facilities, supplies, data processing equipment, reproduction equipment, telecopier equipment, and other client-furnished equipment, vehicles or services may be used only as specifically authorized by our clients. Unless expressly permitted, the use of client assets should be limited to the performance of administrative and technical services necessary and integral under contracts performed by ACS employees. Any questions regarding this policy should be forwarded to the Legal Department or the Ethics Office.

KEEPING ACCURATE BOOKS AND RECORDS. Accurate and reliable business records are of critical importance to our decision making process and the proper discharge of our financial, legal, and reporting obligations under applicable federal, provincial and local laws. Books and records must be prepared carefully and honestly. Transactions must be recorded in accordance with corporate policies and procedures. False or misleading entries are unlawful and are not permitted. The Company also prohibits undisclosed or unrecorded funds or assets for any purpose. All employees having responsibility for keeping ACS books and records must comply with ACS accounting policies, controls, and procedures.

RECORD RETENTION. Legal and regulatory practice under applicable federal, provincial and local laws require the retention of certain records for various periods of time - particularly in the areas of tax, personnel, health and safety, environmental, client contracts, and other legal matters. In addition, when litigation or government investigation or audit is pending or imminent, relevant records must be retained in accordance with the Company's Record Retention Policy where applicable. Destruction or alteration of records to avoid disclosure in a legal proceeding may constitute a criminal offense. It is important that all ACS employees refer to the specific retention periods and destruction restrictions found in the ACS Records Retention Policy prior to destroying any Company related records.

All questions on record retention should be directed to the ACS Legal Department, particularly if any litigation, investigation, or administrative action involving the Company or any of its officers, employees, suppliers, or clients is anticipated, pending or threatened.

MEDIA. ACS values its relationship with those in the media and will endeavor to provide full and prompt disclosure of all material developments of events. Media relations are the responsibility of the ACS Chief Marketing Officer. All statements or responses to inquiries from the media should be coordinated through the ACS Chief Marketing Officer.

In the event the media inquiry relates to a pending or threatened legal matter, media communications should also be coordinated with the ACS Legal Department. Any employee asked for a statement from a member of the media should refer the media representative to the ACS Chief Marketing Officer.

SHAREHOLDER RELATIONS. ACS values its relationships with all of its shareholders. Communications from shareholders requesting information relating to the Company should be forwarded to the ACS Chief Financial Officer.

CHAPTER 5: ADMINISTRATIVE MATTERS

INTERPRETATION. The Ethics Officer and General Counsel are responsible for interpreting and applying the policies described in this Code of Conduct to specific situations in which questions may arise. The General Counsel's office will also maintain a record of interpretations issued under these policies ensuring consistent interpretations throughout the Company. Questions regarding how these policies should be interpreted or applied should be addressed to the ACS Ethics Officer and General Counsel.

VIOLATION OF THE POLICIES. All employees have an ethical, and, in some cases, a legal obligation to call to the Company's attention any violation of the Code. No discipline or other retaliatory action shall be taken against employees because they inform the Company of possible violations.

U.S. and Canada based employees should report any possible, perceived or actual situation that may violate the ACS Code of Ethical Business Conduct to the Ethics Helpline at **(800) 443-1946** or ethics@acs-inc.com. Non-U.S. based employees should report any possible, perceived or actual situation that may violate the ACS Code of Ethical Business Conduct to the International Ethics Helpline Number of their country. **See the attached list for the specific number of the country** or contact the international.ethics@acs-inc.com. Reports detailing possible violations will be provided to the ACS Board of Directors on an annual basis.

Employees who violate any of these policies shall be subject to discipline up to and including termination. In other cases, the Company may have a legal or ethical obligation to report violations of these policies to appropriate enforcement authorities.

AUDITS. In some cases, compliance with these policies will be monitored by periodic audits. These can be done by the Company's lawyers (e.g., in the case of compliance with the antitrust laws) or by the Company's internal auditors (e.g., to determine the Company's compliance with the requirements of written contracts and accurate books and records). All Company employees are required to provide truthful, accurate information in accordance with such audits.

