

ATTACHMENT A

SCAN Inc. Policies and Procedures Code of Business Conduct

Accountability and Responsibility

Living Our Commitment

The purpose of our Code of Business Conduct is to set forth our commitment to high ethical standards and to reinforce prompt and consistent actions in the maintenance of those standards. We must apply these standards in both letter and spirit. Where the letter of the Code is not specific, the spirit must prevail.

When in doubt about what to do, ask yourself this question: Would I be proud to explain my actions to my family or fellow employees?

Remember to always act in such a way that you would be proud of your actions. If the best course of action isn't clear; please talk to your supervisor or the CEO. When in doubt, do the right thing.

Management Commitment

SCAN's management is committed to living up to high standards of ethical behavior. To oversee SCAN's ethics and compliance efforts, the organization has designated the Chief Executive Officer as the Chief Compliance Officer. Additionally, SCAN has designated the Human Resource Officer responsible for implementing the Code of Business Conduct through training.

Accountability and Responsibility

We make many decisions every day at all levels of the Organization. This is how we move forward and accomplish our goals and objectives. We as individuals are accountable for making good decisions and for the outcome those decisions produce. Our Code of Business Conduct provides guidance for our decisions.

Our fellow employees look to us for leadership and to see if we take responsibility for our own actions. Each of us must act as a leader by taking responsibility for everything we do. Each of us must abide by our Code of Business Conduct. Violators of the Code are subject to appropriate discipline, up to and including dismissal from the Organization and prosecution under the law. Any waiver of the provisions of this Code requires the personal review and approval of the CEO and the Board of Directors. Waivers may be granted only as permitted by law and in extraordinary circumstances. Any waiver of the provisions of this Code for the benefit of executive officers, management staff, or members of the Board of Directors is not permitted.

A Responsibility to Ourselves

We believe honesty and integrity benefit the individual, as well as the Organization.

Each of us wants to be known as a person of integrity. When we lose that reputation with others or ourselves it's painful. It can hurt our careers, our health, and our relationships. Unethical conduct may also open the possibility of being held personally, legally liable.

Probably the worst thing to do is to cover up a problem. Attempts to conceal even a minor violation by altering or destroying records can result in civil and criminal penalties that are worse than the penalty of the original offense.

The goal of SCAN is to reinforce a positive work environment where doing the right thing, thereby protecting yourself from the negative consequences of illegal behavior, is the easy thing to do.

Reporting Non-Compliance

If you have any knowledge of a violation of our Code of Business Conduct, you have an obligation to report it to your immediate supervisor or a program director or to another appropriate person. You may report violations knowing that the Organization will not allow retaliation for reporting concerns in good faith. Retaliation for good faith reporting is itself a violation of this Code.

Responsibility To One Another

Dignity, Respect and Fairness

You and your ideas create value and success for SCAN. We must value and respect the unique character and contribution of each employee. Treating each other with dignity, respect and fairness is the foundation of good business conduct.

Diversity

We promote diversity within our workforce. Diversity of people and ideas will provide the Organization with a business advantage.

Discrimination

Discriminating against any employee or person with whom we do business or provide services to on the basis of age, race, color, religion, sex, disability, national origin, sexual orientation, covered veteran or other legally protected status is not permitted.

Workplace Harassment and Violence

Harassment and violence in the workplace are strictly prohibited and will not be tolerated. Conduct that creates an unwelcome or uncomfortable situation or hostile work environment, such as unwelcome advances or requests for sexual favors, inappropriate comments, jokes, intimidation, bullying, or physical contact, may be forms of workplace harassment. Employees should avoid actions or words that might be interpreted by another as harassment or a threat of violence.

Safety and Health

We are committed to providing a safe and healthy workplace. Each of us is responsible for observing all of the safety and health rules that apply to our jobs. We are all responsible for taking precautions to protect ourselves and our fellow employees from an accident, injury or unsafe condition. Additionally, each of us must promptly report unsafe or unhealthy conditions and take steps to correct those conditions immediately.

Alcohol/Substance Abuse

We are committed to a workplace free of substance abuse. We jeopardize ourselves and each other if we report to work impaired by the influence of alcohol or drugs. The use, possession or distribution of unauthorized drugs or alcohol on SCAN time or on SCAN premises is prohibited. Employees are encouraged to seek treatment for alcohol and substance abuse problems.

Responsibility To The Public

Clients/Participants

Each of us has important responsibilities to our clients/participants. While some of us work closer with our clients/participants than others, we all

should think in terms of how our clients/participants feel about how we conduct business and we should act accordingly.

