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RAS, Inc. – Compliance Policy

Federal Acquisition Regulation (FAR) 52.203-13

Ethical Conduct and Reporting Requirements

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ISO 9001:2015 Certified

1. Purpose and Scope

This document outlines RAS, Inc.'s policy and procedures for compliance with FAR 52.203-13, "Contractor Code of Business Ethics and Conduct." It applies to all employees, agents, subcontractors, and principals engaged in the performance of any Government contract.

2. Policy Statement

RAS, Inc. is committed to conducting all business activities ethically and in full compliance with applicable laws and regulations. As a small business, RAS promotes a culture of integrity, accountability, and compliance.

3. Compliance Requirements

3.1 Ethical Conduct and Due Diligence

- Exercise due diligence to prevent and detect criminal conduct in all aspects of business.
- Foster an organizational culture that encourages ethical conduct and a strong commitment to compliance.

3.2 Mandatory Disclosure

RAS will timely disclose in writing to the appropriate Government authorities (including the Office of Inspector General and the Contracting Officer) if credible evidence exists that a principal, employee, agent, or subcontractor has committed:

- A violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations (as defined under Title 18, U.S. Code); or
- A violation of the Civil False Claims Act (31 U.S.C. §§ 3729–3733).

Additional Notes:

- If related to a multi-agency contract or Government-wide acquisition contract, disclosures shall be made to both the ordering agency's OIG and the OIG for the basic contract.

Approved By:

Steven Robbins

President, RAS, Inc.

- Disclosures marked as 'Confidential' or 'Proprietary' will be safeguarded by the Government per applicable laws and will not be released under FOIA without prior notification to RAS.

4. Business Ethics Awareness & Internal Control Program

RAS maintains a business ethics awareness and compliance program appropriate to its small business status and the nature of its Government contracts.

4.1 Ethics Program Communication

- Ethics and compliance expectations are communicated to all employees through regular verbal briefings and during management review meetings.
- Role-appropriate training is provided to principals, employees, agents, and subcontractors, including during onboarding and refresher training sessions.

4.2 Internal Control System

RAS's internal control system includes:

(A) Responsibility & Oversight

- Oversight of the ethics and compliance program is assigned to the President.
- Sufficient resources are allocated to ensure program effectiveness.

(B) Personnel Screening

- Due diligence is performed to avoid assigning individuals with a history of unethical conduct to key positions.

(C) Monitoring & Evaluation

- Ongoing review of company practices, procedures, and controls.
- Internal audits and monitoring to detect criminal conduct.
- Periodic evaluations of program effectiveness.
- Risk assessments to adjust and improve internal controls and training.

(D) Reporting Mechanism

- Employees may report suspected misconduct confidentially to the Contracting Officer or management.
- Reports may be submitted anonymously if desired.

(E) Disciplinary Action

- Disciplinary measures will be taken for misconduct or failure to report unethical behavior.
- All disciplinary actions are determined by the President.

(F) Disclosure Responsibility

- The President is responsible for submitting required disclosures to the OIG and Contracting Officer when credible evidence of a violation exists.

Approved By:
Steven Robbins
President, RAS, Inc.

5. Continuous Improvement

RAS regularly reviews this policy and its compliance program during Management Review meetings. Adjustments are made as needed to ensure continued compliance with FAR 52.203-13 and other applicable regulations.

Approved By:
Steven Robbins
President, RAS, Inc.