

**GTSC Annual Government Contractor Ethics Training**  
**8:30 am – 12:00 pm**

**Featuring**  
**Amy Hutchens, CEO**



Doing business with the federal government requires a heightened level of commitment to ethics and compliance. Though the specific FAR requirements for small and large businesses differ, the FAR requires *all* businesses to conduct themselves with the highest degree of integrity and honesty. It states all businesses should have an employee business ethics and compliance training program that is suitable to the size of the company and extent of its involvement in Government contracting and that facilitates timely discovery and disclosure of improper conduct and ensures corrective measures are promptly instituted and carried out. FAR 3.1002.

The majority of the headlines we see about non-compliance are related to weak ethical cultures and in many cases, a simple lack of training. Both can result in catastrophic business events. Proper training in ethics is not only required for certain contractors, it serves a vital preventive role. If the unthinkable does happen, a strong ethics and compliance program including effective training in critical compliance risk areas can act as a shield for your company. For example, the actions taken by Ed Snowden were every contractor's worst nightmare. However, Booz Allen Hamilton was able to highlight in its public statement that his actions were contrary to its corporate values, internal policies, and its code of conduct – on which he had been trained. Is your company positioned to say the same? If your company finds itself out of compliance, the training your company can show its employees completed may make the difference between no adverse action and suspension or even debarment.

This half-day training session covers risk areas common to most contractors, regardless of industry or size. Even if you have not yet landed a qualifying contract for the FAR ethics program requirements, there is no better time than now to competitively position your company to enhance your business' reputation for compliant and ethical business practices.

**Upon completing this training, GTSC will certify that you and your employees in attendance have completed annual ethics training as required by FAR 52.203-13(c)(1).**

- I. INTRODUCTION – Background on FAR 52.203-13 and integrity in federal contracting
- II. HOW BEST TO REPORT CONCERNS
- III. PROPER AND IMPROPER PAYMENTS
  - a. GIFTS AND GRATUITIES
  - b. KICKBACKS
  - c. BRIBERY
  - d. BUSINESS GIFTS IN THE PRIVATE SECTOR
- IV. "OFF-LIMITS" INFORMATION
  - a. EXTERNAL INFORMATION SHARING
  - b. INTERNAL INFORMATION SHARING

- V. CONFLICTS OF INTEREST
  - a. ORGANIZATIONAL CONFLICTS OF INTEREST
  - b. PERSONAL CONFLICTS OF INTEREST
- VI. INDEPENDENT PRICING
  - a. DEALS AND DISCUSSIONS WITH COMPETITORS
  - b. DEALS AND DISCUSSIONS WITH CONTRACTORS
- VII. EMPLOYMENT DISCUSSIONS WITH GOVERNMENT PERSONNEL
- VIII. RESTRICTIONS ON FORMER GOVERNMENT PERSONNEL
- IX. PERFORMANCE OBLIGATIONS
  - a. TIMEKEEPING
  - b. ACCOUNTING
  - c. SUBSTITUTION OF MATERIALS
  - d. CHANGE ORDERS
  - e. RETAINING RECORDS
  - f. GOVERNMENT PROPERTY
- X. GSA FEDERAL SUPPLY SCHEDULE CONTRACT OBLIGATIONS
  - a. DISCLOSURE OF COMMERCIAL SALES INFORMATION
  - b. PRICE REDUCTIONS
  - c. INDUSTRIAL FUNDING FEE
- XI. PENALTIES AND SANCTIONS
- XII. REPORTING OBLIGATIONS

For more information or to register, visit [www.gtscoalition.eventbrite.com](http://www.gtscoalition.eventbrite.com) or visit [www.GTSCoalition.com](http://www.GTSCoalition.com).