



INNOVATIVE AFTERMARKET SOLUTIONS

ROBBINS ACCESSORY SERVICE. INC.

www.ras4parts.com

email: info@ras4parts.com

ISO 9001:2015 Certified

Tel: (310) 477-3438 Fax: (310) 479-1692

RAS, Inc. Compliance Policy for 52.203-13

This document serves as a procedure for our compliance guidelines

POLICY STATEMENT:

It is the Policy of RAS to conduct all business in an ethical and law-abiding manner. RAS is represented as a small business concern.

ii) This POLICY IS APPLICABLE to all to employees (engaged in performance of the contract, or otherwise).

(2) RAS shall—

(i) Exercise due diligence to prevent and detect criminal conduct; and

(ii) RAS promotes an organizational culture that encourages ethical conduct and a commitment to compliance with the law.

(3)

(i) RAS shall timely disclose, in writing, to the agency Office of the Inspector General (OIG), with a copy to the Contracting Officer, whenever, in connection with the award, performance, or closeout of this contract or any subcontract thereunder, the Contractor has credible evidence that a principal, employee, agent, or subcontractor of the Contractor has committed:

A) A violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code; or

(B) A violation of the civil False Claims Act (31 U.S.C. 3729–3733).

(ii) The Government, to the extent permitted by law and regulation, will safeguard and treat information obtained pursuant to the Contractor's

disclosure as confidential where the information has been marked “confidential” or “proprietary” by the RAS.

To the extent permitted by law and regulation, such information will not be released by the Government to the public pursuant to a Freedom of Information Act request, 5 U.S.C. Section 552, without prior notification to the Contractor.

The Government may transfer documents provided by the Contractor to any department or agency within the Executive Branch if the information relates to matters within the organization's jurisdiction.

(iii) If the violation relates to an order against a Governmentwide acquisition contract, a multiagency contract, a multiple-award schedule contract such as the Federal Supply Schedule, or any other procurement instrument intended for use by multiple agencies, RAS shall notify the OIG of the ordering agency and the IG of the agency responsible for the basic contract.

(c) Business ethics awareness and compliance program and internal control system.

This paragraph (c) does not apply when RAS has represented itself as a small business concern pursuant to the award of this contract or if this contract is for the acquisition of a commercial item as defined at FAR 2.101.

RAS has established the following:

- (1) An ongoing business ethics awareness and compliance program.
This is verbally discussed among employees during management review

This program includes reasonable steps to communicate periodically and in a practical manner RAS’s standards and procedures and other aspects of the RAS’s business ethics awareness and compliance program and internal control system, by conducting effective training programs and otherwise disseminating information appropriate to an individual's respective roles and responsibilities.

(ii) The training conducted under this program shall be provided to the RAS's principals and employees, and as appropriate, RAS's agents and subcontractors. Employees review this during employee training.

(2) An internal control system.

(i) RAS's internal control system shall—:

A) Establish standards and procedures to facilitate timely discovery of improper conduct in connection with Government contracts;

This is conducted thru contract review by the President
and

(B) Ensure corrective measures are promptly instituted and carried out.

At a minimum, the Contractor's internal control system shall provide for the following:

(A) Assignment of responsibility at a sufficiently high level and adequate resources to ensure effectiveness of the business ethics awareness and compliance program and internal control system.

This is the responsibility of the President.

(B) Reasonable efforts not to include an individual as a principal, whom due diligence would have exposed as having engaged in conduct that is in conflict with the Contractor's code of business ethics and conduct.

This is performed during Contract Review

(C) Periodic reviews of company business practices, procedures, policies, and internal controls for compliance with the Contractor's code of business ethics and conduct and the special requirements of Government contracting, including—

(1) Monitoring and auditing to detect criminal conduct;

(2) Periodic evaluation of the effectiveness of the business ethics awareness and compliance program and internal control system, especially if criminal conduct has been detected; and

(3) Periodic assessment of the risk of criminal conduct, with appropriate steps to design, implement, or modify the business ethics awareness and compliance program and the internal control system as necessary to reduce the risk of criminal conduct identified through this process.

This is reviewed and discussed during the Management Review process.

(D) An internal reporting mechanism, such as a hotline, which allows for anonymity or confidentiality, by which employees may report suspected instances of improper conduct, and instructions that encourage employees to make such reports.

Employees can report the above to the contracting officer of a particular contract.

(E) Disciplinary action for improper conduct or for failing to take reasonable steps to prevent or detect improper conduct.

Any action is determined by the President

(F) Timely disclosure, in writing, to the agency OIG, with a copy to the Contracting Officer, whenever, in connection with the award, performance, or closeout of any Government contract performed by the Contractor or a subcontractor thereunder, the Contractor has credible evidence that a principal, employee, agent, or subcontractor of the Contractor has committed a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 U.S.C. or a violation of the civil False Claims Act (31 U.S.C. 3729–3733).

It is the President's responsibility for such disclosure.

Steven Robbins
President