Environment

Environment protection is the right thing to do, and part of our business strategy. We will work to reduce and prevent waste. Our environment protection commitment is a responsibility shared by everyone. No one can assume it is the job of someone else.

External Communications

Communications to those outside our Organization require a unique understanding of legal and media issues. To ensure professional handling, refer requests for information by the media to the CEO.

Responsibility To SCAN, Inc.

Protecting SCAN, Inc. Assets

We are entrusted with SCAN assets and honoring that trust is a basic responsibility to each and to our Organization. We must protect SCAN assets from loss, damage, misuse, or theft. This includes our time when compensated by the Organization. Use of SCAN assets for purpose other than Organization business requires prior authorization by appropriate levels of management.

Protecting Our Good Name

It takes each of us – one person at a time and one action at a time – to protect our name and our reputation. Part of protecting our name and reputation is living up to the standards found in this Code of Business Conduct. We must be careful to only use our name and logo for authorized SCAN business and never in connection with personal activities or personal communication.

Business Records and Communications

When we create or maintain reports, documentation of services, records and communication, we are also responsible for the integrity of those records. All financial reports, case-file documentation, expense reports, time sheets, billings, performance measures, performance reports, evaluations, and other similar documents must be accurate. If you are uncertain of the validity of any entry or report, raise your concern to the best source for correcting it.

We will dispose of documents in accordance with our Records Management Policy. We will never destroy or alter any document or records in response to any investigation, suspected investigation or lawful request.

Confidential Information

Protecting confidential information, one of our most valuable assets, is part of our obligation to our Organization. Confidential information includes client/participant information, business plans, grant applications, financial data, technical information, and all other non-public business information that would be harmful to clients/participants or to the Organization if made public. We must not disclose client information to anyone outside the Organization in a manner that could harm the client/participant. In many instances, we require written authorization for the disclosing of information. If you have questions about the confidentiality of information or the need for a release of information agreement, seek advice from the CEO and if further clarification is need the CEO. Avoid unnecessary discussion of confidential information in public places and with individuals who have no need to have the information. We must protect our information by appropriate use of reasonable security measures.

Protecting the confidential information of our employees and our clients/participants is of the greatest importance. Great care should be taken by everyone who handles such information. Additionally, we should never try to persuade others to violate the confidentiality of other corporations, businesses, or schools. Our responsibility to preserve confidential information continues even after our employment with the SCAN ends.

Conflicts of Interest

Business decisions and actions on behalf of SCAN must never be influenced by personal considerations or personal relationships. We must never use SCAN property, information or our position to create personal benefit. It may also occur when outside interests interfere with our ability to do our jobs to the satisfaction of the Organization. We should never attempt to become involved in a business that may compete with SCAN.

You should promptly disclose to your supervisor all potential conflicts of interest, including those where even the appearance of a conflict of interest may exist.

Gifts, Meals and Services

The exchange of gifts and meals is a common practice and can help us build better relationships with vendors, and other business allies. However, no gift, favor, or meal should be accepted or provided if it will obligate, appear to obligate or is intended to obligate or unduly influence the recipient. Never request or solicit personal gifts, favors, or services. Never offer or accept personal gifts of cash or cash equivalents.

Travel

Business travel requires each of us to know and follow SCAN's current travel and business expense reporting policies.

Marketing Practices

We will compete for "business" aggressively and honestly. We will not misrepresent our services or price if applicable. We will not make false or misleading claims about our services, nor will we do so about the services of other corporations or businesses.

Purchasing Practices

All purchasing decisions will be based on the best value realized by our Organization and in alignment with our standards, policies, and goals. Important components of purchasing include competitive bids, quality verification, confirming the legal and financial condition of the supplier, and avoiding personal conflicts such as dealing with personal family members, relatives of the board members and/or friends. Purchasing requires each of us to know and follow SCAN's current purchasing policies.

Political Activities

Lobbying activities are strictly prohibited. Employees who communicate with government officials on issues that affect our Organization should contact the CEO and if further clarification is needed the CEO will contact SCAN's attorney to ensure that such activities fully comply with the law and SCAN polices.

We respect the right of our employees to participate in the political process and to engage in political activities of his or her choosing. While involved in their personal civic and political affairs, however, employees must at all times make clear that their views and actions are their own, and not those of SCAN. Employees may not use SCAN resources to support their choice of political parties, causes or candidates.

Approved August 30, 2010