REQUESTS FOR EXCEPTION. While Company policies must be adhered to, certain situations may warrant an exception. For example, a minor conflict of interest situation can sometimes be resolved by disclosure of the possible conflict to all interested parties. Employees who believe an exception to any of these policies is appropriate should contact his or her immediate supervisor first. If the supervisor agrees an exception is appropriate, the approval of the ACS Ethics Officer or the ACS General Counsel should be obtained. The ACS Ethics Officer is responsible for maintaining a complete record of all requests for exceptions to any of these policies and the disposition of such requests.

DISTRIBUTION. Every new employee will be given a copy of the Code and asked to acknowledge receipt of it either at or within one week of hiring.

CHANGES OR AMENDMENTS. Changes or amendments to this Code will be promptly provided to all employees. If there are interpretations of the policy of broad application to our employees, those will also be appropriately distributed.

NONEXCLUSIVITY. The policies herein are not a comprehensive, full, or complete explanation of the laws that are applicable to the Company and its employees. All employees have a continuing obligation to familiarize themselves with applicable law and Company policies.

REPORT OF POSSIBLE VIOLATIONS. Please familiarize yourself with the ACS Code of Ethical Business Conduct. If you are aware of any violations of the ACS Code of Ethical Business Conduct, please discuss them with your immediate supervisor or local human resources representative. U.S. and

Canada based employees may also contact the ACS Ethics Office via the toll-free Ethics Helpline (800) 443-1946, or at ethics@acs-inc.com or send the attached form to:

Ethics Office
Affiliated Computer Services, Inc.
2828 N. Haskell Bldg 4-3rd Floor
Dallas, TX 75204

Non-U.S. based employees may also contact the ACS Ethics Office via the toll-free International Ethics Helpline numbers. To see your particular country's Helpline number **see attached document named ACS Helpline** or at international.ethics@acs-inc.com or send the attached form to:

International Ethics Office
Affiliated Computer Services, Inc.
2828 N. Haskell Bldg. 4-3rd Floor
Dallas, TX 75204
USA



ACS HELPLINE

ACS' **new** HelpLine is a confidential outside line made available to raise concerns about potential unethical or illegal behavior or violations of ACS policies. HelpLine is staffed by an **independent organization** and callers may remain anonymous when they call. It is available 24 hours a day, 7 days a week. Language translators are also available to assist you, if necessary.

How HelpLine Works

When an individual calls HelpLine, an interviewer will document the Caller's concerns in detail. The Caller does not have to give his/her name, although they can if they prefer. HelpLine will give the Caller a reference number for identification and a follow-up date. This information will allow the Caller to call back to add information, if necessary, and to receive a response, while remaining anonymous. The information they provide to HelpLine will be relayed to the ACS Office of Ethics for response or investigation. If the Caller has agreed to speak directly with an investigator, you will be contacted by the HelpLine Administrator and you will be asked to contact the Caller at the number the Caller gave to HelpLine. If the Caller prefers to remain anonymous, as the investigator, you will submit additional questions or an update to HelpLine prior to the follow-up date, utilizing the reference number, so the Caller will be able to access this information through HelpLine with anonymity.

Callers from **Fiji, Ghana, UAE, and Guatemala** can reach the **ACS HELPLINE** by using an AT&T Direct Access Number. The AT&T Direct Access Number is different for each country. You can find the appropriate number by using the following link, <http://www.usa.att.com/traveler/index.jsp>

We have also listed those numbers for you below.

The process is simple. First dial the access number for the country from which you are calling (this is the first number listed). When you hear the English message or series of prompt tones, dial the ACS HelpLine number (the second number listed **800-443-1946**). Your call will be connected to the HelpLine and you will hear a message in the language designated for the number from which you called. After the message you will be put on hold for a moment. Do not hang up; the system is locating an interpreter. The interpreter, together with an interview specialist, will listen to your concern.

Location	Access Code	Phone Number
Fiji	004-890-1001	800-443-1946
Ghana	0191	800-443-1946
UAE	0-800-121	800-443-1946
Guatemala (<i>outside Guatemala City</i>)	999-9190	800-443-1946
Guatemala City	138-126	800-443-1946

ACS HELPLINE for United States and Canada is: [800-443-1946](tel:8004431946)

All other countries see below:

Dial the number listed below for your country. The call will be connected to the ACS HelpLine and you will hear a message in the language designated for the number from which you called. After the message you will be put on hold for a moment. Do not hang up; the system is locating an interpreter. The interpreter, together with an interview specialist, will listen to your concern.

Location	Number
• Belgium	0800-7-1417
• Brazil	0800-891-41 77
• Chile	1-230-020-5495
• China	10-800-711-0631 or 10-800-110-0577
• Dominican Republic	1-800-528-1092
• France	0800-90-1703
• Germany	0800-187-3586
• Hong Kong	800-962-881
• Hungary	06-800-17830
• India	000-800-100-1075
• Ireland	1-800-558-549
• Israel	180-940-0091 or 00798-1-1-004-0083 or 00308-411-0518
• Italy	800-788340
• Jamaica	1-800-549-9741
• Japan	0044-22-11-2563 or 00531-11-4737
• Malaysia	1-800-80-3435
• Mexico	001-800-613-2737
• Netherlands	0800-022-5890
• Philippines	1-800-1-111-0112
• Poland	0-0-800-111-1561
• Singapore	800-110-1519
• Spain	900-97-1031
• Switzerland	0800-56-1525
• United Kingdom (including Scotland)	0808-234-7051

ACS CODE OF ETHICAL BUSINESS CONDUCT REPORT OF POSSIBLE VIOLATIONS

I, the undersigned, **am aware of one or more situations** which may constitute a violation of the ACS Code of Ethical Business Conduct.

Signature: _____ Business Unit: _____

Print Name: _____ Position Title: _____

Date: ____ - ____ - _____ Social Security#: ____ - ____ - _____

Phone:(____ -) ____ - _____ DOB: ____ - ____ - _____

Please check if you have supervisory responsibilities of other employees.

If you are aware of any violations of the ACS Code of Ethical Business Conduct, please discuss them with your immediate supervisor or local human resources representative.

Only if you are **aware of a violation** and a **U.S. based employee**, complete this form and forward it to the Ethics Office.

**Ethics Office
Affiliated Computer Services, Inc.
2828 N. Haskell Bldg. 4-3rd Floor
Dallas, TX 75204
Fax # (214) 841-8385**

Only if you are **aware of a violation** and a **non-U.S. based employee**, complete this form and forward it to the Ethics Office.

**International Ethics Office
Affiliated Computer Services, Inc.
2828 N. Haskell Bldg. 4-3rd Floor
Dallas, TX 75204
USA**

KEY CONTACT LIST

ACS President and Chief Executive Officer	Lynn Blodgett 801-567-5101 lynn.blodgett@acs-inc.com
ACS Chief Financial Officer	Kevin Kyser 214-841-6169 kevin.kyser@acs-inc.com
ACS General Counsel	Tas Panos 214-841-6147 tas.panos@acs-inc.com
ACS Chief Compliance Officer	Zak Karamally (interim) 214-887-7978 zak.karamally@acs-inc.com
ACS Chief Ethics Officer	J. Hector Rodriguez 214-841-6354 hector.rodriguez@acs-inc.com
ACS Chief People Officer	Lora Villarreal 214-841-6041 lora.villarreal@acs-inc.com
ACS Chief Marketing Officer	Rebecca Scholl 214-841-8028 rebecca.scholl@acs-inc.com
ACS International Ethics Office HelpLines See Pages 11 – 13 of the Business Code of Conduct for your country’s toll free number	international.ethics@acs-inc.com